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CODE OF ETHICS

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FOREWORD

OMAL has a distinctive history founded on excellence, dedication and respect. Every day, through our work, achievements and ambitions for the future, we demonstrate our commitment to a business model built on responsibility, long-term vision and sustainable innovation.

The values that guide us—**Passion**, **Respect** and a **Sense of Duty**—are at the heart of our identity and mission. We do not uphold them for convenience, to meet market expectations or to avoid criticism. We uphold them because they define who we are and how we conduct our business. We have always been attentive to social and environmental matters, and we remain committed to continuously improving our products, processes and overall impact.

This Code of Ethics gives form and expression to our ethical framework by bringing together and updating principles that are already deeply embedded in our corporate culture. It is not a response to external pressure, but the result of a deliberate internal and strategic decision intended to create positive impacts at every level: stronger relationships, clearer and more consistent communication, deeper connections with the local community, greater appeal to talented and motivated people, and a market position that reflects our values.

We want our employees to be proud to work for OMAL, our partners to understand and share our ethical principles, and the communities in which we operate to view OMAL as a responsible and trusted organization. We believe that growth is a shared and participatory process. For this reason, we are committed to building relationships based on integrity, transparency, fairness and mutual respect with all our stakeholders.

Amedeo Bonomi
CEO OMAL S.p.A. Società Benefit

UMMARY

PEOPLE

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FUTURE OUTLOOK

INTRODUCTION

"***At OMAL, ethics is a manifesto in which we firmly believe.***"

This statement invites us to explore the ethical values that guide all our business activities. To make this journey clear and concrete, we have structured the Code of Ethics around three fundamental pillars:

PEOPLE
The conduct and values that guide our people and shape the way they work.

PARTNERS
The ethical principles that govern our relationships with customers, suppliers and other partners, ensuring reliability and transparency.

COMMUNITY
The social and environmental communities with which we seek to engage in dialogue and collaborate.

At OMAL, ethics concerns and applies to everyone who has a relationship with or an interest in the Company. Our objective is to build high-quality, long-lasting relationships that improve performance and create shared value.

This Code of Ethics reflects the current state of our ethical commitment while also looking ahead. We believe that ethics cannot be imposed from above or reduced to a fixed list of immutable principles. It is an inclusive, collaborative and participatory process. We have reviewed the values that underpin our mission and vision because they represent OMAL's true DNA and form the foundation of everything set out in this document.

Some matters are still under development and are not yet ready to be formalized. We have therefore decided not to include them in the Code of Ethics until we are sure that we can support them consistently. Nevertheless, we consider them goals for the near future and we address them in the final section, dedicated to our future outlook.

SCOPE OF APPLICATION

The Code of Ethics has a broad scope and applies to all individuals and entities that interact with the Company and its sites. It sets out the values that guide our activities, both internally and externally. Specifically, it applies to:

- All **OMAL personnel**: executives, employees, consultants, interns, students and agents.
- **Business partners** and **social stakeholders**: customers, suppliers, distributors and anyone acting on behalf of the Company.
- **Local** and **global communities**: the social and environmental contexts in which the Company operates and with which it engages.

Managers play a key role in implementing this Code by ensuring that their teams are familiar with and understand its content, which is made available both online and offline. Professional integrity cannot simply be imposed; it is conveyed through exemplary conduct, day after day.

Although we cannot directly control the conduct of vendors, distributors or competitors, we are committed to promoting fair and transparent business practices. Any violation of the ethical principles set out in this Code may seriously damage the Company's reputation and will be carefully assessed by senior management, with any appropriate disciplinary or contractual measures applied.

WHISTLEBLOWING

All OMAL activities comply with Italian law and with the laws of the countries in which we operate. Where our ethical standards exceed legal requirements, those higher standards must always be upheld.
Anyone who becomes aware of a potential violation of the ethical principles set out in this Code must report it to their supervisor or to management. The following channels are also available:

- The dedicated QR code displayed on digital noticeboards within the Company's facilities, which can be used to provide feedback on needs, issues and suggestions for improvement.
- The Whistleblowing button on the Company's website, which can be used to report suspected misconduct.

Confidentiality and protection against retaliation are guaranteed, provided that these channels are used in accordance with the applicable procedures.

1. Organization, Management and Control Model pursuant to Legislative Decree 231/2001

OMAL S.p.A. Società Benefit considers **Legislative Decree No. 231 of 8 June 2001** to be a fundamental reference framework for its governance and corporate responsibility system.
This Code of Ethics is an integral part of the **Organization**, **Management and Control Model** adopted by the Company. It promotes the principles of legality, fairness and transparency that everyone who acts on behalf of or in the interest of the Company must follow.

1.1 Purpose of the Model

The adopted **Organization**, **Management and Control Model** is intended to prevent the offenses specified in **Legislative Decree 231/2001** by promoting a corporate culture based on legality, transparency and integrity.
By adopting and effectively implementing the Model, OMAL aims to prevent and mitigate the risk of unlawful conduct being committed, in the Company's interest or for its benefit, by employees, business partners, or third parties acting on its behalf, in accordance with applicable law.

1.2 Supervisory Body (OdV)

In accordance with the Decree, OMAL has established a **Supervisory Body** with independent powers of initiative and oversight. It is responsible for monitoring the operation of, compliance with, and updating of the Model and this Code of Ethics.

1.3 Intended Recipients and Scope of Application

All recipients of this Code of Ethics—including employees, corporate bodies, collaborators and partners—must comply with its principles and rules and actively contribute to preventing, among other things:

- crimes involving dealings with Public Administration bodies;
- corporate crimes;
- offenses relating to occupational health and safety;
- receiving stolen property, money laundering, the use of funds of unlawful origin and self-laundering;
- environmental crimes;
- tax offenses;
- crimes against industry and commerce;
- the employment of foreign workers who are unlawfully resident in the country, as well as the other offenses provided for by Legislative Decree 231/2001.

1.4 Penalty System

Any **violation** of the principles and provisions of the **Code of Ethics** or **Model 231** may result in **disciplinary sanctions**, in accordance with applicable laws and regulations and collective bargaining agreements, or in contractual measures against third parties, without prejudice to any further civil or criminal liability action.

1.5 Whistleblowing System

OMAL encourages everyone to report conduct or situations that do not comply with the Model or the Code of Ethics. Reports must be made through dedicated company channels, including the platform available at **https://whistleblowing.omal.it/it**. In accordance with the Company's **Whistleblowing Policy**, these channels protect the confidentiality and identity of the reporting person and provide protection against any form of retaliation.

OMAL PEOPLE

OMAL expects all employees to **act with integrity** and **responsibility** and to **respect** the views of others. We promote an environment that is open to dialogue, where diversity of thought is valued as a source of professional growth. Sharing different perspectives enables us to learn from one another, strengthen our skills and create a more enriching workplace. Therefore, we encourage innovative thinking and participatory approaches that support the exchange of ideas, collaborative problem-solving and the development of more effective ways of working and relating to others.

We also expect every employee to act fairly and honestly in all business dealings, so that external stakeholders can recognize OMAL's conduct as exemplary.

WORKPLACES

Both **physical** and **psychological** safety are **essential**. The Company is committed to providing workplaces that are **healthy**, **safe** and **stimulating**.

Employees must:

- Remain informed about and strictly comply with health and safety rules.
- Avoid unsafe or high-risk conduct.
- Promote teamwork and collaboration, recognizing that strong performance and productivity depend on effective cooperation.

Managers must also:

- Verify that employees have received specific training on occupational health and safety in accordance with Legislative Decrees No. 81/2008 and No. 106/2009.
- Ensure that training is up to date and delivered effectively.
- Address and resolve, openly and fairly, any misunderstandings or issues among employees that could adversely affect company activities, whether or not those issues arise directly from work.
- Share ideas and solutions that improve and facilitate collaboration between departments.

RIGHTS AND PROTECTIONS

OMAL respects **cultural differences** and treats every employee with **dignity** and **respect**. Ethnicity, gender, religion or belief, cultural background, nationality, political views, disability, health status and socioeconomic background are sources of diversity and must never be grounds for discrimination. Accordingly, employees must:

- Never encourage or engage in bullying, harassment, stalking or humiliating conduct, whether verbal, physical or otherwise.
- Avoid any conduct that could undermine a colleague's dignity, self-esteem or professional reputation.
- Take action and contact their supervisor or manager if they witness or become aware of discriminatory conduct.

Managers must also ensure that employees are treated with due respect and assessed solely on the basis of their professional performance.

PRIVACY

OMAL protects the **privacy** of its **employees** in accordance with **Legislative Decree 196/2003**. Personal information that is not relevant to work must not be requested or collected. Employees must therefore:

- Protect passwords, online accounts and electronic devices that may contain or reveal personal information.
- Collect personal information only when it is relevant and necessary for work-related purposes, and make it accessible only to authorized persons.
- Refrain from asking about personal or health matters unless this is necessary for safety, work-related reasons or compliance with national law.
- Respect the private lives of others, including matters relating to political views, sexual orientation, pregnancy and religious beliefs.

Sensitive and confidential data must be **protected** and must **not be disclosed** to third parties without authorization. These data must be stored securely, whether on electronic devices or in any other physical or digital form.

CHILD LABOR AND FORCED LABOR

The Company does not tolerate any form of **forced labor** or **child labor** and is committed to complying fully with all applicable laws on the minimum age for employment. It also recognizes and protects employees' rights to freedom of association and collective bargaining.

In accordance with these principles, managers must:

- Verify that every employee has signed a written employment contract or equivalent document clearly confirming the voluntary nature of the employment relationship.
- Ensure that all new employees understand and comply with the ethical principles set out in this Code.
- Ensure that wages, including overtime pay, comply with national laws and collective bargaining agreements and are commensurate with employees' skills and responsibilities.
- Avoid using wage deductions as a disciplinary measure.
- Promote an environment in which employees can meet freely and discuss work-related matters, including trade union issues.
- Ensure that no person is employed below the minimum age established by law.
- Ensure that recruitment and selection processes are transparent and impartial and are based solely on professional qualifications, in accordance with applicable collective bargaining agreements. Any family relationship between a candidate and an employee must be disclosed, and the employee concerned must not participate in the selection process.

POLITICAL NEUTRALITY

OMAL does not support political parties or politically affiliated organizations. However, through its senior management, the Company may join industry networks or associations that operate in sectors consistent with its mission and vision. Employees must not use the OMAL name or logo to support political organizations in a personal capacity, express personal political views through a company email account or on official letterhead, or promote party-political activities on company premises.

CONFLICT OF INTEREST

The Company requires employees to **report** promptly any situation that may constitute a potential **conflict of interest**—i.e., any circumstance in which personal interests could take precedence over or interfere with the interests of the Company. Employees must raise any doubts or uncertainties about a potential conflict with their supervisor. They must not use OMAL's name or logo for personal purposes or enter into direct or indirect business relationships with competitors. Managers must also ensure that no employee handles financial transactions alone without involving or at least informing other colleagues, thereby maintaining transparency and shared oversight.

Every report must be carefully reviewed and supported by a written assessment, reflecting the Company's commitment to preventing and managing potential conflicts of interest rigorously and consistently.

INTELLECTUAL PROPERTY

OMAL respects the right to accurate information and manages its communication activities and initiatives through a dedicated function, in accordance with internally defined principles and guidelines. **All information** concerning internal activities **must be accurate**, **verifiable** and **consistent with approved communication plans**.

Intellectual property rights relating to ideas, initiatives, communication content, processes, products and other contributions resulting from internal work belong exclusively to OMAL.

USE OF COMPANY RESOURCES

Employees use company-provided resources to perform their daily work. These include **computers**, **mobile phones**, **tablets**, **corporate credit cards** and **other equipment**.

These resources are intended primarily for professional use, as specified in the internal document "Proper Use of Electronic and IT Tools," which employees are required to sign. Any personal use must be limited, reasonable and justifiable, including in the event of an internal investigation.

Employees must therefore:

- Use electronic devices and company resources only for authorized work-related purposes.
- Never use company resources to transfer money for personal purposes.
- Never use company devices or systems for unlawful activities.
- Protect company devices and data by keeping passwords secure and up to date.
- Report any suspected misuse of their own or another person's device to the IT department.
- Whenever practicable, use digital tools for meetings and conferences to reduce unnecessary travel and its environmental impact.

The use and maintenance of other company equipment, such as vehicles and toll-payment devices, are governed by the internal documents "OMAL Company Cars" and "Maintenance of Company Cars." These documents are provided to and signed by the relevant employees (for example, area managers) before the equipment is used.

OMAL PARTNERS

OMAL complies with all applicable **national** and **international standards and regulations** governing its products, manufacturing processes and business practices.

As a global company, we must **clearly define** the **conduct** that we consider **acceptable** and that may be associated with our brand in the course of professional activities. We recognize the complexity of economic and financial markets, in which different participants pursue commercial objectives through different approaches. However, no commercial consideration may compromise the principles that protect OMAL's credibility and reputation.

The following guidelines govern the Company's relationships with its business partners, including customers, distributors, suppliers, agents, consultants and anyone acting on its behalf.

CORRUPTION AND ILLEGAL PRACTICES

OMAL expressly prohibits all forms of **corruption**, **bribery**, **extortion**, **money laundering**, **facilitation payments** and **tax evasion**. It is prohibited to enter into, or attempt to enter into, corrupt arrangements with public or private third parties in any area of activity, including but not limited to:

- Certification and inspection procedures.
- Relationships with public bodies and regulatory or supervisory authorities.
- Commercial negotiations, competitive tenders and the award of contracts.
- Lobbying, consultancy and intermediary activities.

Any conduct intended to obtain an undue advantage, alter a decision or improperly influence an outcome constitutes a serious violation of this Code of Ethics and will be reported to and assessed by OMAL management.

The Company **supports fair competition** and does not enter into agreements that could distort the free market, including arrangements intended to create or abuse a dominant position. Information about competitors may be collected only through lawful means and used exclusively for legitimate product and business comparisons.

GIFTS AND HOSPITALITY

In some cultures, gifts and hospitality are customary expressions of appreciation and respect. OMAL recognizes this practice but regulates it in accordance with its ethical principles. All gifts and hospitality must be **transparent**, appropriate and free from any intent to influence improperly.

Guidelines for employees:

- Employees must not accept money or loans from customers, partners or distributors.
- This prohibition also applies to members of employees' families.
- Gifts may be accepted only if they are modest, appropriate and do not compromise—or appear to compromise—the Company's integrity or reputation.
- Any gifts received must be donated to the Company's Christmas raffle, in accordance with internal procedures.
- Hospitality and entertainment must remain professional and must not create ambiguous, inappropriate or embarrassing situations.

PHILANTHROPY

Philanthropic **contributions** constitute a **pro bono investment** by the Company, intended to **support its partners**. Under no circumstances, however, may they be used to secure unlawful advantages or commercial benefits. Employees are therefore encouraged to prioritize non-monetary forms of support, such as volunteering their time or sharing their expertise with charitable organizations, and refrain from making monetary donations to public institutions.

The reliability of every recipient organization must be verified, and each contribution must be documented transparently through a signed receipt and a clear statement of its exclusively charitable purpose.

PRODUCT QUALITY AND SAFETY

OMAL is committed to maintaining high standards of **quality**, **safety** and **sustainability** throughout its activities, from product design and production to marketing. We comply fully with applicable regulations and promote a culture of continuous improvement, environmental protection and the health and safety of people.

As evidence of this commitment, the Company implements and maintains management systems certified to the international standards **ISO 9001**, **ISO 14001** and **ISO 45001**. These systems support controlled processes, activity traceability, the management of risks and opportunities, and the active involvement of employees, suppliers and partners in pursuing excellence and sustainability.

THE OMAL COMMUNITY

OMAL believes in a society in which knowledge and best practices are shared among stakeholders committed to ethical values. We therefore **communicate transparently** about our actions and demonstrate that **fairness** and **business success can coexist**. Ethics is not an isolated principle; it is embedded in a network of relationships with companies, public bodies, organizations and local communities. This network should operate responsibly and collaboratively, enabling everyone to feel part of a shared endeavor. A sense of belonging grows from respect for diversity, transparency in relationships and consistency between stated values and everyday conduct.

OMAL employees are therefore expected to engage with stakeholders, remain attentive to the needs of local partners and maintain an open and responsible attitude, actively contributing to a positive impact on the community.

NETWORK CONNECTIONS AND INFORMATION DISTRIBUTION

The Company encourages the responsible sharing of information and knowledge while protecting confidentiality and ensuring clear, consistent communication. Any **content distributed** must **be accurate**, **relevant**, **authorized** and aligned with the **Company's values**.

Employees must:

- Share information only when it is accurate, relevant and authorized.
- Never disclose confidential information or circulate unverified content.
- Use official channels for all external communications.

ENVIRONMENTAL AWARENESS

OMAL recognizes the importance of **acting responsibly** to **reduce the environmental risks** and pollution associated with its activities. Environmental impacts—including those on nature, ecosystems and biodiversity—are carefully assessed at every stage of operations.

Employees must understand the environmental consequences of their actions, follow internal guidelines to minimize them, report any risks and remain up to date on prevention procedures. Management is responsible for promoting sustainable practices, ensuring appropriate employee training and incorporating environmental criteria into the selection of suppliers and partners.

INTERGENERATIONAL RESPONSIBILITY

OMAL makes **passion** a hallmark of everything it does, paying close attention to every detail of its products and acting responsibly toward future generations. This commitment guides every business decision, with the aim of setting a positive example while respecting the environment and the community.

We rigorously apply national and international technical and regulatory standards to ensure the **safety** and **reliability** of our products. We also promote safe working conditions and protect the health, safety and well-being of people throughout the supply chain.

We aim to grow as a responsible company by continuously improving our processes and practices. We ask our employees to lead by example, choose the most ethical and sustainable course of action, and help build a future in which our business is sustainable not only economically but also socially and environmentally.

FUTURE OUTLOOK

The Code of Ethics is a living document. It evolves as the Company's needs, regulatory environment and vision for the future develop. While its core values remain fundamental and non-negotiable, the Code can be enriched over time through dialogue with stakeholders.

OMAL is committed to a fair and responsible business model that extends beyond manufacturing excellence. Two topics are currently being explored: **international visibility**, understood as openness to ethical dialogue with companies and institutions worldwide; and **flexibility**, which is essential for attracting qualified professionals through agile and innovative working solutions.

We recognize that this is a long-term journey and regard this document as the first step on an ambitious and inspiring path.

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