

OPENJOBMETIS S.P.A. AGENZIA PER IL LAVORO

INTERNAL DEALING PROCEDURE

(Edition February 2021)

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FOREWORD

In compliance with the provisions of Article 19 of Regulation (EU) no. 596/2014 of the European Parliament and of the Council of 16 April 2014, and subsequent amendments, on market abuse (“**MAR**”) as well as with the implementation provisions set forth in Articles 7, 8, 9 and 10 of the Delegated Regulation (EU) 2016/522 and Articles 1, 2 and 3 of the Implementing Regulation (EU) 2016/523, this procedure (“**Procedure**”) aims at effectively governing, based on the ordinary shares of Openjobmetis S.p.A. Agenzia per il Lavoro (the “**Company**”) listed on the screen-based stock exchange (MTA) organised and managed by Borsa Italiana S.p.A., the reporting and conduct obligations concerning the transactions carried out by relevant persons, as defined in Article 1.1 of the Procedure, and by individuals closely associated with them, as defined in Article 1.2 of the Procedure, about the Company's shares or other financial instruments associated thereto, as well as the disclosure obligations pertaining to the transactions carried out by the significant shareholders, as defined in Article 1.7 of the Procedure and by the individuals closely associated with them, as defined in Article 1.8 of the Procedure.

Article I DEFINITIONS

For the purposes of the application of the present Procedure, the following definitions are provided:

I.1. “**Relevant Persons**”:

- a) the members of the Board of Directors and of the Board of Statutory Auditors of the Company;
- b) the Chief Financial Officer and the Manager in charge of preparing financial reports, the Personnel Director and the CEO’s Assistant;
- c) if the Company holds an interest in a direct or indirect subsidiary, the carrying amount of which represents more than 50% of the assets of the Company, as recorded in the most recently approved financial statements (“**Significant Subsidiary**”), the members of the administration and control bodies of said Significant Subsidiary, as well as the persons who perform management functions and the managers of the Significant Subsidiary who have regular access to inside information and have the power to adopt management decisions which may affect the evolution and the future outlook of the Significant Subsidiary.

The Managing Director may identify with a specific document, which shall be added to this Procedure, other persons within the Company or Significant Subsidiaries, following structural and/or organisational changes that qualify them as “**Relevant Persons**” in accordance with Article 19 of MAR.

I.2. “**Closely Associated Individuals**”:

- a) the spouse, or partner legally equal to the spouse, pursuant to the Italian law;
- b) dependent children pursuant to the Italian law;
- c) a relative who has been sharing the same home for at least one year as at the date of the transaction in question;
- d) legal persons, partnerships and trusts in which a Relevant Person or one of the persons referred to in

previous letters a), b) or c) performs management duties;

- e) legal persons and subsidiaries, directly or indirectly controlled by a Relevant Person or one of the persons referred to in previous letters a), b) or c);
- f) partnerships with economic interests are substantially equivalent to those of a Relevant Person or one of the persons referred to in previous letters a), b) and c);
- g) trusts set up in favour of a Relevant Person or one of the persons referred to in previous Letters a), b) or c).

1.3. **“Shares”**: The ordinary shares issued by the Company.

1.4. **“Financial Instruments Linked to Shares”**: Financial instruments, as specified below, including the financial instruments not admitted to trade or traded on a trade venue, or for which admission to trade on a trade venue has not been requested:

- a) agreements or shares subscription, acquisition or transfer;
- b) instruments issued or guaranteed by the Company and the market price of which may significantly affect the price of shares or vice versa;
- c) debt financial instruments convertible into shares or exchangeable for shares;
- d) derivative financial instruments based on shares referred to in Article 1, paragraph 2-ter, of the Consolidated Law on Finance (TUF);
- e) other financial instruments, equivalent to Shares, representing such Shares.

1.5. **“Significant Transactions”**: Transactions carried out by Relevant Persons and Closely Associated Individuals, on their own account, concerning the Shares or Financial Instruments Linked to Shares, including:

- a) the acquisition, transfer, short sale, subscription or exchange;
- b) the acceptance or exercise of an option right, including an option right granted to persons who perform administrative, control or management functions or to employees as part of the remuneration due to them, as well as the transfer of shares deriving from exercising a right of option;
- c) execution of exchange agreements related to share indexes or performance of these agreements;
- d) transactions in derivative instruments or in instruments linked thereto, including transactions with cash settlements;
- e) execution of a contract for difference, concerning a financial instrument from the involved issuer, emission allowances or auctioned products based on such allowances;
- f) acquisition, transfer or exercise of rights, including put, call and warrant options;
- g) subscription of a share capital increase or issuance of credit instruments;
- h) transactions in derivative instruments and financial instruments linked to a credit instrument issued by the involved issuer, including credit default swaps;
- i) conditional operations subject the occurring of conditions and to the actual execution of transactions;

- j) automatic or non-automatic conversion of a financial instrument into another financial instrument, including the exchange of bonds convertible into shares;
- k) gifts and donations made or received, and received inheritances;
- l) transactions carried out with products, baskets and index-based financial derivative instruments, as set forth in Article 19 of MAR;
- m) transactions carried out with shares and mutual fund units, including alternative mutual funds under Article 1 of the Directive 2011/61/EU issued by the European Parliament and Council, as set forth in Article 19 of MAR;
- n) transactions carried out by the manager of an alternative mutual fund in which the person who exercises administrative, control or management functions strictly associated with said person, has made an investment, as set forth in Article 19 of MAR;
- o) transactions carried out by third parties, under an asset management agreement or an individual-based portfolio on the behalf or in favour of a person who carries out administrative, control or management functions or a person closely associated therewith;
- p) acquisition or issuance of a loan, in tranches, or credit instruments from the issuers, or derivative instruments or other financial instruments linked thereto;
- q) the transfer, as a guarantee or loan, of financial instruments by or on behalf of a Relevant Person or an individual closely associated with said Relevant Person;
- r) transactions carried out by those who prepare or carry out transactions at a professional level or those who, on behalf of a Relevant Person or an Individual Closely Related to said Relevant Persons, even when discretion is involved;
- s) transactions carried out within the scope of a life insurance, defined pursuant to Directive 2009/138/EC issued by the European Parliament and the Council, where: i) the insurance purchaser is a Relevant Person or an Individual Closely Associated with said Relevant Person; ii) the risk for the investment is held by the contracting party; and iii) the contracting party has the power or the discretion to make investment decisions as regards specific instruments contemplated in the life insurance in question, or to carry out transactions concerning the instruments specific to this life insurance.

1.6. **“Responsible Person”**: The person in charge of the Investor Relator Function. Notices can be delivered to the Responsible Person in one of the following ways:

- fax to the number: +39 0331-211.590
- e-mail to: investor.relator@openjob.it

1.7. **“Significant Shareholder”**: any other person holding an equity investment, calculated in accordance with Article 118 of the Issuer Regulation, equal to at least 10% of the share capital of the Company, represented by shares with voting rights, as well as any other person who controls the Company.

1.8. **“Individuals Closely Associated with the Significant Shareholders”**: the individuals who have one of the following relationships with a Significant Shareholder:

- a) spouse, unless legally separated, dependent children, including those of the spouse, and, if cohabiting for at least one year, parents, relatives and in-laws;
- b) legal persons, partnerships and trusts in which a Significant Shareholder or one of the persons indicated in letter a) holds the management function, jointly or severally;
- c) legal persons, directly or indirectly controlled by a Significant Shareholder or by one of the persons indicated in letter a);
- d) partnerships whose economic interests are substantially equivalent to those of a Significant Shareholder or one of the persons indicated in letter a);
- e) trusts set up for the benefit of a Significant Shareholder or one of the persons indicated in letter a).

1.9. **“Issuer Regulation”**: The CONSOB Regulation approved with resolution no. 11971 of 14 May 1999, as amended.

Article 2 DISCLOSURE OBLIGATIONS OF RELEVANT PERSONS

2.1. The Relevant Persons and the Closely Associated Individuals must inform CONSOB and the Company about any Significant Transaction carried out, within three working days from the day of their performance, according to the methods set out in the Implementing Regulation (EU) 2016/523. For the above purposes: (i) “working days” are all days other than holidays, Sundays and Saturdays; (ii) “date on which the Transaction was performed” means, for Stock Market or similar transactions, the date of execution of the contract and not the subsequent date of liquidation of the transaction. The day of execution of the Significant Transaction shall be excluded for the purposes of calculating the aforesaid time limit.

2.2. The disclosure obligation set forth in the previous paragraph does not apply to transactions, the total amount of which, obtained by adding the value of all transactions without offsetting the transactions of opposite sign, does not reach the threshold of EUR 20,000 (twenty thousand) within the end of each calendar year; when this threshold is exceeded, all transactions, even those in an amount below EUR 20,000 (twenty thousand), must be reported. The amount of EUR 20,000 (twenty thousand) shall be calculated adding the transactions involving Shares and Financial Instruments Linked to Shares, carried out by each Relevant Person or by each of the Closely Associated Individuals, without adding the transactions carried out by each Relevant Subject and those carried out by the related Closely Associated Individuals.

2.3. It is not necessary to disclose a transfer under guarantee of financial instruments or other similar guarantees, in connection with the custody of financial instruments held in a custody account, unless and as long as this transfer under guarantee or other similar guarantees aims at obtaining a specific monetary financing.

2.4. The Company shall publish, in the ways indicated in the applicable regulations, the information received in accordance with previous paragraph 2.1 within two working days of receipt and shall transmit it concurrently with the authorised storage mechanism.

2.5. To fulfil the disclosure obligations of the Significant Transactions carried out, the Relevant Persons and the Closely Associated Individuals shall use **Form A**, attached to this procedure, complete with all information specified therein.

Article 3 DISCLOSURE OBLIGATIONS OF THE SIGNIFICANT SHAREHOLDERS

3.1. Significant Shareholders report to CONSOB and publish, according to the methods set forth in Article 152-octies of the Issuer Regulation and in Annex 6 to the Issuer Regulation, all information regarding purchase, sale, subscription or exchange transactions of Shares or Linked Financial Instruments carried out by them and by Individuals Closely Associated with them, by the end of the fifteenth day of the month subsequent to the one when a given transaction was carried out. To fulfil the disclosure and publishing obligations concerning all transactions carried out, the Significant Shareholders shall use the here attached **Form B**, complete with all information specified therein.

3.2. Pursuant to previous Article 3.1, the following is not subject to disclosure obligation:

- a) transactions whose total amount does not reach Euro 20,000 (twenty thousand) on or before the end of the year; subsequently, at each disclosure, the transaction whose total amount does not reach an additional Euro 20,000 (twenty thousand) on or before the end of the year are not disclosed; for linked derivative financial instruments the amount is calculated with reference to the underlying shares;
- b) transactions carried out between the Significant Shareholder and the Individuals Closely Associated with him/her;
- c) transactions carried out by the Company and by companies under its control;
- d) transactions indicated in Article 152-septies, paragraph 3, letter d), of the Issuer Regulation;
- e) transactions which the Relevant Persons or the Individuals Closely Associated with the Relevant Persons are obligated to disclose in accordance with Article 19 of Regulation (EU) No. 596/2014 and with Article 2 of the present Procedure.

Article 4 MANDATE GRANTED TO THE COMPANY

4.1. The Relevant Persons, the Closely Associated Individuals as well as, within the limits set forth in Article 3 of this Procedure, the Significant Shareholders can grant a mandate to the Company so as to fulfil the respective disclosure obligations toward CONSOB, under articles 2.1 and 3.1 of this Procedure (the “**Mandate**”).

4.2. The Mandate shall be granted to the Company by signing one of the Forms attached herewith and delivering it to the Company. In particular, the Relevant Persons shall sign **Form D**, whereas Significant Shareholders shall sign **Form E**.

4.3. The Relevant Persons, the Closely Associated Individuals and the Significant Shareholders who have granted the Mandate to the Company, must provide the Responsible Person with the information concerning any transaction carried out by them within the following terms:

- a) the Relevant Persons, within three working days from the date of the execution of the transaction;
- b) the Significant Shareholders, no later than the end of the twelfth day of the month following the month of execution of the transaction.

4.4. All communications to CONSOB, Borsa Italiana S.p.A. and the public shall be carried out by the Responsible Person using **Form A** or, in the case set forth in Article 3 of this Procedure, **Form B**.

4.5. The company posts, on its Intranet site, all published communications.

4.6. The Company is not liable for any breach and/or late fulfilment of reporting obligations to the Company and/or to CONSOB imposed on the Relevant Persons, of the Individuals Closely Associated to the Significant Shareholders or of any reporting obligations toward the market imposed on the Company, if these breaches or late fulfilments arise from an omitted, incomplete, inaccurate or late information provided by the Relevant Person or the Individual Closely Associated to said Relevant Person or the Significant Shareholder, in violation of the provisions imposed on them by this Procedure and/or applicable laws.

Article 5 PROHIBITIONS OF AND RESTRICTIONS TO THE EXECUTION OF SIGNIFICANT TRANSACTIONS

5.1. The Relevant Persons are required not to perform, on their own or other parties' behalf, directly or indirectly, during the 30 days of the calendar year prior to the date set forth for the publication, by the Company, also through a press release, of the data contained in the annual and half-year financial reports, as well as in other periodical financial reports, the publication of which is mandatory (the “**Black Out Periods**”).

5.2. The Board of Directors of the Company, if deemed appropriate, may set forth further prohibitions or limitations for the Relevant Persons, to perform Significant Transactions in certain periods of the year or in proximity of certain transactions carried out by the Company or by the companies of the Group.

5.3. The Company may allow a Relevant Person to carry out Significant Transactions during a *Black Out Period*:

- (i) based on an assessment case by case, in the presence of exceptional conditions, such as serious financial difficulties which requires the immediate sale of Shares; or
- (ii) based on the trading characteristics in the case of transactions carried out simultaneously with or in relation to employees' equity investments or a savings programme, a guarantee of or rights to shares, or also transactions in which the beneficial interest of the security in question is not subject to changes.

5.4. The Relevant Person must provide the Managing Director of the Company or, if the latter is the Relevant Person, the Chairman of the Board of Directors, with a reasoned written request at least 15 days before the date set out for the execution of the transaction. This written request must contain:

- a) in sub-hypothesis (i) under previous paragraph, a description of the transaction and a reasonably detailed explanation, of the exceptional circumstances that make the immediate sale of the Shares necessary and the reasons why the sale of the Shares is the only reasonable way to obtain the needed funds; and
- b) in sub-hypothesis (ii) under previous paragraph, an indication of the number and type of the involved financial instruments, as well as the reasons that make the execution of a transaction necessary or appropriate during a Black Out Period.

5.5. The Managing Director or, if necessary, the Chairman of the Board of Directors (or the Board of Directors if it must be the one to deliver the decision), decides whether to allow the Transaction during a Black Out Period in compliance with the criteria and the provisions under Articles 8 and 9 of the Delegated Regulation (EU) no. 522/2016 of 17 December 2015.

Article 6 RESPONSIBLE PERSON

6.1. The Responsible Person shall:

- a) inform, in writing, the Relevant Persons about the obligations arising from applicable laws and from this Procedure, to which they are subject;
- b) deliver a copy of the procedure to each Relevant Person in order for him/her: (i) sign the declaration contained in Form C attached to the Procedure, attesting his/her knowledge and full acceptance of the Procedure; (ii) to formalise the Mandate, if given, by signing Form D; (iii) to notify Individuals Closely Associated with him/her of the existence of the conditions whereby said individuals are subject to the obligations to disclose Significant Transactions; and (iv) to ensure that – also in accordance with Article 1381 of the Italian Civil Code – the Individuals Closely Associated with him/her punctually fulfil the obligations to disclose Significant Transactions prescribed by this Procedure;
- c) draft and update the list of names of the Relevant Persons and of the Individuals Closely Associated with each of them; and
- d) retain all communications received and sent to CONSOB and to the market.

Article 7 FAILURE TO COMPLY WITH THE PROCEDURE

7.1. This Procedure has mandatory effectiveness. Failure to comply with the obligations and prohibitions prescribed herein shall entail the liability prescribed in current laws and regulations.

7.2. Failure to comply with the obligations prescribed herein by the Relevant Persons serving in the office of Director or Statutory Auditor or who perform management duties in the Company or in a Significant Subsidiary may be assessed by the competent bodies as a possible breach of fiduciary duty. The competent bodies may adopt measures taking into account the specific circumstances. If the Directors or executives are concurrently employees of the Company or of other subsidiaries, the provisions of Article 7.3 below shall also apply.

7.3. Failure to comply with the obligations prescribed herein by Relevant Persons who are employees of the Company or of a subsidiary may be assessed by the competent bodies as a possible disciplinary offence. Disciplinary measures shall be applied according to the proportionality criterion, on the basis of the severity and intentionality of the offence committed, and taking into account any reiteration of the breaches and/or violations provided herein.

7.4. The Company reserves in any case the right to seek redress for all damages and/or liability it may incur as a result of behaviours on the part of Relevant Persons and of the Closely Associated Individuals, in violation of the present Procedure.

Article 8 AMENDMENTS AND ADDITIONS

8.1. This Procedure may be amended and/or supplemented by the Board of Directors, as well as by the Chairman of the Board of Directors and/or by the Managing Director as a result of changes to regulations or to the indications of the competent authorities affecting its contents.

8.2. The Responsible Person shall immediately notify the Relevant Persons, in writing, of the amendments and/or additions to the Procedure and obtain their acceptance of the new contents of the Procedure in the ways set out in Article 6 above.

FORM A

ANNEX

Template for notification and public disclosure of transactions by persons discharging managerial responsibilities and persons closely associated with them

1	Details of the person discharging managerial responsibilities/person closely associated	
a)	Name	<i>[For natural persons: the first name and the last name(s).] [For legal persons: full name including legal form as provided for in the register where it is incorporated, if applicable.]</i>
2	Reason for the notification	
a)	Position/status	<i>[For persons discharging managerial responsibilities: the position occupied within the issuer, emission allowances market participant/auction platform/auctioneer/auction monitor should be indicated, e.g. CEO, CFO.] [For persons closely associated, — An indication that the notification concerns a person closely associated with a person discharging managerial responsibilities; — Name and position of the relevant person discharging managerial responsibilities.]</i>
b)	Initial notification/ Amendment	<i>[Indication that this is an initial notification or an amendment to prior notifications. In case of amendment, explain the error that this notification is amending.]</i>
3	Details of the issuer, emission allowance market participant, auction platform, auctioneer or auction monitor	
a)	Name	<i>[Full name of the entity.]</i>
b)	LEI	<i>[Legal Entity Identifier code in accordance with ISO 17442 LEI code.]</i>
4	Details of the transaction(s): section to be repeated for (i) each type of instrument; (ii) each type of transaction; (iii) each date; and (iv) each place where transactions have been conducted	
a)	Description of the financial instrument, type of instrument Identification code	<i>[— Indication as to the nature of the instrument: — a share, a debt instrument, a derivative or a financial instrument linked to a share or a debt instrument; — an emission allowance, an auction product based on an emission allowance or a derivative relating to an emission allowance. — Instrument identification code as defined under Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of transactions to competent authorities adopted under Article 26 of Regulation (EU) No 600/2014.]</i>
b)	Nature of the transaction	<i>[Description of the transaction type using, where applicable, the type of transaction identified in Article 10 of the Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU) No 596/2014 or a specific example set out in Article 19(7) of Regulation (EU) No 596/2014. Pursuant to Article 19(6)(e) of Regulation (EU) No 596/2014, it shall be indicated whether the transaction is linked to the exercise of a share option programme.]</i>

c)	Price(s) and volume(s)	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%; text-align: center;">Price(s)</th> <th style="width: 50%; text-align: center;">Volume(s)</th> </tr> </thead> <tbody> <tr> <td style="height: 20px;"> </td> <td> </td> </tr> </tbody> </table> <p><i>[Where more than one transaction of the same nature (purchases, sales, lendings, borrows, ...) on the same financial instrument or emission allowance are executed on the same day and on the same place of transaction, prices and volumes of these transactions shall be reported in this field, in a two columns form as presented above, inserting as many lines as needed.]</i></p> <p><i>Using the data standards for price and quantity, including where applicable the price currency and the quantity currency, as defined under Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of transactions to competent authorities adopted under Article 26 of Regulation (EU) No 600/2014.]</i></p>	Price(s)	Volume(s)		
Price(s)	Volume(s)					
d)	Aggregated information — Aggregated volume — Price	<p><i>[The volumes of multiple transactions are aggregated when these transactions:</i></p> <ul style="list-style-type: none"> <i>— relate to the same financial instrument or emission allowance;</i> <i>— are of the same nature;</i> <i>— are executed on the same day; and</i> <i>— are executed on the same place of transaction.</i> <p><i>Using the data standard for quantity, including where applicable the quantity currency, as defined under Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of transactions to competent authorities adopted under Article 26 of Regulation (EU) No 600/2014.]</i></p> <p><i>[Price information:</i></p> <ul style="list-style-type: none"> <i>— In case of a single transaction, the price of the single transaction;</i> <i>— In case the volumes of multiple transactions are aggregated: the weighted average price of the aggregated transactions.</i> <p><i>Using the data standard for price, including where applicable the price currency, as defined under Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of transactions to competent authorities adopted under Article 26 of Regulation (EU) No 600/2014.]</i></p>				
e)	Date of the transaction	<p><i>[Date of the particular day of execution of the notified transaction.</i></p> <p><i>Using the ISO 8601 date format: YYYY-MM-DD; UTC time.]</i></p>				
f)	Place of the transaction	<p><i>[Name and code to identify the MiFID trading venue, the systematic internaliser or the organised trading platform outside of the Union where the transaction was executed as defined under Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of transactions to competent authorities adopted under Article 26 of Regulation (EU) No 600/2014, or</i></p> <p><i>if the transaction was not executed on any of the above mentioned venues, please mention 'outside a trading venue'.]</i></p>				
<p>^(*) Commission Delegated Regulation (EU) 2016/522 of 17 December 2015 supplementing Regulation (EU) No 596/2014 of the European Parliament and of the Council as regards an exemption for certain third countries public bodies and central banks, the indicators of market manipulation, the disclosure thresholds, the competent authority for notifications of delays, the permission for trading during closed periods and types of notifiable managers' transactions (see page 1 of this Official Journal).</p>						

FORM B

Model for the notification and disclosure to the public of the transactions carried out by anyone holding shares at least equal to 10 percent of the shareholders' capital as well as any other party controlling the listed issuer

1	Data related to the party holding shares representing at least 10 percent or that controls the listed issuer or the person strictly associated therewith	
a) ¹	Full name	<i>For natural persons:</i> First name(s): Surname: <i>For legal persons:</i> Company name:
2	Reason for the notification	
a)	Reason for the notification	<i>Party holding shares representing at least 10 per cent of the listed issuer:</i> <input type="checkbox"/> <i>Party controlling the listed issuer:</i> <input type="checkbox"/> ----- <i>Person closely associated</i> <input type="checkbox"/> Indicate that the notification concerns a person strictly associated with: <i>For natural persons:</i> First name(s): Surname: <i>For legal persons:</i> Company name :
b) ²	Initial notification /amendment	Initial notification <input type="checkbox"/> Amendment to the previous notification Reason for the notification:

Data related to the party carrying out the transaction

[For natural persons: first name(s) and surname.]

[For legal persons: full name of the company, including the legal form as required in the registry where it is entered, if relevant.]

[Show whether it is an initial notification or an amendment to a previous notification. If it is an amendment, explain the error that is corrected with this notification.]

3	Issuer's data					
a) ³	Name					
b) ⁴	LEI					
4	Transaction data: section to repeat for i) each type of instrument; ii) each type of transaction; iii) each date; and iv) each place the transactions have been carried out					
a)	Description of the financial instrument, type of instrument Identification code					
b) ⁵	Type of transaction					
c) ⁶	Price(s) and volume(s)	<table border="1"> <thead> <tr> <th>Price(s)</th> <th>Volume(s)</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> </tr> </tbody> </table>	Price(s)	Volume(s)		
Price(s)	Volume(s)					
d) ⁷	Date of the transaction					
e)	Place of the transaction	Name of the trading centre: Identification code: «Outside a trading centre»: <input type="checkbox"/>				

³ [Complete name of the entity.]

⁴ [Identification code of the legal person in compliance with the LEI code as specified in ISO 17442 standard.]

⁵ [Purchase, sale, subscription or swap].

⁶ [If multiple transactions of the same type are carried out on the same day or in the same place, indicate the overall volume in aggregate form and the average weighted price of said transactions].

⁷ [Date of the day the notified transaction is carried out. Use ISO 8601 format: YYYY-MM-DD; time UTC.]

FORM C

Declaration of Acceptance of the Procedure

To:

Openjobmetis S.p.A. Agenzia per il Lavoro
Via Assietta, 19
Milan, Italy

Subject: Declaration of acceptance of the internal dealing procedure

I the undersigned _____, born in _____ on _____, residing in _____ (Address) _____, in my capacity as _____ at Openjobmetis S.p.A., declare:

- a) to have received and read a copy of the Procedure (the “Procedure”) adopted by the Board of Directors of Openjobmetis S.p.A. Agenzia per il Lavoro (“Openjobmetis”), pursuant to Article 19 of the Regulation (EU) no. 596/2014 issued by the European Parliament and Council of 16 April 2014, and subsequent amendments, concerning market abuse (“MAR”), and to have acquired knowledge thereof;
- b) to have acknowledged that I have been included among the Relevant Persons in accordance with the Procedure and, therefore, that I am subject to the disclosure obligations prescribed by the aforementioned legal and regulatory provisions and by the Procedure;
- c) to have knowledge of the current applicable regulations: Article 19 of the Regulation (EU) 596/2014, articles 7, 8, 9 and 10 of the Delegated Regulation (EU) 2016/522, articles 1, 2 and 3 of the Implementing Regulation (EU) 2016/523 and articles 187-ter.l and 193 of the TUF (the “Relevant Regulations”);
- d) to be aware of the legal obligations that I must fulfil as set forth in this Procedure and in the Relevant Regulations as well as of the penalties set forth in the case of non-compliance with the requirements;

I undertake

- to comply with this Procedure and to ensure that – also pursuant to Article 1381 of the Italian Civil Code – the Individuals Closely Associated with me promptly fulfil disclosure obligations about the Significant Transactions, as set forth in this Procedure;
- to provide, in a timely manner, the Company with an updated List of the Individuals Closely Associated with me, by using the attached statement;
- to notify in a timely manner, in writing, the Individuals Closely Associated with me, the obligations that they must fulfil pursuant to the Law as well as to deliver to them a copy of the Procedure, while retaining a copy of the carried out communication.

Date: _____ Signature: _____

Personal data processing

I, the undersigned, declare myself to be informed that my personal data will be subject to processing in compliance with the existing legal framework, as well as with the policy available on the website www.openjobmetis.it.

Date: _____ Signature: _____

* * * * *

Statement attached to Form C

PROGRESSIVE NUMBER	NAME AND SURNAME	COMPANY NAME	TAX ID CODE - VAT NUMBER
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			

To: Openjobmetis S.p.A. Agenzia per il Lavoro

by signing this form I, the undersigned *.....*, in my capacity as a Relevant Person, declare that the information contained herein is true, complete and accurate and I undertake to report, in a timely manner, any change that may occur as regards the statements that I am making in this form.

Place and Date: _____ Signature: _____

NOTE * enter NAME and SURNAME of the person making the statement.

FORM D
Mandate

To:
Openjobmetis S.p.A.
Via Assietta, 19
Milan, Italy

Subject: Mandate to disclose and publish information about Significant Transactions pertaining to insider dealing.

I the undersigned _____, born in _____ on _____, residing in _____, (Address) _____, in my capacity as _____ at Openjobmetis S.p.A.

GIVEN THAT:

- I have received and read a copy of the Procedure (the “Procedure”) adopted by the Board of Directors of Openjobmetis S.p.A. Agenzia per il Lavoro (“Openjobmetis” or the “Company”), pursuant to Article 19 of the (EU) Regulation no. 596/2014 issued by the European Parliament and Council on 16 April 2014, and subsequent amendments, concerning market abuse (“MAR”);
- I have delivered on (enter date) _____ the declaration of acceptance of this Procedure – prepared in accordance with Form C of the Procedure – duly signed, after fully acquainting myself with its content;
- I have notified in a timely manner, in writing, the Individuals Closely Associated with me, about the obligations that they must fulfil pursuant to the Law and I delivered to them a copy of the Procedure, while retaining a copy of the carried out communication;
- I intend to make use of the possibility, as set forth in Article 4 of the Procedure, to grant to the Company a mandate so that it can fulfil the obligations of disclosure to CONSOB according to article 2.1 of the Procedure (the “Mandate”);
- to have been authorised by the following Closely Associated Individuals to grant the Mandate also on their account and on their behalf:

_____	_____
_____	_____
_____	_____
_____	_____

[enter general information about the Closely Associated Individuals involved: name and surname in the case of Natural Persons; company name and legal form in case of entities]
(together with the undersigned, the “Principals”).

Given all of the above,

also on the account and on behalf of the Closely Associated Individuals, as indicated in the forward, I hereby grant to Openjobmetis the Mandate, under Article 4 of this Procedure so that it may carry out, on my account and/or on behalf of the Individuals Closely Associated with me, as indicated above, in compliance with the conditions and terms set out in the Procedure, all disclosures to CONSOB about the Significant Transactions carried out by me and/or by Individuals Closely Associated with me.

For this purpose I hereby undertake to inform Openjobmetis, in accordance with Article 4.3. of the Procedure, of the Significant Transactions carried out by me and/or by the Individuals Closely Associated with me, within three working days starting from the date of their execution, by correctly filling out the statement per *Form A* attached to the Procedure and sending it to the Responsible Person.

This Mandate can be revoked by each of the Principals by written notice to be sent at least 15 opening trade days from the efficacy date of the revocation. In the case of a revocation by one of the Principals, the Mandate retains its effectiveness as regards the other Principals.

Openjobmetis may renounce to the Mandate through written notice to be sent to the undersigned at least 15 opening trade days from the effective waiver date. In this case, I undertake to inform in a timely manner the other Principals about the occurred waiver.

Openjobmetis may also deem the present Mandate to be terminated with immediate effect, with no need for any notice whatsoever, if even only one of the Principals should fail to comply with the aforementioned terms and conditions for the communications set forth in the Procedure.

All capitalised terms not defined herein shall have the meaning ascribed to them in the Procedure.

For all matters not regulated herein, the provisions of the Procedure shall apply.

Date: _____ Signature: _____

Personal data processing

I, the undersigned, declare myself to be informed that my personal data will be subject to processing in compliance with the existing legal framework, as well as with the policy available on the website www.openjobmetis.it.

Date: _____ Signature: _____

FORM E
Mandate

To
Openjobmetis S.p.A.
Via Assietta, 19
Milan, Italy

Subject: Mandate for disclosing and publishing information about significant transaction on the matter of internal dealing.

I the undersigned _____,
born in _____ on _____,
residing in _____

- in person, or
- as legal representative of _____
with registered office in _____
tax code/vat _____

in its capacity as:

- a subject holding voting rights equal to at least 10% of the voting rights to be exercised in the ordinary Shareholders' Meeting of Openjobmetis S.p.A.
- a subject that controls the Company

GIVEN THAT:

- the undersigned has knowledge of the contents of the Procedure (the “Procedure”) adopted by the Board of Directors of Openjobmetis S.p.A. Agenzia per il Lavoro (“Openjobmetis” or the “Company”), pursuant to Article 19 of the (EU) Regulation no. 596/2014 issued by the European Parliament and Council on 16 April 2014, and subsequent amendments, concerning market abuse (“MAR”);
- the undersigned has acknowledged that the Procedure regulates also the disclosure to be provided in accordance with Articles 114, paragraph 7, of Legislative Decree no. 58 of 24 February 1998, as amended, and 152-sexies et seq. of the Regulation approved by CONSOB with Resolution no. 11971 of 14 May 1999, as amended
- the undersigned intends to opt, as provided by Article 4 of the Procedure, to grant a mandate to the Company to fulfil the obligations of communication to the CONSOB as indicated in Article 3.1 of the Procedure (the “Mandate”).

Given all of the above,

the undersigned grants a Mandate to Openjobmetis, in accordance with Article 4 of the Procedure, so that the latter can disclose to CONSOB and the market, on its behalf, under the conditions and within the terms

set forth in the Procedure, the purchases, sales, subscriptions or exchanges of Shares or of Linked Financial Instruments carried out by it and/or by Individuals Closely Associated with it.

For this purpose the undersigned hereby undertakes to inform Openjobmetis, in accordance with Article 4.3. of the Procedure, about every purchase, sale, subscription or exchange of Shares or of Linked Financial Instruments carried out by it and/or by the Individuals Closely Associated with it, within the twelfth day of the month following the month of execution of the transaction, by correctly filling out the statement of *Form B* attached to this Procedure and sending it to the Responsible Person.

The present Mandate shall be valid from today's date until the withdrawal of the undersigned or of Openjobmetis, to be notified in writing at least 15 open trading days before the date of the effectiveness of the withdrawal.

Openjobmetis may also deem this Mandate to be terminated with immediate effect, with no need for any notice whatsoever, in the case of the failure of the undersigned to comply with the aforementioned terms and conditions of transmission of the communications as set forth in the Procedure.

All capitalised terms not defined herein shall have the meaning ascribed to them in the Procedure.

For all matters not regulated herein, the provisions of the Procedure shall apply.

Date: _____ Signature: _____

Personal data processing

I, the undersigned, declare myself to be informed that my personal data will be subject to processing in compliance with the existing legal framework, as well as with the policy available on the website www.openjobmetis.it.

Date: _____ Signature: _____