OMT
FABBRICA VITERIE

CODE OF CONDUCT & ETHICS

ECCELLENCE & INTEGRITY

REVISION 01
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INDEX

DOCUMENT INFORMATION 3
1. INTRODUCTION 4
1.1. COMPANY MISSION AND ETHICS 4
1.2. ADDRESSEES OF THE CODE AND ITS FIELD OF APPLICATION 4
1.3. WHAT THE CODE OF ETHICS IS ABOUT AND ITS OBJECTIVES 5
2. CORPORATE VALUES 6
3. GENERAL ETHICAL PRINCIPLES 7
3.1. COMPLIANCE WITH THE LAW 7
3.2. HUMAN AND LABOUR RIGHTS 7
3.3. IMPARTIALITY AND RESPECT FOR INDIVIDUALS 7
3.4. VALORISATION OF HUMAN RESOURCES 7
3.5. HEALTH AND SAFETY 7
3.6. ENVIRONMENTAL PROTECTION 7
3.7. HONESTY, TRUST AND COOPERATION 8
3.8. PROTECTION OF THE CORPORATE IMAGE 8
3.9. RECIPROCITY 8
4. BUSINESS PRINCIPLES 9
4.1. QUALITY OF PRODUCTS AND SERVICES 9
4.2. FAIR COMPETITION AND ANTITRUST LAW 9
4.3. COMPLIANCE WITH ANTI-CORRUPTION LAWS 9
4.3.1. GIVING/ACCEPTING GIFTS OR OTHER BENEFITS 9
4.4. DUTY OF IMPARTIALITY AND CONFLICT OF INTEREST 9
4.5. PROHIBITION OF MONEY LAUNDERING OPERATIONS 10
4.6. FIGHTING ORGANIZED CRIME 10
4.7. RESTRICTIONS ON INTERNATIONAL TRADE 10
4.8. PROTECTION OF INDUSTRIAL AND INTELLECTUAL PROPERTY 10
4.9. CONTRIBUTIONS AND SPONSORSHIPS 10
5. DEALING WITH THIRD PARTIES 11
5.1. RELATIONS WITH CUSTOMERS 11
5.1.1. CUSTOMER CENTRALITY 11
5.1.2. QUALITY 11
5.1.3. IMPARTIALITY AMONG CUSTOMERS 11
5.1.4. FAIRNESS IN NEGOTIATION AND PROCUREMENT 11
5.1.5. CUSTOMER INVOLVEMENT 11
5.2. RELATIONS WITH SUPPLIERS 12
5.2.1. OBJECTIVITY IN THE SELECTION 12
5.2.2. COOPERATION AND INTEGRITY OF COMMUNICATION 12

5.2.3. HEALTH AND SAFETY PROTECTION OF SUPPLIERS 12
5.3. RELATIONS WITH THE PUBLIC ADMINISTRATION 12
5.3.1. LEGALITY, FAIRNESS AND TRANSPARENCY 12
5.3.2. FUNDING AND SUBSIDIES 13
5.3.3. JUDICIAL AUTHORITY 13
5.4. RELATIONS WITH POLITICAL PARTIES, TRADE UNIONS AND OTHER PROFESSIONAL ASSOCIATIONS 13
6. RELATIONS WITH EMPLOYEES AND COLLABORATORS 14
6.1. PERSONNEL SELECTION 14
6.2. THE EMPLOYMENT RELATIONSHIP 14
6.3. PERSONNEL MANAGEMENT 14
6.3.1. PROTECTION OF INDIVIDUALS 14
6.3.2. ENHANCEMENT AND TRAINING OF HUMAN RESOURCES 14
6.3.3. TIME MANAGEMENT 14
6.3.4. INVOLVEMENT 15
6.4. FREEDOM OF ASSOCIATION 15
6.5. TRANSPARENCY AND TRUTHFULNESS OF INFORMATION 15
6.6. DILIGENCE IN THE USE OF COMPANY RESOURCES 15
6.6.1. PROTECTION OF IT (Information Technology) TOOLS 15
6.7. HEALTH AND SAFETY AT WORK 16
6.8. DUTIES OF EMPLOYEES AND COLLABORATORS 16
7. CONFIDENTIALITY AND PRIVACY 17
7.1. CONFIDENTIALITY OF COMPANY INFORMATION 17
7.2. PERSONAL DATA PROTECTION 17
8. ADMINISTRATIVE AND ACCOUNTING MANAGEMENT 18
8.1. FINANCIAL INTEGRITY 18
8.2. APPROPRIATE COMPANY DOCUMENTATION 18
9. ARRANGEMENTS FOR IMPLEMENTING AND MONITORING THE CODE 19
9.1. DIFFUSION, COMMUNICATION AND TRAINING 19
9.2. IMPLEMENTATION 19
9.3. MONITORING 19
9.4. WHISTLE-BLOWING POLICY 20
9.5. CODE VIOLATIONS AND SYSTEM OF SANCTIONS 21
9.6. DIFFUSION AND UPDATES OF THE CODE 21

DOCUMENT INFORMATION

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01	07/11/24	Specification of requirements under Article 15 of Law No. 125 dated 30 March 2001 and subsequent decrees and implementing provisions.	6.7	16

1. INTRODUCTION

As a company with established experience in the fasteners industry, O.M.T. Fabbrica Viterie (hereinafter also referred to as "the Company") is committed to the development of a fair and sustainable business, based on a long-term and forward-looking business strategy.

By virtue of this vision of its business role, O.M.T. Fabbrica Viterie has introduced its own Code of Ethics (hereinafter also referred to as "the Code") which expresses all ethical duties and responsibilities in the management of its business and corporate activities. Equity and fairness in the management of contractual and working relations, moral integrity and protection of its image, transparency and impartiality, guaranteeing workers' safety and promoting an ecological awareness, as well as the full observance of all Italian and international laws, are the guiding principles of this Code of Ethics.

With the approval of this Code, O.M.T. Fabbrica Viterie declares to inspire its activity to the principles contained in it and not to undertake, or continue, any relationship with anyone who proves not to share its spirit or violate its principles and rules of conduct.

1.1. COMPANY MISSION AND ETHICS

The Company's primary objective is to pursue excellence in the supply of quality fastening systems and its related services, enhancing personnel skills and technological development, by means of continuous improvement initiatives with a highly competitive impact, and increasing customer satisfaction.

In carrying out its activities, O.M.T. Fabbrica Viterie undertakes to respect the principles of fairness, honesty, responsibility and respect towards its employees, customers, suppliers, competitors, third parties, partners and all other companies and organisations with which the Company is present with its activities. The Company acts as a fair competitor in a free market.

1.2. ADDRESSEES OF THE CODE AND ITS FIELD OF APPLICATION

The Code of Ethics applies to the Company and is consequently binding for all those who, for various reasons and with different responsibilities, constitute the organisation and/or directly or indirectly achieve its objectives.
The corporate bodies and their members, employees, collaborators (regardless of the legal classification of the relationship), external consultants, agents, suppliers, customers and all persons acting in the name and/or on behalf of O.M.T. Fabbrica Viterie, on the basis of a mandate or other contractual relationship (hereinafter, for the sake of brevity, referred to as "the Addressees") are required to comply with the principles stated in this Code.
The above-mentioned Addressees are required, without distinction or exception, to respect and enforce the principles set out in this Code. In no way may the personal conviction of acting for the benefit of the Company justify the adoption of behaviours in contrast with these principles.

In consideration of the Company's commercial extension in both national and international markets, this Code of Ethics is valid both in Italy and abroad, taking into account the cultural, social and economic diversity of the various countries in which O.M.T. Fabbrica Viterie operates or may operate in the future. Some sites or countries may have policies and practices that impose stricter requirements than those stated in this Code. In all such circumstances, the policy, practice or law must be followed.

The Company will disclose this Code of Ethics by appropriate means, recommending its accurate observance.

1.3. WHAT THE CODE OF ETHICS IS ABOUT AND ITS OBJECTIVES

The Code of Ethics is one of the tools of corporate social responsibility for promoting ethical behaviour practices and professional integrity. It lists the reference values that shall guide the behaviour of all the Addressees in carrying out their daily activities.

The Code of Ethics aims manage the Company in accordance with criteria of ethics, legality, professional correctness, personal integrity, protection of health and of the working environment, as well as honest and transparent competition on the market. Furthermore, this Code is intended to promote the improvement of relations within the Company and the formation of a solid and recognised external corporate image, to consolidate the establishment of a climate of trust within the Company and towards all external interlocutors, supporting the reputation and market leadership of O.M.T. Fabbrica Viterie.

The Code of Ethics shall be interpreted as a *Charter of Rights and Duties* through which O.M.T. Fabbrica Viterie sets out its responsibilities, its ethical-social and environmental commitments.

2. CORPORATE VALUES

This Code, together with the corporate values, is a fundamental element of the Company culture, a set of indispensable guidelines that are essential for building a successful and sustainable business.

- COMMITMENT: passion for work as a guarantee of a continuous will to improve in order to satisfy customers in their current and future needs.

- PROFESSIONALISM: to offer excellence in every product and service. Commitment and know-how are the key-factors of the Company's success.

- COMMUNICATION: fundamental principle for building valuable relationships that go beyond the traditional concept of supplier, but capable of creating strategic partnerships in the long term.

- INNOVATION: the responsibility to offer the market the best combination of products and services, in terms of technical solutions, quality, competitiveness and efficiency.

- PROACTIVITY: in regularly assessing internal and external risks and taking all the necessary measures to build sustainable projects.

- AWARENESS: of rules and principles of work, of operating in full respect of the laws and of environmental protection.

3. GENERAL ETHICAL PRINCIPLES

The general principles reflect the entrepreneurial mission of O.M.T. Fabbrica Viterie and outline the ethical rules adopted in achieving it.

3.1. COMPLIANCE WITH THE LAW

O.M.T. Fabbrica Viterie considers legality as an essential value in the conduct of its business activities. Therefore, the Company is committed to complying with the laws, decrees, legal regulations as well as the generally recognized practices of the countries in which it operates.
All Addressees must be aware of the implications of the law associated with the fulfilment of their activities and are required to act in strict compliance with them. In no case does the pursuit of the Company's interest justifies and makes acceptable any behavior that conflicts with the provisions of the law.

3.2. HUMAN AND LABOUR RIGHTS

O.M.T. Fabbrica Viterie respects and supports the dignity of every individual in all its activities, in accordance with the "Universal Declaration of Human Rights" of the United Nations, and applies a zero-tolerance policy on child labor and any other form of illegal, forced or involuntary labor.

3.3. IMPARTIALITY AND RESPECT FOR INDIVIDUALS

O.M.T. Fabbrica Viterie, in compliance with the principle of equality among all individuals, avoids any kind of discrimination based on age, gender, sexuality, state of health, race, nationality, political opinions and religious beliefs of its interlocutors.
In the full interest of all involved, the Company is committed to promoting an atmosphere of cooperation and trust, and therefore prohibits acts of bullying, physical or verbal abuse and in more general terms any form of behavior that might create a hostile working environment. In consideration of this, threats aimed at inducing people to act against the law and the Code of Ethics are not tolerated.

3.4. VALORISATION OF HUMAN RESOURCES

O.M.T. Fabbrica Viterie acknowledges that all its employees and collaborators are a fundamental factor for the achievement of the Company mission and its success, contributing with professionalism to the achievement of the objectives pursued. For this reason, the Company is committed to promoting the value of human resources in order to increase their assets, by investing in the development of professional skills and ensuring working conditions that respect individual dignity.

3.5. HEALTH AND SAFETY

O.M.T. Fabbrica Viterie, aware that the health, safety and psycho-physical well-being of workers are elements that must be protected, is committed to ensuring a safe health-compliant workplace, and takes full responsibility for safeguarding the health and safety of its employees, collaborators and third parties.

3.6. ENVIRONMENTAL PROTECTION

The protection and preservation of the environment and natural resources are priority values for O.M.T. Fabbrica Viterie, which promotes initiatives to reduce the environmental impact of its business, detecting and reducing waste and inefficient use of resources and energy.

The Company is committed to complying with the applicable environmental policies and legal requirements, and ensures that waste generated by its business is regularly stored and disposed of by specialized and qualified entities.

3.7. HONESTY, TRUST AND COOPERATION

Ensuring the continuity of collaborative relationships is a fundamental ability in the successful management of business activities. For this reason, O.M.T. Fabbrica Viterie encourages that relations of all kind, internal and external to the Company, are based on observance of the principles of loyalty and transparency, collaboration and mutual respect through constant dialogue and trust.

3.8. PROTECTION OF THE CORPORATE IMAGE

Respect for the principles and ethical values of this Code represents a primary requirement in the creation and maintenance of a good company reputation. A good reputation is an essential intangible resource, as it fosters customer loyalty, suppliers' serenity and the attraction of the best human resources, contributing decisively to the pursuit of the Company's goals and success.
The Addressees, in complying with the requirements of this Code, contribute to the protection of the image and of the good reputation of O.M.T. Fabbrica Viterie.

3.9. RECIPROCITY

The Code is inspired by an ideal of cooperation with a view to mutual satisfaction of the parties involved and respecting the role of each. Therefore, O.M.T. Fabbrica Viterie requires all Addressees to behave in line with the principles and rules to which the Company conforms.

4. BUSINESS PRINCIPLES

O.M.T. Fabbrica Viterie recognizes professionalism, transparency and honesty the key principles for the proper conduct of business and to ensure the success and competitiveness of the Company.

4.1. QUALITY OF PRODUCTS AND SERVICES

In compliance with the Company's mission to pursue excellence in the supply of fastening systems and in line with customers' expectations, O.M.T. Fabbrica Viterie targets its industrial processes and services towards high quality standards, constantly promoting every activity that can contribute to the qualitative improvement of the products and services themselves.

4.2. FAIR COMPETITION AND ANTITRUST LAW

O.M.T. Fabbrica Viterie is committed to fair and free competition, fully and scrupulously complying with antitrust regulations, competing on the merits of products and services and encouraging transparent and collaborative relationships with its partners.
All business operations, especially those of commercial nature, must be carried out in accordance with this principle, avoiding actions that have a negative effect on the market or that restrict competition (e.g. agreements containing exclusivity clauses, constraints on pricing, territorial restrictions, etc.).
Violations of antitrust and fair competition laws carry significant penalties that may jeopardize the sustainability of O.M.T. Fabbrica Viterie.

Respecting the above-mentioned principles of transparency and honesty, the Company does not deny, conceal or delay any information requested by the Competition Authority and other regulatory entities in their inspection functions.

4.3. COMPLIANCE WITH ANTI-CORRUPTION LAWS

Corruption hinders progress and innovation, and it irreparably damages the image of the Company. In general, corruption is considered to be any practice aimed at soliciting or accepting, directly or indirectly, for oneself or for others, undue advantages, whether in the personal interest or in the interest of the Company.
O.M.T. Fabbrica Viterie for the values it supports in the conduct of its business, prohibits any action, either by its own personnel or by third parties, aimed at promoting or favouring its activities in an illicit manner.

4.3.1. GIVING/ACCEPTING GIFTS OR OTHER BENEFITS

Addressees are not permitted (either directly or through third parties) to give, promise, offer or receive to or from anyone any gift (money, goods, services or other benefits) that may be interpreted as exceeding normal business practices or courtesy, or intended to obtain favourable treatment in the conduct of any activity related to the Company, therefore aimed at influencing the beneficiary and inducing him/her to behave contrary to official duties (e.g. promises of economic advantages, favours, recommendations, job offers, travel bonuses, etc.).

4.4. DUTY OF IMPARTIALITY AND CONFLICT OF INTEREST

All business decisions and choices shall be made in the best interests of O.M.T. Fabbrica Viterie, and in line with the principles of good corporate management.
The Addressees of this Code must avoid all situations and activities where a conflict of interest may arise between economic, personal or family activities and the position held, such as to influence the independence of judgment and conflict with the goals of the Company (e.g. the existence of financial holdings or business relations with suppliers, customers or competitors).

Furthermore, employees, collaborators and consultants, as well as those acting in the name and on behalf of O.M.T. Fabbrica Viterie, shall ensure that every business decision is made in the interest of the Company (e.g. it must be avoided that a collaborator pursues an interest other than that of the Company and/or takes personal advantage of a business opportunity of the Company).

4.5. PROHIBITION OF MONEY LAUNDERING OPERATIONS

O.M.T. Fabbrica Viterie complies with the application of both national and international anti-money laundering laws. As well as O.M.T. Fabbrica Viterie complies with laws, regulations and measures of the competent authorities on tax and fiscal matters.
All Addressees of this Code shall fully comply with anti-money laundering laws, in particular, the Directors are required to ensure full traceability of incoming and outgoing financial flows.

4.6. FIGHTING ORGANIZED CRIME

O.M.T. Fabbrica Viterie condemns and fights all forms of organized crime, including mafia-related crimes. For this reason, the Addressees of this Code are called upon to prevent the risk of criminal infiltration by carefully verifying the requirements of honourableness and reliability of business counterparts (such as suppliers, consultants, business partners), with the exclusion of any counterpart suspected of belonging to, being close to, or favouring criminal organisations.

4.7. RESTRICTIONS ON INTERNATIONAL TRADE

It is O.M.T. Fabbrica Viterie's policy to ensure compliance with all applicable local and international customs regulations, as well as to comply with all applicable economic and financial restrictions in relation to war zones and/or embargoes.

4.8. PROTECTION OF INDUSTRIAL AND INTELLECTUAL PROPERTY

O.M.T. Fabbrica Viterie operates in full respect of the industrial and intellectual property rights legitimately held by third parties, as well as the laws, regulations and conventions protecting such rights.

In this regard, all Addressees of this Code are required to respect the legitimate industrial and intellectual property rights of third parties and to refrain from the unauthorized use of these rights in accordance with the Law on Copyright (Law no. 633/1941).
In particular, the Addressees, in carrying out their activities, must refrain from any behaviour that may constitute the usurpation of industrial property rights, alteration or counterfeiting of trademarks and/or of distinctive signs of industrial products, patents, designs or industrial models, both national and foreign.

4.9. CONTRIBUTIONS AND SPONSORSHIPS

Any contributions and sponsorships of the Company intended to be disbursed in favour of non-profit organisations and/or associations are bestowed within the limits and in compliance with the provisions of the law in force.
Such initiatives (concerning social, environmental, sports, entertainment, art matters) require a prior verification of the honourableness of the beneficiary and the occurrence of possible conflicts of interest.

5. DEALING WITH THIRD PARTIES

O.M.T. Fabbrica Viterie is particularly committed to developing a relationship of trust with all its possible interlocutors, to build and support a fair and competitive business, based on integrity, professionalism and full respect for the laws and parties.

5.1. RELATIONS WITH CUSTOMERS

A Customer is defined as anyone who benefits from the Company's products or services for any reason.

5.1.1. CUSTOMER CENTRALITY

O.M.T. Fabbrica Viterie considers customer satisfaction as a factor of primary importance for the business success and bases its competitiveness on the ability to identify and satisfy customer's needs, both present and future ones.
Oriented towards continuous improvement, operational and qualitative excellence, the Company is committed to a constant monitoring of its processes and of the entire supply chain, by focusing its actions to a full compliance with the customer requirements and expectations, both in terms of products and services.

5.1.2. QUALITY

O.M.T. Fabbrica Viterie intends to be a reliable and trusted partner for all its customers and plans to develop its market by adhering to this principle and by providing products and services of quality. For this reason, the Company directs its industrial processes and services to the highest quality standards, ensuring quality targets aligned with customer requirements.

5.1.3. IMPARTIALITY AMONG CUSTOMERS

O.M.T. Fabbrica Viterie undertakes not to discriminate its customers by guaranteeing equal treatment in the supply of services and products.

5.1.4. FAIRNESS IN NEGOTIATION AND PROCUREMENT

O.M.T. Fabbrica Viterie is committed to building relationships with its customers based on the criteria of simplicity, honesty and transparency, avoiding the use of any misleading practices, in order to create and maintain over time a profitable working collaboration based on maximum efficiency and courtesy. Agreements and communications with customers shall be formulated in a clear and easily understandable way, in compliance with the applicable regulations, and complete with all information relevant to the customer's decision-making process.

5.1.5. CUSTOMER INVOLVEMENT

O.M.T. Fabbrica Viterie considers the involvement of its customers in the fulfilment of its activities as fundamental. Listening to their needs and differences becomes a source of inspiration to provide new solutions with a highly competitive impact. Therefore, the Company is committed to take into consideration the remarks and complaints submitted by customers and associations for their protection, ensuring the appropriate and timely management, by adopting a style of conduct based on professionalism, availability, respect and courtesy.

5.2. RELATIONS WITH SUPPLIERS

Suppliers are the individuals and companies that, for various reasons, provide goods, services and resources necessary for the implementation of activities and provision of services, contributing to the achievement of the Company's aims.

5.2.1. OBJECTIVITY IN THE SELECTION

In supply relationships for goods and/or services, O.M.T. Fabbrica Viterie selects its suppliers on the basis of objective assessments in terms of quality, price and other requirements.
Therefore, selection processes are based on an impartial comparison of competence, competitiveness, quality, respectability and reputation of the different suppliers avoiding any form of favouritism or discrimination.

5.2.2. COOPERATION AND INTEGRITY OF COMMUNICATION

O.M.T. Fabbrica Viterie is committed to developing cooperative relationships with its suppliers, based on a communication aiming at the mutual exchange of information and know-how, and fostering the creation of common value for greater end-customers satisfaction.
With a view to mutual advantageous collaboration with suppliers, employees and collaborators are required to:

- establish efficient, transparent and collaborative relationships, maintaining an open and honest dialogue in line with the best business practices;
- obtain the collaboration of suppliers in constantly ensuring the most convenient balance between quality, cost and delivery time;
- demand the application of the conditions contractually stipulated;
- demand that suppliers comply with the provisions of this Code.

5.2.3. HEALTH AND SAFETY PROTECTION OF SUPPLIERS

O.M.T. Fabbrica Viterie aims to spread the culture of health and safety among its suppliers and, in particular, protects the health and safety of suppliers who carry out activities and/or visits at the Company's sites with appropriate preventive measures of organisational and technical nature.

5.3. RELATIONS WITH THE PUBLIC ADMINISTRATION

The Public Administration is represented by all those subjects, both of public and private jurisdiction, that perform a "public function" or a "public service". It has to be understood in the broadest sense of the term, such as to include also the Public Administration of Foreign States, as well as all those subjects that can be designated as such in accordance with the current legislation, including, therefore, public officials, individuals in charge of public services, private entities in charge of a public service, as well as private entities that are subjected to public regulation.

5.3.1. LEGALITY, FAIRNESS AND TRANSPARENCY

The undertaking of commitments and the management of relations, of whatever nature, with the Public Administration must be characterised by strict compliance with the national, European and international laws in force. The addressees involved in any relations with the Public Administration are required to be fully transparent, clear and fair in order to establish a relationship of maximum professionalism and collaboration.
In particular, the following applies to the representatives of the Public Administration and the regulatory Authorities:

- Corrupt practices, active or passive, or collusive behaviours of any kind and in any form are not permitted;
- It is not permitted to offer money or benefits of any kind or to perform acts of commercial courtesy in favour of representatives of the Public Administration, or their relatives, except in the case of goods of modest value (with prior authorisation of the corporate management board) and which cannot in any way be interpreted as a means used to influence them in the accomplishment of their duties, to receive illegitimate favours and/or take undue advantages;
- It is strictly forbidden to illegally pursue or establish favourable personal relationships, likely to influence, directly or indirectly, the outcome of the relation with the Public Administration.

The documentation concerning operations, transactions and activities for which O.M.T. Fabbrica Viterie has come into contact with the Public Administration must be kept diligently to ensure maximum transparency and traceability of information.
It is strictly forbidden to destroy or alter records, reports, accounting records or any kind of document; to lie, or to make misleading statements to the competent Authorities.

5.3.2. FUNDING AND SUBSIDIES

Any behaviour aimed at obtaining, from the State, the Regions, the European Union or any other public authority, any type of contribution, funding or other disbursements of the same type, by means of altered or falsified declarations and/or documentations aimed at misleading the granting authority, is forbidden.
It is also prohibited to allocate contributions, subsidies or funding granted, for purposes other than those declared and for which they were granted by the State, the Regions, the European Union or any other public authority.

5.3.3. JUDICIAL AUTHORITY

O.M.T. Fabbrica Viterie aligns its relations with the Judicial Authority to the utmost collaboration in full respect of its institutional role. The people in charge of dealing with the Judicial Authority are required to behave in accordance with the principles of transparency, fairness and professional rigour, avoiding any kind of behaviour that could be interpreted in a misleading way or in contrast with the laws and values of this Code.

5.4. RELATIONS WITH POLITICAL PARTIES, TRADE UNIONS AND OTHER PROFESSIONAL ASSOCIATIONS

O.M.T. Fabbrica Viterie does not contribute in any way to the financing of political parties, movements, committees or trade union organisations representing workers, their representatives or candidates, in respect of whom a conflict of interest could arise.
Furthermore, the Company abstains from any behaviour aimed at exerting direct or indirect pressure on political representatives.

6. RELATIONS WITH EMPLOYEES AND COLLABORATORS

O.M.T. Fabbrica Viterie recognizes in its employees and collaborators a primary factor for the achievement of the Company's objectives and success, by virtue of the professional and personal contribution they make, within a working relationship based on professionalism, commitment and dedication, fairness and mutual trust.

6.1. PERSONNEL SELECTION

O.M.T. Fabbrica Viterie carries out an evaluation of the personnel to be hired on the basis of the correspondence of the candidates' profiles with those expected and with the Company's needs, in full compliance with equal opportunities for all those concerned. The information requested are closely related to the verification of professional and psycho-aptitude requirements, respecting the candidate's privacy and opinions.

6.2. THE EMPLOYMENT RELATIONSHIP

O.M.T. Fabbrica Viterie does not tolerate any form of irregular or undeclared work. The personnel is hired with regular employment contracts in compliance with the various types of contracts permitted by the law. The recruitment of foreign personnel without a regular residence permit is specifically forbidden.
In establishing the employment relationship, the Company undertakes to provide the employee with accurate information about the function and the duties to be performed, the regulatory and salary profiles (as regulated by the national collective labour agreement), as well as, about the rules and the procedures to be followed to ensure health and safety during work.

6.3. PERSONNEL MANAGEMENT

O.M.T. Fabbrica Viterie is aware that the achievement of the Company goals depends on qualified, responsible and loyal employees and collaborators. In this perspective, the Company implements a personnel management policy aimed at preserving and consolidating the professionalism of its employees.

6.3.1. PROTECTION OF INDIVIDUALS

O.M.T. Fabbrica Viterie avoids any form of discrimination, whether related to physical condition, disability, opinions, nationality, religion, sex, gender identity, or any other condition that may lead to discrimination. Likewise, each employee and collaborator is required to adopt an attitude marked by respect, protection of the personal dignity, collaboration and human solidarity towards their colleagues.

6.3.2. ENHANCEMENT AND TRAINING OF HUMAN RESOURCES

O.M.T. Fabbrica Viterie is committed to enhancing the skills, abilities and commitment of all its employees, combining the Company's growth needs with the worker's training requirements and guaranteeing growth paths based exclusively on professional merit. The Company also undertakes to recognise salaries that are proportionate to the quality and quantity of the work performed, and in line with the provisions of applicable collective bargaining.

6.3.3. TIME MANAGEMENT

O.M.T. Fabbrica Viterie is committed to strict compliance with the current and applicable legislation in the matter of working hours, weekly rest and holidays.
Likewise, all workers have the duty to pursue, in the use of their time, the maximum efficiency of the organization.

6.3.4. INVOLVEMENT

O.M.T. Fabbrica Viterie promotes a working environment built on the information and involvement of personnel, encouraging the contribution of all pertinent professional figures to the solution of problems. All employees and collaborators are called upon to participate in meetings and discussions with a spirit of collaboration, proactivity and independence of judgement.

6.4. FREEDOM OF ASSOCIATION

O.M.T. Fabbrica Viterie recognises and respects the freedom of association and the right of workers to form and join trade unions of their choice and to bargain collectively, within the limits of applicable laws and statutes, and ensures that official representatives of such trade unions are not subject to discrimination.

6.5. TRANSPARENCY AND TRUTHFULNESS OF INFORMATION

All employees and collaborators, in their working relationship with the Company, must guarantee the truthfulness, transparency, accuracy and completeness of the documents and information provided in the fulfilment of their duties. Each worker is responsible for ensuring that the documentation entrusted to him/her is carefully kept and conserved, easily available and filed in an orderly manner and according to logical criteria.

6.6. DILIGENCE IN THE USE OF COMPANY RESOURCES

Each employee and collaborator is required to act with the diligence necessary to protect the Company's resources and tools, by behaving responsibly and in line with the operating procedures established to regulate their use, as well as, with the regulations in force, and by avoiding improper uses that may also result harmful to third parties, or in any case be in conflict with the Company's interest. Moreover, it is also up to the workers not only to protect such assets, but also to prevent their fraudulent use.

6.6.1. PROTECTION OF IT (Information Technology) TOOLS

Directors, employees and collaborators must strictly adhere to Company procedures, as well as applicable laws on information security, and use IT systems (hardware/software) and communication systems (telephones / faxes / internet, etc. ...) in compliance with the beforementioned procedures, avoiding behaviour that may compromise their functionality or, in general, the protection of the Company's IT system.

In particular, it is forbidden to:

- upload unauthorized software onto the Company IT systems;
- extract unauthorized copies of licensed programmes for personal or commercial use;
- illegally distribute, duplicate or market software and/or the contents of a database;
- modify and/or falsify data and information stored in the Company IT system.

The IT activity must be carried out by each authorised person, using his/her own credentials, and refraining both from accessing the IT systems using the credentials or authorisations of third parties and from providing any other person his/her own credentials to access the IT systems.

6.7. HEALTH AND SAFETY AT WORK

Safety is a fundamental value that must be integrated into every activity and task, within a risk prevention perspective that involves all the Addressees. In particular, the Company requires its employees and collaborators to take part diligently in internal health and safety training courses and to conduct their operations in scrupulous compliance with the current safety and prevention regulations, for their own and others' safety at work.

In compliance with the requirements stated in Article 15 of Law no. 125 dated 30 March 2001 and subsequent decrees and implementing provisions, all employees and collaborators are prohibited from consuming (and serving) alcoholic beverages, spirits and psychotropic and narcotic substances at work.
The prohibition extends to employees using company or personal vehicles during their work. Any transgressions will be subject to administrative sanctions.

Every employee and collaborator must contribute, in the daily routine of their work, to an exemplary performance in this field, by promptly reporting any malfunctions or possible improvements to those in charge.

The fundamental principles and criteria guiding the Company's decisions on health and safety at work are:

- avoid risks and fight them at source;
- carefully assess the risks that cannot be avoided;
- adapt the work to the person, especially in the concept of the workplace, the appropriate choice of equipment and working methods;
- provide workers with necessary and appropriate personal protective equipment;
- take into account the continuous technological developments in the field and as far as possible replace what is dangerous with what is not dangerous or with what is less dangerous;
- give appropriate instructions to workers on the rules and procedures to be adopted in order to prevent accidents at work and occupational illnesses.

6.8. DUTIES OF EMPLOYEES AND COLLABORATORS

The reputation of O.M.T. Fabbrica Viterie is widely characterised by the behaviour, actions and conduct of all its employees and collaborators, therefore the Company requires all personnel to diligently comply with applicable Laws, this Code of Ethics and internal regulations.

Employees and collaborators are required to work in the interest of the Company, pursuing objectives of effectiveness and efficiency, paying the utmost attention to the constant supply of products and services of excellence, and aimed at ensuring the highest customer satisfaction.

7. CONFIDENTIALITY AND PRIVACY

7.1. CONFIDENTIALITY OF COMPANY INFORMATION

The protection of the business secret and of the confidential information plays a crucial role in the performance of business activities, in ensuring competitiveness, in the market protection and the possibility to developing profitable synergies with business partners.

Addressees are required to comply with the principle of confidentiality of business information, ensuring the utmost secrecy in relation to news and information concerning the Company's activities or those of third parties related to it.

Confidential information is considered to be any data affecting the Company's competitive activities, whether of a technical, administrative, financial or commercial nature and which could be useful to third parties or harmful to the Company itself if disclosed (e.g. work projects, strategic business and industrial plans, process and product know-how, financial operations, operational and investment strategies, etc. ...).

Especially for employees and collaborators, the obligation to protect from disclosure any confidential information (acquired during their service to the Company before it has been formalised and formally communicated to the parties concerned) persists even after leaving the Company.

O.M.T. Fabbrica Viterie bases all its activities on the protection of confidentiality and is committed to:

- ensure the secrecy of information, acquired in business relations or within the company, concerning its interlocutors;
- avoid any improper use of the information itself.

7.2. PERSONAL DATA PROTECTION

O.M.T. Fabbrica Viterie ensures to process the personal data of its employees, customers, suppliers and/or third parties that are provided or communicated to it within the scope of its activities, in full compliance with the National and European legislation in force pro tempore on the subject.

In particular, the Company ensures that personal data are:

- required for specific, explicitly defined and justified purposes;
- appropriate and not exceeding the purposes for which they were collected;
- protected in distribution, except when disclosure to third parties is necessary for the proper management of its activities;
- protected against unauthorized access.

8. ADMINISTRATIVE AND ACCOUNTING MANAGEMENT

8.1. FINANCIAL INTEGRITY

O.M.T. Fabbrica Viterie works with the utmost accounting transparency and under the principles of truthfulness, accuracy and completeness of information.
The financial statements and accounting books accurately reflect all Company transactions to ensure legal business practices and prevent fraudulent activities.

Anyone who is aware of possible omissions, falsifications or alterations in accounting records and/or related documents, is required to promptly inform the competent corporate function.

8.2. APPROPRIATE COMPANY DOCUMENTATION

O.M.T. Fabbrica Viterie guarantees that the Company documentation is written in accordance with applicable legal and accounting principles and declares itself readily available to provide such information to those authorised to inspect it, such as auditors or government entities.

All the corporate functions, as far as they are concerned, are responsible for the truthful, complete, regular, clear and accurate keeping of the accounting records.

The accounting records, economic and financial information of the Company shall not be transmitted or disclosed to third parties without the authorisation of the competent corporate function.

9. ARRANGEMENTS FOR IMPLEMENTING AND MONITORING THE CODE

9.1. DIFFUSION, COMMUNICATION AND TRAINING

O.M.T. Fabbrica Viterie is committed to bring the knowledge of this Code of Ethics to all the employees of the Company and to those who have collaborative relations with it, even on a temporary basis.

The Code of Ethics is brought to the attention, inside and outside the Company, by means of appropriate communication activities (display of a copy of the Code on the Company notice board, insertion on the Company portal, insertion of an informative note about the adoption of the Code in all contracts).

All the interested parties must formally confirm in written form that they have received the Code of Ethics and that they are aware of its contents.

9.2. IMPLEMENTATION

The Addressees must be aware of the existence of control procedures and be conscious of their contribution to the achievement of the Company's objectives and efficiency.

Internal controls are understood to be all the tools necessary or useful for guiding, managing and verifying the Company's activities with the aim of ensuring compliance with the law and Company procedures, protecting the Company's assets, managing activities efficiently, and providing accurate and complete accounting and financial data.

The responsibility to create an effective internal control system is common to every operational level. Consequently, all "addressees", within the scope of their functions, are responsible for the definition, implementation and correct functioning of the controls inherent to the operational areas assigned to them.

Within the scope of their responsibilities, department or unit heads are required to be involved in the Company's control system and to involve their employees in it.

Every operation and transaction must be correctly recorded, authorised, legitimate, coherent, congruent and verifiable.

All actions and operations of the Company must be properly recorded, and it must be possible to verify the process of decision, authorisation and execution. For each operation there must be an adequate documental report, in order to be able, at any time, to carry out controls that certify the characteristics and motivations of the operation and identify who authorised, performed, recorded and verified it.

9.3. MONITORING

The person in charge of the Quality Management System and in general the personnel (possibly external) who perform internal audits within the scope of ISO 9001/IATF 16949, as far as within their competence, are entrusted with the responsibility of verifying the implementation of the Code of Ethics and the compliance with it. In particular, within the relevant competences, the above-mentioned functions shall:

- monitor the initiatives for the diffusion of knowledge and comprehension of the Code of ethics;
- propose hypotheses for the revision of corporate procedures;
- carry out monitoring activities of corporate conduct, in order to assess the level of respect and observance of the principles expressed in the Code;

- report cases of breach of the principles of the Code to the chairman of the board of directors, for the adoption of possible sanctioning measures.

9.4. WHISTLE-BLOWING POLICY

The purpose of the whistleblowing policy is to ensure the anonymity of reports of non-compliance with laws or regulations, Company policies, rules and procedures and, in particular, with this Code of Ethics.

The Company is committed to facilitate whistleblowing so that it can benefit from it and intercept non-compliant behaviours on time, in order to remedy and correct them.

The whistleblowing system is the tool through which protection is provided to those who report non-compliance in good faith. The aim of the tool is to prevent the occurrence of irregularities within the organisation, but also to involve all interested parties and, more in general, all the people around the Company, in activities to combat non-compliance, through active and responsible participation.

All interested parties may report, in writing and non-anonymously, any violation or suspected violation of this Code of Ethics by ordinary email to the following address:

O.M.T. Fabbrica Viterie S.r.l.
Segnalazioni Whistleblowing
Via Guglielmo Marconi 8/E
24030 – Brembate di Sopra (BG) – Italia

The CEO of the Company (the only one with access to the Whistleblowing correspondence) analyses the report, possibly consulting the author and the person of the alleged violation.

The CEO acts in such a way as to protect whistleblowers against any kind of retaliation, intended as an act that may rise even the mere suspicion of being a form of discrimination or penalisation (e.g. for suppliers: interruption of business relations; for employees: non-promotions, etc.). The confidentiality of the identity of the whistleblower is ensured, without prejudice to legal obligations. The CEO activates the competent corporate functions to confirm and define corrective and/or sanctioning measures, to take care of their implementation and report the results to the board of directors.

O.M.T. Fabbrica Viterie ensures that whistleblowers who report in good faith will be protected against any form of retaliation, discrimination or penalisation, and their identity will be kept confidential, without prejudice to legal obligations and the protection of the Company's rights.

9.5. CODE VIOLATIONS AND SYSTEM OF SANCTIONS

Compliance with this Code of Ethics by all employees is additional requirement to the obligation to fulfil the general duties of loyalty, fairness and performance of the employment contract in good faith, as required pursuant to and for the purposes of Articles 2104 and 2105 of the Civil Code. It must also be considered an essential part of the contractual obligations assumed by non-subordinate collaborators and/or persons having business relations with the Company.
Violation of the rules of this Code may constitute a breach of the obligations arising from the employment relationship, in accordance with Art.7 of the Workers' Statute (Law No. 300 if 30 May 1970) with all contractual and legal consequences, including termination of the contract and/or assignment, and may entail compensation for damages arising therefrom.

O.M.T. Fabbrica Viterie undertakes to provide for and impose, with coherence, impartiality and promptness proportionate sanctions to the respective breaches of this Code of Ethics and in compliance with the provisions in force on the regulation of labour relations.

9.6. DIFFUSION AND UPDATES OF THE CODE

This Code of Ethics is disclosed through:

- The publication on the Company's website;
- The display on the appropriate notice boards.

O.M.T. Fabbrica Viterie undertakes to update the contents of the Code of Ethics when requirements dictated by changes in the context, in the reference regulations in force or in the Company organisation make it appropriate and necessary.
Any declared provisions of this Code of Ethics that should go against the applicable law, e.g. as a result of a regulatory and/or legal development, shall immediately be considered null and void.

Any subsequent amendments to this Code of Ethics must be approved by the board of Directors of O.M.T. Fabbrica Viterie in accordance with the applicable regulations, requirements and legal provisions.

The English version of this Code of Ethics is solely a translation. In the event of contradictions between the Italian and the English versions, the Italian version shall take priority over the English version.