

CODE OF ETHICS





INDEX

1 Introduction	5	3.4 Drug abuse	21
1.1 Group history and “mission”	6	3.5 Protection of health and safety at work	21
1.2 Objectives of the Code of Ethics	10	3.6 Fairness in relations with partners	22
1.3 Recipients and scope of application of the Code of Ethics	11	3.7 Internal control system	22
1.4 Contractual value of the Code of Ethics	12	3.8 Corporate communications and accounting records	24
1.5 Disciplinary sanctions	12	3.9 Protection of assets and gifts	24
1.5.1 Sanctioning system towards employees, directors, statutory and independent auditors	12	3.9.1 Use of equipment, devices and facilities of the Group with reference to IT tools	25
1.5.2 Sanctioning system towards Third parties	13	3.10 Cash collections and payments	27
2 General principles	14	3.11 Conflict of interests	28
2.1 Legality	15	3.12 External relations	29
2.2 Integrity, honesty, fairness and good faith	15	3.13 Confidentiality	29
2.3 Competition	15	3.13.1 Privacy policy	29
2.4 Trust	15	4 Ethical principles in external relations ...	30
2.5 Sharing	15	4.1 Relations with Public Administration and similar organisations	31
2.6 Group work.....	16	4.2 Judicial Authority and Supervisory Authority	32
2.7 Transparency and completeness of information	16	4.3 Public institutions	34
2.8 Respect for the dignity of people	16	4.4 Political parties and organisations	34
2.9 Environmental protection	16	4.5 Relations with associations	34
2.10 Responsibility towards the community	17	4.6 Relations with Third parties	35
2.11 Fight against corruption	17	4.7 Donations, sponsorships, and gifts	36
2.12 Protection of inside information	17	4.8 Fair competition	37
3 Ethical principles in internal relations ...	18	4.9 Rules of conduct for the sponsoring of sport events	37
3.1 Personnel policy	19	5 Implementing provisions	38
3.2 Selection, management and value of resources	20	5.1 Reporting and supervisory activities ...	40
3.3 Mobbing or harassment in the workplace	20	5.2 Guarantor of the code of ethics	40
		5.3 Code promotion team	41
		5.4 Revision of the Code	41



1 INTRODUCTION

Il Gruppo Openjobmetis

This Code of Ethics (hereinafter referred to as the “**Code**” or “**Code of Ethics**”) sets out the principles that Openjobmetis S.p.A - Employment agency and its controlled companies (hereinafter referred to singularly as the “**Group**”) are inspired by in conducting their relationship with stakeholders, establishing the commitments, rules of conduct and responsibilities that directors, employees and collaborators, including occasional collaborators, of the Group companies assume, in the conduct of business and in performing their duties in their midst or on their behalf.

In this perspective, the principles and values expressed in this Code extend and complete the scope of application of the Organisation, Management and Control Model pursuant to Legislative Decree 231/2001 (hereinafter also the “**Model**”) adopted by the Parent Company Openjobmetis S.p.A. – and known by the subsidiaries of the Group – defining, in relation to the Processes with a

Crime Risk, behaviours that should be observed to prevent illicit conduct that is not precisely regulated within the scope of the Model since they are considered residual with respect to the risks of committing crimes which may involve Openjobmetis in carrying out its operational activities. Any conduct which, in violation of the provisions contained in this Code, may include criminally relevant behaviour contemplated by Legislative Decree 231/2001 and subsequent amendments, or by other legal provisions, is to be considered prohibited and subject, in addition to disciplinary sanctions provided for by law, collective bargaining and the Disciplinary Code referred to in the Company Regulations, to the disciplinary system referred to in the Model adopted by Openjobmetis pursuant to Legislative Decree 231/2001 (Annex 2 of the General Part of the Model), available on the corporate website.

INTRODUCTION


1.1 Group History and Mission

Openjobmetis S.p.A. is an Employment Agency established pursuant to Legislative Decree 276/2003, specializing in the provision of temporary work services, intermediation between job demand and offer, personnel search and selection, support for professional outplacement and staff training. It started in 2001 under the name of Openjob S.p.A.

In July 2003, with the aim of embarking on a plan for growth including the use of external channels, it joined the shareholding structure Wisequity, a private equity fund managed by Wise SGR. In December 2004, an expansion project was launched which led to the acquisition of important operators in the sector, including Pianeta Lavoro, In Time, Quandocorre, JOB company branch. In 2011 Openjob acquired Metis, achieving a turnover of approximately 400 million euros. Openjobmetis started in December of the same year. With this acquisition the company Seltis S.r.l., controlled by Metis S.p.A, also became part of Openjobmetis S.p.A. In January 2013, the acquisition of Corium S.r.l., the first outplacement company in Italy, took place.

Since 3 December 2015 Openjobmetis S.p.A has been the first and only Employment Agency listed on Borsa Italiana's Euronext Milan, Star segment and is now positioned among the top operators of the sector in Italy.

2001	Openjob START-UP
2002	
2003	
2004	 PIANETA LAVORO Agenzia per il lavoro
2005	
2006	 Quandocorre s.p.a.  In Time Agenzia per il lavoro
2007	
2008	
2009	 Just on Business
2010	
2011	 Metis LAVORO IN MOVIMENTO  Seltis Build up your Future
2012	
2013	 CORIUM
2014	
2015	 IPO  Borsa Italiana
2016	
2017	
2018	 MERITOCRACY  HE
2019	
2020	 Jobmetoo  lyve <small>UNIONE CREATA DA UN BRIGLIO ALIANTER</small>
2021	 QUANTA IT & DIGITAL
2024	 Just on Business



In 2018 Openjobmetis S.p.A. acquired 100% of Coverclip S.r.l., then Meritocracy S.r.l., a platform specializing in staff search, principally for digital professions, which also uses Artificial Intelligence elements for the selection of positions, and 70% of HC Human Connections S.r.l., an educational company that performs activities dedicated to the development and motivation of human resources in organizations.

In January 2020, HC S.r.l. and Corium S.r.l. merged to become a single new reality, capable of synergistically offering services in the fields of both change management and outplacement. In September 2020, the participation of

Openjobmetis S.p.A. in this new reality, HC S.r.l., grew to 92.9%.

Family Care S.r.l. has been operational since 1 January 2020. – an Employment Agency dedicated to the search, selection and supply of family assistants. Established in October 2019 and 100% controlled by Openjobmetis S.p.A., the creation of this autonomous company and the subsequent transfer of the activities relating to the previous Family Care Division of Openjobmetis S.p.A., was the natural evolution of experience gained since 2015 in the search and selection of family assistants (commonly known as caregivers) dedicated to and non-self-sufficient people. In 2022 Family Care S.r.l. obtained



INTRODUCTION

permanent ministerial authorization as an Employment Agency.

On 31 January 2020 Openjobmetis S.p.A. acquired 100% of Jobdisabili S.r.l., the company that owns the "Jobme-too" brand, an online platform specialized in the search and selection of personnel with disabilities, which facilitates the meeting of people from protected categories with the world of work and companies.

In October 2020 Meritocracy became part of Seltis S.r.l., strengthening the latter's potential, particularly in the field of search and selection of professionals in the digital world.

In November 2020 Seltis, Meritocracy and UNA Sales Force became Business Lines of Seltis Hub S.r.l., the new center for experience, skills and opportunities in the HR field of Openjobmetis.

On 9 November 2020 Openjobmetis S.p.A. acquired 50.66% of Lyve S.r.l., a company specialised in company training, a real laboratory for innovation in retail. Lyve has innovated both traditional face-to-face training and remote

training, building synergies between teaching models and designing and developing tools for engagement, assessment and certification that live together in a single Open learning system.

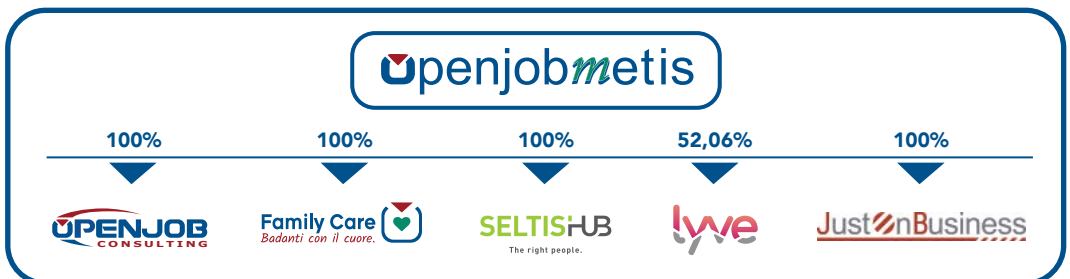
In April 2021, following the incorporation of Jobdisabili S.r.l., Seltis Hub S.r.l. was enriched with a new Business Line: Jobmetoo.


In May 2021 Quanta S.p.A. became part of the Openjobmetis Group, with a merger that went into effect on 1 January 2022. With Quanta S.p.A., Quanta Risorse Umane S.p.A. also joined the Group, which was then merged into Openjob Consulting S.r.l. with effect from 1 April 2022.

In June 2023 the subsidiary Lyve S.r.l. merged for incorporation of HC S.r.l.

In January 2024 Just On Business SpA becomes part of the Openjobmetis Group.

Since January 2024, the Group has been made up of the parent company Openjobmetis S.p.A. and its subsidiaries Openjob Consulting S.r.l., Seltis Hub S.r.l., Lyve S.r.l., Family Care S.r.l. and Just On Business S.r.l. as shown below:





The Group has set itself the goal of being a leader in the human resources sector, aiming to be a reference partner for companies interested in the services offered (temporary work, search and selection, training and outplacement) and focal point for workers interested in entering, returning or repositioning themselves in the world of work.

In April 2021 Openjobmetis was assessed as 'Low Risk' in terms of ESG by Sustainalytics, a worldwide leading com-

pany in carrying out research, ESG data and ratings, i.e. a concise judgment that certifies the solidity of the Company in terms of environmental, social and governance performance. The Openjobmetis' 'Low Risk' ESG rating places the Employment Agency among the top companies in the HR sector. Furthermore, in May 2022, the Sustainalytics agency issued an update of the ESG rating, which showed a significant improvement compared to the already positive one of April 2021.



INTRODUCTION

This attention to ESG themes shows the willingness of the Openjobmetis Group companies to increasingly pursue business that places people at the center of their strategic choices.

Through its activities, the Group aims to:

- contribute to the growth of national employment;
- create value for its shareholders and develop the company;
- contribute to the well-being and professional growth of its employees;
- transfer elements of economic and civil progress to the community in compliance with the values which inspire the Group;
- contribute to the achievement of sustainability objectives in line with the Group's business lines.


1.2 Objectives of the Code of Ethics

In virtue of a policy that is attentive to issues of legality, also for the purposes set out in Legislative Decree 231/2001, the Group intends to clearly define the set of values that it recognizes and adopts as guiding criteria for its operations, as well as the entirety of responsibilities it assumes internally and externally. The observance by the Recipients (as defined below) of this Code of Ethics, adopted by the other Group companies by deed of the competent legal representatives on 24 October 2022, is of fundamental importance for the good functioning, reliability and reputation of the

Group, factors that are an indispensable asset for the Group's success.

The Code of Ethics aims to base the operations, behaviours and modus operandi of the Group companies on correctness, fairness, integrity, loyalty and professional rigour, both in internal relations and in relations with external subjects, fully observing current regulations as well as compliance with internal procedures.





A clear “ethical direction” in the Group’s actions, combined with a culture of competition and respect for the market, which translates into transparency, loyalty and honest behaviour towards the outside world and internally, is essential to ensure the Group’s credibility vis-à-vis the stakeholders (central and local Public Administration, shareholders, customers, workers, suppliers, other companies, business associations etc.) and, more generally, in the civil and economic context in which it operates.

Each Recipient is required to know the Code of Ethics, to actively contribute to its implementation and to report any deficiencies.

The Group undertakes to promote awareness of the Code by its Recipients, incorporate their contribution in defining its contents and prepare suitable tools to ensure the full and effective application of the Code itself.

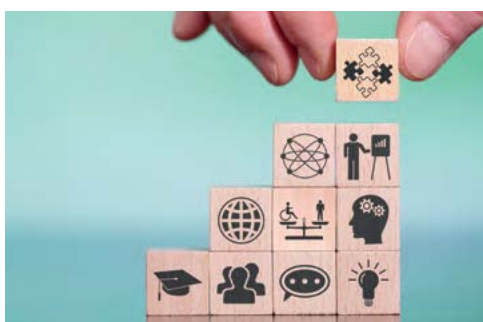
Any behaviour contrary to the letter and spirit of the Code of Ethics will be sanctioned in accordance with and according to the applicable procedures.

Any update, change or addition to the Code of Ethics must be approved by the Board of Directors of Openjobmetis S.p.A., as well as implemented - as regards the other companies of the Group – by deed of the competent legal representative.

The Code of Ethics is also brought to the attention of those who maintain com-

mercial and business relations with the individual companies of the Group.

It is available on the intranet system, as well as on the websites of the various Group companies.



1.3 Recipients and scope of application of the Code of Ethics

The provisions of the Code – and the relative sanctions in the event of non-compliance – apply to all those who, directly or indirectly, permanently or occasionally, work with or for Group companies. These provisions are aimed at people who hold representation, administration or management functions, or who exercise, even de facto, the management and control of the Group companies, as well as people subject to management - employees - or supervised by them (the Recipients) and to third parties who maintain collaboration relationships with the Group that are contractually regulated or who represent Group companies without employment ties (for example, consultants and other independent collaborators), as well as all subjects who

INTRODUCTION

interact in various capacities with the Group collaborators, consultants, suppliers, customers, outsourcers, etc., (hereinafter "Third Parties").

The Code of Ethics is applied in relation to all activities carried out by or in the name and on behalf of Group companies.

1.4 Contractual value of the Code of Ethics

Compliance with the rules of the Code of Ethics must be considered an essential part of the contractual obligations of the employees of the Group companies based on the provisions in force.


1.5 Disciplinary Sanctions

1.5.1 Sanctioning system towards employees, directors, statutory and independent auditors

Failure to comply with and/or violation of the rules of conduct indicated by the Code of Ethics by employees of the Group constitutes a breach of the obligations of the employment relationship and gives rise to the application of the disciplinary sanctions required by law, collective bargaining, the Disciplinary Code referred to in the Company Regulations and, as applicable, by the disciplinary system referred to in the Model adopted by Openjobmetis pursuant to Legislative Decree 231/2001 (Annex 2 of the General Section of the Model), available on the company website of the parent company.

The management of disciplinary proceedings and the imposition of sanctions remain the responsibility of the individual companies, it being part of their functions.





In the event of violations of the Code of Ethics by directors, statutory auditors and independent auditors, the Internal Audit function and the Supervisory Body - for profiles relevant to Legislative Decree 231/01 for Openjobmetis S.p.A. and if they have evidence - will have to communicate the circumstance to the competent Board of Directors and/or the Board of Statutory Auditors, so that these bodies can take the appropriate initiatives, jointly or separately on the basis of the crime.

1.5.2. Sanctioning system towards Third parties

Any behavior carried out in violation of the provisions of this Code by Third parties may, in the most serious cases, determine the termination of the contractual relationship. For Openjobmetis please consult the sanction system pursuant to the Model ex Legislative Decree 231/2001 (Annex 2 of the General Part of the Model), available on the company website.

The faculty of the group companies to act to obtain compensation for any damage suffered remains unaffected, if the prerequisites exist.





2 GENERAL PRINCIPLES

The Group believes the following principles are essential:

2.1 Legality

The Group recognizes compliance with the laws, regulations and all provisions of the legal system as a fundamental principle. The Recipients and Third parties, in carrying out their functions and performing their respective activities, are required to comply with the regulations in force.

In this sense, these subjects are required to know the implications of the law relating to their role and are required to carry out their activities with professionalism, diligence, efficiency, collaboration and fairness, making best use of the tools and time available to them and taking on the responsibilities related to the commitments undertaken.

2.2 Integrity, honesty, fairness and good faith

The Group bases its conduct on standards of moral integrity and transparency and on the values of honesty, fairness and good faith. The Group will therefore not undertake or continue any type of relationship with anyone who adopts behaviour that differs from that established in this specific point of the Code of Ethic.

2.3 Competition

The Group believes in the principle of respect for competition in the relevant markets, considering this value a primary source of healthy commercial behaviour

and a prerequisite for the development of business relationships that are sustainable over time and profitable for the group.

2.4 Trust

The Group believes that mutual trust is the basis for profitable and effective business relationships both within the Group companies and with Third parties.

2.5 Sharing

The Group stimulates the sharing of information, knowledge and experience and professional ability both inside in the Group and externally where appropriate.



Rosario Rasizza, AD Openjobmetis

GENERAL PRINCIPLES

2.6 Group work

Group work and collaboration in achieving common objectives characterize the actions of the Group companies, with the awareness that the success of each of their initiatives is largely based on the added value given by the synergy of those who work within it.

2.7 Transparency and completeness of information

The Group adopts the principles of transparency and completeness of information in the performance of institutional activities, the management of financial resources and the consequent reporting and/or accounting records, as well as in the drafting of all documents relating to its activities.

2.8 Respect for the dignity of people

The Group respects the fundamental rights of individuals, protecting their moral integrity and guaranteeing equal opportunities. In internal and external relations, the companies of the Group repudiate any discrimination based on political and trade union opinions, religion, ethnic origins, nationality, age, gender, sexual orientation, health, marital status, disability, physical appearance, social-economic condition and, in general, any individual characteristic of a person.

2.9 Environmental Protection

The Group considers the protection of the environment to be a fundamental objective of its business and undertakes



to ensure that the regulations for the protection of the environment are constantly respected. The operational management of the Group companies is based on the criteria of environmental protection and energy efficiency.

Recipients and third parties are therefore required, in carrying out their activities, to implement sustainable behaviour using the resources made available by the Group according to criteria aimed at minimizing negative.

2.10 Responsibility to the community

The Group assumes any responsibilities vis-à-vis the community that may arise from the performance of its business, acknowledging the values of solidarity and dialogue as its own. It also promotes social, economic and employment development in full compliance with internationally recognized rights, with particular regard to:

- the protection of working conditions;
- the protection of trade union rights;
- the protection of health and safety at the workplace;
- compliance with the principle of fairness and correctness in determining working hours and salary.

2.11 Fight against corruption

The Group recognizes the importance of ethical integrity, transparency and fairness in relations with third parties (both public and private) and prohibits any

form of corruption in favour of anyone. The adoption of a specific Anti-corruption Policy with which the Group (through publication on the corporate websites), intended to formalize and make known its commitment on these issues, also falls within this perspective.

2.12 Protection of inside information

The Procedure for Internal Management and external Communication of information adopted by Openjobmetis (available on the Company's website) and applicable to all Group companies, prohibits the use or communication to other parties of privileged information, without a justifiable reason, as defined pursuant to Regulation (EU) no. 596/2014. If the Recipients are in possession of the aforementioned privileged information, they must immediately notify their Department manager, in order to handle it with appropriate means and in line with the procedures adopted by Openjobmetis and applicable to the other companies of the Group.





ETHICAL PRINCIPLES IN INTERNAL RELATIONS

3.1 Personnel policy

The Group is committed to creating a serene and inclusive work environment internally, where everyone can work in compliance with the laws, principles and shared ethical values.

The individual companies of the Group ensure that their employees and collaborators behave and are treated with dignity and respect in compliance with the provisions of the laws in force. No form of isolation, exploitation, harassment or discrimination, for personal or work reasons, by any manager, employee or collaborator towards another manager, employee or collaborator is tolerated.

The Group prohibits the imposition of disciplinary sanctions against employees or collaborators who have legitimately refused a job unduly requested of them by any person associated with the Group. Sexual harassment of any kind is severely punished, even by means of termination of employment or collaboration. The Group reiterates its firm opposition to any type of discrimination based on the diversity of ethnic group, language, faith and religion, opinion and political orientation, nationality, ethnic group, age, gender and sexual orientation, marital status, visible or invisible disability, economic and social status; likewise, it opposes the granting of privileges for the same reasons. The Group does not tolerate any form of irregular work or "illegal labour" or child labour, nor any

other conduct which may, even if only abstractly, constitute an offense against the person. The Group considers it essential that only personnel of non-EU origin who are fully compliant with current immigration rules are employed. The group undertakes to not use human resources from non-EU countries who are not in order with their residence permits according to that established by current legislation on immigration.

The Group recognizes the right of its employees to set up or take part in organizations aimed at defending and promoting their interests and be represented by union bodies or other forms of representation, in compliance with national legal obligations.





ETHICAL PRINCIPLES IN INTERNAL RELATIONS

3.2 Selection, management and value of resources

All employment and collaboration relationships presuppose the signing of a regular contract.

All employees and collaborators are informed about the rights, duties and obligations deriving from the stipulation of the contract.

In the staff selection and recruitment phases, the Group companies adopt, as exclusive evaluation criteria, the matching of the candidates' profiles to the needs of the Company and the users and the verification of their professional skills.

The Group enhances the professionalism of its employees by facilitating and, where appropriate, promoting their training, making the necessary training tools available, as well as expanding the specific skills of each one. The Group companies strive to promote a work environment that contributes to the enhancement of the individual as a person, promoting corporate welfare initiatives.

3.3 Harassment or mobbing at work

The Group favours initiatives for creating working methods aimed at obtaining greater organizational well-being in the company. In addition, it requires that in





internal and external work relationships no harassment or attitudes attributable to mobbing are displayed, which are prohibited without exception.

The following are considered as such:

- Creating an intimidating, hostile, isolating or otherwise discriminatory work environment towards individuals or groups of workers;
- Creating unjustified interference in the execution of the work or services of others;
- Obstructing any individual job prospects of others for mere reasons of personal competitiveness or that of other workers. It is specified that any form of violence or sexual harassment or attributable to diversity related to people and their culture is prohibited. The following are considered as such:
- Subordinating any decisions related to the recipient's working area subject to acceptance of sexual favours or personal and cultural differences;
- Inducing workers to sexual favours through the influence the role held;
- Proposing private interpersonal relationships, despite express or reasonable disapproval;
- Alluding to disabilities, mental and physical impairments or other forms of cultural and religious diversity or sexual orientation.

3.4 Drug abuse

All the people in the Group must personally contribute to promoting and main-

taining a climate of mutual respect in the working environment, paying attention to the conditions of respect and sensitivity of others. Taking the risk of compromising these environmental characteristics is considered a conscious risk, as is being under the influence of alcohol, drugs or substances which can cause an effect such as to inhibit one's ability to understand and take action during daily work. Any states of chronic dependency, when they affect the work environment, will be considered for contractual matters equivalent to the states mentioned above; the Group undertakes to support the social actions in this context provided for by employment contracts.

It is forbidden to:

- Possess, consume, offer or hand over drugs or substances having similar effects for any reason during work performance and in the workplace;
- Smoking in the workplace; the Group companies take into consideration the condition of those who feel physical discomfort due to the possible presence of smoke in workplace situations and ask to be protected from contact with "passive smoke" in their workplace.

3.5 Protection of health and safety at work

The Group undertakes to disseminate and consolidate a culture of safety by developing awareness of risks, promoting



ETHICAL PRINCIPLES IN INTERNAL RELATIONS

responsible behaviour by all collaborators and making every effort to preserve, above all through preventive actions, health and personnel safety.

The activities of the Group companies must be carried out in full compliance with current legislation on the prevention and protection of occupational accidents, pursuing continuous improvement of health and safety conditions in the workplace.

To this end, the Group undertakes to carry out interventions of a technical and organizational nature, concerning:

- the introduction of a risk and safety management system;
- the analysis of the risks and criticalities of processes and resources to be protected;
- the adoption of suitable tools to prevent the emergence of risks relating to the safety and/or health of workers;
- checking and updating working methodologies;
- the organization of training courses (mandatory and not) on the subject.

3.6 Fairness in relations with partners

In managing relations with their shareholders, the Group companies observe the principles of fairness and transparency, avoiding favoritisms and unequal treatment.

The Group companies therefore undertake to:

- promptly inform shareholders of any action or decision that could have significant effects on their investment, according to the applicable legislation
- maintain a Corporate Governance system that complies with the provisions in force;
- ensure the regular participation of Directors in meetings;
- guarantee the orderly and functional conduct of the Shareholders' Meetings, in compliance with the fundamental right of each shareholder to request clarifications on the various topics under discussion and to express his or her opinion;
- ensure efficient and specific structures dedicated to relations with shareholders.

It is forbidden for anyone to influence the regular conduct of the Company's shareholders' meetings and the decisions taken therein, misleading or deceiving the shareholders.

3.7 Internal control system

The Group undertakes, for all the companies belonging to it, to promote and maintain an adequate internal control system as a set of all the tools necessary or useful for directing, managing and verifying business activities, with the goal of:

- ensuring compliance with laws and regulatory documents;
- protecting company assets;
- managing activities optimally and efficiently;
- providing accurate and complete accounting and financial data.

In particular, the Group promotes the concept of continuous improvement of the internal control system, with the aim of adapting to the dynamic nature of the external context and to offer its services according to high quality standards. The responsibility for implementing an effective internal control system is common to every level of the organizational structure of the Group companies; consequently, all the People of the Group, within the scope of the functions and responsibilities covered, are committed to defining and actively participating in the correct functioning of the internal control system and consider any impro-

vements to be made to it for their own processes.

The Group at all levels promotes the dissemination of a culture of clear and up-to-date regulatory documents that indicate an awareness of the existence of controls and the assumption of a mentality oriented towards the conscious and voluntary exercise of controls. The management in the first place and in any case all the People of the Group are required to contribute to and participate in the internal control system of the various Group companies and, with a positive attitude, involve their collaborators.



ETHICAL PRINCIPLES IN INTERNAL RELATIONS

Everyone is the responsible custodian of assigned corporate assets (tangible and intangible) which are instrumental to the activity carried out; no employee may make or allow others to make improper use of assets assigned nor of the Group's resources. Practices and attitudes attributable to the commission or participation in the commission of fraud are prohibited without exception.

The control and supervisory bodies (where present), the Internal Audit function and the appointed auditing firms have free access to the data, documentation and information required for carrying out their duties.

3.8 Corporate communications and accounting records

The Group believes that the transparency and keeping of accounting records according to principles of truth, completeness, clarity, precision, accuracy and compliance with current legislation, are the fundamental prerequisite for effective control. For each operation, adequate supporting documentation must be kept with the records to allow easy accounting entries, the reconstruction of the operation itself and the identification of any liability.

The financial statements must represent the economic, equity or financial situation of the Group in a clear, truthful, and complete manner.

3.9 Protection of assets and gifts

Recipients contribute to protecting the integrity of the Group's assets so that maximum protection of shareholders and creditors is achieved.

Directors (or whoever performs their functions) must not in any way impede or hinder the control activities of the members of the Board of Statutory Auditors, the shareholders and the auditing firm.

Considering the above:

- the assets of the companies of the Group, assets, receivables and shares



must be valued correctly and not be attributed higher or lower values than that due;

- no financial transactions may be carried out whose characteristics, conflict with the purposes of the Group;
- initiatives that differ or deviate from the statutory purposes are prohibited;
- the management of corporate assets must be consistent with the policies of the Group which operates according to principles of transparency and morality.

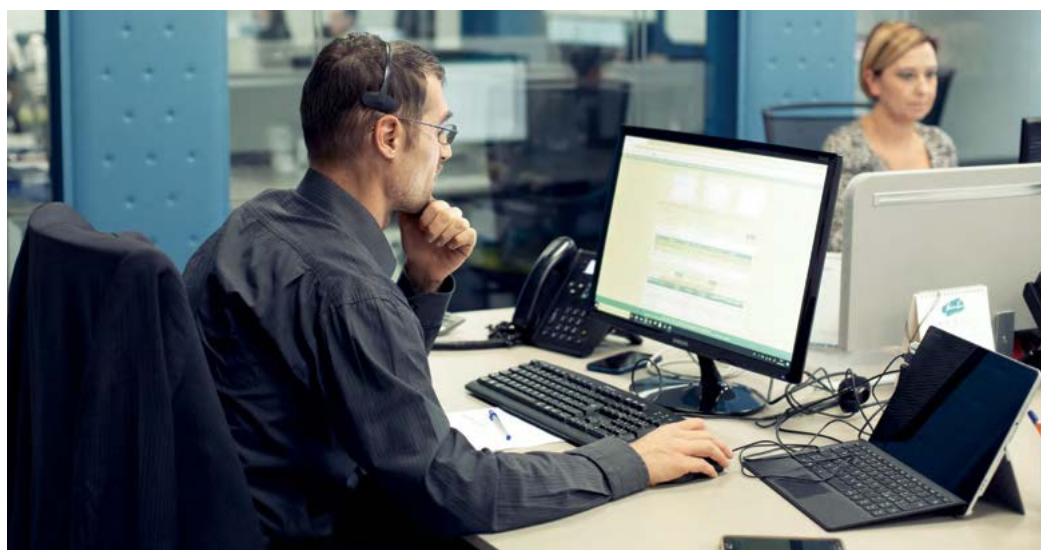
Acts of commercial kindness, such as gifts or forms of hospitality, are only allowed for amounts of little value so as not to influence the receiver's independent judgement. These expenses must be carried out in compliance with company procedures and must be adequately documented.

Directors, direct and temporary employees, as well as individuals who, through specific duties, represent the companies of the Group towards third parties, cannot receive gifts or preferential treatment, except within the limits of normal commercial relations, courtesy and if they are of modest value.

3.9.1 Use of Group equipment, devices and facilities with reference to IT tools

The Recipients are obliged to operate diligently to protect the Group's assets, adopting responsible behaviour in compliance with the law and in line with the operating procedures set up to regulate their use.

To this end, the Recipients are responsible for guarding, preserving and defending the assets and resources of the Group entrusted to them and must use





ETHICAL PRINCIPLES IN INTERNAL RELATIONS

them properly and in a manner consistent with the interests of the Group, preventing any improper use.

It is also forbidden to divulge or otherwise make use of intangible assets, know-how, data and processes owned by the Group, for one's own benefit or that of third parties.

Regarding IT tools, Recipients must:

- abstain from any activity that could lead to the modification, suppression or fraudulent creation of public or private IT documents which could have probative value;

- refrain from illegally accessing the Group's computer or telematic system or the protected system of third parties, whether they are public or private, in order to modify or suppress data, documents and information stored therein;
- refrain from illegally holding and disseminating authentication credentials or access codes to IT or telematic systems;
- abstain from carrying out any activity that could cause damage or interruption to a public or private third party computer or telematic system, as well as from disseminating equipment, devices or computer programs capable



of damaging or interrupting an IT or telematic system;

- refrain from carrying out any activity that could damage the information, data and computer programs of third parties, whether public or private or damage computer or telematic systems;
- abstain from carrying out any abusive activity of interception, impediment or interruption of IT or telematic communications, as well as from installing equipment for intercepting, impeding or interrupting IT or telematic communications.

3.10 Cash collections and payments

The Group carries out its activities in compliance with the currency provisions and the anti-money laundering regulations in force, as well as the prescriptions dictated by the competent authorities.

To this end, employees and collaborators must avoid carrying out suspicious transactions under a profile of correctness and transparency. Employees and collaborators of the Group companies undertake to operate in a way to avoid implications in transactions that may be potentially suitable for promoting money laundering deriving from illegal activities and act in full compliance with anti-money laundering legislation.

To avoid giving or receiving undue payments and the like, employees and col-

laborators of the Group, must comply, in all their negotiations, with the following principles regarding the documentation and conservation of accounting records:

- all payments and other transfers, made by or in favour of Group companies, must be accurately and fully recorded in the accounting books and in the obligatory accounting entries;
- all payments must be made directly to Recipients and their reason must derive from the activities contractually formalized and/or approved by the Group companies;
- false, incomplete or misleading records must not be created; hidden or unregistered funds must not be established and funds must not be deposited in personal accounts or accounts not belonging to Group companies;
- no unauthorized use should be made of the funds or resources of Group companies;



A photograph of two women in a meeting, one on the left and one on the right, both smiling and looking towards each other. The image is overlaid with a teal tint.

ETHICAL PRINCIPLES IN INTERNAL RELATIONS

- no payment must be made - in cash or with bearer means of payment - for amounts higher than the amount identified from time to time by the anti-money laundering legislation and/or internal procedures.

3.11 Conflict of interest

Group companies ensure that their employees, directors, statutory auditors, representatives or collaborators do not find themselves in a position of conflict of interest.

Every initiative undertaken by employees, directors, statutory auditors, representatives and collaborators of Group companies must be oriented exclusively towards the pursuit of the Group's interests.

To this end, the Group establishes the following rules of conduct.:

- directors and statutory auditors cannot carry out or collaborate in the execution of operations (or participate in related resolutions) which may represent a gain them, even if only partially in conflict with that of the companies for whom they work;
- employees, collaborators and statutory auditors of Group companies cannot engage in business or professional activities in full or potential conflict with the interests or the purposes pursued by the companies for whom they operate, as indicated in the respective Statutes and referred to in this Code.

Employees and collaborators of Group companies refrain from taking part in transactions, financial operations or investments made by the Group, from which they may derive a profit or other type of personal advantage not provided for in the contract, unless authorized in writing by the Company.

It is the duty of all employees, collaborators, directors, statutory auditors and independent auditors of the Group companies to avoid and prevent the emergence of a conflict of interest and must also comply with the internal procedures adopted on this subject.

By way of example but not limited to, the following situations may lead to conflicts of interest:

- having economic and financial interests (professional, etc.), also through family members, with suppliers, customers or competitors;
- carrying out work activities, even by family members, for customers, suppliers or competitors;
- accepting money, gifts or favors of any kind from people, companies or entities that have or intend to enter business relations with the Company, except in the cases provided for in paragraph 4.2 and for amounts of modest value;
- using one's position in the company or the information acquired in one's work in a way that could create a conflict between one's own interests and those of the company;

- buy or sell shares in the Company when, in relation to one's work, one has knowledge of information not yet in the public domain.

Anyone who finds himself in a situation which could potentially give rise to a conflict of interest, must immediately inform his superior in order to assess its actual existence and define any action to be taken with reference to internal procedures.

3.12 External relations

Relations with the press, television and with the mass media in general, both national and foreign, are held exclusively by company representatives authorized to do this or by persons delegated by them.

Statements, press releases and all external communication initiatives must be previously authorized in compliance with the corporate and governance procedures in force.

To safeguard its image and the correctness of the information released, the Group demands that:

- no employee and/or collaborator give interviews or any type of declaration concerning the Group to unqualified external subjects or to accredited journalists;
- any employee and/or collaborator who may have been solicited by unqualified external parties or by accredited journalists to give statements or information regarding the Group, refer the requesting parties to persons in charge.

3.13 Confidentiality

All information obtained by Group employees and collaborators, by virtue of or during their employment and collaboration relationship with the companies of the Group, is owned by the Group. Recipients must therefore ensure the confidentiality of the information obtained during the operations carried out on behalf of the Group.

Recipients are also required to process the data and information in question exclusively within the scope and for the purposes relating to their work activities and not to disclose, disseminate or publish sensitive and confidential information in any way - also for the purposes of legislation to protect the market - without the explicit consent of the interested parties and appropriate authorization.



3.13.1 Privacy policy

The Group undertakes to protect the information relating to its People and third parties, generated or acquired internally and in business relationships, and to avoid any improper use of it.



ETHICAL PRINCIPLES IN EXTERNAL RELATIONS

4.1 Relations with Public Administration and similar organisations

The management of relations with the Public Administration, public officials, public employees and public service concessionaires is reserved exclusively to the Group functions responsible for this and to personnel authorized by them.

In the event of commercial negotiations, participation in public procedures and any other activity involving the Public Administration or other subjects similar to it (such as publicly owned companies, public service concessionaire consortia of Municipalities), the group will behave fairly and transparently.

Relations with public officials are based on transparency, loyalty and fairness. The Group does not intend to give rise to even the slightest suspicion of wanting to unduly influence these subjects to obtain illicit benefit.

The Group therefore condemns any behaviour that could constitute an act of corruption, even if inspired by a misunderstood corporate interest.

Employees and collaborators are obliged to report to their manager any attempt at extortion or abuse by a public official of which they may be the recipient, or of which they simply may have knowledge. Employees and representatives of Group companies also have the obligation to

inform their manager of business relationships or economic activities undertaken on a personal basis with public officials. Recipients are therefore required to fully collaborate with the supervisory and control authority and the public authorities that may request this in relation to their relationship with the Group and generally not to unlawfully interfere in the correct performance of any inspection activity and/or investigation.

Considering the above, no director, employer or collaborator of the Group companies may:



ETHICAL PRINCIPLES IN EXTERNAL RELATIONS

- give or promise, directly or indirectly, gifts, money or other advantages to such people so as to influence the the impartiality of their judgement; only courtesy, hospitality or promotional gifts of modest value are allowed, and subject to authorisation and documentation;
- send false or counterfeit documents, certify non-existent requirements or give guarantees that do not correspond to the truth;
- unduly procure any other type of profit for the Group (licenses, authorisations, loans, relief from charges, including social security, etc.), misleading others with means that constitute artifice or deception (for example: sending false documents or attesting things that are not true);
- undertake economic activities, confer professional assignments, directly or indirectly give or promise gifts, money or other advantages (such as, by way of example and not exhaustively, employment or promises of employment) to public officials or civil servants involved in administrative proceedings from which advantages may derive for the Group;
- alter in any way the functioning of a computer or telecommunications system of the Public Administration or intervene without right and in any way on data, information or programmes, content in one of the aforementioned systems;
- unduly receive contributions, loans, subsidized loans or other disbursements of the same type in any way denominated, granted or disbursed by the Public Administration, through the use or presentation of false or misleading documents, or through the omission of required information;
- use grants, subsidies or public funding intended for carrying out activities in the public interest, for purposes other than those for which they were granted;
- exchanging information on offers with participants in any public tenders or procedures;
- disseminate in any way sensitive information relating to the Group's economic and financial conditions or relating to its forthcoming corporate or financial policy initiatives. Lastly, as regards the promotional activities of the Group, donations, payment of cash contributions and the stipulation of free loan agreements, these must be carried out:
 - for pure and authentic generosity;
 - in the context of projects of obvious interest and social value;
 - in compliance with the criterion of congruity (understood as economic proportionality between the contribution requested and the purpose for which it is disbursed) and relevance to the activities and interests pursued by the Group.

4.2 Judicial Authority and Supervisory Authority

The Group acts in compliance with the law and promotes, within the limits of its powers, the correct administration of justice.

Where required, it collaborates with the Judicial Authorities, the police forces and public officials who exercise inspection powers and investigative activities against it. The Group reiterates its condemnation of any behaviour that could constitute an act of corruption. Employees and collaborators must report to their manager any attempt at extortion or extortion by a public official, or a public service officer of which they may be recipients or aware of.

The Group demands that all Directors, employees and collaborators make themselves available and collaborate with any subject - public official or Supervisory Authority - who carries out

inspections and checks on the work of the Group companies.

On the occasion of or in anticipation of a judicial proceeding, an investigation or an inspection by the Public Administration or the Supervisory Authorities, it is forbidden to destroy or alter records, minutes, accounting records and any type of document, lie or make false statements to the competent authorities. Likewise, it is prohibited to persuade or attempt to persuade others to provide false or misleading information to the competent authorities.

Employees, executives and collaborators of Group companies are also prohibited from engaging in economic activities, conferring professional assignments, giving or promising gifts, money, or other advantages to persons who carry out checks or inspections at companies in the Group.



ETHICAL PRINCIPLES IN EXTERNAL RELATION

4.3 Public institutions

Relations with national or international public institutions must be inspired by canons of absolute transparency.

These relationships will take place in the form established by current legislation and will aim exclusively to obtain clarifications regarding the implications of the legislative and administrative activity vis-à-vis the Group, respond to any requests made to the Company, deal with inspection union acts (interrogations, interpellations, etc.) or make known the Group's position on issues pertinent to the latter.

To this end, the Group undertakes to establish stable channels of communication with institutional interlocutors and represent its interests and positions in a transparent, rigorous and consistent manner and avoid a collusive attitude.

To ensure maximum clarity and impartiality, contacts with institutional interlocutors will take place exclusively through contacts who have received an explicit mandate.

4.4 Political parties and organisations

The Group cannot make political contributions of any kind.

"Political contribution" means any payment, loan or act of donation made to

political parties and/or political or trade union organisations their members or to individuals engaged in political activity and/or trade union (both in the case in which they already hold public office, and in the case in which they propose to do so by standing for election).

The directors, employees and collaborators of the Group cannot make political contributions by drawing on funds, property or other resources attributable to the Company. Contributions from Group companies are also considered those made through an interposed person, or interposed sponsorship operations, that gives money, goods or other benefits – on behalf of the Group or in its name – to one of the persons listed above. It also follows from the foregoing that the Group does not reimburse political contributions that may be granted on a personal basis by employees, directors or any other person associated with it.

4.5 Relations with associations

The Group believes that participation in trade associations must respond to legitimate corporate needs, aimed at promoting specific initiatives on issues relating to the development of the markets in which it operates. In this sense, participation in the activities of trade associations is considered by the Group to be an extremely relevant activity and of social utility, as it is aimed at providing a contribution to the growth of the labour

market and, as such, to the development of people. For this reason, by basing its conduct on respect for the values set out in this Code and in particular on maintaining a culture of acting in compliance with the rules for the protection of competition, the Group undertakes not to allow its representatives within said associations to contribute or participate in formal or informal meetings with these, whose objective is the commercial behaviour of their members with reference to prices, markets, customers, products, services, commercial strategies and/or investments or which may in any case have as their object subjects and/or decisions which, if agreed to, may be harmful to the principle of competition.

Participation in associations is permitted only in organizations whose objectives and activities comply with the law, moral principles and public order. The Group participates exclusively in organizations recognized by the competent institutions.

4.6 Relations with Third Parties

The Group establishes relations with third parties based on the criteria of professionalism, fairness, respect for the rules of impartiality and fair competition. It only maintains relationships with third parties who have a consolidated reputation for honesty and fairness in carrying out their activities.



Marco Vittorelli, Openjobmetis President

ETHICAL PRINCIPLES IN EXTERNAL RELATIONS

The Group promotes the strengthening of a “respect culture” based on integrity and the promotion of transparent practices in relations with Third parties.

It prohibits, and does not tolerate, the adoption of unlawful conduct, such as the offer or receipt of money or other benefits to/from third parties aimed at obtaining/maintaining business or ensuring an unlawful advantage to the Group.

Recipients and Third Parties behave in compliance with the principles contained in this Code of Ethics (of which they must be brought to due knowledge) and avoid personal involvement and/or avoid involving the Company in any type of corruptive or anti-competitive behaviour (transactions, activities and relationships with third parties that may lead to criminal charges and corporate liability).

The Group informs Recipients and Third Parties of its policies.

It ensures that the purchases of goods and services take place exclusively based on objective criteria of quality, convenience, price, capacity, efficiency, avoiding agreements with unreliable contractual counterparts (with special regard to subjects such as respect for the environment, working conditions and/or human rights).

The Group deems it essential that suppliers and collaborators adopt legal, ethical behaviour that respects internationally recognized standards and principles on the treatment of workers, regarding the protection of fundamental

human rights, the prohibition of discrimination, the protection of children, prohibition of forced labour, the protection of trade union rights, the protection of health and safety in the workplace, respect for working hours and the principle of fair pay and respect for the environment.

Behaviours other than those described constitute a serious breach of the duties of correctness and good faith in the execution of the contract, jeopardize a trusting relationship and constitute a just cause for termination of a contractual relationship.

Finally, with reference to customer relations, the Group guarantees adequate quality standards for the services offered in compliance with legislation and set up to protect competition and the market. Furthermore, it undertakes to examine - and maybe promptly accept - the suggestions and complaints formulated by customers and associations set up to protect their interests.

4.7 Donations, sponsorships and gifts

Without prejudice to the provisions of paragraph 3.6 above, any form of gift for the benefit of third parties which may be interpreted as exceeding normal commercial or courtesy practices, or which may appear to be aimed at acquiring favourable treatment, is prohibited in conducting activities connected to the Group.

There must be a direct and easily identifiable connection between the gifts and hospitality received from third parties - or offered to third parties - and the activity or (legitimate) business of the Group companies.

All gifts and hospitality offered, provided or received must be adequately documented to allow for appropriate checks and must be duly authorized.

Gifts and hospitality are always prohibited if they consist of:

- cash or cash equivalents (cheques, loans, shares);
- gifts and hospitality that violate any applicable law or regulation.

4.8 Fair competition

In carrying out its activities, the Group is inspired by the principles of fairness, fair competition and transparency towards operators on the market.

Recipients undertake not to unjustly damage the image of competitors and their services.



4.9 Rules of conduct or the sponsoring of sport events

The Group works to spread the culture of the fight against match-fixing practices, in harmony with inter-national and national sports bodies.

Without prejudice to the principles of behaviour indicated in the previous paragraph 4.8, each of the Recipients must behave according to the principles of loyalty, fairness and probity, typical of the sporting system in any relationship.

All Recipients must refrain from carrying out, by any means, acts aimed at altering the conduct or the result of the competitions. Any offer of money or other benefits or advantages (whether direct or indirect) to directors, executives or members of sports clubs, aimed at altering the result of sports competitions or aimed at favouring or influencing the conclusion of athlete transfer agreements, is prohibited.

More precisely, Recipients must refrain from making, accepting or facilitating bets, directly or through intermediaries, both with persons authorized to receive them, and not, whose objective is the results of sports matches and/or competitions in which the Group is involved (e.g., as a sponsor).



5 IMPLEMENTING PROVISIONS

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To ensure compliance with the principles set out in this Code, the Group promotes:

- complete dissemination and awareness of this code;
- interpretation, where necessary, of the provisions contained in the Code of Ethics;
- uniform interpretation and implementation of this Code;
- carrying out careful checks in the event that violations of this Code are reported or detected;
- application of adequate sanctions in the event of ascertainment of the aforementioned violation;
- prevention and repression of any form of retaliation against those who contribute to the implementation of this Code;
- periodic updating of this Code, based on the needs that arise from time to time also because of the activities indicated above.

To ensure the widest dissemination and understanding of this code, when

establishing employment relationships, the individual companies of the group will provide suitable information regarding their adoption of the Code of Ethics and its availability in electronic format on the intranet of the parent company Openjobmetis S.p.A. The Code is posted on the company notice boards, available in the offices and branches of the Group companies, is published on the website and its adoption is communicated to the public using the most suitable tools for this purpose.

Any modification or revision of the code is brought to the attention of the Recipients and Third Parties in the same manner.

Without prejudice to the attributions of the corporate bodies pursuant to the law and the Articles of Association in force, as well as those of the Supervisory Body pursuant to Legislative Decree 231/2001, all Recipients are required to collaborate in the implementation of the Code of Ethics, within the limits of their competencies and function.



IMPLEMENTING PROVISIONS

5.1 Reporting and supervisory activities

The pursuit of the objectives of this code also translates into:

- the recognition of an adequate space for reporting – made in good faith and disinterestedly.
- guaranteeing that these reports are treated in a serious and appropriate manner, ensuring, in the activities of management of these, the confidentiality of the reporter's personal data.

The adoption of a specific Whistleblowing Policy (published on the company websites) fits into this perspective, with which the Group intends to recognize and offer the possibility to employees, collaborators, directors, suppliers/partners and to stakeholders in general, to present reports on facts or documents relating to relevant illicit conduct which may also constitute a threat for the Company itself, ensuring, at the same time, that each subject - who presents his reports in good faith - is protected against retaliatory or discriminatory or unfair acts, directly or indirectly linked to the report presented.

Also for reports relating to unlawful conduct relevant pursuant to Legislative Decree 231/01 and violations of the rules and principles contained in the Organisation, Management and Control Model adopted - the communication

channel with the Supervisory Body is indicated in the Whistleblowing Policy.

5.2 Guarantor of the code of ethics

The Group has decided to establish the figure of Guarantor of the code of ethics. The Group assigns the functions of the Guarantor to the Internal Audit function, attributing specific responsibilities as highlighted below.

They are assigned the tasks of:

- promoting the implementation of the code and the issue of reference regulatory documents;
- reporting and proposing to the Chief Executive Officers of the Group companies any useful initiatives for wider dissemination and knowledge of the Code, also in order to avoid the repetition of ascertained violations;
- promoting specific communication and training programs for management and employees of all Group companies;
- examining reports of possible violations of the code, promoting the most appropriate checks; intervening, even in the case of reports from employees, in the event of possible violations of the code of ethics deemed not duly addressed or retaliation suffered by the person following reporting of news;
- communicating to the competent bodies the results of the relevant checks for the adoption of any sanctioning measure.

5.3 Code Promotion Team

To promote awareness and facilitate the implementation of the Code, the Code Promotion Team has been set up in the Internal Audit function, reporting to the Parent Company. The Team promotes the availability of all potential knowledge and tools for the clarification, interpretation and implementation of the Code.

This Code of Ethics was approved by the Board of Directors of Openjobmetis S.p.A. on 14 December 2022 and updated on 13 March 2024 following the favorable opinion of the Control, Risk and Sustainability Committee of Openjobmetis S.p.A. and on the same date adopted by the individual companies controlled by the same by deed of their respective legal representatives.

5.4 Revision of the Code

The revision of the Code is approved by the Board of Directors of the Parent Company and by the Managing Directors of the subsidiaries. The proposal is formulated based on the Stakeholders' assessment, with reference to the principles and contents of the Code, also promoting their active contribution and reporting any deficiencies.



Rosario Rasizza, AD Openjobmetis





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