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1. INTRODUCTION

OMP srl believes that compliance with ethical rules and transparency in the conduct of business constitute a necessary condition, as well as a competitive advantage, to pursue and achieve its objectives.

For this reason, OMP srl promotes the creation of an environment characterized by a strong sense of ethical integrity, in the firm belief that this contributes decisively to the effectiveness of policies and control systems, influencing behaviors that could escape even the more sophisticated surveillance mechanism.

OMP srl's social policy is inspired by the Global Compact Principles for the protection of human rights, the labor market, the environment and the fight against corruption.

OMP srl has, therefore, deemed it appropriate and necessary to adopt and issue a Code of Ethics which explains the values on which must be based on the conduct of all those who, at various levels of responsibility, contribute with their own acts to the performance of the activity of company (including Consultants and/or external Collaborators).

These values are mainly:

- moral integrity, personal honesty and fairness in internal and external relationships;
- transparency towards the market and related stakeholders;
- respect for employees and the commitment to enhance professional skills;
- the protection of health, occupational safety and the environment;
- not being, even indirectly, complicit in human rights abuses;
- the elimination of all forms of forced and compulsory labour;
- the effective elimination of child labor and any form of forced labour;
- fight corruption in all its forms, including extortion, bribes, unfair competition and anti-trust;

and, more generally, the rejection of any conduct which, although aimed at achieving a result consistent with the interests of OMP srl, is not compatible with an organizational and management model characterized by absolute compliance with the law and the behavioral and procedural rules in force within the Company.

Consequently, OMP srl undertakes to supervise compliance with the Ethical Code, providing adequate information, prevention and control tools and intervening, where necessary, with adequate corrective actions.

2. RECIPIENTS, SCOPE AND UPDATE

The principles and provisions of this Ethical Code are binding for all the following Recipients:

- subjects who are in a top position within the corporate organization (administrators, executives);
- individuals who within the corporate organization hold a subordinate position with respect to the first ones (employees);
- external collaborators who perform, directly or indirectly, services connected to the company activity (consultants, external professionals);
- commercial or operational partners of OMP srl who have a role in projects and operations.

All Recipients undertake to pursue their objectives with loyalty, seriousness, honesty, competence and transparency, in absolute compliance with the laws and regulations in force.

It is the right/duty of everyone to contact their superiors or to the Supervisory Body in case of need for clarification on the methods of application of the rules of the Ethical Code, as well as promptly report to the Supervisory Body any news relating to possible violations of the Code itself, collaborating with the structures in charge of verifying them.

Any violations committed by one of your hierarchical managers must be reported in writing to the Supervisory Body or to a manager belonging to your organizational structure and will be treated guaranteeing the confidentiality of the whistleblower.

The control over the application of the Ethical Code is entrusted to the Human Resources Manager. Where violations are detected, these will be reported to the Board of Directors and to the Supervisory Body so that the corporate bodies responsible for this can adopt any sanctions against personnel who have violated the rules.

In this context, OMP srl undertakes to:

- promote the maximum dissemination of the Ethical Code, providing for its in-depth study and updating, also by making the management policies and guidelines defined for each area of activity available to all employees;
- ensure a differentiated training program and continuous awareness of issues relating to the Ethical Code;
- carry out all the necessary checks on any news relating to possible violations, applying appropriate sanctions if the news are ascertained;
- ensure that no one can suffer retaliation of any kind for having provided, in good faith, news of possible violations of the Ethical Code, guaranteeing, in any case, the right to confidentiality of the identity of the whistleblower;
- ensure compliance with the working hours established by the CCNL (National Collective Labor Agreement) and comply with Italian law as regards wages and benefits;

3. RESPECT AND ENHANCEMENT OF HUMAN RESOURCES

3.1. Basic principles

Human resources are an indispensable element for the existence, development and success of any company. OMP srl, therefore, pays particular attention to the enhancement, protection and development of the skills and competences of all its employees so that they can express their potential and professionalism to the maximum level. OMP srl offers all its employees equal job opportunities according to their respective professional characteristics and performance capacity, without any discrimination.

To this end, OMP srl, in compliance with all laws, regulations and company policies in force and through the competent functions, undertakes to:

- select, hire, pay, train and evaluate employees based on criteria of merit, competence and professionalism, without any political, trade union, religious, racial, language or gender discrimination;
- ensure a work environment in which relations between colleagues are based on loyalty, correctness, collaboration, mutual respect and trust;
- offer safe and healthy working conditions, as well as respectful of everyone's moral personality, in such a way as to favor interpersonal relationships free from prejudices;
- hire physically and socially disadvantaged individuals;
- respect and constantly protect human rights and intellectual property;
- intervene in the event of attitudes that do not comply with the principles set out above;
- combat, in particular, any form of intimidation, hostility, isolation, undue interference, conditioning or sexual harassment;
- uphold the freedom of association of workers and recognize the right to collective bargaining and to support the representation of the interests of its employees in freely elected industrial councils and commissions.

3.2. Development of professionalism

In the evolution of the employment relationship, OMP srl favors the development of the potential and professional growth of each resource by providing specific training and updating programs in relation to the professional profiles and potential of each one.

Personnel are required to solicit the acquisition of new skills and knowledge, working methods, information from their superiors and executives, while executives are required to pay the utmost attention to enhancing the potential and predisposition of personnel.

4. INTERNAL RELATIONS

4.1. Rules of personal behavior

The behavior of employees in the pursuit of objectives and in the conclusion of each transaction must be inspired by the principles of honesty, transparency, loyalty, integrity and correctness, in compliance with company policies as well as with the laws and regulations in force.

The conviction of acting for the benefit of OMP srl cannot, in any way, justify conduct in contrast with the principles stated in this Ethical Code, the generalized observance of which is of fundamental importance for the proper functioning and prestige of OMP srl and the Group.

This commitment must also apply to anyone who works in the name and on behalf of OMP srl.

Any situation or activity that could lead to conflicts of interest or that could interfere with the ability to make impartial decisions must be avoided.

The information acquired by employees and/or consultants in the performance of assigned duties must remain strictly confidential and must not be disclosed inside or outside the company except in compliance with current legislation and company procedures.

The employees and/or consultants of the company must use the company assets exclusively for carrying out their work activities.

It is forbidden to accept, for oneself or for others, recommendations, bribes, preferential treatment, gifts or other utilities from the subjects with whom one enters into a relationship, avoiding receiving benefits that could be such as to jeopardize the impartiality of judgment.

The decisions taken by each employee and by the Management must be based on the principles of sound and prudent management in the awareness that they contribute to the achievement of positive corporate results.

Particular attention must be paid in the case of activities carried out by employees who hold the role of Public Official or Public Service Officer in order to avoid abuse of their position or of the powers attributed to perform, omit or delay acts of their office or to perform acts contrary to his official duties.

5. EXTERNAL RELATIONS

5.1. Relations with the Public Administration

For the purposes of this code, Public Administration means Public Entities, public service concessionary Entities, natural or legal persons acting as a public official, a public service officer, a member belonging to a body of the European Community, an official of the European Communities or foreign state official, the judiciary, public supervisory authorities, etc.

In the context of relations with the PA, it is necessary to take particular care not to carry out acts in violation of the provisions of the law and of this Ethical Code.

In particular, it is expressly forbidden to:

- mislead someone by using artifice or deception for the purpose of obtaining an unfair profit to the detriment of the State, another public body or the European Union. In particular, compliance with the law and correct commercial practice is recommended for tenders, negotiations, concessions, licenses and the like, as well as requests for funding, contributions, subsidies and disbursements from the State or other entities belonging to the Public Administration;
- use or submit false declarations or documents or omit information required to obtain contributions, loans, subsidized loans or other disbursements of the same type granted or provided by the State, by other Public Bodies or by the European Union;
- allocating a loan obtained from the State or from another Public Entity to a different use to favor initiatives aimed at the realization of works or activities of public interest;
- alter the functioning of a computer or telematic system by manipulating the data or programs contained therein for the purpose of obtaining an unfair profit and damaging the State or other Public Entity;

- influence in any way the decisions of representatives of the Public Administration in an improper and/or illegal manner (such as, by way of example, soliciting and/or accepting and/or paying and/or offering the same, directly or through third parties, sums of money or other benefits in exchange for favours, compensation or other advantages for oneself or for the Company). Acts of commercial courtesy (such as, by way of example, gifts or forms of hospitality) are permitted only if they do not exceed normal commercial and/or courtesy practices and if, in any case, they are such as not to compromise the impartiality and independence of judgment of the representative of the Public Administration;
- receive, even indirectly, money or other benefits to omit or delay acts or perform acts contrary to the official duties of a public official or public service employee (pursuant to article 357 of the criminal code, public officials are those who exercise a public legislative, judicial or administrative function, and pursuant to Article 358 of the Criminal Code, those who, for whatever reason, provide a public service are persons in charge of a public service).

5.2. Relations with customers and suppliers

Relations with customers and suppliers must be conducted correctly, transparently and impartially by qualified personnel.

The selection of suppliers must take place exclusively on the basis of objective parameters such as convenience, quality, efficiency, compliance with environmental procedures, for the purpose of protecting the assets of OMP srl. In choosing its suppliers, OMP srl is careful that they respect workers' rights and minimum social standards.

5.3. Gifts, benefits and promises of favours

During the business negotiation or commercial relationship both with the PA and with customers and suppliers, it is necessary to apply general criteria of correctness, transparency and integrity.

Particularly:

- no employment and/or commercial opportunities must be examined or proposed or promised that may benefit employees of the public administration or customers/suppliers on a personal basis;
- gifts, donations, benefits, even indirect ones, goods, services and performances or favours that are not due or go beyond ordinary courtesy must not be offered in any way;
- confidential information that may compromise the integrity or reputation of both parties as well as bring about significant direct or indirect benefits for oneself or for OMP srl must not be solicited or obtained;
- actions aimed at improperly influencing the decisions of the other party must not be undertaken.

Furthermore, managers, employees or collaborators of OMP srl in any capacity must not accept from external or internal subjects any goods, services, gifts, benefits, benefits or donations that go beyond ordinary courtesy relations, nor adopt behaviors aimed at favoring such subjects.

Employees who receive gifts or preferential treatment from officials of the PA, Customers or Suppliers that go beyond ordinary courtesy must immediately notify their superior or the Supervisory Body.

6. USE AND PROTECTION OF COMPANY ASSETS

All employees and collaborators must remember that the tangible and intangible corporate assets made available to them by OMP srl are to be used:

- with the utmost scruple and in a proper way, also in order to avoid damage to property or people;
- avoiding, as far as possible, waste, tampering or use that could affect its efficiency or accelerate its normal deterioration; exclusively for purposes connected and instrumental to the exercise of the working activity;
- absolutely avoiding - except as provided for by specific regulations - the use or transfer of the goods themselves by third parties or to third parties, even temporarily;
- avoiding counterfeiting of details.

All employees and collaborators are responsible for the use and custody of the assets granted to them by OMP srl

IT equipment and applications must also be used in compliance with the above and in particular:

- carefully following the corporate security and confidentiality policies defined in the document "OMP Data Processing Technical Regulations";
- absolutely avoiding the acquisition, use or transmission, especially if massive, of information and content not pertaining to the work activity;
- not altering the hardware and software configurations supplied by OMP srl

In compliance with the laws in force, OMP srl carries out checks and implements measures in order to prevent behaviors that are not in line with the above.

All employees must also operate in order to reduce the risk of theft, damage or other external threats to the resources assigned or present in the Company, promptly informing the Managers in charge in the event of anomalous situations.

7. CONFLICT OF INTEREST

There is a relationship of full trust between OMP srl and its directors and employees at any level, in the context of which it is the primary duty of the directors and the employee to use the company's assets and their own working skills for the realization of the corporate interest in compliance with the principles established in the Ethical Code which represent the values which OMP srl draws inspiration from.

In this perspective, the administrators, employees and various collaborators of OMP srl must avoid any situation and abstain from any activity that could oppose a personal interest - direct or indirect - to those of the company or that could interfere and hamper the ability to take decisions in the interest of the company in an impartial and objective manner.

The occurrence of situations of conflict of interest, in addition to being in conflict with the law and with the principles established in the Ethical Code, is prejudicial to the image and integrity of the Company.

The Recipients indicated above must therefore exclude any possibility of overlapping or in any case crossing, exploiting their functional position, the economic activities responding to a logic of personal and/or family interest and the duties they carry out or cover within the Company.

Any situations of conflict of interest, even if potential, must be promptly and in detail communicated to the Company, in the figure of one's hierarchical superior and, if necessary, to the Supervisory Body. The subject with a potential conflict of interest must refrain from carrying out acts that could cause damage to the Company or third parties or even compromise its image.

8. USE AND DISCLOSURE OF INFORMATION

OMP srl considers the dissemination of correct, complete and truthful information on all company facts - and the maintenance of due confidentiality on the same, when necessary - as a prerequisite for creating and maintaining a relationship of transparency and trust with its own stakeholders, related interests and the market.

Consequently, in managing information, employees must:

- keep scrupulously and with the utmost confidentiality all corporate information of any type acquired in the exercise of one's duties;
- request consent to the processing of personal data for the purposes communicated.

In relation to information, employees generally must:

- avoid improper or instrumental use of confidential information in your possession, or use them to your advantage and/or that of family members, acquaintances and third parties in general;
- protect them from access by unauthorized third parties, prevent their dissemination unless specifically authorized by the Manager;
- do not try to obtain from others those that do not pertain to one's sphere of competence or function;
- classify and organize them so that it is possible for authorized parties to access them easily and obtain a complete picture.

Employees not expressly authorized in the forms and terms set out in EU Regulation 2016/679 (concerning the protection of personal data) are prohibited from knowing, recording, processing and disclosing the personal data of other employees or third parties.

9. TRANSPERENCE IN ACCOUNTING

9.1. Accuracy and transparency of official documentation

All official documents intended to illustrate the Company's management situation must be drawn up with the utmost care in order to guarantee accuracy and truthfulness. They must also be drawn up in compliance with the laws and regulations in force.

In drafting the aforesaid documents, OMP srl personnel must pay due attention and maintain those behaviors based on principles of correctness, honesty and integrity which must inform the performance of the professional activities within their competence.

In any case, the drafting and/or keeping of deliberately false or artificial documentation so as to significantly alter the truthful representation of the situation of OMP srl will not be justified or justifiable

9.2 Recording and Documenting Transactions

Every operation, action and transaction of the company must be adequately recorded and documented in order to allow the verification of the decision, authorization and execution processes.

Each act or operation carried out by the staff must be supported by adequate, clear and complete documentation to be kept in the records, so as to allow control at any time of the motivations, the characteristics of the operation and the identification of the subjects who carried out the operation, who have granted the authorizations and who have carried out the checks.

9.3. Accounting transparency

All corporate functions are required to provide maximum collaboration in order to guarantee correct and timely accounting entries. Accounting entries based on economic-patrimonial assessments must comply with the criteria of reasonableness and prudence.

Adequate documentation must be kept in the records for each accounting entry. This documentation must make it possible to identify the reason for the operation that generated the disclosure and the relative authorisation. Supporting documentation must be archived and easily accessible.

Anyone who becomes aware of possible omissions, falsifications or irregularities in bookkeeping must immediately inform their superior or, alternatively, the Supervisory Body.

10. PROTECTION OF HEALTH AND SAFETY

OMP srl aware of the importance of guaranteeing the best environmental, health and safety conditions in the workplace, undertakes to promote and disseminate responsible behavior among its employees, implementing the necessary preventive actions, in order to preserve health, safety and security of all personnel as well as third parties who frequent their premises using their own production plants environmental management systems that correspond to the international standard ISO 14001.

The culture of health, safety and the environment is disseminated systematically, through training and communication moments, and is achieved through continuous updating of control methodologies and systems, in the light of the best available technologies, by carrying out an analytical evaluation of the risks, of the criticalities of the processes and of the resources to be protected.

Company representatives who hold sensitive roles for health, safety and the environment undertake to comply with the rules and obligations deriving from this in terms of prevention and protection, placing themselves, in full awareness of the value represented by safeguarding health conditions personal safety and well-being.

OMP srl undertakes to verify the supply chain and origin of tin, tantalum, tungsten and gold from the Democratic Republic of the Congo or neighboring regions (Conflict minerals).

11. INFORMATION OBLIGATIONS

If any Recipient becomes aware of situations, even if only potentially illegal or contrary to the principles expressed in this Ethical Code, which directly or indirectly benefit OMP srl or are committed in its interest, they must immediately inform the Supervision, or its delegate, by communicating it in writing, also electronically, with exemption from the obligation to observe the pre-established hierarchical order.

Failure to comply with the duty to inform may be subject to disciplinary sanctions.

Under no circumstances may anyone who brings legally or ethically incorrect behavior to the attention of the company or the competent authorities be subjected in any way to retaliatory actions of any kind (Whistle-blowing and protection against retaliation).

The reports received are quickly examined and processed by the Supervisory Body in accordance with the provisions of the Model.

Any disciplinary sanctions are assumed and imposed on the basis of the disciplinary system established by the CCNL in force and by the Organizational Model.

Relations between Employees, at all levels, must be based on criteria and behaviors of correctness, loyalty and mutual respect. Therefore, the abuse of the duty to inform governed by this chapter for the purpose of retaliation or merely emulation is punishable.

12. SANCTIONS SYSTEM

Already from the premises of this Ethical Code, the strong call for precise and punctual compliance with all the provisions of the law by each employee in the performance of their work clearly emerges.

Failure to comply with the same can only lead to the application against the employee of the sanctioning procedures by the contractual provisions (CCNL of reference) and/or by law.

Compliance with the Code of Ethics, on the other hand, must arise more than from an obligation imposed by OMP srl towards its employees, from their sharing of the fundamental values that are stated in it.

However, this does not exclude the right/duty of OMP srl to supervise compliance with the Code of Ethics, implementing all prevention and control actions deemed necessary or appropriate for the aforementioned purpose.

Violation of the provisions of the Code of Ethics constitutes a breach of the primary obligations of the employment relationship and a disciplinary offence, with all legal consequences, also with regard to the preservation of the employment or collaboration relationship.

Therefore, in the event of ascertained violations, OMP srl intervenes by applying the measures envisaged by the sanctioning system.

These measures, proportionate to the seriousness of the infringements committed, are applied in compliance with the contractual and legal provisions as well as with the procedure set up for the imposition of disciplinary sanctions.