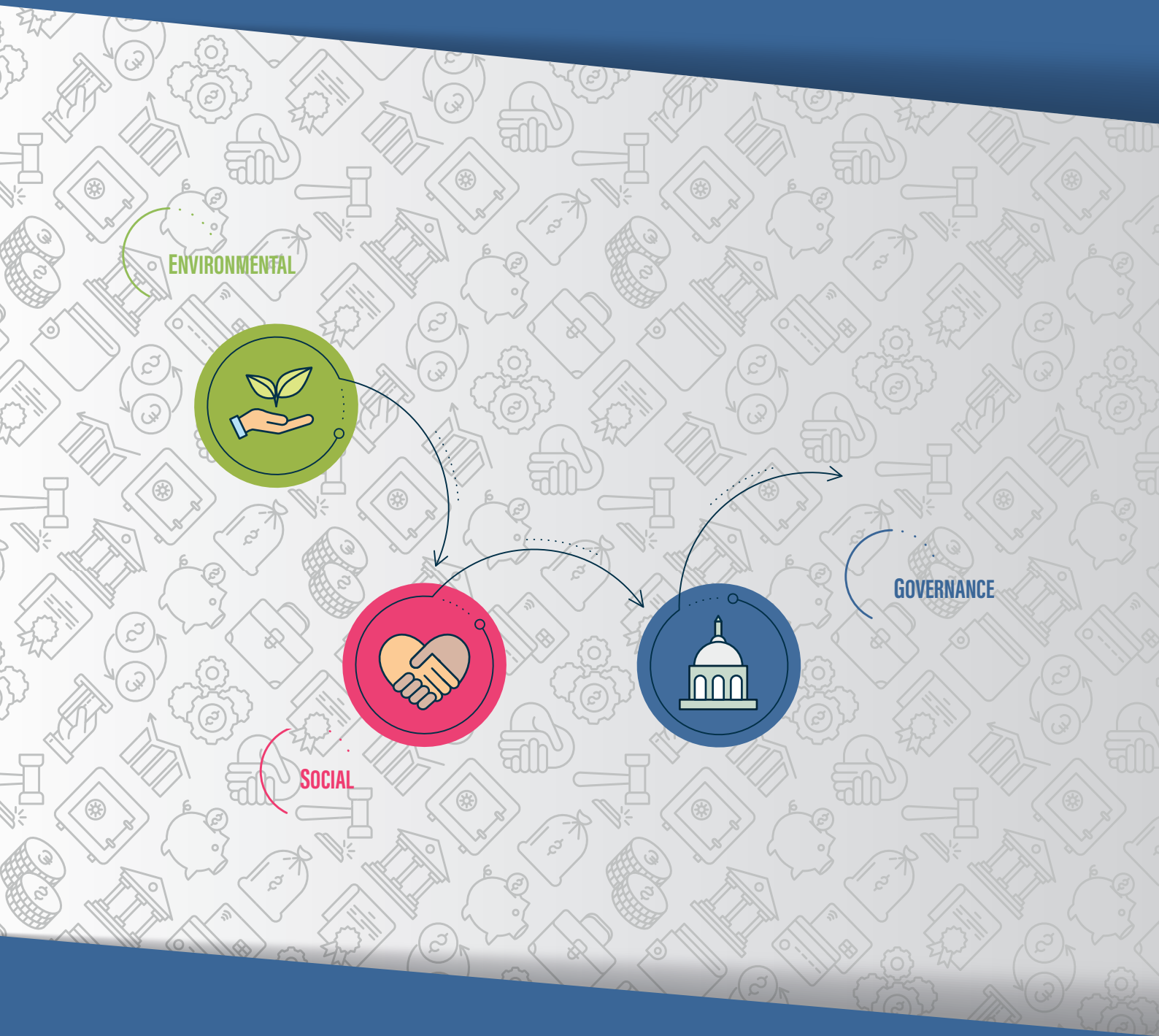
REPORTING POLICY

openjobmetis



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1. Purpose

Openjobmetis Group (hereinafter also the "Group" or "Openjobmetis"), including the Parent Company Openjobmetis S.p.A. and its subsidiaries, undertakes to operate in compliance with the law and with the principles set out in the Code of Ethics, available on the website of each Group company.

A clear ethical orientation in the actions of the Group companies translates into transparency, loyalty and honesty in inward and outward behaviour.

This approach is essential to ensure the credibility of Openjobmetis Group companies towards stakeholders in the civil, social and economic context in which they operate.

Cohesively, this policy intends to recognise and ensure adequate space for reports made in good faith and selflessly, as well as to guarantee the integrity of Openjobmetis Group companies.

In particular, the objectives of this policy are to:

- *Recognise and offer employees, collaborators, volunteers and trainees, administrators, shareholders, persons with administrative, management, control, supervisory or representative functions, suppliers/partners and stakeholders in general the opportunity to submit reports on matters or acts relating to significant illegal conduct (exemplified in the following paragraph) that may constitute a threat to the Company.*

- *Ensure that these reports are treated in a serious and appropriate manner, guaranteeing, in the management of these, the confidentiality of the personal data of the person reporting, the person reported and the person involved or mentioned, as well as the content of the report and the related documentation required for the purpose and the context of the report;*

- *Ensure that any person who presents a report in good faith is protected against retaliatory, discriminatory or unfair acts that are directly or indirectly related to the report submitted.*

Please note that the scope of this policy also includes reports relating to harassment, to which the Group, with the assistance of the Gender Equality Steering Committee, pays particular attention.

This policy explains how to submit a report and how it is processed.

2. What to report

This policy can be used as a reference for submitting a detailed report on matters or acts relating to significant illegal conduct – as well as to protect the integrity of the companies of Openjobmetis S.p.A. Group.

Some examples of matters that could be reported via the methods indicated in this policy referring to paragraph 7 Definitions:

- *Violation of human rights;*
- *Financial fraud;*
- *Physical, verbal and digital harassment;*
- *Violations of competition law;*
- *Money laundering;*
- *Corruption;*
- *Conflicts of interest;*
- *Issues relating to the environment, health and safety;*
- *Disclosure of confidential information;*
- *The intentional concealment of any of the above;*
- *Retaliation against anyone who reports in good faith or against anyone who participated in its management;*
- *Administrative, accounting, civil or criminal offences;*
- *Predicate offences pursuant to Legislative Decree 231/01 or failure to comply with the control measures required by MOG 231 of the parent Company and Just On Business S.p.A.*

You should not use the reporting methods of this policy in the following cases:

- *To report events that pose an immediate threat to life or property that must be reported through emergency numbers;*
- *For any dispute in relation to one's employment conditions, unless it is attributable to harassment or discrimination;*
- *To settle legal or personal disputes;*
- *To express administrative/commercial "complaints" (e.g., complaints, requests for clarifications, reports relating to errors in administrative documents).*

3. Guarantees for the reporting party

The reporting channels described in this policy provide for:

- *Confidentiality of the identity of the reporting party, for the purpose of protecting the personal data of this person to avoid any form of retaliation of against him/her;*
- *Receipt of the report only by the recipients indicated in this policy;*
- *Absence of retaliatory, discriminatory or unfair acts against the reporting party and a general commitment to ensure his/her protection;*
- *Provision of disciplinary sanctions for Company staff who violate the protection measures for the reporting party and of any reported party (confidentiality and/or retaliatory, discriminatory or unfair acts);*
- *Retention of the tracing of the analysis process and conclusion of the report.*

If it is ascertained that the intention of the reporting party is motivated by defamatory or slanderous intent against the reported person or by spurious motivations not based on real facts, no form of protection provided for by this policy will be guaranteed and one or more of the disciplinary measures as required by the company disciplinary system will be imposed on the person who made the report. The protection of the reporting party is also applied if the reporting took place at a time before the start of the employment relationship, if the information on the violation was acquired during the selection process or other contractual phases, during the trial period and following the termination

of the employment relationship or if the information on the violation was acquired during the employment period.

The protection measures described above also apply to the so-called whistleblowers, to people in the same working context as the reporting person, to people related to him/her with a personal or family relationship up to the fourth degree, to the whistleblower's work colleagues who work in the same context and have a regular and current relationship with this person, to companies owned by the whistleblower for which he/she works as well companies that operate in the same working context as the reporting parties.

The issues and reports submitted under this policy will be treated confidentially by the companies of Openjobmetis Group in accordance with the confidentiality requirements applicable to data processing, without prejudice to legal obligations and the protection of the rights of the Company or of the persons accused wrongly and/or in bad faith. The identity of the writer of the report will be kept confidential.

The rules governing investigations or proceedings initiated by the judicial authority in relation to the matters that may be the subject of the report are without prejudice.

4. How to submit a report

Openjobmetis has identified three autonomous functions dedicated to the management of reports made pursuant to this policy:

- The Supervisory Body (hereinafter SB) appointed pursuant to Legislative Decree 231 for the management of reports pertaining to the issues of Legislative Decree 231/01 of the Parent Company.
- The Supervisory Body (hereinafter SB) appointed persuant to Legislative Decree 231 for the management of reports pertaining to the issues of Legisltive Decree 231/01 of the Company Just On Business S.p.A.
- the People and Culture Manager function for managing reports of harassment by direct personnel of the various companies of the Group;
- the Internal Audit and Risk Analysis function (hereinafter "Audit") for all other reports relating to the various companies of the Group."

Please also refer to the Contact Us section of the websites for general complaints reporting and, for direct personnel only, to the dedicated section on the company intranet for direct access to the various channels through which it is possible to report various issues.

The channels through which reports can be made are as follows:

- internal reporting channel;
- external reporting channel.

With reference to the internal reporting channel, communications are managed according to the methods specified below:

1. Dedicated area on the website of the company Openjobmetis S.p.A (*www.openjobmetis.it*) and Just On Business (*www.jobspa.it*) at the link *https://openjobmetis.integrityline.com/* where it is possible to leave either a written or oral report through a voice messaging system;
2. A second reporting channel provided for the purposes of managing internal reporting is possible, at the request of the reporting person, by means of a direct meeting set within a reasonable time with one of the three autonomous functions dedicated to the management of the reports indicated above. You may request a meeting with the Openjobmetis Supervisory Body at odv@openjob.it, the Internal Audit function at internal.audit@openjob.it, and the People and Culture Manager at segnalazioni.people@openjob.it.

With reference to the external reporting channel, in accordance with current Whistleblowing legislation and in the presence of the conditions provided for by this, the whistleblower is entitled to make a communication using the external channel.

For this purpose, the National Anti-Corruption Authority (ANAC) has established an external channel for reports which ensures the protection of the anonymity of the person reporting, the person involved and the person mentioned in the report, as well as of the content of the report and related documents, also through the use of cryptographic tools. This anonymity is also guaranteed if the report is made through channels other than those initially indicated or is received by personnel other than the one responsible for processing the reports, to whom the report is in any case transmitted without delay.

Any external report submitted to a person other than the ANAC is transmitted to the latter within seven days from the moment it is received, simultaneously providing information to the person who made the report on the transmission itself.

Again, in accordance with current Whistleblowing legislation, the reporting person is also entitled to make a public disclosure when the conditions set forth in current legislation are met[1].

All communication channels guarantee the confidentiality of the identity of the reporting party, the content of the report and the related documentation, unless the contrary is expressly requested.

Reporters are encouraged to disclose their identity and present the issue with sufficient detail in order to facilitate checks. More detailed questioning or further investigations will not be able to take place if the reporting party has not communicated his/her identity.

In order to collaborate in the verification and resolution of the report, you are encouraged to provide as much detailed information as possible such as, by way of example but not limited to:

- *A clear and complete description of the matter covered in the report and the ways in which you became aware of it;*
- *The time and place in which the event occurred if known;*
- *Personal details or other information if known to be able to identify the person(s) who brought*

1 In this regard, please refer to the provisions pursuant to art. 15 of Legislative Decree 24/2023.

about the matter reported;

- *Details of any other individuals who may also be able to report the event that has been reported if known;*
- *Reference to any documents that can confirm the validity of the matter reported;*
- *Any other information that may provide confirmation of the existence of the matter.*

5. How reports are handled

The SB and Internal Odv, Audit and People and Culture Manager (hereinafter People), each with reference to the reports received, constantly monitor the communication channels indicated in this policy and carry out a screening of the reports received. Within seven days of submitting a report, these functions issue a notice of receipt and acceptance of the report to the reporting party.

If the report is presented to a person other than the one in charge of receiving such communications as identified in this policy, this report must be transmitted within seven days of its receipt by the person who received the report to the responsible person, at the same time giving notice of the transmission to the reporting person.

Potential conflicts of interest

Should a report involve a potential conflict of interest with one or more members of the functions responsible for receiving reports, the conflicted member must refrain from handling the report via a written statement to be attached to the report's case file. In the case of the People and Culture Manager function—which does not operate as a collective body—any conflict of interest requires that the function delegate the handling of the report to a different party, selected based on the specific subject matter. This designated party will then be enabled to technically manage the specific report in accordance with applicable regulations, and the Company commits to verifying and ensuring that the said party possesses the required qualifications for the assignment. Examples of potential conflicts of interest include personal or financial ties or prior contact with the whistleblower in contexts unrelated to the subject of the report, as well as situations where the person handling the report is the same individual as the whistleblower or the person implicated or affected by the report.

Preliminary verification

The Internal Audit and SB Functions carry out a preliminary verification of the seriousness and

credibility of the report, as well as the requirements for the application of this policy.

If the SB or Internal Audit Functions receive reports falling under the responsibility of the other Function, they will forward them to the competent party in good time so that the latter can respond to the reporting party within 7 days of the notification.
If a report involves elements falling under the remit of multiple functions (e.g., the Supervisory Body and the Control function), responsibility for managing the report remains with one of the functions, while both functions share information and consult each other on how to handle it. A record of this information-sharing and consultation is maintained in the report management platform.

If the report, pursuant to paragraph 2 above, does not strictly provide for the application of this policy, the SB or Internal Audit functions will assign the management of the report to other Functions within the Group that have jurisdiction for the matter reported, subject to authorization and acknowledgement of the reporting party. Where, on the other hand, the report, pursuant to the previous paragraphs 1 and 2, appears to refer to facts or acts relating to significant unlawful conduct, the procedure is as follows:

Investigation phase

Following the preliminary verification, the Odv, Audit and People and SB Functions will then proceed to identify the preparatory activities for the preliminary investigation phase, the objective of which is to carry out specific investigations, analyses and assessments regarding the validity of the actual circumstances indicated in the report.

For this purpose, the SB or Odv, Audit and People Functions may request, where necessary, additional information or documentation from the reporting party. It may also, without prejudice to the guarantee of confidentiality of the identity of the reporter, of the person reported or of the other persons as indicated in point 3, involve other internal Functions of the Group for the management of the report, if this proves necessary or appropriate in relation to the matter to which it relates.
The People and Culture Manager can consult with the Steering Committee for Gender Equality.

Within three months from the date of issue of the notice of receipt of the report, the SB or Internal Audit Functions will provide feedback to the reporting party on the outcome of the investigation.

In consideration of the possibility that, for some reported violations, the relative ascertainment and the definition of effective remedial actions may require more than three months, the feedback

or the progress of the investigation may be undetermined.

Conclusion of the investigation

If the matter reported proves to be unfounded, the SB or Odv, Audit and People Functions will file the report, without prejudice to any measures and provisions for cases in which unfounded reports have been made with malicious intent or through gross negligence.

If the matter reported proves to be founded, the SB or Odv, Audit and People Function will prepare a report, containing details of the report received, the checks carried out and the conclusions of the preliminary investigation, and will send it to the competent body or function to carry out an appropriate assessment. The People & Culture Manager, also through other company functions, shares the reporting of reports received regarding harassment with the Steering Committee for Gender Equality.

In cases where the content of the report so requires, the Supervisory Body (ODV), Control, and People functions will evaluate the appropriateness of forwarding the report—while safeguarding the confidentiality of the whistleblower's identity—to the judicial authorities, regarding matters within their respective jurisdictions, through the designated corporate functions.

In cases where the assessments of the relevant functions necessitate the initiation of disciplinary proceedings, and the name of the whistleblower is essential for conducting such proceedings, that name may be provided by the Supervisory Body (ODV), Control, and People functions only with the whistleblower's prior consent.

Corrective actions and monitoring

Should the need for corrective actions emerge, the competent body or function will be responsible for defining an operational plan for the removal of the critical issue identified. This plan will be communicated to theand, limited to reports of harassment made by direct staff, to the People & Culture Manager function so that it can monitor the status of its implementation.

Reporting requirements

The SB or Odv, Audit and People Functions will prepare a summary of the reports received for all purposes that may be necessary, also in relation to the reporting the Group is required to perform

in accordance with applicable legislation.

Record keeping

The documentation relating to the report, together with all the relative investigative documents will be stored appropriately for the time necessary to process the report and in any case no later than five years from the date of communication of the outcome of the report, in compliance with IT confidentiality requirements with access granted only to the SB or Odv, Audit and People Functions.

All information and personal data acquired will be processed in compliance with fundamental rights and freedoms, as well as the dignity of the concerned parties, in terms of confidentiality and data security and in compliance with Regulation 2016/679/EU (General Data Protection Regulation - GDPR) and the privacy policy for the purpose of obtaining the informed consent of the person involved.

6. Implementation of the policy

All Group Companies are responsible for ensuring the correct adoption of this policy by their employees as well as its implementation and control.
This policy is subject to prior notification to the trade unions.

This policy is disclosed within the Group organisation via a special internal communication and publication on the company website. It is also made available on the websites of the various Group companies, which can be accessed by all relevant stakeholders.

The Senior and Top Management of the Group are responsible for promoting a corporate culture based on the commitments contained in this policy, as well as for disseminating and monitoring its application.

This Policy was first adopted on February 4, 2022, by resolution of the Openjobmetis Board of Directors and adopted on the same date by its subsidiary companies by deed of their respective legal representatives. Last modified on 30 October 2026.

7. Definitions

The following definitions are used in this document:

- "violations":
  1. *administrative, accounting, civil or criminal offences which do not fall into the following points 3), 4), 5) and 6);*
  2. *significant illegal conduct pursuant to legislative decree 8 June 2001, n. 231, or violations of the organization and management models provided for therein, which do not fall into the following points 3), 4), 5) and 6) or failure to comply with the control measures provided for by Model 231;*
  3. *offences that fall within the scope of application of the European Union or national acts indicated in the annex to this decree or of the national acts which implement the European Union acts indicated in the annex to (EU) directive 2019/1937, although not indicated in the annex to this decree, relating to the following sectors: public procurement; financial services, products and markets and the prevention of money laundering and terrorist financing; product safety and compliance; transport safety; environmental protection; radiation protection and nuclear safety; food and animal feed safety and health and welfare of animals; public health; consumer protection; protection of privacy and protection of personal data and security of networks and information systems;*
  4. *acts or omissions affecting the financial interests of the Union referred to in Article 325 of the Treaty on the functioning of the European Union specified in the relevant secondary legislation of the European Union;*
  5. *acts or omissions relating to the internal market, as referred to in Article 26, paragraph 2 of the Treaty on the functioning of the European Union, including infringements of European Union competition and state aid rules, as well as infringements concerning the internal market related to acts which infringe corporate tax rules or mechanisms whose purpose is to obtain a tax advantage which defeats the object or purpose of the applicable corporate tax law;*
  6. *acts or behaviours which jeopardize the object or purpose of the provisions referred to in*

2 For further information please refer to Law n. 162/2021, art.2;

the Union acts in the sectors indicated in the previous points 3), 4) and 5);

- "facilitator": a natural person who assists a reporting person in the reporting process, operating within the same working context and whose assistance must be kept confidential;
- "information about violations": information, including well-founded suspicions, regarding violations committed or which, on the basis of concrete elements, could be committed in the organization with which the reporting person or the person who files a complaint with the judicial or accounting authority maintains a relationship, as well as the elements concerning conduct aimed at concealing such violations;
- "internal report": written or oral communication of information on violations, submitted through the Company's internal reporting channel;
- "external report": written or oral communication of information on violations, submitted according to the reporting channel indicated in this policy;
- "public disclosure": making information about violations publicly known through print or electronic means or otherwise;
- "retaliation": any behaviour, act or omission, even if only attempted or threatened, put in place as a result of the report, the complaint to the judicial or accounting authority or the public disclosure and which causes or may directly or indirectly cause unfair damage to the reporting person or the person who made the report;
- "feedback": communication to the reporting person of information relating to the follow-up that is given or that is intended to be given to the report;
- "direct discrimination": any provision, criterion or practice, for example in the personnel selection phase, which produces a detrimental effect by discriminating against candidates and/or workers on the basis of their gender[2];
- "indirect discrimination": provision, criterion or practice including those of an apparently neutral organizational nature, implemented in the personnel selection phase, which put or may put workers of one gender at a disadvantage compared to those of the other[3];
- "harassment": undesired behaviours carried out for reasons related to gender, with the aim of violating the dignity of a male or female worker or of creating a degrading, humiliating or offensive climate[4];
- "sexual harassment": unwanted behaviour with a sexual connotation expressed in physical, verbal or non-verbal form, carried out with the aim of violating dignity and creating an intimidating, hostile or humiliating climate[5].

3 For further information please refer to Law n. 162/2021, art.2;
4 For further information please refer to Law n. 198/2006, art.26;
5 For further information please refer to Law n. 198/2006, art.26;

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