



Policy for managing dialogue with shareholders

(Approved by the Board of Directors of 04 February 2021)

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Introduction.

Pursuant to Principle IV and Recommendation 3 of article 1 of the Corporate Governance Code – approved by the Italian Corporate Governance Committee in January 2020 – the Board of Directors of Openjobmetis S.p.A. (the “Company”), upon proposal by the Chairman in agreement with the chief executive officer, adopts this Policy for managing dialogue with shareholders (the “Policy”), in order to promote the dialogue with shareholders.

The Policy defines the principles ruling the bidirectional interaction between the Company and its shareholders and complies with the provisions of the law relating to companies listed on regulated markets and the principles contained in the Corporate Governance Code.

This Policy for managing dialogue with shareholders is described in the Report on Corporate Governance and Ownership Structures pursuant to article 123-*bis* of Legislative Decree No 58/1998.

1. Principles.

The Policy is based on the following principles:

- a) encouraging **interaction** between the Company and its shareholders – including through innovative technologies – to encourage them to turn their attention to company life and to induce and nurture a sense of belonging to it, maintaining a constructive, continuous and effective dialogue with them aimed at aligning their objectives and interests with those of the Company;
- b) establishing new and innovative channels of **dialogue** and active participation that allow the shareholders to interact effectively with the Company, without prejudice to the powers that can be exercised at the Shareholders' Meeting;
- c) allowing the Board of Directors to determine management guidelines, having **knowledge** of the opinions, expectations and sensitivities of shareholders on matters pertaining to company life;
- d) respect the **equal treatment** of all shareholders by establishing adequate measures to ensure that disclosures – as well as protecting the corporate interest – do not give some shareholders privileges or advantages over others.

The Company's Board of Directors plays a central role in the interactive relationship with shareholders and, to this end, has recourse to the Chairman of the Board of Directors and/or the Managing Director, who may delegate the exercise of this function to the CFO and/or the Investor Relations Officer and may also make use of the support of external professionals (e.g. financial brokers), where this is appropriate, in order to manage and promote the effective functioning of the shareholder participation channels.

The parties to whom this function is delegated periodically report to the Chairman and the Managing Director on the communications with the shareholders, as well as any other significant aspect that emerges during this information exchange. The Chairman and the Managing Director inform the Board of Directors on the implementation of the Policy in order to integrate the related information into the Corporate Governance Report.

2. Engagement matters.

Except as provided by law and by the Corporate Governance System, the Company informs shareholders in accordance with this Policy solely in regard to matters pertaining to corporate governance and the Company's sustainable development strategy.

3. Engagement channels.

The Company encourages the involvement of shareholders in the Company's life through the following engagement channels.

3.1 Shareholders' Meeting.

The Shareholders' Meeting is the main opportunity for interaction between the Company's Management and its Shareholders. The right to attend the Shareholders' Meeting is governed by the law, the Articles of Association, the Shareholders' Meeting regulations and the provisions contained in the notice of call. Shareholders may ask questions on the agenda even before the Shareholders' Meeting; the questions received will be answered at the latest at the Shareholders' Meeting.

The Company facilitates access to the documents relating to the Shareholders' Meeting and the understanding of the information relating to the matters to be discussed, through the "Corporate Governance" section of its website (www.openjobmetis.it). The Company may also carry out other proactive actions aimed at encouraging the maximum participation of shareholders, such as ad hoc information campaigns.

3.2 Website and dedicated interactive area.

The Company uses the company website to make available to shareholders, Institutional Investors and the market in general the information that may be of interest to them, thus allowing the timely disclosure and subsequent storage of the same.

The Company has a dedicated area of the company website where shareholders can register in order to receive content, such as the financial statements published on the site from time to time, both in Italian and English, in addition to a periodic newsletter that discusses various issues concerning corporate life.

4. Dialogue with analysts and institutional investors.

The Investor Relations (IR) Office is the main point of contact between the national and international financial community and the Company. The IR coordinates and manages, with a view to transparency, continuity and proactivity, the Company's economic and financial and non-financial disclosures, favouring both stable and effective relations with shareholders, but also with analysts and other stakeholders; the IR is responsible for providing investors with information that helps them to be informed and make informed purchase and sale decisions.

During the meetings of the Board of Directors called for the approval of the Annual Financial Report,

the Half-Year Financial Report and the Additional Periodic Financial Information, the Company forwards so-called “save the date” notices to analysts and institutional investors containing the information necessary to be able to connect to Conference Calls organised for an in-depth analysis of the data published. At the end of these Conference Calls, there is an opportunity for interested parties to ask questions to the Company's Top Management.

In addition, the Company participates in meeting days with investors and analysts on various topics including, for example, the economic and financial performance of the Group, regulatory changes that impact the reference market, any focus on projects and initiatives in progress or planned and other matters relevant to the life of the company. These days are organised by Borsa Italiana (e.g. STAR Conference) or by other third parties, such as financial brokers or other parties that operate supported by them.

Interested parties can also send to the IR – using the email investor.relator@openjob.it – questions, requests for meetings or conference calls and ad hoc insights.

5. Relations with shareholder associations and institutional investors.

The Company recognises the importance of shareholder associations as a suitable vehicle for the representation of retail shareholders and for the relaying of their positions regarding the areas of involvement of this Policy. To this end, the Company may participate, through its representatives designated for this purpose, in special meetings with the representatives of the shareholders' associations.