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## PREAMBLE

OMFB S.p.A. (hereinafter the “Company” or “OMFB”) works in the field of hydraulics components, from electrohydraulic power units to truck PTO’s, pumps and spare parts, and accessories in general.

In order to clearly define the values inspiring the Company’s activity and goals in the performance of its activity and in the achievement of its objectives and to define the ethical and operative principles necessary to prevent the offences provided for under Italian Legislative Decree no. 231 of 2001 (hereinafter the “Decree”), the Company has issued the following Code of Ethics (hereinafter the “Code of Ethics”), the compliance with which is of the utmost importance for the correct functioning, reputation, reliability and image of the Company.

Every corporate activity must be carried out respecting the applicable legal and regulatory provisions and be respecting honesty, reliability, impartiality, trust, transparency, correctness and good faith principles, as further detailed hereinbelow.

To the above aim, anyone involved in the corporate activity, including, by way of example, directors, auditors, employees, collaborators (including, for example, consultants, suppliers, etc.), as well as third parties who have contractual relationship with the same, must abide by the rules and principles provided for in this Code.

Each director, auditor, employee and collaborator and anyone who deals with the Company must know the Code of Ethics and actively contribute to its respect. To the above aim, the Company undertakes to grant the maximum diffusion of the Code of Ethics and to supply adequate information on its principles.

Any behaviour not complying with the content and the spirit of the Code will be persecuted and punished being in contrast with the Company’s principles.

The Company shall monitor the compliance with the rules contained in this Code, granting at the same time the transparency of the actions and decisions taken in case of breach and applying an adequate punishing system towards the parties in breach.

## 1. GENERAL PRINCIPLES

### 1.1. Addressees

The rules contained herein shall apply to each director, auditor, employee, collaborator (including, by way of example, consultants and suppliers, etc.) and whoever enters into a contractual relationship with the Company (hereinafter collectively the “Addressees”).

Corporate bodies – in establishing the Company’s targets and goals and in any decision or action relating to the management and activity of the Company – must take into account the principles contained in this Code as well as those concerning honesty, transparency and loyalty; on the other hand, those responsible for the functions, in implementing the decisions taken by the corporate bodies, must follow the same principles both within the Company, thus enhancing the cohesion and the reciprocal cooperation, and vis-à-vis third parties entering into a business relationship with the Company and to refrain from any initiative in contrast with the same.

Employees and collaborators of the Company, as well as partners in business relationships and anyone dealing with the Company must behave in compliance with the provisions of this Code of Ethics.

Each employee and collaborator must perform his/her role with honesty and professional rigor and operate in full compliance with any applicable law or regulation. Any relationship among employees, at any level, and among the latter and any third party, shall be based on fairness, cooperation, honesty and reciprocal respect criteria.

Actions, operations, negotiations and any other activity carried out by the Company’s employees and collaborators in the performance of their role shall rely on correctness, transparency and completeness of the information and comply with the law and internal procedures.

### 1.2. Company’s obligations

La Società assicura:

- maximum knowledge of the Code of Ethics amongst its directors, auditors, employees and collaborators: to the above aim the Code is uploaded onto the Company’s intranet and collocated in a place accessible to anyone, within the Company’s premises;
- spread of instruments of knowledge, training and clarification on the content and the interpretation of the Code of Ethics;
- the updating of the Code of Ethics and the subsequent communication of the amendments introduced;
- the carrying out of controls, following prior information, in case of breach of the Code of Ethics.

Furthermore, the Company:

- grants a correct information to the market and third parties in general, through fair and transparent communications and procedures;
- adopts organisational instruments, such as specific procedures followed by adequate recordings, aimed at hindering the breach of legal rules and of the correctness, transparency and loyalty principles by its collaborators, employees and suppliers, monitoring the correct implementation thereof;
- constantly pursues safety and security improvement, both through a specific training and information and through aimed investments;
- grants to the market, the shareholders and the community in general, within the respect of a fair competition, complete transparency in its activities;
- it's engaged in the promotion of a fair competition, regarded as an element finalised to the fulfilments of its own interests as well as those of clients, market operators, shareholders and stakeholders, of those who come, directly or indirectly, in contact with OMFB's activity;
- enhances competitiveness and innovation;
- protects, enhances and rewards its collaborators and employees;
- safeguards and respects human rights, regarded as a fundamental pillar of its corporate policy and censors any form of negation, apology or propaganda of crimes against humanity;
- fights any form of racism and xenophobia;
- sustains and promotes a sustainable development, respectful of environment and territory.

### 1.3. Addressees' obligations

Each Addressee must be fully aware of the provisions contained in this Code of Ethics and shall:

- refrain from any behaviours or initiatives in contrast with the provisions of the Code;
- report to his/her superior, if any, and, in any case, to the Control Body (with which a constant flow of information shall be maintained) any news concerning any breach of the Code within the corporate activity, using the fax no. 030 9830669 or the following email address: [odv@omfb.it](mailto:odv@omfb.it).

Any director, employee or collaborator must, towards any third party entering in contact with the Company:

- adequately inform them on the provisions of this Code of Ethics;
- require the respect of the provisions of the Code of Ethics in the performance of the activities for which they entered into a relationship with the Company;
- adopt the initiatives herein provided for in case of breach by any third party of the obligation to comply with the rules contained in this Code of Ethics.

## 1.4. Control Body

In accordance with the Decree, OMFB has appointed a Control Body entrusted with autonomous initiative and control powers.

The Control Body of the Company — also with the cooperation and support, whether necessary, of external consultants, who can perform a technical monitoring — shall:

- monitor the compliance with the Code of Ethics, through a procedure of a steady flow of information with all corporate levels “at risk”, and examine any information concerning possible breaches of the same, providing, with prior notice, any further investigation deemed necessary;
- spread and monitor of the knowledge of the Code of Ethics, organising specific training and communication courses and activities finalized at a better understanding of its contents;
- issue guide lines and operational procedures aimed at reducing the risk of breach of the Code of Ethics, promoting, in an adequate manner, the constant update of the same.

The information and news received by the Control Body and by the structures utilised by this latter are confidential and cannot be disclosed, exception made as provided for by applicable law.

## 1.5. Effectiveness of the Code and consequences of its breach

Compliance with the rules contained herein shall be regarded as an essential part of the contractual obligations provided for the employees of the Company, in accordance with article 2104 of the Italian Civil Code.

The adoption by a Company’s employee of behaviours not in compliance with the above rules amounts to non-fulfilment of his/her obligation deriving from the employment contract and a disciplinary unlawful act, with consequent personal liability, as provided for in the applicable collective agreement.

The applicable sanctions shall be applied, in full compliance with the disciplinary corporate provisions and with the applicable collective agreement, by the corporate bodies entrusted therewith.

The Company shall adopt and apply, in a coherent, impartial and uniform way, sanctions proportioned, based on their seriousness, with the different breaches of the Code of Ethics and consistent with the applicable labour regulations.

In case of breach, by the Company’s executives, of the internal procedures and of the Code of Ethics, the Company will evaluate the facts and conducts and will take any appropriate action against the persons responsible thereof, taking into account that these violations amount to non-fulfilment of the obligations deriving from the employment relationship.

In case of violation of the Code of Ethics by the Directors and auditors of the Company, the Control Body will inform the entire Board of Directors and the Board of Statutory Auditors, which will take appropriate actions in accordance with the law.

Any violation of the Code by collaborators, consultants or other third parties having with the Company a contractual, non-employment relationship, may lead, in accordance with the specific contractual clauses of the relevant contracts or assignments, to termination of the contractual relationship, notwithstanding any possible claim for damages whether such violation causes damages to the Company, even regardless of the contractual termination.

## 2. PRINCIPLES OF CONDUCT

To reach its goals, the Company shall follow the following principles:

- respect of all rule or regulation applicable in the countries in which the Company operates;
- compliance with the most rigorous rules of conduct in any relationship with any Public Authority, in full respect of their institutional roles;
- honesty, transparency and reliability;
- equality and impartiality vis-à-vis clients, suppliers, employees and collaborators;
- professionalism, loyalty, correctness and good faith;
- contrast of any possible illicit behaviour and spread of legality culture;
- respect of its employees and collaborators and of everyone in general;
- environmental and safety safeguard, with reference also to that in the work place;
- compliance with the procedures for the use of IT instruments adopted by the Company;
- health and environment protection.

(hereinafter the "Principles").

Every director, employee, collaborator, consultant and anyone who has any kind of relationship with the Company is required to comply with the Principles. The Company shall not enter into, or continue, a relationship with anyone who does not comply with the Principles.

In the performance of his/her work tasks every director, employee, collaborator or consultant shall refrain from any activity not in the interest of the Company or which is, or might be, in whole or in part, in contrast with the Company's interests.

By way of example, but no limited to, the following shall be regarded as conflict of interest:

- any interest – whether visible or hidden – of directors, employees, collaborators with exclusivity or relatives thereof in activities of suppliers, clients, competitors;
- the misuse of his/her position for the achievement of interests in contrast with corporate interests;
- use of the information achieved in the performance of the work activity for his/her own advantage or for the advantage of any third party or in any way in contrast with the corporate interests;
- the performance of a work activity of any kind (manual or intellectual) in favour of clients, suppliers, competitors and/or third parties in contrast with the corporate interests;

- the finalisation or entrance into negotiations and/or contracts referred to the Company, having as counterparties relatives or partners of directors, employees or collaborators or entities in which the latter are partners or have an interest and which are in contrast with the corporate interests.

Outside the working hours and the workplace, any director or employee is free to perform all licit activities compatible with his/her obligations towards the Company.

### 3. RELATIONSHIP WITH THIRD PARTIES

#### 3.1. Relationship with collaborators

Collaborators (including consultants) must abide by the Principles contained in this Code. This obligation is a condition precedent to enter into and maintain a collaboration and/or consultancy relationship with the Company.

Each director and employee, with regard to his/her functions, shall:

- strictly comply with internal procedures concerning selection of and relationship with independent collaborators;
- accurately select people and companies qualified and having a good and solid reputation, with absolute impartiality, autonomy and independence of judgment;
- inform and constantly update independent collaborators on the Principles of the Code of Ethics and the internal procedures adopted by the Company;
- promptly report to the Control Body, with the first immediate results, any possible breach of the Code of Ethics by independent collaborators;
- in every contract, make express reference to the obligation to comply with the Principles of the Code of Ethics, lest termination of the contract itself.

#### 3.2. Relationship with clients and suppliers

In the relationship with clients and suppliers directors and employees of the Company shall:

- comply with the law and the rules of the Code of Ethics;
- strictly respect internal procedures on the management of the relationship with clients and suppliers;
- supply accurate, true and exhaustive information on the products and services offered by the Company to allow the client to take informed decisions;
- supply high quality products and services which satisfy the client's requests and protect the latter health and safety;
- avoid entering into and/or continuing relationships with third parties who do not agree and do not comply with the Principles or do not adopt behaviours in line with those adopted by OMFB;
- act in transparency and good faith;
- adhere to truth in promotional and advertising messages and communications in general.

In any purchase or supply relationship for goods and services, employees and collaborators of the Company must respect the Principles of this Code of Ethics as well as the internal procedures adopted by the Company to grant the respect thereof.

The employees and/or collaborators dealing with suppliers and service providers are required to select them and manage the relevant relationships with impartiality, transparency and fairness, avoiding any conflict of interest situation, even if potential, with the same, reporting to the Company any such situation, selecting people from companies qualified and with a good reputation.

When participating to a bid, the Company carefully evaluates the feasibility of the works or services requested and the congruity of the consideration, promptly signalling possible irregularities.

The offers must allow the respect of adequate quality standard, adequate wage levels for the personnel employed and full compliance with safety and security regulations and environmental safeguard.

In particular, directors and employees must:

- strictly comply with applicable regulations and internal procedures concerning selection and management of the relationship with suppliers and clients, private and/or public;
- while selecting possible suppliers having the requested requirements, adopt objective and transparent evaluation criteria;
- obtain the suppliers' cooperation in ensuring a satisfactory answer to the clients' needs in terms of quality, cost and delivery terms;
- in supply relationships, respect and abide by any applicable legal provision and contractual conditions provided for;
- in the correspondence and interchange with suppliers and clients, comply with correctness and good faith principles, in line with the most rigorous commercial practices.

Directors and/or employees shall not:

- receive any consideration from any third party to perform his/her duties or a deed contrary to his/her official duty;
- give or receive, in any way, whether direct or indirect, gifts, hospitality or benefit of any kind, unless if of little value, normal use and such as not to compromise the corporate image and in compliance with the provisions of the Gift, Gratuities and Sponsorship Procedure;
- be the object of any kind of pressure by third parties, not authorised by the Company, to take decisions and/or to perform acts connected with his/her work activity.

Directors and/or employees receiving gifts or other form of benefits, not to be regarded as a normal form of courtesy, shall take any appropriate initiative to refuse the above gift or other form of benefit, promptly informing the Body of Control accordingly.

In the countries where it is customary to offer gifts to clients or suppliers, the Company and/or the corporate functions and/or consultants appointed and authorised can proceed accordingly only if these gifts are of appropriate nature and little value, but always in compliance with the applicable law, corporate procedures, commercial uses and codes of ethics – if known – of the entities or companies with which the Company is dealing.



### 3.3. Relationships with Public Authorities or Entities and/or relating to relations having a public nature.

Relationships of the Company with Public Authorities or Entities having a public nature and/or in any event relations of a public nature, both in Italy and abroad, must be based on a strict observance of any applicable provision of law or regulation, in compliance with the Relationship with the Public Administration Procedure, and cannot in any way compromise the integrity and the reputation of the Company.

The undertaking of obligations and management of relationships, of whatever nature, with Public Authorities and/or Entities having a public nature, both in Italy and abroad, are reserved solely to the corporate functions and the personnel duly appointed and/or authorised in respect thereof.

In the relationship with Public Authorities and/or Entities having a public nature, both in Italy and abroad, the Company and, on its behalf, any employee or collaborator involved must not try to inappropriately influence the decisions of the interested entity in order to obtain the fulfilments of acts non-compliant with or contrary to office duties, in particular offering or promising, directly or indirectly, gifts, money, favours or any other benefit of whatever nature. In addition, the employee or the collaborator must not try to reward the obtainment of advantages for the performance by public officers of their official duties. Should an employee or collaborator be asked or be instructed to act as specified above, s/he shall immediately notify the Control Body.

In a business negotiation or commercial relationship with Public Authorities and/or Entities having a public nature, in Italy and abroad, the Company, the authorised corporate functions and/or appointed and authorized collaborators undertake not to:

- offer employment or commercial opportunities to the personnel and employees of the Public Authorities and/or Entities having a public nature involved in the negotiation or transaction or to relatives thereof;
- solicit or obtain confidential information compromising the integrity or reputation of the Company.

In the relationships with Public Authorities and/or Entities having a public nature, both in Italy and abroad, the Company cannot not be represented by a consultant or independent collaborator when a conflict of interest may arise.

Commercial courtesy acts, such as gifts, or hospitality or any other form of benefit, are allowed only if of little value and not compromising the integrity and reputation of the parties and not likely to be regarded by a third impartial party as acts finalized at improperly obtaining advantages or favours. In any event, the Gift, Gratuities and Sponsorship Procedure must be complied with and these acts must always be authorised and adequately documented.

### 3.4. Relationships with political organisations and trade unions

The Company does not grant contributions of any kind, either directly or indirectly, to political parties, movements, committees or political organisations or trade unions, nor to their representatives or candidates, both in Italy and abroad, except for contributions due under specific laws, and bases any relation with the same on principles of fairness and collaboration, in the interest of the Company and its employees and collaborators.

These contributions shall be made in strict compliance with applicable law and regulations and adequately documented.

Moreover, the Company does not contribute to organisations with which a conflict of interests could be envisaged (such as, for example, environmental associations or consumers' protection associations).

### 3.5. Relationships with mass media

Relationships between the Company and mass media in general are dealt with exclusively by the corporate functions entrusted therewith.

In any event, information and communications concerning the Company and its activities and meant to be spread shall be accurate, true, complete, transparent and congruous.

Employees of the Company cannot relate with mass media nor issue public statements, data or information concerning the Company.

The participation by directors and/or employees, in the name of the Company or on behalf of the same, to committees or associations of any kind, be they scientific, cultural or belonging to the same category, must be duly authorised by the Company itself.

### 3.6. "Nonprofit" initiatives

The Company promotes non-profit activities in order to testify its efforts to answer interests valuable for their medical, ethical, juridical and social profile within the communities in which it operates.

Directors, employees and/or independent collaborators, compatibly with their role, are required to actively participate in the definition of the above activities, consistently and in compliance with the Company's policies, and to carry them out in compliance with transparency and honesty criteria.

In respect with the Company's principles, it is therefore allowed to contribute to "non-profit" associations regularly incorporated, having a high cultural or beneficial value at a national level.

Sponsorships, which can concern social, sport, entertainment, artistic and cultural events, can be destined only to initiatives offering a quality assurance, in compliance with the Gift, Gratuities and Sponsorship Procedure.

In any event, in selecting the proposals, the Company must be careful about any possible conflict of interests, whether personal or corporate, making sure the payment is not finalised at obtaining or might be regarded as an attempt to obtain a favourable treatment for the Company or for its benefit. It is anyway necessary that the Company has not had recent business relationships with the sponsored parties and that, when making the sponsorship, business relationships are not envisaged in the short term.

### 3.7. Relationships with competitors

The Company undertakes to comply with antitrust laws respecting fair commercial competition.

The company shall therefore refrain from market division agreements with other competitors and from any conduct finalised at limiting its activity in breach of free competition principles.

### 3.8. Environmental policy

OMFB pays great attention to the respect of public interest and regards environment and nature as fundamental values and public assets, to be protected and defended, and it undertakes to adopt responsible behaviours of environment protection, acting in strict compliance with the rules on environmental protection as well as with the limits set forth by possible authorisations and prescriptions issued by the competent Entities, refraining from behaviours harmful for the environment.

OMFB promotes respect for the environment, regarded as a qualifying and rewarding element for any kind of project, and endeavours to orient its business to the respect of the above principles, taking into account the need for a correct use of natural resources.

The Company follows with attention the development of national and international environmental law, managing with attention qualifying projects at a territorial level, working to introduce continuous improvements to the protection of the environment, minimizing the impact of its business on the environment.

## 4. CORPORATE GOVERNANCE, TRANSPARENCY OF ACCOUNTS AND INTERNAL AUDITS. ANTI-MONEY LAUNDERING AND ANTI TERRORISM.

### 4.1. Corporate Governance

The Company must adopt any necessary measure to allow its shareholders to take their decisions consciously.

In the corporate governance, the Addressees - in the interest of the shareholders, employees, collaborators and all those relating with the Company – must comply with the governance principles more apt at granting the best achievement of the corporate activity, in compliance with corporate rules and the provisions of this Code of Ethics.

#### a) Shareholders

The Company controls that shareholders do not act in contrast with the corporate interests, pursuing their own or third parties' interests, unrelated with or contrary to the corporate object, or adopt behaviours in contrast with the Company.

The Company involves all its shareholders in the adoption of the relevant corporate decisions, taking into account and protecting also the interests of the minority.

The Company grants a prompt and thorough information, as well as transparency and access to data and documents.

#### b) Board of Directors and delegates

The Board of Directors acts with professionalism, autonomy, independence and reliability towards the Company, its shareholders, creditors and third parties.

The directors shall not hinder or refuse any audit activity by the subjects appointed thereto.

Aside from its own tasks, the board of directors must control the scrupulous compliance with the values contained in this Code, promoting their knowledge, also vis-à-vis third parties, as well as with the rules and behaviours of the Organisation, Management and Control Model adopted by the Company.

#### c) Board of statutory Auditors

The statutory auditors act with impartiality, autonomy and independence, in order to grant an effective control and a constant monitoring of the Company's economic and financial conditions, as well as the conformity and adequacy of its organisational and administrative structure.

Moreover, they take care of the information and dialogue amongst the various corporate bodies, internal or external.

## 4.2. Accounting records and fiscal fulfilments

The Company complies with the rules on accurate, complete and transparent bookkeeping in accordance with the standards indicated by the applicable rules and the Accounting Principles in force.

In accounting the Company's management facts, its employees, consultants and collaborators are required to strictly comply with the applicable law and the internal procedures so that all operations are duly registered as well as authorized, assessable, legitimate, consistent and reasonable.

In order to ensure that the accounting answers to truthfulness, completeness and transparency criteria of the registered data, for any operation an adequate and thorough support documentation of the activity must be kept within the Company's documentation, so as to allow controls to ascertain:

- the accuracy of the accounting;
- the prompt determination of the characteristics and reasons of the same;
- the easy chronological reconstruction of the operation;
- the verification of the decision-making, authorisation and implementation processes, as well as the identification of the various levels of liability.

Anyone must, therefore, cooperate – within his/her own competences – to make sure that any fact connected with the Company's management is correctly and promptly registered in the accounting records.

Each accounting registration must strictly reflect what is recorded in the supporting documentation. Therefore, each director, employee and independent collaborator entrusted therewith shall act so that the supporting documentation can easily be found and ordered according to logic criteria.

OMFB acts also in accordance with the tax laws in force to ensure the correct tax calculation, certification and payment.

The directors, employees and collaborators – the latter as far as they are involved – who become aware of any omission, falsification or imprecision in the accounting records or in the supporting documentation must immediately report to the Control Body or to his/her internal reference person so that the latter can report to the Control Body itself.

### 4.3. Internal audits

“Internal audits” means all instruments necessary or useful to address, manage, control and pursue the Company’s business in order to ensure compliance with the law and the internal procedures and to protect the corporate assets, manage in an efficient and lawful manner the corporate activities and supply true and correct information on the economic and financial situation of the Company.

The Company must promote, at all levels, an internal culture based on the awareness of the existence of controls and orientated to the implementation of the controls.

Within their role and competences, directors and employees of the Company shall participate to the definition and implementation of an efficient internal audit system and inform thereof all those subject to their authority.

Directors and employees of the Company shall, therefore, within their competences:

- identify and correctly implement the control system;
- responsibly look after the corporate assets, be they tangible or intangible, necessary for the activity performed and refrain from any improper use of the same.

### 4.4. Anti-money laundering and anti-terrorism

The Company pursues its business in full compliance with money laundering, self-laundering and terrorism regulations and with the provisions issued by the competent Authorities. To this end, it shall refrain from operations that might be deemed suspicious in fairness and transparency terms.

Nether the Company nor its employees and/or external collaborators (including representatives, consultants and/or agents) shall, in any way and under no circumstances, be involved in money laundering from criminal or illicit activities.

Before entering into long-term relationships or agreements with suppliers and other partners, the Company, its employees and/or collaborators must verify the respectability, the moral integrity and the reputation of the third party involved and of its activity so as to avoid any involvement in operations which can, even only potentially, favour terrorism and money laundering deriving from unlawful or criminal activities and acting in full compliance with internal control procedures and anti-money laundering and anti-terrorism law.

## 5. HUMAN RESOURCES POLICIES

### 5.1. Human resources

Human resources are considered an essential element for the existence and development of the Company.

In order to enhance the skills and professionalism of each employee and to grant that each employee can exploit his/her potentiality, the competent corporate functions must:

- when adopting any decision concerning employees, apply criteria based on merit and professional skills;
- select, hire, pay and manage employees without any discrimination, ensuring that anyone receives a fair and equal treatment, independently from sex, age, nationality, religion, ethnicity;
- grant to each employee equal opportunities with respect to all aspects of the work relationship with the Company, including, by way of example but not limited to, professional awards, payroll, formation courses, etc.

Employees must be aware of the Code of Ethics and of the behaviours therein provided for; to the above aim the Company shall organise, on a regular basis, formation and information courses concerning the contents of this Code of Ethics.

The Company undertakes to protect employees' physical and psychological integrity, in respect of their personality and avoiding that they might be subject to any kind of influence or discomfort. To the above aim, the Company, in order to protect its image, shall be entitled to consider important also those out of work behaviours, which, for their relevance, can be regarded as offensive for the general sensibility, and will intervene to hinder interpersonal offensive or defamatory attitudes.

Therefore, employees shall cooperate to maintain a work environment of reciprocal respect and refrain from adopting behaviours that can prejudice each one's dignity, honour and reputation.

The Company grants its employees an adequate accident prevention and a safe and a healthy environment.

### 5.2. Harassments in the workplace

The Company wants to avoid any form of harassment in the internal or external work relationships, either in the form of mobbing or in the form of sexual harassment, considering as such the dependence of professional growth or any other kind of advantage on sexual favours or personal proposal of interpersonal relationships that, being disagreeable for the employee, are likely to disturb the latter tranquillity.

Whoever might be aware of any such situation shall immediately inform the Body of Control which will adopt any necessary measure to protect the disclosing party against any form of retaliation, discrimination or penalty, ensuring at the same time the confidentiality on the disclosing party's identity, exception made for any legal obligation and for the safeguard of the interests of the Company or of those wrongly accused or accused in bad faith.

### 5.3. Smoke

The Company will safeguard health and safety of its employees: notwithstanding the prohibition to smoke where this endangers the personal safety and environmental healthiness and legal obligations, if any, the Company can evaluate and impose further prohibitions to reduce and/or eliminate the discomforts associated to passive smoke.

### 5.4. IT systems

The Company has adopted a Regulation for the use of email and internet by the employees, both to comply with data protection law and to limit to the extent possible improper and illegitimate use of these instruments for non-allowed or illicit goals.

The Company acts in full compliance with applicable law on the use and management of IT systems, law which the recipients of this document are therefore required to respect.

Under no circumstances can IT instruments and network resources be used for purposes in contrast with mandatory provisions of law, the public order or decency, and to perpetrate or induce the perpetration of offences, to damage or alter IT systems and third parties' information (private or public entities) or to unlawfully obtain confidential information.

No Addressee can make audio-visual, electronic, paper or photographic recordings or reproductions of corporate documents, unless these activities fall within the ordinary scope of his/her duties.



## 6. PROTECTION OF SAFETY OF THE WORKPLACE AND OF EMPLOYEES' HEALTH

The Company undertakes to grant its directors, employees and independent workers work conditions respectful of individual dignity as well as a safe, clean and hygienic work environment, in order to avoid possible accidents in the workplace and to promote the employees' well-being in the workplace. In its activity the Company shall, therefore, respect the applicable law concerning safety and security of the workplace (Italian Legislative Decree no. 81/2008 and subsequent amendments) as well as the procedures provided for in the Quality Manual.

Company's employees, within their tasks, shall actively participate into the risk prevention, environment safeguard and safety and security protection processes, abiding by the instructions and rules issued by the persons to whom the Company has delegated the compliance with safety obligations.

## 7. CONFIDENTIALITY AND DATA PROTECTION

### 7.1. Confidential information and data protection

OMFB protects the confidentiality of information and data relating to its employees, collaborators or third parties, collected by reason or for its activity, and each employee or collaborator is required to comply with these principles.

The corporate activities require the constant acquisition, conservation, data processing, communication and disclosure of data, documents and information pertaining to negotiations, procedures, operations and contracts of which the Company is a party.

Bank data of the Company can also contain personal data protected under data protection law, data which cannot be disclosed and data the disclosure of which could damage the Company itself.

Each employee shall therefore protect the confidentiality of the information of which he/she has become aware for reasons connected with his/her role and shall not use or disclose them without the Company's prior specific authorisation.

Each employee shall:

- collect and lawfully process, according to EU Regulation 2016/679 and Italian Legislative Decree 196/2003, only data necessary and directly related to his/her role and in compliance with possible appointments received according to the mentioned Eu Regulation and Decree;
- keep the above data in order to prevent any third party from having knowledge thereof, according to the provisions under EU Regulation 2016/679 and Italian Legislative Decree 196/2003, concerning processing specific categories of personal data with electronic means;
- communicate and disclose the data within procedures set forth by the Company or following the prior authorisation by the appointed person;

- assess the confidential nature of the information according to the procedures set forth for by the Company;
- ensure that there are no confidentiality commitments based on relationships of whatever nature with third parties;
- use and keep IT devices in compliance with the procedures adopted by the Company with specific reference to the Regulation for the use of electronic mail and internet;
- use electronic mail and internet only for work purposes in compliance with the procedures set forth by the Company with specific reference to the Regulation for the use of electronic mail and internet;
- refrain from any unlawful access to third parties' systems for which he/she does not legitimately have the relevant passwords;
- keep usernames e passwords - the use of which has been authorised by the Company - with the utmost diligence.

## 7.2. Insider trading

All directors, employees and independent workers shall comply with the national and international insider trading rules. Therefore, no member of the board of directors, employee or collaborator can obtain benefits of any kind, direct or indirect, present or future, personal or financial, from the use of information protected under the above rules unless the same are of public domain.

## 8. INTELLECTUAL AND INDUSTRIAL PROPERTY RIGHTS

OMFB protects intellectual and industrial property rights; any director, auditor, employee and independent collaborator shall comply with the relevant law.

The Company does not allow the use, for any reason or goal, of products with counterfeited trademarks or logos as well as the unauthorised use of patented products or the appropriation of third parties' domain names.

All Addressees shall refrain from buying works protected by copyrights without the simultaneous acquisition of the relevant license and authorisation for their use. The Company does not allow the use of intellectual works not bearing the SIAE mark or bearing a counterfeited mark and forbids the reproduction of software or of the contents of bank data. The download of music, films and intellectual works, as well as the appropriation and distribution, in any form, of works protected by copyright, are forbidden.

Finally, the Company prohibits the use of corporate assets (such, for examples, photocopiers, IT instruments or the website) to implement conducts in violation of the protection of intellectual and industrial property rights.



## 9. FINAL DISPOSITIONS

This Code of Ethics, in its updated version, has been approved by OMFB S.p.A. Board of Directors; any future amendment thereto shall be submitted to the same Board.

Should the Code of Ethics be amended in any way, the Addressees shall be adequately and immediately informed accordingly.

The Code of Ethics is activated together and in coordination with the provisions of the Organization, Management and Control Model adopted by OMFB S.p.A.

The Code of Ethics will automatically incorporate any present or future law defining the list of offences provided for by the Decree and finalised at preventing and punishing these offences.

Provaglio d'Iseo 16th June 2023