

CODE OF CONDUCT OUR DNA OMB Saleri Values

*"We are focused on products innovation, production processes and factory organization. We are inspired by the Italian **humanistic** experience (Camillo and Adriano Olivetti) and by the production techniques experimented in Toyota and in German factories (lean production)".*

*"Our ambition is to combine the efficiency of the factory processes with the **development of the people**, indicating as the ultimate goal of working, the human welfare.*

As well as being profitable, a Company must generate Welfare both for the people and for the territory. It's an attention that we entrepreneurs can and must have".

Paride Saleri

PREMISE

From these words, we do see how the Company places, among its primary values, the ethical and civic ones. Our values have allowed us to strengthen and enrich our company culture and to widen even more on our sustainable growth.

The innate attitude towards innovation does lead us toward a continuous improvement in terms of quality, environmental impact and anticipation of industrial transformation.

Our goal is to seek and maintain a balance between being a "company" and the participation and empowerment of employees and collaborators in the decision-making and organizational processes.

OMB SALERI ACTIONS

In the recent years, OMB has decided to strengthen its commitment on issues of social and environmental responsibility combined with a strong root in local communities.

By **joining the United Nations Global Compact** to Group's decision to adopt an environmental policy, the need arose to communicate to its stakeholders OMB approach towards the most relevant issues in the socio-environmental field.

Our ethical codes are based on the principles contained in the **United Nations Universal Declaration of Human Rights** (which OMB supports in all its points), in the **Tripartite Declaration of Principles on Multinational Enterprises, ILO Social Policy and OECD Guidelines for Multinational Enterprises**.

OMB acts in accordance with the principles of **freedom, human dignity and respect for diversity, rejects any discrimination** based on sex, culture, ethnicity, personal and social conditions, languages, disability, religious and political beliefs.

OMB promotes a **working environment inspired by respect, fairness and collaboration**.

OMB Saleri has included in its statute "Benefit Society" to further implement its commitment to sustainable development and in order to create a positive impact on the environment and civil society.

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OMB has signed the **Charter for Equal Opportunities and Equality at Work**, a declaration of intents, voluntarily signed by companies of all sizes, for the dissemination of a corporate culture and inclusive policies, free from discrimination and prejudice, capable of promoting talents in all their diversity. We are part of the **Sodalitas Foundation**, a network of companies, volunteers and collaborators committed to **generating shared social value** by promoting the culture of partnerships aimed at building a future of growth, sustainability, inclusion and cohesion, widespread development for the community. We have joined both the WHP program, **Workplace Health Promotion**, the World Health Organization program to **promote health through healthy working lifestyles**, and the **PMI Welfare Index**. In 2022 OMB began to draw up the **Sustainability Report**, anticipating the legislative obligation and we completed the **Carbon Footprint** in order to set up improvement plans for the following years.

THE VALUES OF OMB SALERI

Our values are cohesive (they generate unity of purpose), pervasive (they are not for an elite but for all) and permanent.

OMB SALERI as well as a "joint stock company" is above all a "**society of People**" characterized, in their individuality, by a common value DNA. The following values are fundamental:

- HUMANISM
- SENSE OF RESPONSIBILITY
- INNOVATION AND OPEN-MINDEDNESS
- CO-PARTICIPATION AND COLLABORATION
- CONTINUOUS IMPROVEMENT
- WELFARE
- CONTRIBUTION TO ENVIRONMENTAL, SOCIAL AND GOVERNMENTAL SUSTAINABILITY (ESG)

HUMANISM

Alongside the economic prosperity of the company, human beings have a central position.

Our constant commitment is not only to improve the cognitive and social skills of everyone but also to support and increase their growth.

A SENSE OF RESPONSIBILITY

Responsibility towards ourselves, the company, the people who we do relate with, tangible and intangible busvalues ofs, the environment and the territory. Responsibility that involves taking on the problems and cooperating to generate the innovations necessary for their solution.

OPENMINDEDNESS AND INNOVATION

Our undisputed dedication to innovation has made us aware, through research and studies, of our ability to anticipate industrial and technological transformations. We pursue excellence by imagining new solutions.

CO-PARTICIPATION AND COLLABORATION

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The attitude of an active participation, through working groups, derives from the persevering sharing of the objectives and the values of the Company. The basis of this collaboration implies that everyone does share their knowledge, is inclined to help, to listen and care about the others without any discrimination.

CONTINUOUS IMPROVEMENT

The high technological level and the reliability of OMB Saleri products are the result of an important activity of design, prevention of defects and validation tests with a meticulous attention to details. Our goal is to ensure the highest quality of products, the excellence of systems and production processes.

WELFARE

OMB does believe that the participatory factory is the way to achieve industrial development and its continuity.

The prerequisite is the existence of a positive climate among people that takes into account their well-being and their satisfaction and allows workers to manage their time with flexibility, to balance family and business needs.

CONTRIBUTION TO ENVIRONMENTAL, SOCIAL AND GOVERNMENTAL SUSTAINABILITY (ESG)

We have always been committed also in the social and community field, promoting both territorial sustainability and growth, improvement and socio-economic development.

We pursue the 17 Goals of the 2030 Agenda of the United Nations.

CODE OF CONDUCT

The compliance with the contents of this Code is to be considered an integral part of Contractual obligations assumed by all the members of the company.

The Code contains the ethical principles and the general rules which identify and connote the action and the values of the company and that, together with the legal, regulatory and contractual ones, inspire the organization and the activity of the company.

RECIPIENTS

This Code expresses the commitments and ethical responsibilities of the company in the context of its activities towards its customers, in the context of its internal activities and in its relations with all those who get in contact with the company.

The Code constitutes a set of principles and rules that complement the regulations and the policy adopted by the company and whose compliance by all the recipients - Directors, Employees, Collaborators, trainees

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of OMB Saleri and, in general, any third party who maintains relations with the latter - is of fundamental importance for the smooth operation, the reliability of the management and the image of the company.

Every employee and/or collaborator is therefore obliged to:

- diligently observe the rules of the Code of Conduct and all the company regulations and policies in their most up-to-date version, refraining from any conduct contrary to them;
- check and periodically consult the company information tools to see the rules, and the procedures contained in the regulations, company policies and in the Code of Conduct;
- contact the Human Resources department in case of need for clarification on the interpretation and implementation of the rules contained in the Code of Conduct and/or in other company regulations and policies.

BUSINESS RELATIONS

OMB avoids and condemns any conduct that does not comply with the general obligations of diligence, fairness and loyalty that qualify the performance of work and contractual rules.

It does not tolerate any kind of corruption in any form or manner, in any jurisdiction.

COMPETITION AND CONFLICT OF INTEREST

The addressees of this Code shall not engage in any activity, on their own or on behalf of third parties, in competition with what carried out by OMB, unless the latter expressly consents in writing.

The addressees of this Code must avoid all the situations which are conflictual, directly or indirectly, with the interests of OMB.

In particular, they should avoid situations that could lead to a conflict between their personal interests and those of OMB, having to refrain from representing OMB, intervening or being part of decision-making processes in which, directly or indirectly, they or their spouse, relatives or relatives, have a personal interest.

GOOD PRACTICE IN THE COMPANY

- Integrity, honesty, correctness, sobriety
- to pursue respect for the principle of equal opportunities in the working environment, irrespective of sex, marital status, sexual orientation, religious belief, political views, skin colour, ethnic origin, nationality, age, different abilities
- to protect the company assets, both tangible and intellectual.

CONFIDENTIALITY

Each person, on his or her position within the organisation and in the performance of the tasks entrusted to him or her or in any case by maintaining relations with OMB, may come directly or indirectly into possession of secret and confidential information, as well as trade secrets concerning the Company, its know-how, its activities, its products.

The knowledge and the know-how developed by OMB is an invaluable asset that every employee must protect as well as any third party which has relations with OMB.

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OMB is therefore the exclusive owner of an asset of data, knowledge and technical-industrial and commercial experiences, know-how, patentable or not.

PROTECTION OF THE ENVIRONMENT

OMB takes its environmental commitment into the same consideration of all the other organisational management needs.

It regularly and systematically plans and implements environmental and sustainable objectives, continuously monitoring the progress of these programmes, and taking appropriate corrective action if necessary.

OMB promotes professional development through training and raising the awareness of its workforce on environmental issues, with the goal of a permanent improvement of the performance of its Environmental Management System.

OMB collaborates with global organizations for the dissemination and protection of sustainability on a large scale.

INTERNAL CONTROL SYSTEM

The recent legislation on the prevention of corruption and illegality (Whistleblowing) has introduced a new tool to facilitate the reporting of behaviour that could constitute unlawful actions, in particular of a corruptive nature.

They person who, in good faith, denounces or refers to his superior any unlawful conduct of which he or she has become aware cannot be penalised, dismissed or subjected to a discriminatory measure, direct or indirect, affecting working conditions for reasons directly or indirectly linked to the complaint.

The subjects protected by these guidelines are the employees of OMB, both with an open-ended employment contract and with a fixed-term employment contract.

The object of the report concerns offences of a corruptive nature, which might result in property damage to OMB, or which constitute violations of the provisions of the Code of Conduct.

The reports must be substantiated, dealing with facts known and found directly by the signaller - and not reported by others - and, if possible, identify with certainty the author of the illegal conduct.

The report should be made to the Whistleblowing Team, represented by the *Company Management*, via M-7-15 module accessible via website <https://ombsaleri.typeform.com/to/bAE9gB>.

Whistleblowing Team must keep confidential the identity of the reporting subject.

For reports of a discriminatory nature, on the other hand, it is possible to fill in the M-7-19 form accessible via the web at the address <https://ombsaleri.typeform.com/to/hx9g00D2>.

The reports must be detailed, have as their object facts known and/or found directly by the reporting person. The report must be made to the Diversity & Inclusion (D&I) Team, represented by the corporate ACADEMY.

The Team responsible for discrimination will guarantee the confidentiality of the identity of the reporting subject, will analyze the facts and evaluate, together with the Management, which corrective actions to

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implement as well as generate culture to ensure that certain behaviors do not repeat themselves over time.

This Code of Conduct comes into force from 14/12/2022.

The undersigned has read carefully and well understood the contents of this supplementary document about the obligations arising from their employment contract and from other company regulations or policies; it contains contractual conditions and behavioural rules that complement their contract of employment, as well as the Rules of Use of Information Systems and the Policy on Know-How in their updated version delivered as an annex to the Code of Conduct, with particular reference to the use of IT tools and the protection of company confidential information; he or she returns a signed copy for viewing, adhesion and full acceptance.

Brescia, _____

SIGNATURE _____

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