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Revision Note

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1 Introduction

The principles and values that characterize the OMP culture and business model find their natural synthesis today in this Code of Ethics (hereinafter also the "Code").

The Code represents the guideline that must guide the behavior and actions of all those who in various ways contribute to the achievement of corporate objectives.

The fundamental principles and values on which it is based are: respect for the person, legality, honesty, integrity, transparency, impartiality, correctness, diligence, professionalism, efficiency and good faith.

The provisions of the Code represent examples of the general obligations of diligence, correctness, loyalty and good faith that qualify the fulfillment of work performance and the behavior that each worker must observe in carrying out his work.

2 Recipients

Recipients are all those who, for various reasons, operate in the name and / or on behalf of OMP or in its interest regardless of the legal qualification of the relationship (the "Recipients").

Recipients can be:

- the corporate bodies and their components, or each member of the corporate bodies of the company;
- workers, including managers;
- collaborators who in any capacity, lend their business in the interest of OMP;
- suppliers of raw materials and / or services;
- consultants, agents and business brokers or those who act in the name and / or on behalf of the company, on the basis of a mandate or a technical or professional consultancy relationship;
- the partners, or third parties with whom OMP for various reasons, has partnership relations, development of the distribution network or, in general, commercial or business relations.

As part of their duties and in the exercise of their respective activities, the Recipients are required to know, observe (and to the extent of their competence to enforce) and comply with any applicable laws and regulations, including EU and / or international ones, refraining from committing violations and / or crimes.

Any type of circumstance will ever justify the adoption of behaviors in contrast with the laws, regulations and this Code.

The dissemination and knowledge of the Code will be guaranteed through:

- delivery by hand or by e-mail;
- publication on corporate digital bulletin boards;
- publication on the company website.

In-depth meetings will also be organized for the benefit of the employees.

In relations with third parties, the adoption of the Code will find expression in specific contractual clauses.

3 Rules of conduct in the management of Human Resources

OMP recognizes the central role of its human resources in achieving company objectives.

The company protects the value of the person, promotes respect for the psychophysical, moral and cultural integrity of the individual, ensuring safe and healthy working environments and working conditions that respect individual dignity.

OMP is committed to enhancing diversity, promoting inclusion and the development of an inclusive corporate culture.

It promotes and adopts procedures and methods of selection, training and working performance based on absolute respect for human rights. OMP rejects any form of child work, servitude or forced labour, as well as any form of human trafficking and modern slavery.

It is OMP's primary interest to encourage the development of everyone's professional potential, ensuring an environment, procedures and work organization that are constantly based on:

- respect for the personality and dignity of each person;
- the prevention of any form of discrimination, harassment and / or abuse. Any form of intimidation, threats, harassment or abuse in physical, verbal or psychological form, such as to create an intimidating, offensive or hostile work environment is prohibited. Abusive or defamatory interpersonal attitudes are prohibited. OMP is absolutely active in the prevention of any form of bullying and / or stalking. Each worker is called upon to adopt an attitude towards their colleagues based on respect, protection of the dignity of the person, collaboration and human solidarity;
- promoting the principle of equal opportunities in all aspects and phases of the employment relationship, supporting



gender equality; any form of discrimination due to sex, race, religion, political opinion, language, disability, sexual orientation, skin colour, social or personal conditions is prohibited;

- the promotion of a work environment based on motivation and involvement, favoring teamwork;
- the absolute prohibition of the exploitation of child labor;
- to organize periodic meetings in order to share company objectives;
- to develop appropriate communication tools and channels;
- the recognition of a fair salary and classification as well as the offer of a path to enhance knowledge, skills and professional experience, with a view to absolute impartiality and fairness, avoiding any form of discretion;
- to the enhancement of the innovative spirit and resourcefulness of each, in the context of their activities and responsibilities;
- the correct definition of roles, responsibilities, proxies and access to information, so as to ensure that everyone can adequately and consciously take the decisions that belong to them in the interest of OMP.

The company is committed to promoting working methods that combine efficiency and effectiveness in the use of time and space with the help of the most suitable technologies.

OMP promotes work-life balance. Each manager must make the most of the working time of their collaborators who can only be asked for services that are consistent with their activities and with the real business needs. Likewise, all of the workers have a duty to pursue, in the use of their time, maximum efficiency of the organization by proposing, if necessary, also improvement solutions.

The company expresses interest and attention to the difficulties of the individual by implementing, if necessary, aid and / or support actions.

OMP workers are free to carry out, outside their working hours, working activities in their own interest or in the interest of third parties, including those of a charitable nature. These activities cannot harm OMP's interests and reputation and cannot hinder the fulfillment of their duties towards the company.

4 Conflict of interest

Each Recipient is obliged to report to their superior (in case of a worker) or company contact person (in case of a different person) the situations of potential conflict of interest in which he could find himself in the performance of his duties / activities.

He will also have to refrain from using the information, role and / or function attributed to him for his own personal advantage.

An example of a situation that could generate a conflict of interest could be represented by carrying out a top management function (eg Director, Advisor, Function Manager) and having economic interests in common with suppliers, customers or competitors (ownership of shares, professional assignments, etc.) also through their family members.

Suppliers and partners must refrain, in their relations with OMP, from engaging in activities, even occasional ones, which may constitute a conflict with the interests of the company or such as to interfere with the ability to make consistent decisions with corporate objectives.

Suppliers and partners who find themselves in a situation of direct or indirect conflict of interest (even if only apparent and even if relating to parent and / or controlled companies) must formally declare it before interacting with OMP or as soon as they become aware of it, so as to allow management to make informed choices in compliance with the company's ethical principles.

5 Health and safety protection

Living and working in a healthy, protected and safe environment is the necessary prerequisite for everyone's well-being and satisfaction.

OMP is committed to disseminating and consolidating the culture of health and safety at work among the Recipients through the implementation and maintenance of a certified occupational safety management system.

Each Recipient is obliged to comply with the prevention and safety measures established by the company.

Workers must refrain from carrying out actions that could generate a risk for their own and / or other people's health.

OMP promotes compliance with the relevant legislation in force among third parties.

6 Environmental Protection

OMP recognizes the environment as a primary asset of the community, promotes environmental care towards all its interlocutors and uses the most suitable technologies, tools and processes to prevent and reduce direct and indirect environmental impacts and to preserve and regenerate natural resources. It promotes in particular the protection of forests, water rights, soil and biodiversity, repudiating any action that may lead to deforestation, forced eviction or indiscriminate use of land and resources.

The company adopts a certified environmental management system.

Each Recipient, in carrying out his duties, undertakes to comply with the legislation on environmental protection, specific requirements related to the activities, to the products and to the services rendered.



7 Social Responsibility

OMP has always been committed to promoting the growth of the economic fabric in which it operates. The company prefers companies present in its territory or neighboring areas as commercial partners, recognizing an important role to the Made in Italy and the need to promote local development.

OMP welcomes young high school and university students every year to whom it offers a concrete and real training course, which gives them the opportunity not only to develop their skills, but to start interfacing with the world of work.

The attention to the training and the needs of individuals in situations of hardship, on the other hand, finds expression in those interventions aimed at ensuring support for the study or the availability of the necessary technologies.

8 Rules of conduct towards the suppliers

OMP undertakes to select its suppliers and collaborators by evaluating their professionalism, competence, suitability and affordability.

Business relationships must be based on the utmost commitment and professional rigor and carried out with the attention and precision necessary to ensure respect and dissemination of the prestige and good reputation of the company.

The purchasing process - based on transparency, fairness and impartiality towards the suppliers - must comply with the principles and laws to protect the competition.

Practices of corruption, illegitimate favors, collusive behavior, payment of tangible and intangible benefits and / or other advantages aimed at influencing and / or compensating representatives of institutions, third-party companies and / or employees of the company are banned and prosecuted.

Suppliers, consultants, agents and business brokers will be selected in full compliance with internal procedures. The managers and workers responsible for the aforementioned process must:

- recognize to all of the third parties involved and in possession of the necessary requisites, equal opportunities for the participation in the selection;
- directly verify (site visits and periodic Quality, Environment and Safety Audits) and indirectly through appropriate documentation, that they have the means, organization, knowledge, technical and financial skills necessary for the supply of a certified quality system;
- verify - as far as possible on the basis of information in the public domain - that they are not involved in acts of terrorism and / or crime;
- promptly communicate any hypothesis of conflict of interest and / or relationship with third parties, immediately refraining from carrying out activities related to them.

Suppliers are required to read and sign this Code upon receipt and reading.

9 Rules of conduct towards the customers and export controls

OMP bases its conduct, also in relations with customers, on the principles of transparency, reliability, fairness, integrity, professionalism, legality, impartiality and quality.

Practices of corruption, illegitimate favors, collusive behavior, payment of tangible and intangible benefits and / or other advantages aimed at influencing and / or compensating representatives of institutions, third-party companies and / or employees of the company are banned and prosecuted.

In managing export transactions, OMP constantly checks the relevant regulations and any limitations/prohibitions to the different Countries imposed by governments, the EU and/or the United Nation.

Therefore, Recipients must:

- comply with the laws, regulations and company procedures relating to the performance of their business and the contractual obligations undertaken;
- guarantee the highest quality standards of the products sold and / or the services provided;
- ensure that the products meet the expectations and requirements of the market, comply with the laws in force, also in terms of safety;
- pursue continuous improvement within the activities carried out;
- condemn the use of any advertising and / or communication tool capable, in any way, of misleading customers about the quantity, quality, origin and provenance of the products and / or services offered;
- prohibit the use of any misleading, elusive or incorrect practice in communications and advertising messages addressed to customers, ensuring maximum transparency and correctness in said communications;
- scrupulously observe the provisions of this Code of Ethics and the internal procedures of OMP relating to the management of relations with customers;
- provide the customer with accurate, complete and truthful information on the contractual terms and conditions;
- ensure maximum attention to the suggestions and any complaints from customers and promptly inform them of the outcome of any checks requested by them;
- adopt a behavior based on professionalism, availability, respect, courtesy and on confidentiality.



>>>> In the management of commercial relations and specifically in the export field, OMP constantly checks the reference legislation and any limitations imposed by governments and / or the United Nations in relations with certain countries.

10 Rules of conduct in relations with the Public Administration

The Public Administration is made up of public entities that perform public or of public service functions.

In particular, public officials are understood to be persons who, in any form and for any reason, represent the Public Administration: public officials or persons in charge of a public service, employees of a public body or controlled by the Government, including political parties, party officials and candidates for public office.

Relations with the Public Administration are based on maximum transparency, clarity, impartiality and fairness, in order not to generate partial, untruthful, ambiguous or misleading interpretations in the public entities with which OMP deals.

Relations with public officials are exclusively attributed to company functions in charge of this and duly authorized.

It is absolutely forbidden:

- to offer, directly or through a third party, money or other benefits to public officials involved, their family members or to subjects connected to them in any way to seek or establish personal relationships of favors, influences or interference;
- to make utility donations or illegal payments with the aim of influencing, directly or indirectly, their activity in the performance of their duties.

These provisions cannot be circumvented by resorting to different forms of contributions which, under the guise of sponsorships, assignments and consultancy pursue the same purposes.

It is also absolutely forbidden for each OMP employee and / or collaborator to accept the request made by a public official, for money, gifts or services, in order to perform or not or facilitate the start and / or conclusion of an administrative procedure and / or the issue of authorizations or other.

Acts of courtesy, such as gifts and forms of hospitality, towards representatives of the public administration or public officials, are not permitted, unless they are of modest value and such as to be considered usual in relation to the recurrence, as well as such as not to compromise the integrity and the reputation of OMP and not to influence the recipient's independent judgment.

In any case, the expenses referable to the courtesy acts referred above must always be adequately assessed, authorized and documented.

Likewise, managers, employees and all of those who act in the name and / or on behalf of OMP cannot receive gifts or special treatments, except within the limits of normal courtesy relations and provided that they are of a modest value.

This rule, relating both to gifts promised or offered, and to those received, also applies in those countries where offering gifts of high value is customary.

It is also not allowed:

- to solicit, provide and obtain confidential information that may compromise the integrity or reputation of both parties or that violate equal treatment and operational procedures activated by public institutions or public officials;
- to allocate for purposes other than those for which they were granted: contributions, subsidies or funding from the state or other public body, even if of limited value and / or amount;
- to engage in reticent, omissive or obstructive behavior towards the judicial authorities.

11 Rules of conduct in relations with the corporate structure

OMP bases its relations with its shareholders on the principles of this Code, or rather on the principles of legality, correctness, impartiality, integrity, transparency and timeliness.

OMP guarantees its shareholders transparency of action and the right to be informed, as well as in the cases provided for by current legislation, on any circumstance deemed to be of interest. To this end, it prepares specific information flows, from the operational functions in charge to the administrative body and from the latter to the shareholders, to ensure constant updating and information completeness.

12 Rules of conduct in relations with the media

Relations between OMP and the mass media in general, are handled by the Board of Directors (CDA) and are maintained in compliance with the communication policy defined by the company.

Recipients cannot, therefore, provide information to representatives of the mass media without having been previously authorized by the Board of Directors.

Communications directed to the outside will thus be disclosed through the persons appointed by the Board of Directors, from time to time, according to the internal procedures of OMP, so that the information and communications relating to OMP and intended for external use are always accurate, truthful, complete, transparent and properly disseminated.

13 Corporate assets and tools

OMP puts at disposal, to its employees, the company assets and tools necessary for the carrying out of its business and recommends a conscious, responsible and always respectful use of the internal procedures and rules of conduct, avoiding any improper use and any behavior that does not comply with the law in force. It is forbidden to use company assets and



tools for personal purposes.

To this end, OMP promotes compliance with the Regulation on the use of company assets adopted on 19.12.2019 and organizes training and discussion meetings aimed at ensuring the IT security of the systems and preventing the commission of crimes.

Recipients are required to refrain from any use of company IT systems that could represent a violation of applicable laws (crimes), an offense to people's freedom, integrity and dignity or that could lead to undue intrusions or damage to the computer systems of others.

14 Accounting records and consequent preparation of the financial statements

OMP respects the laws and regulations in force and adopts the applicable accounting practices and principles, basing its work towards stakeholders on the principle of maximum transparency. Each operation or transaction is correctly and promptly recorded in the companies accounting system according to the criteria indicated by the law and on the basis of the applicable accounting principles.

Each operation or transaction is authorized, traced, verifiable, legitimate, consistent and congruous.

In order for the accounting to meet the requirements of truth, precision, completeness and transparency of the recorded data, OMP keeps adequate and complete supporting documentation for the activity carried out, in order to allow:

1. the accurate accounting registration of each operation;
2. the immediate determination of the characteristics and reasons behind it;
3. the easy formal and chronological reconstruction of the operation;
4. verification of the decision-making, authorization and implementation process, as well as the identification of the various levels of responsibility and control.

Each accounting entry must reflect exactly what results from the supporting documentation.

Therefore, it is the task of each Recipient appointed to do this to ensure that the supporting documentation is easily available, archived and ordered according to logical criteria and in compliance with company provisions and procedures.

All financial transactions as well as cash movements carried out in the interest of OMP are carried out by the persons authorized for this purpose and are adequately justified, traced and documented.

Recipients who become aware of omissions, falsifications or negligence in accounting records or supporting documentation are required to promptly report them to their manager.

15 Anti-money laundering

OMP has adopted specific procedures which provide for:

- the identification and evaluation of customers / suppliers, acquiring useful information in advance in order to verify their professional requirements and the legitimacy of their business;
- compliance with the laws in economic transactions, ensuring full traceability of incoming and outgoing flows;
- the use of only authorized financial operators;
- compliance with the procedures on the use of cash or other bearer financial instruments, making use of payment instruments that ensure traceability of payments and comply with current legislation (limiting the use of cash only to residual cases, if authorized and envisaged expressly in the companies procedures), for any collection, payment, economic transaction, transfer of funds, employment or other use of financial resources.

OMP expressly prohibits the use of current accounts or savings books anonymously or with a fictitious header.

16 Internal controls

Internal controls are represented by all of those activities and tools necessary to:

- ensure compliance of the activities carried out in the interest of the company with the laws and the companies procedures;
- protect company assets;
- effectively manage OMP;
- provide clear, complete, truthful and correct information on the patrimonial, economic and financial situation of the company;
- identify, assess and prevent the risks in which OMP may incur.

OMP guarantees the dissemination, at all levels, of an internal culture characterized by the awareness of the existence of controls and oriented towards the exercise of the control itself.

17 Intellectual property

OMP operates in full compliance with the laws and international conventions / agreements regarding the protection of intellectual property, guaranteeing the maximum protection of its own and others' assets consisting of patents, trademarks, distinctive signs, industrial know-how and any other confidential, secret and / or strategic information.

It allows the sharing of information relating to it only to persons expressly authorized after signing a specific confidentiality agreement.



The use of OMP trademarks and other distinctive signs by third parties without its prior authorization is strictly prohibited. OMP expressly prohibits any conduct aimed at altering, counterfeiting, using trademarks or distinctive signs owned by others.

It also condemns any conduct aimed at introducing industrial products with altered or counterfeit brands or other distinctive signs into the territory of the State.

Furthermore, OMP prohibits the manufacturing, marketing, dissemination or simple use of objects made by usurping or violating industrial property rights.

18 Confidential information

All corporate information is confidential and therefore should not be shared and / or disseminated.

Confidential information also includes data relating to one's salary and / or one's contractual position and to one's remuneration. It is absolutely forbidden to disseminate and / or share such data even with one's colleagues and / or collaborators.

Each Recipient is obliged to maintain reservedness and confidentiality of the Information learned, acquired or processed for or in connection with the performance of their duties.

Any form of communication and / or disclosure is prohibited.

19 Personal data protection

OMP ensures the confidentiality of the personal data in its possession.

Recipients are required to use the data exclusively for purposes related to the exercise of the respective activity, observing the security measures adopted.

Each Recipient is obliged to comply with current legislation on the subject, in particular he must:

- acquire and process the data strictly necessary and directly connected to its functions and to the specific activity carried out;
- adequately store the data in order to prevent third parties from accessing it;
- communicate and process data in compliance with the law and OMP procedures.

OMP promotes training meetings in order to disseminate correct information and facilitate compliance with laws and company procedures.

20 Relations with political parties, trade unions and other associations with interests

Relations with political parties, trade unions and other associations with interests are held by the subjects authorized to do so or by the persons delegated by them, in compliance with the rules of this Code and applicable laws, having particular regard to the principles of impartiality and independence.

21 Freedom of association and collective bargaining

OMP:

- promotes and favors the free expression of thought on the part of workers, guaranteeing freedom of association, even of a trade union nature;
- respects and favors the correct application of the legislation on trade union representation, in particular the freedom of choice of the individual trade union association;
- defines agreements relating to second-level bargaining, when the conditions exist and collaborates with the workers' representatives in defining agreements aimed at improving the workers conditions.

22 Alcoholic and narcotic substances, smoking

In order to consolidate a climate of mutual respect and responsibility, it is absolutely forbidden:

- to consume, offer, distribute or sell alcoholic substances, narcotic substances or substances with a similar effect in any capacity during work and / or in the workplace;
- to smoke in the workplace, except for the areas reserved for this.

23 Responsibility - Supervision - Reports

It is the responsibility of each Recipient to apply the provisions of the Code in the exercise of their duties and / or in the performance of their business, as well as to verify their application within the scope of their own controls.

Each Recipient must:

- read the Code;
- understand the principles and rules of the conduct set out therein;
- observe the Code and actively contribute to its concrete application, also by reporting any behavior of dubious compliance;
- contact the Management as the body responsible for dissemination, awareness raising and compliance to obtain useful



advice on the correct application.

The Management will have the task of:

- disseminating knowledge of the Code and making Recipients aware of its compliance;
- monitor its correct application;
- formulate their observations on any problems that may arise;
- provide their advice for the purposes of the correct interpretation and implementation;
- formulate proposals for adaptation and / or updating;
- promote staff training;
- report to the competent corporate bodies any violations of the Code of which they become aware during the supervisory activity.

Any violation or suspected violation can be communicated by sending a report to the following e-mail address:

segnalazioni@omppumps.com.

Once the report has been received, the Management will carry out the related investigations, possibly also making use of the competent company functions.

If the investigations carried out should confirm the non-compliance by a worker with the provisions contained in the Code, the Management, involving the competent company functions, may decide to initiate a disciplinary procedure, or if the violation could constitute a hypothesis of crime, inform the competent authorities.

Maximum confidentiality is guaranteed regarding the identity of the reporting subject. It is the company's obligation to protect reporting subjects from any form of retaliation, violence and / or discrimination.

In the event that a crime occurs, the identity of the reporting subject can only be communicated to the competent authorities.

24 Violations of the Code of Ethics

The compliance with the rules contained in this Code is an essential part of the contractual obligations governing the employment relationship pursuant to the Article 2104 of the Civil Code or the existing contractual relationship with respect to other Recipients such as Agents, Consultants, Collaborators and others.

Its violation, damages the fiduciary relationship established with the company and may determine:

- the adoption of disciplinary measures against the worker involved, in accordance with the applicable legislation on the matter;
 - the adoption of the protection measures provided for by the law, even if not expressly referred to by the individual contractual clauses, in the event of contractual relationships with third parties other than the workers.
-