



Progettazione e realizzazione di attrezzature ed impianti di curvatura, profilatura, fresatura e stampaggio di materiali metallici.

Design and manufacture of stretch bending, roll forming, milling and stamping tooling and machines for metal materials.

## CODE OF ETHICS

Revision	Approval	Description of Changes
00	Board of Directors of 12.05.2015	Adoption
01	Board of Directors of 02.08.2018	Update of social responsibility policies, code of conduct for employees according to point of regulation 5.1.1.1 IATF, implementation of anti-corruption policy and ethical escalation policy
02	Board of Directors of 24.04.2024	Update of health and safety policies on ergonomics, counterfeit parts, greenhouse gas emissions, energy efficiency, renewable energy, quantity and consumption of water, air quality, sustainable waste management, responsible management of chemical resources

(Signature General Director)



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## Index

- 1 The History, Mission and Values of O.M.C.M. S.r.l.**
- 2 Top management**
- 3 Human Resources**
- 4 Use of company means and tools**
- 5 Conflict of Interest**
- 6 Confidentiality and confidentiality obligation**
- 7 Money Laundering Prevention**
- 8 Relationship with Customers**
- 9 Relationship with Suppliers**
- 10 Relationship with Public Institutions**
- 11 Relationship with trade unions and political parties**
- 12 Relations with third parties in general**
- 13 Health and Safety**
- 14 Environment**
- 15 Compliance with the law on free competition**
- 16 Counterfeit Party Policy**
- 17 Cybercrime**
- 18 Management and accounting transparency**
- 19 Protection of quality and corporate image**
- 20 Protection of company data and confidential information**
- 21 Compliance with the Code**
- 22 Whistleblowing**
- 23 Sanctions**
- 24 Publicity of the Code of Ethics and training of assigned personnel**



## 1. The History, Mission and Values of O.M.C.M. S.r.l.

O.M.C.M. S.r.l. is a Turin company operating in the automotive sector since 1958. The main activities are the design and construction of high-tech tools for iron bending, milling machines, profiling machines and molds.

Furthermore, O.M.C.M. S.r.l. is able to produce aesthetic, functional and structural details in aluminum, iron and steel using the following processes: 1) Bending, milling and cutting 2) Cold forming (aluminum / sheet metal); 3) Profiling and prototyping; 4) Spot welding and TIG welding; 5) Cleaning and Oxidation in collaboration with other companies.

The wide range of services offered makes it possible to satisfy customers and to guarantee a 360 ° service.

The strength of the company is the long experience gained over the years and the collaboration with large industrial groups. In particular:

- **1958** Mr. Masiero Benito begins his work experience in the field of prototyping and construction of specific tools for profiles.
- **1980** After twenty years of experience working for major companies such as Fiat, Alfa etc., Mr. Masiero takes over O.M.C.M., which also his two sons take over. Initially the company had 3 employees.
- **1985** the company has 10 employees and begins to diversify production by acquiring orders also in the field of assembly and welding. In addition, he began collaborating with URMET, an important Turin-based company affiliated with Telecom, for which he supplies various models of public telephone sets for international markets such as Morocco, Tunisia, Indonesia, Cuba, without neglecting Italy.  
Of course, at the same time the activity in the construction of tools and the production of specific profiles is carried out.
- **1997** Development of cold bending technology through the creation of specific tools. Acquisition of the 9001: 2000 certification. Development and construction of the "PROFILE".
- **2007** New factory of 4,000 square meters of which 2,100 are covered.
- **2010** Development and construction of electronic bending machines with 10 and more axes, in particular for Audi and Maserati.
- **2018** O.M.C.M. S.r.l. collaborates with FCA GROUP, MASERATI, PSA PEUGEOT CITROEN, GENERAL MOTORS, VOLKSWAGEN GROUP. Currently O.M.C.M. has about 20 employees.

The mission of the O.M.C.M. S.r.l. is to provide the customer with an excellent service, integrating the best quality levels with the punctuality of delivery times, production efficiency, guarantee of execution of the manufacture with the highest safety standards and environmental protection, all with professionalism and precision.



To achieve this purpose, O.M.C.M. S.r.l. inspires its business to the following values:

- Interaction;
- Commitment
- Innovation.

Values that give O.M.C.M. S.r.l. a competitive advantage and that allow you to maintain a leadership position, even in a constantly changing context.

One of the main features of the O.M.C.M. S.r.l. it is the ability to listen to and understand the different needs of customers and to create new and better solutions, following the customer's requirements scrupulously and attentively. Total dedication to finding the best solution to offer to customers and constant commitment to them are equal, if not coincident, with those with which the goals and objectives of O.M.C.M. are pursued. S.r.l.

The innovative spirit is considered an essential and driving part of the corporate identity and has allowed O.M.C.M. S.r.l. to become an important company in the sector. Innovation is the real driver of profitability and growth over time. Commitment and innovation shine through in the relationship with customers; in addition to observing the values of business ethics and always correct behavior towards the community and the environment, which for O.M.C.M. S.r.l. they have always been considered a must.

O.M.C.M. S.r.l., with this Code of Ethics, an integral part of the internal organizational Model, aims to provide all Recipients of the same (top management, employees, suppliers, customers, consultants, temporary agencies, etc.) with a guideline to be follow in order to pursue the aforementioned corporate mission in the most effective manner in accordance with the principles of ethics and transparency indicated below as well as in order to reconcile the pursuit of competitiveness with the requirements of correct competition.

The Company will carefully monitor compliance with the Code of Ethics, providing adequate information, training, prevention and control tools and ensuring the transparency of the operations and behaviors implemented, intervening with corrective and, if necessary, disciplinary actions

## **2. Top management.**

The corporate bodies of the O.M.C.M. S.r.l., in the awareness of their responsibilities, are inspired by the principles contained in this Code, conforming their business to values of honesty, integrity in the pursuit of personal and company profit, loyalty, correctness, respect for people and rules, mutual collaboration.

It is the responsibility of the individual members of the Board of Directors and of those in top positions to evaluate, with the utmost rigor, situations of conflict of interest or incompatibility of functions, offices and positions outside as well as within the company.

In particular, top management is required to:

- assume a behavior inspired by autonomy and independence from public institutions, private subjects, economic associations and political forces;
- keep a behavior inspired by integrity, loyalty and a sense of responsibility towards O.M.C.M. S.r.l. ;
- participate assiduously and informed in the activities of the Board of Directors;
- be aware of their role and related responsibilities, providing a significant and attentive personal contribution;
- express any divergent positions without damaging the image and prestige of the company;
- maintain the confidentiality of any information received for office reasons, even after the termination of the relationship with the company.

### **3. Human Resources.**

The company policy is to hire, also through temporary agencies, and give career opportunities to qualified people, having regard to the tasks to be performed and the experience gained in similar activities, offering equal opportunities to everyone regardless of race, color of skin, religious opinions, sex, nationality, mental and physical state, sexual preferences, citizenship, marital status, belonging to groups or minorities.

The working relationship is based above all on respect, trust, a sense of responsibility and loyalty between employer and employees who must comply with the principles indicated below.

The employer undertakes to:

- Train your staff on the content of this Code so that the implementation of the provisions of the same is effective.
- - Protect and promote the value of human resources in order to improve and increase the assets and competitiveness of each person's skills;
- - Selecting, training, managing human resources, as well as the related career and salary advancements, without any discrimination, according to criteria of merit, competence and professionalism and protecting the psycho-physical integrity of the same. It is therefore forbidden for anyone involved in hiring to accept or solicit promises or payments of money or goods or benefits, pressures or services of any kind that may be aimed at promoting the hiring of a worker as an employee or his transfer or its promotion;
- - Offer a safe and hygienically healthy work environment;
- - Recognize the right of each individual employee to join, or not, the chosen trade union organization, as provided and enshrined in Title II of the Workers' Statute, without this choice causing prejudice to the worker;
- - Treat all employees fairly, with bonuses or wage increases linked to an annual performance assessment;
- - Regularly offer all employees opportunities for training and professional development to allow them not only to grow together with the company, but also to develop the skills necessary to achieve good results;
- - Encourage the continuous exchange of information between the different functions in order to take full advantage of all the knowledge and experience available;

- Assiduously and frequently monitor all the evolutions and changes regarding national, European and international legislation concerning human rights, security, anti-corruption, the environment, as well as all legislative aspects connected and connected to the activity of 'business;
  - Do not carry out any investigation on the ideas, preferences, personal tastes and, in general, the private life of employees; hiring staff with a regular employment contract and respecting and observing all provisions on temporary employment;
  - Avoid all forms of discrimination, in particular that based on race, nationality, sex, age, physical disability, sexual orientation, political or trade union opinions, philosophical orientations or religious beliefs
  - Reject and disapprove in a certain, clear and univocal way any form of exploitation or forced and compulsory labor.
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- With regard to workers, it should be noted that this Code of Ethics will be an integral part not only of the individual contract of each worker, but also of all relationships between O.M.C.M. S.r.l. and temporary agencies in the context of the administration relationship, and any violation of the same will be sanctioned.
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- The employee or temporary worker, in particular, must:
  - Behave in a manner consistent with the Code and refrain from any conduct that may harm the company or compromise its honesty, impartiality or reputation;
  - Avoid any situation, even if only apparent, of conflict of interest;
  - Report any violations, carried out within the company, of laws or regulations, or of this Code of which it is aware;
  - Cooperate in any internal investigations into violations of the Code;
  - Use the company assets exclusively for social and non-personal purposes;
  - Avoid unnecessary consumption or the irrational use of means and resources;
  - Maintain a decent work environment; therefore, it is forbidden to work under the influence of alcohol or drugs; it is forbidden to engage in intimidating or offensive conduct towards colleagues or subordinates in order to marginalize or discredit them.
  - The employee who holds positions of responsibility must also:
  - -Set an example, provide leadership and guidance, showing employees that compliance with the Code is a fundamental aspect of their work;
  - - Establish relationships with their collaborators based on mutual respect and fruitful collaboration, paying due attention to suggestions and requests;
  - - Report non-compliance with the Code, protect those who report and sanction those who commit violations.
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- In accordance with the Conventions of the International Labor Organization, the O.M.C.M. S.r.l. does not employ child labor, or does not employ people under the age established for the start-up to work by the regulations of the place where the work is performed and, in any case, under the age of fifteen, except for the express exceptions provided for by international conventions and possibly by local legislation, nor does it use suppliers who violate these regulations; furthermore O.M.C.M. S.r.l. scrupulously respects the rules and conventions regarding women's work.

#### **4. Use of company means and tools**

Each recipient of the Code of Ethics is responsible for protecting the resources entrusted to him and has the duty to promptly inform the structures in charge of any threats or harmful events, even if only potentially, for the Company.

In particular, each Recipient must:

- (i) work diligently to protect company assets, through responsible behavior and in line with the operating procedures set up to regulate their use;
- (ii) avoid improper use of company assets that may cause damage or reduction in efficiency, or in any case in contrast with the interests of the company;
- (iii) request and obtain the necessary authorizations for the purposes of any use of the asset outside the company context.

The growing dependence on information technology requires ensuring the availability, security, integrity and maximum efficiency of this particular category of assets.

Each Recipient is required to:

- (i) scrupulously adopt the provisions of corporate security policies, in order not to compromise the functionality and protection of the IT systems;
- (ii) avoid loading borrowed or unauthorized software on corporate systems and never make unauthorized copies of licensed programs for personal, corporate or third party use.

The use, even involuntary, of these assets for any purpose outside the company activity, can cause serious damage (economic, image, competitiveness, etc.) to the Company with the aggravating circumstance that improper use can cause them. potential criminal and administrative sanctions for any offenses and the need to take disciplinary measures against employees.

Workers are therefore required to ensure maximum respect for the infrastructure, means, tools and materials of the company, promptly reporting to their manager any non-compliant use of such equipment that they believe others make.

They belong to these categories, for example premises, furnishings and furnishings, operational equipment and equipment (such as company cars, personal computers, printers, photocopiers, servers, or even communication tools, such as telephone, fax, e-mail, personal stationery, paper) , functions offered by the company IT system (such as processing procedures, software, internet access and databases and the like), books, manuals, newspapers and magazines in general.

The employee is required to use the company's equipment only for the performance of the job duties for which he is in charge. It is therefore strictly forbidden for employees, in the absence of express authorization, to act with company means, whether they are IT, technical or any other type, for the achievement of private purposes or interests or in competition with company activities.

#### **5. Conflict of Interest**



In order to avoid conflicts of interest, each operation and activity must be undertaken solely and exclusively in the interest of the company in a lawful, transparent and correct manner.

The Recipients of this Code must avoid all situations and all activities in which a conflict with the interests of the company may arise or which may interfere with their ability to make, in an impartial manner, decisions in the interest of the company and in full compliance with the rules of this Code of Ethics.

Recipients are required to avoid conflicts of interest between personal and family economic activities and the duties they hold within the structure to which they belong. Any situation that may constitute or lead to a conflict of interest must be promptly communicated to the Function Manager or, failing that, to the elected SB or the Board of Directors.

By way of example but not limited to, they represent situations of conflict:

- (i) economic and financial interests of the employee and / or his family exercised in competition or contrast with those of the company;
- (ii) carrying out work activities, of any kind, with customers, suppliers, competitors of the company;
- (iii) acceptance of money, favors or benefits from people or companies who have or intend to enter into business relationships with the company.

Given the variety of hypotheses that can be found in terms of conflict of interest, in case of doubt about the onset or otherwise of a conflict of this type, employees must contact their manager or, failing that, the elected SB or the Board of Directors.

## **6. Confidentiality and confidentiality obligation.**

The knowledge and innovations developed over the years by O.M.C.M. S.r.l. they constitute a fundamental resource that every Recipient of the Code must protect in order to prevent the company from suffering damage to property and / or image. Therefore, employees and other recipients are required, during and after the relationship, not to disclose to third parties information regarding the company's technical, technological and commercial knowledge as well as other non-public information, except in cases where such disclosures are requested. by laws, regulations or specific contractual agreements.

Information to the outside, press and information organizations, must be truthful and transparent. A prior agreement with top management is required to represent the positions and activities of the company in any form and public occasion (conferences, participation in conferences and other public interventions, drafting of articles or other publications).

O.M.C.M. S.r.l., and consequently those who work in it, also undertake to process the personal data and confidential information of which it becomes aware in the performance of its business in compliance with current legislation, national and community, on privacy.

## **7. Money Laundering Prevention.**





O.M.C.M. S.r.l. and its employees must never carry out or be involved in activities that involve money laundering (i.e. the acceptance or treatment) of proceeds from criminal activities in any form or manner.

All Recipients of this Code, who must establish on behalf of O.M.C.M. S.r.l. business relationships with commercial counterparties and suppliers, must ascertain the respectability and legitimacy of their business, by verifying the available information in advance, in full compliance with current legislation and related company protocols.

## **8. Relationship with Customers.**

O.M.C.M. S.r.l. aims to be the preferred supplier of all current customers but, above all, potential customers, as well as consumers / end users.

Customers are placed at the center of production, aiming to meet their expectations and always treat them fairly and honestly. Therefore, its employees and the other Recipients of this Code must also abide by these principles, developing and maintaining profitable and lasting relationships with them, offering them safety, assistance, quality, continuous innovation and value in compliance with the principles of equality, impartiality, continuity, right of choice, privacy and confidentiality.

The products and services offered are designed with the aim of meeting the productivity, quality, functionality, safety and environmental impact needs of customers.

O.M.C.M. S.r.l. operates with a lasting commitment to customers in every country and market served and strives to establish relationships of close collaboration with customers to always be able to meet and exceed expectations.

The Recipients of this Code are obliged to:

- (i) observe internal procedures for managing relationships with customers;
- (ii) provide accurate and exhaustive information about the products and services offered so that the Customer can make informed decisions;
- (iii) be truthful in communications and correspondence.

## **9. Relationship with Suppliers.**

In order to guarantee the highest level of customer satisfaction, O.M.C.M. S.r.l. selects suppliers based on their ability to offer in terms of quality, innovation, costs and services, ensuring equal opportunities.

The selection of Suppliers and the formulation of the conditions for the purchase of goods and services is dictated by values and parameters of competition, objectivity, correctness, impartiality, fairness in the price, quality of the goods and / or service, carefully evaluating the guarantees of assistance and the panorama of offers in general.

The purchasing process must be based on the objective search for the maximum competitive advantage and on loyalty and impartiality towards each Supplier in possession of the required requisites. Furthermore, the collaboration of suppliers must

be pursued in constantly ensuring the satisfaction of customer needs both in terms of quality and with regard to delivery times.

The stipulation of a contract with a Supplier must always be based on extremely clear relationships, avoiding, where possible, the assumption of contractual obligations that involve forms of dependence on the contracting Supplier.

In relations for the supply of goods and / or services, employees are obliged to:

- (i) observe the internal procedures for the selection and management of relations with suppliers;
- (ii) observe and enforce the contractual conditions and maintain a frank and open dialogue with suppliers, in line with good business practices;
- (iii) bring any problems with a supplier to management so that the consequences can be assessed.

Contracts with suppliers must expressly provide for the acceptance, also on their part, of this Code.

All Recipients of this Code are invited to establish and maintain stable, transparent and cooperative relationships with Suppliers.

The Recipients of this Code cannot accept compensation, gifts or preferential treatment of more than symbolic value from the Suppliers and must in any case report to their superiors.

Similarly, it is forbidden to offer or pay undue compensation, gifts or preferential treatment to Suppliers of more than symbolic value and in any case unrelated to normal relations of courtesy, in order to illegally favor the interests of the company.

## **10. Relationship with Public Institutions.**

Relations with the Public Administration must be managed only by top management and by the employees delegated to do so; they must be transparent, clear, correct, must not give rise to misunderstandings or misunderstandings and must be exclusively inspired by the values of society.

Employees who, by virtue of their duties within the company, are responsible for requesting, managing and / or administering contributions, grants or loans from the State or other public body are required, within the limits of their functions, to ensure that the aforementioned reports are intended for the purposes for which they were requested and in any case to maintain accurate documentation of each operation, which ensures maximum transparency and clarity of the related money movements. Gifts and / or acts of courtesy and hospitality to representatives of the P.A. as public officials or persons in charge of a public service are permitted when they are of modest value and in any case such that they cannot be interpreted by a third party as aimed at acquiring advantages improperly.

The recruitment of former employees of the Public Administration, who in the exercise of their functions have had relations with the Company, or with their relatives and / or similar, must be carried out in strict compliance with the standard procedures defined by the company for the selection of personnel. The definition of other employment relationships with former employees of the Public Administration, or with their relatives and / or similar, must take place in strict compliance with standard procedures.

In the event that O.M.C.M. S.r.l. participate in a tender with the Public Administration, it must operate in compliance with the law and correct commercial practice.

## **11. Relationship with trade union organizations and political parties.**

Any report of the O.M.C.M. S.r.l. with trade union organizations, political parties and their representatives or candidates must be based on the highest principles of transparency and fairness.

Without prejudice to compliance with the specific applicable regulations, O.M.C.M. S.r.l. does not make contributions, direct or indirect and in any form, to parties, movements, committees, associations or other bodies of a political or trade union nature, or to their representatives or candidates

## **12. Relations with third parties in general**

The Company is particularly careful to develop a relationship of trust with all its possible interlocutors, i.e. individuals, groups or institutions whose contribution is necessary to pursue its corporate mission, as well as with collaborators, customers, suppliers, partners in business, public institutions, the market, political, trade union and social organizations and any other subject whose interests may be directly or indirectly influenced by the Company's activities. O.M.C.M. S.r.l. in carrying out its activities it conforms to the principles of loyalty and correctness, requiring all those who work on its behalf to behave honestly, transparently and in compliance with the law in any relationship they entertain, not tolerating corrupt and / or collusive conduct, or non-favoritism due; aware of the importance of the services rendered, it ensures the transparency of its actions and behavior. It is forbidden for employees and collaborators to give / offer and / or accept / receive, even through a third party, gifts, benefits and / or any other utility, personal or otherwise, as part of the activities carried out for O.M.C.M. S.r.l., such as to generate even only the suspicion of having acted in the interest and on behalf of the same, with the exception of gifts of modest value attributable to normal courtesy relations or commercial practices.

## **13. Health and Safety**

O.M.C.M. S.r.l. guarantees the protection of health and safety in the workplace for its staff and third parties, committing itself to compliance with the legislation on safety at work, to promote the safety of all the places that make up the working environment, to prevent accidents and occupational diseases. Each employee, for his part, must not put his colleagues in front of unnecessary risks that could cause damage to their health or physical safety.

O.M.C.M. S.r.l. in particular, through the Risk Assessment Document formally approved by the Employer, in collaboration with the Head of the Prevention and Prevention Service and the competent Doctors, announces the fundamental principles and criteria on the basis of which decisions are made , of all types and at all levels, in the field of health and safety at work.

The methods of communication are those established by the regulations in force with particular reference to the consultation and participation of workers through their representatives.

The principles and criteria to which O.M.C.M. S.r.l. is inspired by the making of decisions in matters relating to safety at work are:

- avoid risks;
- assess the risks that cannot be avoided;
- combat risks at source;
- adapt work to man, in particular with regard to the design of workplaces and the choice of work equipment and work and production methods, in particular to reduce monotonous and repetitive work and to reduce the effects of these works on health;
- take into account the degree of technical evolution;
- replace what is dangerous with what is not dangerous or is less dangerous;
- planning prevention, aiming at a coherent complex that integrates the technique, work organization, working conditions, social relations and the influence of factors in the working environment into the same;
- give priority to collective protection measures over individual protection measures;
- give adequate instructions to workers, verifying their correct implementation;
- respect the principles of ergonomics and healthiness in the workplace in the organization of work, in the design of workplaces and in the choice of work equipment, in the definition of work and production methods, in particular in order to reduce health effects of monotonous and repetitive work.

O.M.C.M. S.r.l. also undertakes to spread and consolidate a solid culture and environmental awareness, always operating in compliance with the national and international laws in force, respecting the requirements indicated in the environmental authorizations held, as well as applying the best technologies available in order to mitigation of the environmental impacts of its processes. O.M.C.M. S.r.l. wants to create, offer and maintain a healthy environment within the company, to extend it to the broader concept of preserving the environment for future generations. The main principles are:

- Do not pollute;
- constantly optimize the use of resources;
- identify, acquire and plan in advance the activities required by the new legal requirements in environmental material;
- continuously improve the management system through the planning, implementation and control of each measure introduced for the improvement of environmental aspects;
- protect the environment through continuous technological improvement, processes and resources by providing criteria that safeguard man and the environment;
- disclose the commitment to environmental protection that the company pursues and all the people who work for the organization or on its behalf.

## **14. Environment**

Environmental management:

O.M.C.M. S.r.l. undertakes to comply with the laws in force and try to anticipate changes or legislative trends in each country or region, to build and operate constantly and improve the management scheme at company level to pursue a wide range of environmental activities.

Reduction of greenhouse gas emissions:



O.M.C.M. S.r.l. undertakes to comply with applicable laws and try to anticipate legislative changes and trends in each country or region, to manage greenhouse gas emissions from company activities and to continue efforts to reduce and try to use energy in effective way.

Prevention of air, water and soil pollution:

O.M.C.M. S.r.l. undertakes to comply with the laws in force and try to anticipate changes and legislative trends in each country or region of activity regarding the prevention of air, water and soil pollution and to prevent pollution by monitoring and reducing continuous pollutants.

Saving resources and reducing waste:

O.M.C.M. S.r.l. undertakes to comply with the laws of each country and region regarding the correct disposal and recycling of waste. Strive to reduce the consumption of energy, water and the amount of final waste disposed of by using resources effectively.

Chemical management:

O.M.C.M. S.r.l. undertakes to comply with applicable laws and try to anticipate changes or legislative trends in each country or region, to specify and safely manage chemicals that can pollute the environment, present risks to employees and occupants of a vehicle, not to include chemicals prohibited by the laws of each country and region in products or to use chemicals that are prohibited in production processes and to record and report to the competent authorities the quantities of chemical emissions indicated by the laws of each country and region.

Ecosystem conservation:

O.M.C.M. S.r.l. undertakes to pay attention to the impact of the business on the ecosystem, including the acquisition of raw materials.

## **15. Compliance with the rules on free competition**

O.M.C.M. S.r.l. intends to practice fair competition by refraining from engaging in anti-competitive or collusive conduct; for this reason, it scrupulously and slavishly observes the criteria of commercial ethics, complying with all the laws and regulations in force in the countries in which it operates.

It is contrary to the company's policy to have information exchanges and / or agreements with any competitor regarding prices, pricing policies, discounts, promotions, conditions of sale, costs: the company does not in any way want to restrict or distort the free market of competition.

Each employee or collaborator who works in the commercial activity is invited to submit to the management any doubts or initiatives that may fall within the cases sanctioned by law, in order to operate in full compliance with the applicable rules.

## **16. Counterfeit Party Policy**

The organization deemed it necessary to constantly integrate and monitor in its Management System for Quality, Safety and Health at Work, the Environment and

Information Security, the aspects strictly related to the authenticity of the products and the protection from counterfeit parts. for the long-term maintenance of levels of reliability, sustainability, profitability, competitiveness and customer satisfaction.

In this perspective, the principles adopted are the following:

- Compliance with the anti-counterfeiting regulations in force;
- The development of policies and guidelines to effectively combat the use of counterfeit parts in its own production cycle and in that of its suppliers;
- The satisfaction of the expectations of the interested parties and the formal obligations signed by the Company, as a fundamental prerequisite for the creation of value;

In order to achieve these objectives, the Management undertakes to:

- Identify the strengths and weaknesses of the organization in order to eliminate the dangers and reduce the risks deriving from the use of counterfeit parts;
- Train, raise awareness and ensure continuous updating of its corporate resources;
- Optimize the management of incoming products for the identification of "Suspicious" parts / products;
- Ensuring information and training activities for the staff of the supplier companies in order to analyze the risks and all the aspects that may have specific effects on the economy and on the satisfaction of its customers;
- Disseminate its policy to all functions of the organization, to its customers and to its suppliers and contractors.

## **17. Cybercrime**

The Recipients of this Code, in the activities carried out on behalf of O.M.C.M. S.r.l., they must not:

- declare, and will take all necessary precautions to ensure that they are not declared, falsehoods in a public electronic document with evidential value;
- violate access to the computer or telematic system;
- damage the computer system of the O.M.C.M. S.r.l. (or of other subjects, in the activities carried out on behalf of O.M.C.M. S.r.l.), the information, data or programs contained therein or favor the interruption, total or partial, or the alteration of its functioning;
- intercept communications relating to the computer system of the O.M.C.M. S.r.l. (or of other subjects, in the activities carried out on behalf of O.M.C.M. S.r.l.) or between two systems or to prevent or interrupt the communications themselves; install equipment designed to intercept, prevent or interrupt communications relating to an IT or telematic system or between multiple systems;
- destroy, deteriorate, cancel, alter or suppress information, data or computer programs of others or owned by the State or in any case of public utility, respecting the terms of the contract contained in the relative licenses and using them within the measures and limits established by the relative owners;
- destroy, deteriorate, cancel, alter or suppress information, data or computer programs of others or owned by the State or in any case of public utility, respecting the terms of the contract contained in the relative licenses and using them within the measures and limits established by the relative owners.

## **18. Management and Accounting Transparency**



It is the commitment of O.M.C.M. S.r.l. not only to guarantee that all communications, both written and verbal, are open, truthful and accurate within the limits of commercial confidentiality, but also to provide reliable and relevant information on the activities carried out in a timely and regular manner. As previously specified, significant importance is given to the interaction and from this derives a positive attitude towards dialogue with all those interested in the activities.

O.M.C.M. S.r.l. guarantees management and accounting transparency which is based on the truth, accuracy, completeness and reliability of the documentation of management events and the related accounting records. It is therefore forbidden for each Recipient of this Code to:

- register fictitious transactions;
- record misleading or insufficiently documented transactions;

Instead, it must:

- collaborate so that the management facts are correctly and promptly represented in the accounts;
- document every accounting operation carried out and keep the related documentation.
- report to his / her superior if he becomes aware of omissions, falsifications, alterations or negligence in the information and accounting documentation.

The bodies in charge of internal verification activities have free access to data, documentation and information useful for carrying out the control activities under their responsibility. All employees and collaborators are required to give their full cooperation for this purpose.

## **19. Protection of quality and corporate image**

The quality and efficiency of the company organization, as well as the good reputation of O.M.C.M. S.r.l., are values that the company has built over time, always working under the banner of transparency and honesty.

Therefore, conduct that does not comply with the ethical values of this Code put in place even by the individual can, in itself, prejudice the image and reputation gained by O.M.C.M. S.r.l. Therefore, each Recipient of this Code is required, with their own conduct, to contribute to the safeguarding of this corporate assets and in particular to the protection of the good reputation of the company, both in the workplace and outside it.

## **20. Protection of company data and confidential information**

For O.M.C.M. S.r.l. trade secrets, intellectual property and any other confidential information (eg industrial processes, customer lists, contacts, inventions) represent a resource that employees must protect.

Therefore, the Recipients are required to maintain the strictest and absolute confidentiality on all information relating to the company and / or its employees of which they have become aware due to the work performed. This, in order to avoid the



disclosure of confidential information relating to the organization, production methods and any other information whose disclosure could cause damage to the company.

In particular, the Recipients must:

- (i) acquire and process only the data necessary and appropriate for the purposes directly attributable to the function performed;
- (ii) acquire and process the data only within specific procedures;
- (iii) keep the data in such a way as to prevent unauthorized others from gaining knowledge of it;
- (iv) communicate said data as part of pre-established procedures and / or with the explicit authorization of managers and / or top management;
- (v) ensure that there are no restrictions on the possible disclosure of information regarding third parties connected to the company by a relationship of any kind and, if necessary, obtain their consent.

Each recipient of the Code of Ethics must therefore know and implement the provisions of company policies on information security to ensure its integrity, confidentiality and availability.

The Recipient is therefore required to process his own documents using clear, objective and exhaustive language, allowing them to be consulted by colleagues, managers or external parties authorized to request them.

By way of example and not limited to, all information relating to: studies relating to services under development, commercial, management, industrial and strategic plans, financial transactions or investment and divestment transactions, personal data of employees and lists of customers and collaborators and anything else that is part of the know-how of O.M.C.M. S.r.l. Any information and material obtained or produced in execution or in any case in relation to the activities carried out is the exclusive property of O.M.C.M. S.r.l., due to the current employment relationship.

## **21. Compliance with the Code**

Compliance with the rules of this Code is an essential part of the contractual obligations of employees pursuant to and for the purposes of Articles 2104 and 2106 of the Civil Code.

The application of this Code falls within the personal and indelegable responsibilities of each employee and collaborator. Once informed, he will not be able to invoke the lack of knowledge of the Code or having received instructions to the contrary from any hierarchical level as a justification for his non-fulfillment.

It is also desirable that the staff adopt a proactive attitude, avoiding attitudes of passive tolerance in the face of possible infringements.

The violation of the provisions of this Code by employees constitutes a breach of contractual obligations and may determine, depending on the case:

- the application of the sanctions and disciplinary measures provided for by the applicable National Collective Labor Agreements;
- termination of the relationship;
- the application of penalties;
- compensation for damage.

In case of violation of the ethical principles established in this Code by the Directors, the electing Supervisory Body will inform the Shareholders' Meeting, with the exclusion of the shareholder who also holds the position of Director and for whom the examination is requested. conduct allegedly contrary to this code, which will proceed

to take the most appropriate and adequate initiatives in line with the seriousness of the violation and in accordance with the powers provided for by the law and / or the Articles of Association (such as, by way of example, revocation, liability action, etc. ).

Where the violation is committed by one of the shareholders, the Shareholders' Meeting will proceed to take the most appropriate initiatives in accordance with the articles of association of the company

Any behavior carried out in the context of a contractual relationship by collaborators in any capacity, consultants, partners, counterparties, attorneys, agents and other external subjects, including suppliers, contractors in contrast with the lines of conduct indicated in this Code may determine, thanks to the activation of appropriate clauses, the termination of the contractual relationship. The Company undertakes to ensure, with the collaboration of the elected Supervisory Body, the elaboration, updating and inclusion in the letters of appointment or in the contractual or partnership agreements of these specific contractual clauses which provide, in the event of non-compliance with the established ethical principles, the resolution of contractual obligations.

## **22. Whistleblowing**

The system for protecting reports of violations of the provisions of this code of ethics is considered, as also specified in the general part of the Organizational Model, a fundamental tool not only for self-regulation and internal management, but also, and above all, for the effective application of the crime risk prevention system.

And in fact, as has already been noted in the Organizational Model "The adoption of ethical principles relevant to the prevention of crimes pursuant to the Decree is an essential element of the preventive control system".

Therefore, apart from cases of liability by way of slander or defamation, or for the same reason pursuant to Article 2043 of the Civil Code, an employee who reports a violation of the Code of Ethics, even if not a crime, must not be involved in any disadvantageously for this action, regardless of whether his report was later found to be well founded or not.

An employee who believes that he has been discriminated against in his business following a report of a violation of the Code of Ethics must report the abuse immediately to his Manager; where the abuse comes from the Manager then the employee can contact the elected O.d.V. or to the Board of Directors.

O.m.c.m. S.r.l. is committed to providing a workplace free of discrimination and harassment, as specifically stated above, and expects all employees to do everything possible to maintain this type of work environment.

The company will not tolerate harassment of an employee by anyone. Disciplinary action will be taken against anyone who discriminates against or harasses any employee who reports a violation of the code of ethics.

An employee who reports a violation of this code or transmits an accusation whether it is false, or presented by means other than those recognized by the protection system, will not be entitled to the protections offered by the latter. Disciplinary proceedings will be initiated against anyone intentionally raising false or irregular allegations.

O.m.c.m. S.r.l. encourages all employees who wish to raise an issue relating to a violation of the code of ethics to discuss it with the direct Head of Department before following the whistleblowing procedures, unless there are obvious contraindications.

It is expected that in most cases, the Function Manager will be able to solve the problem informally. To this end, the Department Managers must consider all the concerns raised seriously and completely and, where necessary, seek opinions from the Board of Directors or the elected SB, each according to their competences, and from other competent figures and / or carry out in-depth investigations, in compliance with their powers. If the report is unsuccessful or the employee feels uncomfortable in submitting the report to the Function Manager, the employee must contact the Board of Directors or the SB, each for his or her competences.

Consultants and Partners, in relation to the activity carried out with O.m.c.m. S.r.l., report directly to the elected Supervisory Body or to the Board of Directors, in relation to the specific case.

To allow a correct assessment and a complete investigation of a report relating to suspicious behavior, when reporting the alleged violation, employees must provide the following information:

- description of the matter with all relevant details (for example the incident, the type of behavior, the date and place of the incident and the parties involved);
- indication that you confirm whether the fact has happened, is happening or is likely to happen;
- indication of how the employee became aware of the fact / situation;
- existence of witnesses;
- additional information deemed relevant by the employee;
- if the employee has already raised the issue with someone else and, if so, to whom;
- the specific function within which the suspicious behavior occurred.

Where possible and not contraindicated, the employee making the report must also provide his or her name and contact information. The non-anonymous reporting procedure must be preferred, by virtue of the greater ease of ascertaining the violation.

The election of the Supervisory Body and the Board of Directors establish an internal communication channel that guarantees, if the nature of the report so requires, the confidentiality of what is reported, also in order to avoid retaliatory attitudes towards the whistleblower.

Employees who wish to remain anonymous must use traditional mail or the special box located at the entrance to the company.

In any case, anonymous reporters are asked to provide sufficient information relating to a fact or situation to allow for an adequate investigation.

In the event of a report:

- All personnel involved in any capacity whatsoever in the whistleblowing system are required to maintain high standards of professionalism and confidentiality.
- Any documents created in connection with a whistleblowing report must be kept strictly confidential.
- During any communication and / or meeting, it is necessary to pay attention and avoid possible harmful statements to protect the identity of the people involved and make sure that the investigations do not cause damage.
- All investigations must be carried out in such a way as to avoid excessive attention and / or speculation on the part of those who must not be involved.
- Communications should only be directed to people who need to be informed.
- Each employee questioned in relation to an investigation must be aware that the issue will be treated confidentially and must avoid talking to third parties.

## 23. Sanctions

Failure to comply with the rules of the Code of Ethics by the Recipients involves different penalties depending on the role played by the Recipient concerned, without prejudice to any right to compensation for any damage resulting from such non-compliance.

The observance of the Code of Ethics by the Recipients adds to the general duties of loyalty, correctness, good faith execution of the contract, and is also relevant for the purposes of art. 2104 of the Italian Civil Code (Employee diligence). Violations of the rules of the Code of Ethics constitute a breach of the obligations deriving from the employment relationship, with all contractual and legal consequences, also with reference to the relevance of the same as a disciplinary offense and / or the preservation of the employment relationship. For violations of the Code of Ethics committed by subjects having collaborative relationships with O.M.C.M. S.r.l will apply the sanctions contained in the respective contracts.

O.M.C.M. S.r.l undertakes to foresee and impose, in compliance with the provisions of the corporate disciplinary system and the procedures of the national collective bargaining agreement for the category, sanctions proportionate to the seriousness of the violations committed. In particular, violations of the provisions and principles established in the Code of Ethics may give rise to the application of sanctions and / or additional measures, also of a precautionary nature, expressly indicated on pages 42 ff. of the Organizational Model pursuant to Legislative Decree no. 231.

Violations of the Code of Ethics by members of corporate bodies may result in the adoption by the competent corporate bodies of the measures deemed most appropriate among those provided for by law.

### 24. Publicity of the Code of Ethics and training of staff

The dissemination of the Code of Ethics and company procedures to the Recipients is ensured through adequate communication tools.

O.M.C.M. S.r.l ensures the publication of the Code of Ethics on the website [www.omcm.it](http://www.omcm.it)

O.M.C.M. S.r.l ensures that the Code of Ethics is effectively implemented through the continuous promotion of the most appropriate communication, training and consultative support initiatives, aimed at the Recipients.

The Code of Ethics is checked and updated on an annual basis.

Any update, modification and / or integration of the Code of Ethics will be approved by the Board of Directors and promptly disseminated to all Recipients with the means that will be deemed most suitable.