

**OPENJOBMETIS S.P.A. AGENZIA PER IL LAVORO**

**REGULATION APPLICABLE TO THE LIST OF PERSONS WITH ACCESS TO  
INSIDE INFORMATION**

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## Article I SCOPE

1.1 Article 18 of Regulation (EU) no. 596/2014 issued by the European Parliament and of the Council of 16 April 2014 on market abuse (“**MAR**”) requires that the listed issuers prepare and regularly keep up to date a list of all those who have access to inside information under Article 7 of MAR (“**Inside Information**”) and with whom a professional relationship has been established, whether through employment or others types of relationships, and with those who, in performing certain activities, have access to inside information, i.e. consultants, accountants or credit rating agencies.

1.2 In accordance with Article 7, first paragraph, of MAR, the term Inside Information means information of a specific nature, that has not been made public, concerning, directly or indirectly, one or more issuers or one or more financial instruments, and which, if made public, could materially affect the prices of such financial instruments or the prices of derivative financial instruments linked to shares (hereafter, “**Inside Information**”).

1.3 Pursuant to Article 7, second and third paragraphs, of MAR, a piece of information is of a specific nature if it refers to a series of existing circumstances or if it is reasonable to believe that such circumstances will occur, or to an event that has already occurred or that it is reasonable to believe that it will occur, and if this information is sufficiently specific to allow one to draw conclusions about the possible effect of said circumstances or said event on the prices of the financial instruments or related derivative financial instrument. To this regard, in the case of a lengthy process that intends to materialise or determine a particular circumstance or event, such a future circumstance or event, as well as all the intermediate steps of this process that are connected to materialising or determining said future circumstance or event, may be considered information of a specific nature. An intermediate step of a lengthy process is considered inside information if it meets the criteria set forth in this article concerning inside information.

1.4 Pursuant to article 18 of MAR, a List of the persons with access to the Inside Information (the “**List**”) of Openjobmetis S.p.A. has been compiled.

## Article 2 LIST

2.1 The List is divided into the following sections:

- a) a section (the “**Permanent Section**”) that includes permanently the data of persons who always have access to Inside Information (the “**Permanent Insiders**”);
- b) a separate section for each Inside Information (the “**Separate Section**” and collectively the “**Separate Sections**”). Each time a new Inside Information is identified, a new and specific Separate Section is added to the List. Each Separate Section includes only the data of the people with access to the Inside Information included in that particular section. The data concerning the Permanent Insiders recorded in the Permanent Section are not included in the Separate Sections of the List.

2.2 The List is set up in an electronic form such as to guarantee at any time the confidentiality of the information contained therein, its accuracy as well as its access and retrieval of previous versions of the List. This electronic format is compliant with Models 1 (for the Separate Sections) and 2 (for the Permanent Section) of the Implementing Regulation (EU) 2016/347 issued by the Commission on 10 March 2016.

2.3 Each Separate Section of the List contains:

- a) date and time of the creation of the section, i.e. the date and time when the Inside Information was identified;
- b) for each person recorded in the Separate Section (the “**Recorded Person**”):
  - b.1) the date and time when the subject has had access to the Inside Information;
  - b.2) identity of the person who has access to the Inside Information by specifying:
    - (i) in the case of a physical person: name, surname, work and personal telephone number (home and personal cell phone), date of birth, Tax ID Code, private address (street, number, town, postal code, country), email address for communications related to this Regulation;
    - (ii) in the case of a legal person, entity or association of professionals: company's name, legal form, registered office, VAT number, as well as the data under the previous

paragraph (i) related to a reference subject who is capable of identifying the persons (belonging to the legal person, entity or professional association or in any way connected with the same entity) who have had access to inside information;

- b.3) parent company and type of the relationship therewith;
- b.4) reason why the person is recorded in the List;
- b.5) update and reason for the update of the information contained in the List;
- b.6) date and time of each update of the information already recorded in the List;
- b.7) cancellation and reason for the cancellation from the List;
- b.8) date and time of cancellation of the person from the List, i.e. date and time when the recorded subject has ceased to have access, on a regular basis, to the Inside Information.

### **Article 3 IDENTIFICATION OF THE PERSONS TO BE RECORDED IN THE LIST**

3.1 The Permanent Insiders who, as such, must be recorded in the Permanent Section of the List, shall be identified by the Board of Directors, and, in the case of an emergency, by the Chairman of the Board of Directors or by the Managing Director who reports to the Board, at the next meeting.

3.2 The persons who, because of the functions performed, have access to Inside Information and who, therefore, must be recorded in a Separate Section of the List, shall be identified by the Chairman of the Board of Directors, the Managing Director or Key management personnel, on a case by case basis.

3.3 Those responsible for identifying the persons to be recorded in the List pursuant to Article 3.1 and 3.2 shall communicate to the Corporate Function tasked with keeping the List the names of the persons to be recorded and the reasons for being recorded, in accordance with the provisions of this Regulation.

### **Article 4 UPDATING THE LIST**

4.1 The updating of the List shall be promptly requested by the subjects under Article 3.1 and

3.2 above, in the following cases:

- change in the reason why a person is recorded;
- change in the information about the recorded person;
- recording of a new person in the Permanent Section or in a Separate Section of the List;
- termination of access to the Inside Information by the subjects recorded in a Separate Section.

4.2 Each update must include the date and time when a change took place and made the update necessary.

4.3 The update shall also be entered, for each recorded person, in relation to his/her access to the various subsequent stages of the progress of the set of circumstances or of the material event that gives rise to the Inside Information.

## **Article 5 DELETION**

5.1 The deletion of the persons recorded in a Separate Section of the List must be requested, by the subjects under previous Article 3.1, in the case when the information to which said Separate Section refers ceases to be Inside Information because it has become part of the public domain or for another reason (for instance when it ceases to have a specific nature since it is no longer reasonable to believe that certain circumstances will be produced or that an event will occur).

## **Article 6 CORPORATE FUNCTION TASKED WITH KEEPING THE LIST**

6.1 The Corporate Function tasked with keeping the List is the Corporate Affairs Department, in person of his Responsible or his substitute in the case of absence or impediment.

6.2 The Corporate Function tasked with keeping the List shall perform the following duties:

- a) ensure compliance with current regulatory provisions and with this Regulation;

- b) promptly complete the assigned tasks (recordings, updates or cancellations) in the List on the basis of the requests received or of the press releases issued by the Company;
- c) establish and maintain the archive of paper documents connected with the keeping of the List;
- d) proceed with all communications with respect to the persons included in the List;
- e) collaborate with the Supervisory Authorities in the case of data requests or inspections.

6.3 All communications to the Corporate Function tasked with keeping the List prescribed herein shall take place in the following ways:

- a) by sending an e-mail to the following address:
  - (i) [segreteria@societaria@openjob.it](mailto:segreteria@societaria@openjob.it);
- b) by hand – with proof of delivery – to the Responsible of the Corporate Function tasked with keeping the List or his substitute in the case of absence or
- c) by fax to the number +39 0331-211.582

6.4 The Corporate Function tasked with keeping the list shall take steps, also through third parties, to timely inform the involved subjects:

- a) of their inclusion in the List;
- b) of the updates pertaining to them;
- c) of the obligations that derive from having access to inside information;
- d) of the penalties set forth in Legislative Decree 58/1998, as amended, in case of unauthorised disclosure of inside information.

6.5 The information under the previous paragraph is normally provided with communication through email, although certified email or registered mail delivered by hand or sent with return receipt, is allowed. In the event of a recording, the communication containing said information must also include a specific reference to this Regulation as it is made available, also for consultation, on the website of the Company. The person tasked with keeping the List (or by his/her substitute) will verify that the information is received in accordance with the prerogatives

stated in previous paragraph 6.2. – also in compliance with the agreements undertaken with any designated third parties.

6.6 Access to the List shall be allowed solely through specific technical procedures that assure the confidentiality and security of the data it contains.

## **Article 7 KEEPING THE LIST**

7.1 The data concerning the persons recorded in the List and all the support documentation (letters requesting the recording, communication to the recorded persons, etc.) are retained for at least five years after the circumstances that have determined the recording or the updating, have ceased to exist.

## **Article 8 CHANGES AND UPDATE OF THE REGULATION**

8.1 If it is necessary to revise the provisions of this Regulation following amendments made to applicable laws or regulations or if required by the supervisory authorities, this Regulation shall be amended by the Chairman of the Board of Directors or by the Managing Director, with subsequent ratification of the amendments by the Board of Directors in the course of its next meeting.