



## **CODE OF ETHICS**



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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 establish 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 crimes 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, the reputation and the reliability of the Company.

Every corporate activity must comply with the applicable legal and regulatory provisions and be in strict adherence with 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, accountants, employees, independent workers (including, for example, consultants, suppliers, etc.), as well as third contractual parties, must comply with the rules and principles provided for in this Code.

Each director, accountant, employee or consultant and anyone who deals with the Company must know the Ethical Code and actively contribute to its respect. To the above aim, the Company undertakes to grant the maximum spread 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.

The Company shall monitor the compliance with the rules contained hereinbelow, 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, accountant, employee, third party (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, as well as vis-à-vis third parties entering into a business relationship with the Company.

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

Each employee and independent worker must act 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.

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



## **1.2. Company's obligations**

The Company grants:

- maximum knowledge of the Code of Ethics amongst its directors, accountants, employees and consultants: to the above aim the Ethical Code shall be collocated in a place accessible to any employee, within the Company's premises;
- spread of knowledge, formation and explanation criteria concerning the content and the interpretation of the Code of Ethics;
- the update of the Code of Ethics and the subsequent disclosure of the amendments introduced;
- the monitoring, following prior information, in case of breach of the Code of Ethics.

Moreover, the Company:

- grants a correct information to the market and third parties in general, through communications and correct and transparent procedures;
- adopts organisational instruments, such as specific procedures followed by the relevant registration, aimed at hindering breach of legal rules and of correctness, transparency and loyalty principles by its consultants, employees and suppliers, monitoring the correct applicability of the above instruments;
- works constantly, both through a specific formation and information and with specific investments aimed at safety and security improvement;
- grants to the market, the shareholders and the community in general, even though in respect of a fair competition, complete transparency in its activities;
- it's engaged in the promotion of fair competition, regarded as an element finalised at reaching its goals as well as those of clients, market operators, shareholders and interested parties, who come, directly or indirectly in contact with OMFB activity;
- enhances competitiveness and innovation;
- protects, enhances and rewards its consultants 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, respecting environment and territory.

### **1.3. Addressees' obligations**

Each Addressee must be fully aware of the dispositions contained herein and shall:

- refrain from holding behaviors or take initiatives in contrast with these dispositions;
- report to his/her manager 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 consultant must, towards any third party entering into a relationship with the Company:

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

### **1.4. Control Body**

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 constant flow of information with all corporate levels “at risk”, and examine any information on possible breaches of the same, adopting, following a prior information, any further control deemed necessary;
- spread and verify the Code of Ethics, organising specific formation and communication courses and activities aimed at a deeper understanding of its contents;
- provide for guide lines and operational procedures aimed at reducing the risk of violation of the Code of Ethics, promoting, in an adequate manner, the constant update of the same.

### **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, as well as for its consultants and independent workers.

Moreover, the adoption by an employee of behaviors not in compliance with the above rules constitutes a breach of his/her obligation to diligently fulfill his/her tasks, as provided for in the applicable collective agreement.

The applicable sanctions shall be applied in full compliance with the disciplinary provisions and with the provisions of the Organisation, Management and co Control Model as well as of those of the applicable collective agreement.

The Company shall adopt and apply, in a coherent, impartial and uniform way, sanctions proportioned with the different violation of the Code of Ethics and consistent with the applicable labor regulations.

## **2. ETHICAL PRINCIPLES**





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

- respect of all legal and regulatory rules applicable in the countries in which the Company operates;
- adherence to the strictest conduct rules in the relationship with public entities, in full respect of the institutional roles;
- honesty, transparency and reliability;
- equality and impartiality vis-à-vis clients, employees and consultants;
- professionalism, loyalty, correctness and good faith;
- contrast of any possible illicit behaviour and spread of legality culture;
- respect of its employees and consultants and of third parties in general;
- safeguard of environment and security, also in the work place;
- respect of the procedures for the use of IT devices within the Company;
- health and environment protection.

(hereinafter the “Principles”).

Every director, employee, consultant and anyone entering into a business relationship with the Company must comply with the Principles. The Company shall not enter into, or continue, a relationship with anyone not complying with the Principles.

In the performance of his/her work tasks every director or employee shall refrain from any activity not in the interest of the Company or which is, or might be, 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 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 any way in contrast with the corporate interests;



- the performance of a work activity of any kind (manual or intellectual) by 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 entities in which the latter are partners or have an interests in contrast with the corporate interests.

Outside the working hours and the work place, 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 consultants**

Consultants and all those cooperating with the company shall comply with the Principles of this Code of Ethics.

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

- strictly comply with internal procedures concerning selection of and relationship with consultants and independent workers;
- accurately select people and companies qualified and having a good and solid reputation;
- inform and constantly update independent workers on the Principles of the Code of Ethics Code and the Organisation, Management and Control Model adopted by the Company;
- promptly report to the Control Body, with the first results, any possible breach of the Code of Ethics by independent workers;
- 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.

Consultants and independent workers must comply with the Principles contained in the Ethical Code.



### **3.2. Relationship with clients and suppliers**

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

- comply with 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 make adequate decisions;
- supply high quality products and services which satisfy clients' requests and protect their safety and security;
- refrain from entering into relationships with third parties who do not agree with the Principles or do not adopt behaviours in line with those adopted and hold 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 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. This obligation is a necessary condition for the implementation and development of any purchase or supply relationship. In any event, the selection must be made following quality, price, capacity and efficiency requisites.

If participating into a bid, the Company carefully evaluates the feasibility of the works or services requested and the congruity of the consideration, promptly evidencing any possible problem. Offers must grant the respect of adequate quality standard, adequate salary levels and full respect of safety and security rules and environmental safeguard.

More specifically, directors and employees must:

- strictly comply with applicable regulations and internal procedures concerning selection and management of the relationship with suppliers and clients, whether private and/or public;
- while selecting possible suppliers having the requested requisites, adopt fair and transparent evaluation criteria;



- obtain suppliers' cooperation in granting a satisfactory answer to clients' necessities in terms of quality, cost and delivery terms;
- in supply relationships, respect any applicable legal provision and contractual conditions provided for;
- in relationships with suppliers and clients, follow correctness and good faith principles, in line with the most rigorous commercial practice.

Directors and/or employees shall not:

- receive any consideration from any third party to fulfill his/her duties or a deed contrary to his/her duty;
- give or receive, in any way, whether direct or indirect, gifts or hospitality, 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 Representation Expenses 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 connects with his/her work activity.

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

### **3.3. Relationships with Public Entities**

Relationships with Public Entities, both in Italy and abroad, must be based on a strict observance of any applicable legal or regulatory provision, in compliance with the Relationship with the Public Administration Procedure, and cannot hinder the integrity and the reputation of the Company.

Undertaking of obligations and management of relationships, of any kind, with Public Entities, both in Italy and abroad, are carried out only by the corporate functions and the personnel duly authorised.

In the relationship with Public Entities, both in Italy and abroad, the Company and/or anyone



involved must not try to inappropriately influence the decisions of the involved entity.

In a business negotiation or commercial relationship with Public Entities, in Italy and abroad, the authorised corporate functions and personnel undertake not to:

- offer work or commercial opportunities to the personnel and employees of the Public Entity involved in the negotiation or transaction or relatives thereof;
- offer gifts, unless of little value and ascribable to commercial use and courtesy;
- solicit or obtain confidential information compromising the integrity or reputation of the Company.

In the relationship with Public Entities, in Italy and abroad, directors, employees or independent workers shall not, directly or through third parties, pay or offer money or gifts of any nature or amount to entities, governmental officials, public employees or private citizens, both Italians or belonging to countries with which the Company has commercial relationships, as consideration or repayment for an official action or for an act contrary to their working duties.

In the relationships with Public Entities, both in Italy and abroad, the Company shall not be represented by a consultant or independent worker should a conflict of interest derive therefrom.

Courtesy acts, such as any form of hospitality or any other 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 inappropriately obtaining advantages or favours. In any event, the Gift, Gratuities and Representation Expenses Procedure must be complied with and these acts must always be authorised and adequately documented.

In those countries in which offering gifts to clients or third parties is a habit, the Company and/or its authorised departments or workers can proceed accordingly only whether these gifts are of appropriate nature and little value, but always in compliance with any applicable law, corporate procedures, commercial use and code of ethics - whether known – of the company or entity entering into the relationship with the Company.



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

The Company does not make any kind of contribution, 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, exception made for contributions due under specific laws.

These contributions shall be made in strict compliance with the 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 authorised corporate departments.

In any event, information and communications concerning the Company and its activity and addressed to third parties shall be accurate, true, complete, transparent and coherent.

Employees of the Company cannot enter into a relationship with *mass media* nor issue public statements or disclose data or information concerning the Company.

Participation by directors and/or employees, in the name of the Company or representing the same, to committees or associations of any kind, be them scientific, cultural or belonging to the same category, must be duly authorised by the Company itself.

### **3.6. “Non profit” initiatives**

The Company favours “*non profit*” activities to testify its undertaking to actively participate in the



satisfaction of valuable common interests under an ethic, legal, social or health point of view.

Directors, employees and/or independent workers should, whether possible for their role, actively participate to the definition of the above activities, in compliance with corporate decisions, and implement them in compliance with transparency and honesty criteria.

Contributions to regularly incorporated “*non profit*” associations regularly incorporated, having a high cultural or beneficial value of national relevance, can therefore be made, in compliance with the Company’s Principles.

Sponsorships, in the social, sport, show business, art and cultural fields, are aimed only at events offering a guaranteed quality.

In any event, in selecting the proposals, the Company must be aware of any possible conflict of interests, whether personal or corporate, avoiding that the money or benefit aims at, or can be regarded as aiming at, obtaining an illicit advantage for the Company. The Company must not have held a recent business relationship with the beneficiaries of the sponsorship nor a business relationship must be foreseeable in the near future.

### **3.7. Relationships with competitors**

The Company undertakes to comply with competition law while respecting fair commercial competition.

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



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

##### **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, consultant and any third party entering into a business relationship with the Company – must comply with the governance principles more suitable for granting the best implementation of the corporate activity, in compliance with corporate rules and the dispositions contained in this Code of Ethics.

##### a) Shareholders

The Company controls that shareholders do not act in contrast with the corporate interests, for personal or third parties' interests, alien or contrary to the corporate goals, or adopt behaviours in contrast with the Company.

The Company involves all shareholders in the decision making process, taking into account and safeguarding at the same time the minorities' interests.

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

##### b) Board and delegates

The Board of Directors acts with professionalism, independence and reliability vis-à-vis the Company, its shareholders, creditors and third parties.

The directors shall not hinder or refuse any control activity by the appointed persons.

Moreover, the Board of Directors must grant compliance with the values and principles contained in this Code of Ethics, promoting its disclosure and knowledge also towards third parties, as well as to the rules of the Organisation, Management and Control Model adopted by the Company.

##### c) Board of Auditors





The auditors act with impartiality and independence, in order to grant an effective control and a constant monitoring of the socio-economic situation of the Company, as well as the conformity and adequacy of the organisation and corporate model adopted.

They take particular care in the information and dialogue amongst the various corporate bodies, internal or external.

#### **4.2. Accounting records**

Any operation or transaction must be correctly registered into the accounting records, according to the criteria provided for by the law and of the applicable accounting principles, as well as be authorised, correct, verifiable, legitimate and congruous.

In order to ensure compliance with truth, completeness and transparency principles, for any operation an adequate and complete documentation supporting the relevant activity must be kept on record, to allow the controls aimed at verifying:

- accurate registration;
- prompt identification of the operation's characteristics and reasons;
- easy chronological reconstruction of the operation;
- verification of the decision making, authorisation and implementation process, as well as of the various liability levels.

Anyone is, therefore, obliged to cooperate – in the context of his/her role – to ensure that any fact connected with the management of the Company is correctly and promptly registered in the accounting records of the same.

Each accounting registration must reflect what results from the supporting documentation. Therefore, each director, employee and independent worker involved therein shall ensure that the supporting documentation can easily be found and ordered according to logic criteria.

Directors, employees and independent workers – the latter whether so entrusted – who become aware of any omission, falsification or inadequacy in the accounting records or in the supporting



documents must immediately report to the Control Body or to his/her internal head of office 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, verify and implement corporate activities with the aim of ensuring compliance with the law and the internal procedures and of protecting corporate assets, effectively and lawfully managing the corporate activity and supplying true and correct information on the economic and financial situation of the Company.

The Company shall enhance, at all levels, an internal culture based on the awareness of the control existence and orientated to the implementation of the control itself.

Within their role and functions, directors and employees shall participate to the creation and implementation of an efficient internal audit system and involve all those subject to their authority.

Directors and employees of the Company shall, therefore, each for his/her role, be bound to:

- the definition and correct implementation of the audit system;
- responsibly protect corporate assets, tangible or intangible, necessary for the activity, and not misuse them.

#### **4.4. Anti-money laundering**

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

Before entering into a long-term relationship or agreement with suppliers and other partners, the



Company, its employees and/or consultants must verify the moral integrity and the reputation of the third party involved.

The Company undertakes to comply with all anti-money laundering rules and laws, national or foreigner.

## **5. EMPLOYEES AND WORK ENVIRONMENT**

### **5.1. Human resources**

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

In order to reward the skills and professionalism of each employee, the 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, making sure that anyone receives a fair and right 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 know the Code of Ethics and the behaviours therein provided for; to the above aim the Company shall organise formation and information courses concerning the contents of this Code of Ethics.

The Company undertakes to protect the physical and psychological integrity of the employees, respecting their personality and avoiding that they become subject to conditionings or hardships. To the above aim, the Company, in order to protect its image, shall have the right to consider important also those extra working behaviours, which, for their relevance, can be regarded as offensive for the civil sensibility, and will intervene to avoid interpersonal offensive



attitudes.

Employees shall, therefore, 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 secure work environment.

## **5.2. Harassments in the work place**

The Company wants to avoid any form of harassment in the internal or external work relationships, neither in the form of mobbing nor in the form of sexual harassment, meaning as such the subordination of professional growth or any other advantage to sexual favours or any personal proposal that, being disagreeable for the employee, can undermine the latter tranquility.

Should anyone become aware of these situations, he/she shall immediately inform the Body of Control accordingly and the latter shall adopt any necessary measure to grant the whistleblower from any form of revenge, discrimination or penalty, granting as well the whistleblower's privacy, exception made for legal obligations and the safeguard of the Company's rights or of the wrongly accused persons.

## **5.3. Smoke**

The Company shall grant the safety and security of its employees: notwithstanding the prohibition to smoke where this endangers the personal security and environmental safety and the possible legal obligations, the Company can evaluate and impose further prohibitions to reduce or eliminate the disadvantages arising from passive smoke.

## **5.4. IT devices**



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 as much as possible improper and illegitimate use of these instruments for non-allowed or illicit goals.

## **6. SAFETY AND ENVIRONMENTAL SAFEGUARD**

The Company undertakes to grant its directors, employees and independent workers 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 safety and security law (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.

## **7. CONFIDENTIALITY AND DATA PROTECTION**

### **7.1. Confidential information and data protection**

Company's activities constantly require the acquisition, storage, data processing, communication and disclosure of data, documents and information pertaining to negotiations, procedures, operations and contracts in 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 outside of the Company and data the disclosure of which is likely to prejudice 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 tasks and shall not use or disclose them without the Company's prior specific authorisation.

Each employee shall:

- acquire and duly process, according to Italian Legislative Decree 196/2003, only data necessary and connected with his/her tasks and in compliance with possible appointments received according to the mentioned Decree;
- keep the above data in order to prevent any third party from having knowledge thereof, according to the provisions under Italian Legislative Decree 196/2003, with reference also to processing personal and/or judicial data with electronic means;
- disclose data in respect of the procedures provided for by the Company or if previously authorised by the appointed person;
- establish the confidential nature of the information according to the procedures provided for by the Company;
- ensure that there are no confidentiality obligations based on relationships of whatever nature with third parties;
- use and keep electronic 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;
- not illicitly access into third parties' systems for which he/she does not legitimately have access passwords;
- keep usernames and passwords - the use of which has been authorised by the Company - with the utmost diligence.

The Company, in its turn, undertakes to protect information and data of its employees and third parties and to avoid any improper use thereof.

## **7.2. Insider trading**



All directors, employees and independent workers shall comply with the national and international insider trading regulations. No member of the board of directors, employee or independent worker can therefore benefit, directly or indirectly, from the use of information protected under the above rules unless the same are of public domain.

## **8. INTELLECTUAL PROPERTY RIGHTS**

OMFB protects intellectual and industrial property rights; any director, accountant, employee and independent worker shall comply with the relevant regulations.

The Company does not allow the use, for any reason, 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. 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 bank data. The download of music, films and intellectual works, as well as the appropriation and distribution, by any means, of works protected by copyright, are forbidden.

Finally, the Company prohibits the use of corporate assets (such, for examples, photocopiers, IT devices or the website) to perform conducts in violation 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 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 applied together and in coordination with the rules of the Organization, Management and Control Model adopted by OMFB S.p.A.

The Code of Ethics will automatically include any present or future rule defining the list of crimes provided for in the Decree and aimed at their prevention and punishment.