



# SUPPLIER CODE OF CONDUCT

Funo, 27/08/2024

## Table of contents

<b>Introduction.</b>	<b>4</b>
<b>1. Labor and Human Rights.</b>	<b>5</b>
<b>1.1. No use or tolerance of Child Labor.</b>	<b>5</b>
<b>1.2. No Use or Tolerance of Forced or Obligatory Labor.</b>	<b>5</b>
<b>1.3. Ensure Freedom of Association for Personnel.</b>	<b>5</b>
<b>1.4. Zero Tolerance for Harassment.</b>	<b>5</b>
<b>1.5. Guarantee Adequate Salaries and Benefits.</b>	<b>6</b>
<b>1.6. Ensure Compliance with Work Hours, Overtime, and Leave.</b>	<b>6</b>
<b>1.7. Non-Discrimination.</b>	<b>6</b>
<b>1.8. Cover Hiring Expenses for Workers.</b>	<b>6</b>
<b>2. Health and Safety.</b>	<b>7</b>
<b>2.1. Identify, value and manage risks.</b>	<b>7</b>
<b>2.2. Provide adequate controls, safe working procedures, appropriate maintenance.</b>	<b>7</b>
<b>2.3. Provide appropriate training and information programs for its own personnel.</b>	<b>7</b>
<b>2.4. Develop, implement and correctly test emergency management plans.</b>	<b>7</b>
<b>2.5. Protect its own personnel from chemical, biological and physical hazards.</b>	<b>8</b>
	<b>1</b>



2.6. Manage its own suppliers and contractors.	8
2.7. Ensure adequate hygienic and sanitary services, nutrition and environments.	8
3. Environment.	8
3.1. Prevent, Reduce and Mitigate Environmental Pollution.	8
3.2. Have and maintain all necessary authorizations.	8
3.3. Circular Economy and efficient use of resources.	9
3.4. Limit the use of dangerous substances.	9
3.5. Reduce Emissions.	9
4. Ethics.	9
4.1. Commit to preventing and contrasting active and passive corruption as well as other related crimes.	9
4.2. Do not take advantage of free gifts and hospitality for personal benefits.	10
4.3. Respect others' confidential information.	10
4.4. Respect intellectual property rights.	10
4.5. Protect and promote fair and free competition.	10
4.6. Avoid conflicts of interest.	10
4.7. Protect identity and ensure non-retaliation.	11
4.8. Ensuring responsible sourcing of minerals ( <i>Conflict Minerals</i> ).	11
4.9. Maintain adequate records and accounting.	11
4.10. Meeting the obligations of Taxation.	12
4.11. Be compliant with Export Control and sanctions regulations.	12



<b>5. Data protection.</b>	<b>12</b>
<b>5.1. Ensure information protection.</b>	<b>12</b>
<b>5.2. Treat information confidentially.</b>	<b>13</b>
<b>Control and Monitoring Systems.</b>	<b>13</b>
<b>Sharing and Training.</b>	<b>13</b>
<b>OMP's open line.</b>	<b>13</b>
<b>Compliance measures, reports and evaluations.</b>	<b>13</b>



### **Introduction.**

The Business Model of O.M.P. Officine Mazzocco Pagnoni S.r.l., hereafter referred to as OMP, is based on the principles and values that have always guided the company. These include legality, correctness, integrity, transparency, employee empowerment, health and safety at work, environmental respect, customer satisfaction, innovation, excellence, and energy efficiency. OMP has joined the UN Global Compact by endorsing its ten principles, thereby promoting a culture of sustainability.

This code is founded on the values outlined in OMP's Ethical Code, inspired by the principles contained in the United Nations Universal Declaration of Human Rights (which OMP supports in all aspects), the Tripartite Declaration of Principles concerning Multinational Enterprises, the ILO Social Policy, and the OECD Guidelines for Multinational Enterprises and Non-Member Countries (source: OHCHR).

To ensure ethical sourcing that respects both the environment and people, OMP requires its suppliers to recognize and adopt the same principles and standards upheld by the company throughout the entire supply chain. OMP is committed to conducting business and procuring materials, components, and services from responsible suppliers who comply with national and international laws, regulations, international agreements, and prevailing standards in the countries where they operate.

OMP further mandates that its suppliers adhere to the principles outlined in the United Nations Universal Declaration of Human Rights (which OMP supports in all aspects), the Tripartite Declaration of Principles concerning Multinational Enterprises, the ILO Social Policy, and the OECD Guidelines for Multinational Enterprises and Non-Member Countries (source: OHCHR). Suppliers must also comply with applicable national and international laws related to their business.

**If local regulations are less stringent than the principles outlined in this Code, suppliers commit to taking necessary measures within a reasonable timeframe to align with the principles and behaviors defined in this Code.**

The term "Supplier" includes any entity that provides products, persons, or services to OMP and, where applicable, the Supplier's personnel, subcontractors, and agents.



## **1. Labor and human rights.**

In absolute compliance with international laws and conventions, consistent with the above-mentioned international standards, and with a view to social protection and sustainability aimed at preventing and/or avoiding that its activities may cause or contribute to the violation of human rights, OMP expects the Supplier to comply with all applicable local laws and regulations related to labor and employment and in particular the following principles:

### **1.1. No use or tolerance of child labor.**

The Supplier does not use or tolerate the use of child labor. In all cases, OMP supports the use of legitimate workplace learning programs that comply with all applicable laws and regulations.

### **1.2. No use or tolerance of forced or obligatory labor.**

The supplier must not engage in any form of forced or obligatory labor. The Supplier shall not demand any work or service from any person with violence and/or under threat of retaliation. The Supplier shall not withhold, seize, destroy, or deny access to employees' passports or any other identity documents, or take other actions that restrict the freedom of movement of employees. The Supplier must oppose any form of human trafficking and modern slavery. The Supplier must not prejudice in any way the employee's right to terminate employment.

### **1.3. Ensure freedom of association for personnel.**

The Supplier is required to recognize the principle of freedom of association and the right to collective bargaining where permitted by locals.

### **1.4. Zero tolerance for harassment.**

There shall be no harsh and inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse toward workers, nor shall there be the threat of such treatment.



#### **1.5. Guarantee adequate salaries and benefits**

The Supplier shall pay compensation to employees in accordance with all applicable wage and hour laws, including those related to minimum wage (if any), overtime hours, and benefits imposed by the law. The Supplier shall properly compensate employees for overtime hours in compliance with national, international, regional and/or local laws and regulations.

#### **1.6. Ensure compliance with work hours, overtime, and leave.**

The Supplier shall ensure that working hours and overtime policy are in accordance with national, international, regional and/or local laws and regulations, local industry standard or international standards set by the International Labor Organization (ILO). Mandatory overtime shall be governed by local law and/or collective bargaining agreements and shall not exceed allowable weekly or monthly limits. The Supplier must guarantee the right to vacation, sick or parental leave and any other paid or unpaid leave defined by national, international, regional and/or local laws and regulations.

#### **1.7. Non-Discrimination.**

The Supplier is expected to support diversity and employment equity. It is expected to provide equal employment and pay opportunities based on people's skills, experience, job potential and performance, without discrimination on the basis of gender, sexual orientation, religion, nationality or ethnic origin, age, disability, political orientation, unless such discrimination is based on the inherent requirements of the job or in the course of a program to promote diversity.

#### **1.8. Cover hiring expenses for workers.**

Workers are not required to pay the hiring expenses related to their employment.



## **2. Health and safety.**

The Supplier shall manage its activities while protecting the health, safety and welfare of people, ensuring compliance with national, international, regional and/or local laws and regulations and all commitments made to third parties. The Supplier shall:

### **2.1. Identify, evaluate and manage risks.**

To ensure occupational health and safety, the Supplier must take specific measures to identify, evaluate and manage risks. This includes the prevention of accidents and occupational diseases, as well as the management, monitoring and reporting of accidents and related diseases.

### **2.2. Provide adequate controls, safe working procedures, appropriate maintenance.**

To ensure the occupational health and safety of its own human resources, the Supplier must provide adequate controls, safe working procedures, and appropriate maintenance. Furthermore, it is important that it takes protective measures to mitigate actual and potential risks, including those to prevent mental and physical fatigue due to, for example, insufficient rest.

### **2.3. Provide appropriate training and information programs for its own personnel.**

To ensure safety at work, the Supplier must conduct appropriate training and information programs for the personnel. These programs must include knowledge of the regulations and obligations imposed by laws, regulations or other normative acts, including operating procedures and provisions on the use of personal protective equipment (PPE) in order to educate and involve the employees in risk management and the adoption of protective measures.

### **2.4. Develop, implement and correctly test emergency management plans.**

The Supplier shall create, implement and properly test emergency management plans in order to prevent accidents and minimize their impacts.



### **2.5. Protect its own personnel from chemical, biological and physical hazards.**

It is fundamental to protect personnel from chemical, biological and physical risks. This obligation applies both to risks present in the workplace and those associated with the facilities used by the employees.

### **2.6. Manage its own suppliers and contractors.**

The Supplier shall require its own suppliers and subcontractors to apply the same responsible approach to health and safety management in the performance of their activities.

### **2.7. Ensure adequate hygienic and sanitary services, nutrition and environments.**

The Supplier shall provide workers (employees, temporary workers, trainees, etc.) with a safe and healthy working environment that includes, at a minimum, immediate access to clean toilets, potable water and hygienic facilities for food preparation, storage and catering, adequate temperature and ventilation, and, if applicable, safe and healthy corporate housing.

## **3. Environment.**

The Supplier, as well as complying with national and international laws and regulations affecting the environment, is required to minimize the adverse effects on the community, environment and natural resources of its own operations while safeguarding the health and safety of the community.

### **3.1. Prevent, reduce and mitigate environmental pollution.**

The Supplier shall take measures to prevent, reduce and mitigate any form of environmental pollution (of air, water, soil, groundwater, etc.) and implement actions aimed at preventing environmental accidents and carrying out timely intervention and restoration in case they occur.

### **3.2. Have and maintain all necessary authorizations.**

The Supplier must possess and maintain all necessary environmental permits (these may include permits for discharges to water or air, environmental monitoring, and other specific activities), obtain approval for its operations and register with the relevant authorities, and comply with the operating standards and reporting requirements established by environmental laws and regulations.





### **3.3. Circular Economy and efficient use of resources.**

The Supplier shall eliminate waste and minimize the use of resources and the generation of waste of all kinds, including the consumption of materials, water and energy where possible, in order to minimize the impact of its products and/or services on the environment and people. This is achieved both by taking action at the design stage of its products and services and through continuous improvement.

### **3.4. Limit the use of dangerous substances.**

The Supplier shall identify, manage, monitor, and reduce substances that represent a danger if released into the environment (such as dangerous solid waste, wastewater, air emissions) and ensure their handling, storage, use, recycling or reuse, and disposal in all safety. The Supplier shall follow all laws and regulations, and comply with requirements requested by the Customer, regarding the prohibition or restriction of specific substances in products and production, including labeling.

### **3.5. Reduce emissions.**

The Supplier shall classify, continuously monitor, control and regularly treat air emissions and other emissions.

## **4. Ethics.**

The Supplier shall act with fairness, honesty, transparency and responsibility in all business activities and dealings with its own business partners, public officials and other third parties (both private and public). The Supplier must at all times respect national, international, regional and/or local laws and regulations, including international best practices (e.g., ISO standards). Therefore, OMP requires the Supplier to:

### **4.1. Commit to preventing and contrasting active and passive corruption as well as other related crimes.**

The Supplier shall prohibit and avoid any conduct that might constitute a wrongful act, including crimes of bribery (both active and passive), extortion, bribery, receiving stolen goods, money laundering/self-laundering, extortion, and misappropriation, and shall ensure that such conduct is not engaged in by its employees and agents. Also, the Supplier shall refrain from other actions that could result in illicit advantages in the management of business activities.



#### **4.2. Do not take advantage of free gifts and hospitality for personal benefits.**

The Supplier shall compete on the basis of the performance of its own products and services and shall not exploit the exchange of gifts and hospitality to obtain an improper advantage.

#### **4.3. Respect others' confidential information.**

The Supplier respects the property rights of others. In the execution of its activities, the Supplier has occasion to receive and use confidential information owned by others. Such information shall be used in accordance with the agreements under which it is acquired.

#### **4.4. Respect intellectual property rights.**

The Supplier shall honor and respect the intellectual property rights of others relating to: patents, trademarks, and copyrights. There shall be no misuse of the intellectual property rights of others, that is, the Supplier shall not conduct illegal activities or the unauthorized reproduction, disclosure, or use of the intellectual property of others.

#### **4.5. Protect and promote fair and free competition.**

The Supplier shall operate in compliance with national, international, regional and/or local laws and regulations to protect and promote fair and free competition. The Supplier shall not conduct practices or enter into agreements with competitors, other suppliers, customers, or other third parties that may restrict or potentially restrict fair and free competition, such as illegal price fixing, exchange of confidential information, market sharing, customer allocation, or any other illegal or improper practice, at any level of the production or distribution chain.

#### **4.6. Avoid conflicts of interest.**

The Supplier shall report to OMP any situation in which private or outside interests come into conflict with its job responsibilities with regard to OMP.



#### **4.7. Protect identity and ensure non-retaliation.**

The Supplier shall activate, maintain, and communicate to its personnel the procedure by which its personnel may raise any concerns regarding the business activities and operations carried out by the Supplier without fear of retaliation. The Supplier must ensure the confidentiality, anonymity and protection of whistleblowers, except to the extent required by law. A whistleblower is anyone who reports improper or illegal conduct by an employee or manager of the company or a public official or official body.

#### **4.8. Ensuring responsible sourcing of minerals (*Conflict Minerals*).**

The supplier must recognize the risk regarding the extraction and trade of minerals for use as raw materials (direct or indirect), of the negative impacts related to human rights violations, conflict, child labor, illegal operations, and hazardous health and safety conditions. The supplier must responsibly manage the supply chain of any potentially critical minerals, paying particular attention to those from conflict-affected or high-risk areas, maintaining an active due diligence program through the procedures and instruments of the Organization for Economic Cooperation and Development (OECD) and the Responsible Minerals Initiative (RMI), with specific reference to:

- “3TG”, meaning gold, columbite-tantalite, cassiterite, wolframite, and their derivatives (such as tantalum, tin, and tungsten);
- cobalt;
- natural mica;
- any other minerals extracted, refined, or traded under conditions of armed conflict or human rights violations in the Democratic Republic of Congo, other countries in the same region in Africa, and any conflict-affected or high-risk area.

#### **4.9. Maintain adequate records and accounting.**

The Supplier shall be in possession of the necessary authorizations and licenses to carry out its activities in accordance with national, international, regional and/or local laws and regulations. The Supplier is expected to maintain proper accounting and adequate records of its business and administrative activities and to have controls in place to ensure that these activities are performed accurately and securely and stored appropriately.



#### **4.10. Meeting the obligations of taxation.**

The Supplier shall comply with all applicable tax laws and regulations in the countries in which it operates, shall provide accurate and complete information to tax authorities and cooperate with them in a transparent manner; promptly report any significant changes in its tax or financial situation; ensure that financial transactions are properly documented, and payments are properly recorded; and shall prohibit tax avoidance or tax evasion practices.

#### **4.11. Be compliant with export control and sanctions regulations.**

The Supplier shall monitor the development of key domestic and international sanctions-related laws and regulations, covering, among others: export bans and controls and commodity trade restrictions. The Supplier shall provide truthful and accurate information on export classification and control, obtain control licenses or other authorizations if required, and report any declarations if necessary. In addition, the Supplier shall not deal with sanctioned parties, and shall communicate any possible involvement to OMP in a timely manner.

### **5. Data protection.**

#### **5.1. Ensure information protection.**

OMP expects that the Supplier will ensure that all sensitive, confidential, and proprietary information is adequately protected. The Supplier must take consistent measures with the highest industry standards to protect the personal information of the people involved in its operations: customers, vendors, consumers, employees, and agents, including OMP, in compliance with national, international, regional, and/or local privacy and information security laws and regulations regarding the collection, storage, processing, transmission, and sharing of information.

The Supplier must also implement measures to identify and manage information security risks and regularly review these risks, developing processes to identify, prevent and respond to them and is encouraged to adopt the ISO 27001 and/or TISAX guidelines.



### **5.2. Treat information confidentially.**

The Supplier shall maintain strict confidentiality of technical and commercial know-how, processes, initiatives, and any other confidential or proprietary information concerning OMP's activities, products, and personal information of which it may become aware.

### **Control and monitoring systems.**

#### **Sharing and training.**

OMP is committed to sharing this Code with its suppliers, for this purpose that this Code is published on the institutional website: <https://www.omppumps.com/>.

Furthermore, OMP is committed to adequately train its employees on the principles indicated in this document and encourages all its suppliers to disseminate these principles and lines of conduct through appropriate training of its employees and suppliers.

#### **OMP's open line.**

OMP has put at the disposal of its workers, collaborators and its Suppliers (including their employees), adequate tools to enable them to send and promptly respond, to reports of potential violations of their rights, laws, regulations, the Code of Ethics and this Code of Conduct.

The reporting channel is: [segnalazione@omppumps.com](mailto:segnalazione@omppumps.com). In case the report should fall within the offenses provided for by the Legislative Decree 24/23 cd. "Whistleblowing", you can find on the site the procedure to be followed for this type of report.

#### **Compliance measures, reports and evaluations.**

The company verifies the proper implementation of the regulations described in this Code. The violation of the provisions indicated in this Code will be evaluated in the qualification process of the Supplier and in the maintaining of the same.

**In case of noncompliance with this Code**, OMP reserves the right to request to the Supplier to comply with the principles and rules contained in this Code within a reasonable period of time. The Supplier shall notify to OMP the actions it intends to take. In the event of failure to comply within the period specified by OMP,



OMP may: suspend the supply, refuse to take delivery of the goods or terminate the contract, or rather adopt any other measure permitted by the law.

The law applicable to the supply relationship is the Italian law.

