

Gallarate (VA), 09 March 2018

ANNEX I

ORGANISATION, MANAGEMENT AND CONTROL MODEL

as per LEGISLATIVE DECREE 231/2001

CODE OF ETHICS

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1 Introduction

This Code of Ethics (hereinafter, "the Code") sets out the principles on which "Openjobmetis S.p.A. Agenzia per il Lavoro" (hereinafter, sometimes, "**Openjobmetis**" or "**the Company**") is based in order to prevent the commission of offences referred to in Italian Legislative Decree 231/2001 as the requirement of the administrative liability of the body and, more in general, in order to prevent any form of offence.

The Code sets out the commitments, rules of conduct and responsibilities that directors, employees and collaborators, including casual workers, of Openjobmetis assume in the conduct of business and in the performance of their tasks within the Company or on its behalf.

1.1 The "Mission" of Openjobmetis

Openjobmetis is an employment agency established pursuant to Italian Legislative Decree no. 276 of 10 September 2003 specialised in the supply of contract workers, mediation between demand and supply of labour, personnel recruitment and selection, outplacement support and personnel training. The Company, established in February 2001, merged the Company "Metis S.p.A. Agenzia per il lavoro", effective as from 1 January 2012, giving rise to one of the main employment agencies operating in the country.

The Company aims to be a leader in the field of human resources, aiming at being a reference partner for companies interested in the services offered and a reference point for the workers interested in entering, re-entering or repositioning themselves in the world of work.

Through its activity, the Company aims:

- to contribute to the growth of employment in the Country;
- to create value for its shareholders and to develop the company;
- to contribute to the well-being and professional growth of its employees;

- ❑ to transfer elements of economic and civil progress to the community in compliance with the values on which the Company is based.

1.2 Objectives of the Code of Ethics

In accordance with Italian Legislative Decree 231/2001, but more in general, by virtue of a policy attentive to legality issues, Openjobmetis intends to clearly define the set of values that the Company recognises and adopts as guidelines of its work, as well as all the responsibilities that it assumes internally and externally.

For this reason, with resolution of 28 May 2012, the Board of Directors of Openjobmetis adopted this Code of Ethics, updated by resolution of 23 September 2014, compliance with which by the recipients is essential for the proper operation, reliability and reputation of the Company, factors that represent an essential asset for the success of Openjobmetis.

The Code of Ethics intends to inspire the operations, behaviour and way of working of the Company with correctness, fairness, integrity, loyalty and professional uprightness both in internal relations and in relations with external subjects, by placing the focus on full compliance with regulations, in addition to compliance with the internal procedures of Openjobmetis.

A clear “ethical approach” in the actions of the Company that actually results in a transparent, loyal and honest behaviour towards the outside and the inside, is essential to ensure the reliability of Openjobmetis towards stakeholders (Central and local public administration, shareholders, customers, suppliers, other companies, business associations, NGOs, etc.) and, more generally, towards the entire civil and economic context in which it operates.

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

Openjobmetis undertakes to promote the knowledge of the Code among its recipients, implement their contribution in defining its contents and develop appropriate instruments to ensure the full and effective application of the Code.

Any behaviour contrary to the letter and spirit of the Code of Ethics will be punished in accordance with the procedures adopted by the Company.

Each update, amendment or supplement to this Code of Ethics must be approved by the Board of Directors of Openjobmetis.

The Code of Ethics is also made known to those who maintain business relations with the Company.

It is available on the intranet as well as on the website of the Company.

1.3 Recipients and scope of application of the Code of Ethics

The requirements of the Code – and penalties for non-compliance – apply to all those who, directly or indirectly, permanently or occasionally, work with or for the Company. In particular, these provisions are addressed:

- to all employees and collaborators, including casual workers, of Openjobmetis;
- to shareholders, directors, members of the Board of Statutory Auditors and to accounting auditors regardless of the legal/formal position held;
- to advisors, suppliers, customers, trading partners and anyone who carries out activities in the name and on behalf of Openjobmetis or under its control.

The Code of Ethics applies in relation to all the activities carried out by or in the name and on behalf of Openjobmetis.

1.4 Contractual value of the Code of Ethics

The observance of the regulations of the Code of Ethics must be considered as an essential part of the contractual obligations of the employees of the Company, pursuant to and for the purposes of Article 2104 of the Italian Civil Code and of the National Labour Agreement in force.

1.5 Disciplinary penalties

1.5.1 Penalty system against employees, directors, statutory auditors and auditors

Failure to comply with and/or violation of the rules of conduct set out in the Code of Ethics by the employees of Openjobmetis is a non-fulfilment of the obligations arising from the employer-employee relationship and leads to the application of disciplinary

penalties provided by law, by collective bargaining and by the disciplinary system adopted by the Company as part of its Model pursuant to Italian Legislative Decree 231/2001.

The management of disciplinary proceedings and the imposition of penalties are the responsibility of the Company functions empowered to do so.

In case of violations of the Code of Ethics by the directors, statutory auditors and auditors, the Supervisory Body must report the circumstances to the Board of Directors and to the Board of Statutory Auditors, in such a way that these bodies can take appropriate actions pursuant to the law and in accordance with the disciplinary system adopted by the Company as part of the Model pursuant to Italian Legislative Decree no. 231/2001.

1.5.2 Penalty system against collaborators, suppliers, advisors, and trading partners

Any behaviour in violation of the provisions of this Code by collaborators, suppliers, advisors and trading partners linked to Openjobmetis by a contractual relationship other than employment relationship, may determine, in the most serious cases, the termination of the contractual relationship in compliance with the penalty system adopted by the Company as part of its Model pursuant to Italian Legislative Decree 231/2001.

There is no prejudice – if the requirements are met – to the right to take action to obtain compensation for any damage suffered by the Company.

2 General principles

Openjobmetis recognises the following principles as essential:

2.1 Legality

Openjobmetis recognises as a fundamental principle the compliance with laws, regulations and standards of the system. The recipients of the Code, when carrying out their functions and activities, are required to comply with the regulations in force.

2.2 Integrity and impartiality

Openjobmetis ensures that its behaviour complies with moral integrity standards and transparency and with values of honesty, fairness and good faith.

Therefore, Openjobmetis will not undertake or continue any relation with those who adopt a behaviour different from that established in this specific point of the Code of Ethics.

2.3 Trust

Openjobmetis believes that mutual trust constitutes the prerequisite for effective and profitable business relationships both within the Company as well as with trading partners and external professional collaborators.

2.4 Sharing

Openjobmetis stimulates the sharing of information, knowledge, experience and professional skills both inside and outside the Company, where appropriate.

2.5 Group work

Teamwork and collaboration in achieving common goals characterise the actions of the Company, knowing that the success of Openjobmetis is largely based on added value from the synergy of those working within it.

2.6 Transparency and completeness of information

Openjobmetis adopts the principles of transparency and completeness of information in the performance of institutional activities, in the management of financial resources and in the subsequent reporting and/or accounting record, as well as in the preparation of all the documents concerning its activities.

2.7 Respect for the dignity of the person

Openjobmetis respects the fundamental rights of the individual, protecting his/her moral integrity and guaranteeing equal opportunities.

In internal and external relations, Openjobmetis rejects any discrimination based on political and trade-union opinions, religion, racial or ethnic origins, nationality, age, gender, sexual orientation, health, marital status, disability, physical appearance, economic and social condition and, in general, any individual characteristic of the human person.

2.8 Protection of the environment

Openjobmetis considers environmental protection a fundamental objective of its activity. The Company undertakes to ensure that rules to protect the environment are complied with.

2.9 Responsibility towards the community

Openjobmetis assumes towards the community responsibilities coming from the carrying on of its activity, recognising the values of solidarity and dialogue as if they were its own.

Openjobmetis also promotes social, economic and employment development in full compliance with internationally recognised rights, with a special attention to the protection of working conditions, trade-union rights, health and safety at work, as well as in accordance with the equitable and fairness principle in determining the working hour and remuneration.

2.10 Fight against corruption

Openjobmetis recognises the importance of ethical integrity, transparency and fairness in relations with third parties (both public and private).

Openjobmetis prohibits all forms of corruption in favour of anyone.

3 Ethical principles in internal relations

3.1 Personnel policy

Openjobmetis undertakes to ensure the creation within it of a peaceful working environment in which everyone can work in observance of laws, principles and shared ethical values.

Openjobmetis makes sure that its employees and collaborators behave and are treated with dignity and respect, in accordance with the provisions of law.

The Company does not tolerate any form of isolation, exploitation, harassment or discrimination, for personal or working reasons, by any manager, employee or collaborator towards another manager, employee or collaborator.

Openjobmetis prohibits the imposition of disciplinary penalties with regard to employees or collaborators who have legitimately refused a work requested unduly from them by any subject related to the Company.

Sexual harassment of any kind is severely punished, also by terminating the employer-employee or collaboration relationship.

The Company confirms its firm opposition to any kind of discrimination based on differences of race, language, colour, faith and religion, opinion and political orientation, nationality, ethnicity, age, gender and sexual orientation, marital status, disability and physical appearance, economic and social condition; likewise, Openjobmetis opposes the granting of privileges for the same reasons.

Openjobmetis does not tolerate any form of illegal work or child labour or any other behaviour that could, only theoretically or otherwise, integrate cases of unlawfulness against the person.

It is a mandatory rule for the Company to use only personnel, should they be of non-EU origin, in full compliance with current immigration rules.

Therefore, Openjobmetis undertakes not to use human resources of non-EU origin without residence permit, as required by current legislation on immigration, and asks all its collaborators/suppliers to make use only of personnel of non-EU origin with a valid residence permit.

3.2 Selection, management and enhancement of resources

Each employer-employee and collaboration relationship requires the signing of a regular contract. All employees and collaborators are informed about their rights, duties and obligations arising from the signing of the contract.

In the phases of personnel selection and recruitment, Openjobmetis adopts as exclusive evaluation criteria the matching of the profiles of the applicants with the requirements of the Company and of the users and the checking of their professional skills.

Openjobmetis enhances the professionalism of its employees by facilitating and, where appropriate, promoting their training, providing the necessary training tools and expanding their specific skills.

3.3 Safety and health at work

Openjobmetis undertakes to disseminate and strengthen a culture of safety, developing risk awareness, promoting a responsible behaviour by all the collaborators and operating in such a way as to maintain, especially with preventive actions, the health and safety of the personnel.

The activities of the Company must be carried out in full compliance with the regulations in force with regard to industrial accident prevention and protection.

The operational management must refer to methods of environmental protection and energy efficiency, pursuing the improvement of health and safety at work.

To this end, Openjobmetis undertakes to carry out technical and organisational actions, concerning:

- the introduction of an integrated system of risk and security management;
- the constant analysis of risks and of critical processes and resources to be protected;
- the adoption of the best technologies to prevent risks relating to safety and/or health of workers;
- the control and updating of working methods;
- the intensification of training events.

3.4 Fairness in relations with shareholders

When managing the relations with its shareholders, Openjobmetis observes the principles of fairness and transparency avoiding favouritism and unequal treatment.

The Company undertakes to

- immediately inform shareholders of any action or decision that could have a material impact on their investment;
- maintain a corporate governance system in compliance with the provisions in force;
- ensure the regular participation of the Directors in the shareholders' meetings;
- ensure the orderly and functional carrying out of the Shareholders' meetings, in accordance with the fundamental right of each shareholder to request clarifications on various matters discussed and to express his/her opinion;
- ensure efficient and specific structures dedicated to relations with shareholders.

No one is allowed to affect the regular carrying out of the shareholders' meetings of the Company and the decisions taken therein by misleading the shareholders.

3.5 Corporate communications and accounting records

Openjobmetis believes that an effective control is based on transparency and the keeping of the accounting records in accordance with the principles of truth, completeness, clarity, precision, accuracy and compliance with the regulations in force.

Adequate supporting documents must be kept on record for each operation, such as to facilitate the entry of the accounts, the reconstruction of the transaction and the identification of liabilities, if any.

The financial statements must give a true and fair view of the financial position, the results of the operations and of the cash flows.

3.6 Protection of assets and gifts

All the subjects required to observe the Code contribute to protect the integrity of the assets of Openjobmetis in such a way as to achieve the maximum protection of shareholders and creditors.

The directors (or anyone acting in their capacity) must not prevent or obstruct in any way the members of the Board of Statutory Auditors, the shareholders and independent auditors from carrying out the control activities.

In the light of the above:

- the assets of the Company, the property, receivables and shares must be evaluated properly, not allowing them to have values higher or lower than those due;
- financial transactions that, by their nature, are in contrast with the purposes of the Company, cannot be carried out;
- different or diverging initiatives with respect to the statutory purposes are not allowed;
- the management of the company's assets must be consistent with the policies of Openjobmetis that operates according to principles of transparency and morality.

Acts of commercial courtesy, such as gifts or forms of hospitality, are only allowed for amounts of low value and such as not to affect the independence of judgement of the recipient. Such expenses must be in accordance with company procedures and must be properly documented.

The directors, employees, including contract workers, as well as subjects who, by virtue of specific tasks, represent Openjobmetis towards third parties cannot receive gifts or preferential treatments except within normal business and courtesy relations and provided of low value.

3.6.1 Use of equipment, devices and structures of the Company, with special reference to IT tools

The recipients of the Code are required to act diligently to protect the assets of the Company, behave responsibly in accordance with law regulations and with the operating procedures prepared for regulating their use.

To this end, the recipients of the Code are responsible for keeping, preserving and defending the assets and resources of Openjobmetis entrusted to them and must use them properly and in compliance with the interest of the Company, preventing any improper use.

It is also forbidden to disclose or use in another way, to its own advantage or to the advantage of third parties, intangible assets, know-how, data and processes owned by Openjobmetis.

As regards IT tools in particular, the recipients must:

- refrain from any activities that may determine the modification, concealment or fraudulent creation of electronic documents - public or private - which are likely to have evidentiary value;
- refrain from illegally accessing the IT or telecommunication systems of the Company or protected by third parties, whether public or private, in order to alter or conceal data, documents and information contained therein;
- refrain from holding and disseminating authentication credentials or unauthorised access codes to IT or telecommunication systems;
- refrain from engaging in any activity that may result in damage or disruption of an IT or telecommunication system of third parties, public or private, as well as by disseminating equipment, devices or software intended to damage or disrupt an IT or telecommunication system;
- refrain from engaging in any activity that may result in damage to information, data and software of third parties, whether public or private, or in any case, damage to IT or telecommunication systems;
- refrain from engaging in any unlawful tapping, impeding or disrupting of IT or telecommunications, as well as from installing equipment to tap, impede or disrupt IT or telecommunications.

3.7 Receipts, payments and similar

Openjobmetis carries on its activity in compliance with currency regulations and laws in force against money laundering, as well as requirements laid down by the competent authorities.

To this end, employees and collaborators must avoid engaging in suspicious transactions in terms of fairness and transparency. In particular, employees and collaborators of Openjobmetis undertake to operate in such a way as to avoid implications in transactions

even if only potentially fit for favouring the laundering of money from illegal activities, acting in full compliance with the anti-money laundering legislation.

To avoid giving or receiving undue payments and the like, employees and collaborators of Openjobmetis, in all their negotiations, must comply with the following principles with regard to documents and record keeping:

- all payments and other transfers made by or in favour of Openjobmetis must be accurately and completely recorded in accounting books and in mandatory entries;
- all payments must be made directly to recipients and their details must be found only in activities contractually formalised and/or approved by Openjobmetis;
- no false, incomplete or misleading records must be created and no concealed and non-registered funds must be set up and, no funds must be deposited in personal accounts or in accounts not belonging to Openjobmetis;
- funds or resources of the Company must not be used without authorisation;
- no cash or bearer payments must be carried out for amounts exceeding EUR one thousand (1,000.00) or the amount identified each time by the anti-money laundering legislation.

3.8 Conflict of interests

Openjobmetis makes sure that its employees, directors, statutory auditors, representatives or collaborators are not in position of conflict of interest.

Any initiative taken by employees, directors, statutory auditors, representatives and collaborators of Openjobmetis must aim exclusively at pursuing the interests of the Company.

To this end, Openjobmetis establishes the following rules of behaviour:

- directors and statutory auditors cannot carry out or collaborate to the carrying out of transactions (or take part in their resolutions) in which they have an interest even partially in conflict with that of Openjobmetis;
- employees, collaborators and statutory auditors of Openjobmetis cannot engage in business or professional activities in real or potential conflict with the interests of

Openjobmetis or with the objectives pursued by the Company, as indicated in the Articles of Association and referred to in this Code.

The employees and collaborators of the Company refrain from taking part in transactions, financial operations or investments made by Openjobmetis, which may bring them a profit or other personal advantage not provided for by contract, unless authorised in writing by the Company.

It is the duty of all employees, collaborators, directors, statutory auditors and auditors of Openjobmetis to avoid and prevent the occurrence of a conflict of interest.

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

- economic and financial interests (professional etc.), also through family members, with suppliers, customers or competitors;
- work, carried out by family members or otherwise, with customers, suppliers or competitors;
- accept money, gifts or favours of any kind by persons, companies or bodies that have or intend to have business relations with the Company, except as provided in paragraph 4.1 and for amounts of low value;
- use one's own position in the company or the information acquired when working in such a way as to create a conflict between one's own interests and those of the company;
- purchase or sell shares of the Company when, in relation to one's work, one is acquainted with important information not yet of public domain.

Anyone who is in a situation that, potentially or otherwise, can give rise to a conflict of interest, must immediately inform his/her superior in order to assess if a conflict of interest actually exists and define a possible intervention.

3.9 External relations

Relations with the press, television and with the mass media in general, both Italian and foreign, are held exclusively by the corporate officers authorised to do so or by persons delegated by them.

Statements, press releases and all external communication initiatives must be authorised in advance in accordance with company and governance procedures in force.

To safeguard its image and the correctness of the information released, Openjobmetis requires that:

- no employee and/or collaborator should give to unqualified external subjects or to accredited journalists, interviews or any sort of statement concerning Openjobmetis that may result in damage to the Company;
- each employee and/or collaborator who is requested by unqualified external subjects or by accredited journalists to issue statements or information concerning Openjobmetis should refer them to the bodies in charge.

3.10 Confidentiality

All information obtained from employees and collaborators of Openjobmetis by virtue or on the occasion of its employer-employee and collaboration relationship with the Company is owned by it.

Therefore, the recipients of this Code ensure the confidentiality of the information known at the time of the transactions carried out on behalf of the Company

The recipients of the Code are also required to process data and information in question exclusively as part of and for the purposes related to their works and, anyway, not to disclose, disseminate, publish or communicate in any way sensitive information – also for market protection regulation purposes - without the explicit consent of interested parties, and confidential information without the authorisation of the Company.

The prohibitions are also extended to family members, partners, collaborators and anyone who, because of his/her confidential relationship with the owner of the information, comes into possession of said information.

4 Ethical principles in external relations

4.1 Relations with the Public Administration and with comparable subjects

The management of relations with the Public Administration, public officials, civil servants and bodies granting a public service is reserved exclusively to the functions of

the Company charged to do so and to the personnel authorised by them.

In case of trade negotiations, participation in public evidence procedures and any other activity involving the Public Administration or comparable subjects (such as government-owned companies, bodies granting a public service, association of local authorities) Openjobmetis behaves properly and with transparency.

Relations with public officials are based on transparency, honesty and fairness.

Openjobmetis does not intend to give rise to even the slightest suspicion of wanting to unduly affect these subjects in order to obtain illegal benefits.

Therefore, the Company condemns any behaviour that may consist in an act of corruption, even though based on a mistaken corporate interest.

Employees and collaborators are obliged to report to their manager any extortion attempt by a public officer that they may receive or be simply informed about.

Employees and representatives of Openjobmetis are also obliged to inform their manager about business relations or economic activities undertaken on a personal basis with public officers.

In the light of the above, no director, employee or collaborator of Openjobmetis can:

- give or promise, directly or indirectly, gifts, money or other benefits to these subjects in order to influence the impartiality of their judgment; only gifts of courtesy, hospitality or promotion of low value are allowed subject to explicit authorisation and documentation;
- send forged or counterfeit documents, certify non-existent requirements or give guarantees not corresponding to the truth;
- unduly provide the Company with any other kind of profit (licences, authorisations, loans, reductions of social security charges etc.), misleading others by means of any device or trickery (for example: sending forged documents or documents containing false statements);
- undertake economic activities, grant professional assignments, give or promise, directly or indirectly, gifts, money or other advantages (such as, by way of example but not limited to, recruitment or promises of recruitment) to public officers or public employees involved in administrative procedures that may bring benefits to Openjobmetis;

- alter in any way the operation of an IT or telecommunication system of the Public Administration or intervene without any right by any means on data, information or programmes contained in one of the above systems;
- unduly receive contributions, loans, subsidised loans or other disbursements of the same kind howsoever named, granted or disbursed by the Public Administration, through the use or presentation of forged or false documents, or by omitting required information;
- use contributions, subsidies or public loans for carrying out works or activities of public interest, for purposes other than those for which they were granted;
- exchange information on offers with participants at any tenders or public evidence procedures;
- disseminate in any way sensitive information relating to economic and financial conditions of the Company or to its forthcoming initiatives of company or financial policy.

Finally, as regards the promotional activities of the Company, donations, payments of cash contributions and the signing of gratuitous bailments, they must be carried out:

- for pure and genuine spirit of donations;
- as part of projects of obvious interest and social value;
- in compliance with the principle of consistency (intended as economic proportionality between the requested contribution and the purpose for which it is disbursed) and relevance with regard to the activities and interests pursued by Openjobmetis.

4.2 Judicial Authority and Supervisory Authority

Openjobmetis acts in compliance with the law, and fosters, within the limits of its powers, the proper administration of justice.

Where required, Openjobmetis collaborates with the Judicial Authority, the police and the public officers exercising inspection powers and investigation activities against it.

The Company confirms the condemnation of any behaviour that may consist in an act of corruption. Employees and collaborators must report to their manager any extortion attempt by a public officer or civil servant that they may receive or be informed about.

Openjobmetis requires that all directors, employees and collaborators become available and collaborate with any subject - public officer or Supervisory Authority – carrying out inspections and controls on the Company's operation.

During or in anticipation of legal proceedings, investigation or inspection by the Public Administration or Supervisory Authority, it is not allowed to destroy or alter records, reports, accounting entries and any type of document, lie or make false declarations to the competent authorities.

Likewise, it is not allowed to persuade or attempt to persuade others to provide false or misleading information to the competent authorities.

Employees, managers and collaborators of Openjobmetis are not allowed to undertake economic activities, grant professional assignments, give or promise gifts, money or other advantages to subjects who carry out investigations or inspections at the Company, or provide services at the relevant competent authorities.

4.3 Public institutions

Relations with Public Institutions - national or international - must be based on absolute transparency standards.

These relations will be carried out in the forms provided by current regulations and will exclusively aim to obtain clarifications on the implications of legislative and administrative activities with regard to Openjobmetis, reply to any request made to the Company, deal with inspection deeds (examinations, questions, etc.) or, in any case, make known the position of the Company on issues relevant to the latter.

To this end, Openjobmetis undertakes to establish stable channels of communication with institutional stakeholders and to represent the interests and positions of the Company in a transparent, rigorous and consistent manner, avoiding collusive attitudes. In order to ensure maximum clarity and impartiality, contacts with institutional stakeholders will take place exclusively through representatives who received a clear mandate from the Company.

4.4 Political parties and organisations

Openjobmetis cannot provide any kind of political contribution.

“Political contribution” means any payment, loan or gift, made to political parties and/or political or trade-union organisations, their members or, however, to individuals engaged in political and/or trade-union activity (both in the case in which they already hold public positions, as in the case in which they offer to do so by standing for election).

Directors, employees and collaborators of Openjobmetis cannot provide political contributions from funds, properties or other resources attributable to the Company.

The contributions of Openjobmetis also include those made by an interposed subject or interposed sponsoring operations, which donates money, assets or other benefits – on behalf of the Company or in its name – to one of the subjects listed above.

From the foregoing, it also follows that Openjobmetis does not reimburse the political contributions possibly granted on a personal basis by employees, directors or any other subject related to it.

4.5 Relations with associations

The participation of Openjobmetis in associations of any kind must meet lawful corporate needs and must be functional to mutual collaboration, to the promotion of specific initiatives on issues related to the activity of the Company and to the taking-on of common positions.

This participation is allowed only in organisations whose objectives and activities are in compliance with the laws and principles of morality and public order. The Company takes part only in organisations recognised by competent institutions.

4.6 Relations with private subjects (customers, suppliers, collaborators, advisors and trading partners)

Openjobmetis sets the relations with customers, suppliers, collaborators, advisors and trading partners based on professionalism, fairness, compliance with the rules of impartiality and fair competition.

In particular, Openjobmetis maintains relations only with customers, suppliers, collaborators, advisors and trading partners with a well-established reputation for honesty and fairness in carrying out their activities.

The Company promotes the strengthening of a “culture of compliance” based on integrity and the promotion of transparent practices in relations with third parties.

Openjobmetis does not allow, and does not tolerate, the adoption of illegal behaviour, such as offering or receiving money or other benefits to/from customers, suppliers, collaborators, trading partners, etc., in order to obtain/continue business deals or provide an illegal benefit to the Company.

The behaviour of employees of Openjobmetis and, more in general, of the recipients of the Code of Ethics is in compliance with the principles contained in this Code of Ethics (of which they must become acquainted with). They avoid personal involvement and/or avoid involving the Company in any kind of corrupt behaviour (operations, activities and relations with third parties that may result in criminal charges and corporate responsibilities).

Openjobmetis informs its employees and third parties about its anti-corruption policies. Openjobmetis makes sure that goods and services are purchased exclusively on the basis of objective criteria of quality, convenience, price, skills, efficiency, avoiding any agreements with non-reliable contracting parties (having regard, for example, to respect for the environment, work conditions and/or human rights).

Openjobmetis claims that suppliers and collaborators adopt a behaviour that is legal, ethical, in compliance with standards and internationally recognised principles concerning salary of workers, with a special attention to the protection of the fundamental human rights, prohibition of discrimination, child protection, prohibition of forced labour, protection of trade union rights, protection of health and safety at work, observance of working hours and of the principle of fair remuneration and respect for the environment.

Behaviour contrary to those described integrates a serious non-fulfilment of the duties of fairness and good faith in the performance of the contract, compromises the relationship based on trust and represents cause for termination of the contractual relationships.

Finally, with particular reference to relations with customers, Openjobmetis guarantees adequate standards of quality of services offered in accordance with regulations for the protection of competition and the market.

Openjobmetis undertakes to examine and, if necessary, admit immediately the suggestions and complaints made by the customers and associations set up to protect their interests.

5 Implementing provisions

In order to ensure compliance with the principles of this Code, Openjobmetis promotes:

- maximum dissemination and full knowledge of this Code;
- the interpretation and uniform implementation of this Code;
- the carrying out of careful checks, if violations of this Code are reported, and the application of appropriate penalties in case of assessment of the above-mentioned violations;
- the prevention of repression of any form of retaliation against those who contribute to the implementation of this Code;
- periodical updating of this Code of Ethics, on the basis of the requirements that emerge each time, also due to the above-mentioned activities.

In particular, in order to ensure the widest dissemination and understanding of this Code, upon the establishment of this employment relationship, Openjobmetis delivers and/or makes available a copy of the Code of Ethics to all the employees and collaborators.

The Code is posted up on the company notice boards present at the premises of the Company and at its branches and published on the company intranet, and its adoption is disclosed to the public by using the most appropriate means to this end.

Any amendment or revision of the Code is notified to the recipients in the same way.

Without prejudice to the powers of the corporate bodies pursuant to the law and to the Articles of Association in force, as well as those of the Supervisory Body under Italian Legislative Decree 231/2001, all recipients are required to cooperate in the implementation of the Code of Ethics, within the limits of their powers and functions.

5.1 Supervisory Body

The Supervisory Body of the Company (also "SB") is vested with the powers, tasks and duties envisaged in the Organisational Model under Italian Legislative Decree 231/2001 and in the specific regulation of the SB to which reference is made.

The Supervisory Body is authorised to receive requests for clarifications, complaints or reports of potential or actual violations of this Code. For this purpose any reports could be sent to the email address odv@openjob.it – which has been established in accordance

with current legislation in order to ensure the confidentiality of both contents and whistleblower's identity.