

Honest Sharing
Passion Respect
Taking care



CODE OF ETHICS

ON SOCIAL RESPONSIBILITY

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	CODE OF ETHICS	COD.ET. Rev. 1 del 01.10.21
CODE OF ETHICS ON SOCIAL RESPONSIBILITY		

Table of content

Introduction

1. Principles and Values of the Company

- 1.1 Employees
- 1.2 Associations and NGOs
- 1.3 Customers/Users
- 1.4 Suppliers
- 1.5 Other parties involved
- 1.6 Institutions

2. Commitments of the Company

- 1.7 OMETEC SRL's commitment to Employees and Partners
- 1.8 OMETEC SRL's commitment to Suppliers and Sub-Contractors
- 1.9 OMETEC SRL's commitment to Customers
- 1.10 OMETEC SRL's commitment to other parties involved (Institutions, local community, Trade Unions, NGOs, voluntary associations, etc.)

3. Behavioural rules

- 1.11 The commitment of the Employees and Partners to OMETEC SRL
- 1.12 The commitment of Users and Customers to OMETEC SRL
- 1.13 The commitment of the Suppliers and Sub-Contractors to OMETEC SRL

4. Applicability of the Code of Ethics

- 1.14 Compliance with the regulations
- 1.15 Contact persons for the interpretation and application of the Code of Ethics
- 1.16 Reporting violations

	CODE OF ETHICS	COD.ET. Rev. 1 del 01.10.21
CODE OF ETHICS ON SOCIAL RESPONSIBILITY		

INTRODUCTION

OMETEC SRL operates in the industry of plastic mould manufacturing and plastic material moulding.

The drafting of the Code of Ethics is part of a journey that began more than a year ago, when OMETEC SRL decided to implement a series of initiatives aimed at confirming and informing people outside the company of its principles and values based on the concept of "social responsibility of the company".

In recent years, the theme of social responsibility has become increasingly important and a key requirement.

The ethical aspects of fairness, responsibility, transparency and respect for human rights seem to increasingly affect economy and social systems, while, at the same time, the role of all the parties involved within companies (institutions, employees, suppliers, sub-contractors, customers, associations, trade unions, etc.) is increasing.

The ethical commitment of OMETEC SRL has been marked by the implementation of the following actions:

- drafting of the Social Responsibility Policy
- construction and implementation of a Social Responsibility Management System

The need to draft a Code of Ethics arises from the awareness that the integrity, reputation and profitability of OMETEC SRL mainly depend on the individual behaviour of its managers, employees, partners, sub-contractors and suppliers.

	CODE OF ETHICS	COD.ET. Rev. 1 del 01.10.21
CODE OF ETHICS ON SOCIAL RESPONSIBILITY		

The Code of Ethics therefore aims at defining the principles, values and behaviours that must inspire the performance of the activities of OMETEC SRL on a daily basis. This tool is an expression of the essential values of OMETEC SRL and represents a reference point for each decision-making process.

The Code must be used as a guide. Each employee and partner is personally responsible for complying with the Code of Ethics and must always take it into account.

The suppliers and sub-contractors of OMETEC SRL are encouraged to read the Code and sign it in order to commit to complying with it.

All other stakeholders of OMETEC SRL are encouraged to read it carefully and to bear in mind the contents at all times.

Ethics and compliance with the rules are a responsibility that OMETEC SRL intends to share with its business associates. The reputation of OMETEC SRL must be immaculate, perfect - with no exceptions.

Anyone who should become aware of situations that seem not to comply with the ethical values and behavioural rules of the Code, must inform the Management of OMETEC SRL or the Manager of the Social Responsibility Management System or the Employee Representative for Social Responsibility.

CODE OF ETHICS ON SOCIAL RESPONSIBILITY**OMETEC SRL****CODE OF ETHICS****1. Principles and values of OMETEC SRL**

OMETEC SRL commits to complying with the most stringent standards of ethical and professional conduct towards employees, partners and all other business associates: customers/users, suppliers, associations, institutions, local community. This commitment and the responsibility it implies, it summarised below.

1.1 Employees

Towards its employees, OMETEC SRL commits to respecting the following ethical principles:

- do not use or promote the use of child labour;
- do not use or promote the use of forced labour;
- guarantee all employees a safe and healthy workplace;
- respect the right of workers to join and form trade unions;
- do not enforce any kind of discriminations;
- do not use or promote corporal punishment, mental or physical coercion and verbal violence;
- operate in accordance with the international and national labour laws and the National Collective Labour Agreement;
- guarantee compliance with the minimum wage levels provided for by current legislation and by the National Collective Labour Agreement.

CODE OF ETHICS ON SOCIAL RESPONSIBILITY

We are required to behave equally in our mutual relationships and to implement an employment policy based on equal opportunities for all employees and partners, on dialogue, listening to the requirements and needs of everyone, in order to create a pleasant work environment, an atmosphere where the exchange of frank and loyal opinions is encouraged, and to promote the well-being of the staff.

We recognise everyone's right to the confidentiality of their private life, and we give priority to taking care of our employees, their health and safety at the workplace, their professional growth and personal satisfaction and motivation.

1.2 Associations and NGOs

Towards all the associations and NGOs with which OMETEC SRL collaborates in various ways, OMETEC SRL commits to promoting the exchange of information, dialogue and transparency.

1.3 Customers/Users

OMETEC SRL's customers include the following categories:

- providers of courses and consultancy
- those who make use of the courses and consultancy
- those who use the information and guidance services

We must provide our customers with high quality, professionalism, excellence, fair prices and honest behaviour, in order to pursue continued customer satisfaction. Relations should be based on principles of legality, morality, transparency and professional fairness.

CODE OF ETHICS ON SOCIAL RESPONSIBILITY*1.4 Suppliers*

We are required to treat our suppliers fairly. Fair competition, without discriminatory or unfair practices must be encouraged, aimed at stimulating the creation of lasting business relationships based on correctness and transparency.

1.5 Other parties involved

We are required to behave as responsible citizens in the local community in which we operate, in accordance with all the national and local laws, whilst committing to improving the quality of life through the promotion of awareness-raising initiatives on issues related to the protection of human rights and to the professional growth and development of young people.

1.6 Institutions

We are committed to maintaining an open and transparent dialogue with all national, regional and local institutions with whom we interact every day.

2. COMMITMENTS OF OMETEC SRL*2.1 OMETEC SRL's commitment to Employees and Partners*

__ We do not use and in no way do we intend to support the use of child labour.
__ We do not use and in no way do we intend to support the use of forced labour.
We are committed to ensuring that all the employees of OMETEC SRL are fully aware of their rights and obligations deriving from the employment contract.

CODE OF ETHICS ON SOCIAL RESPONSIBILITY

_ We guarantee to all employees a safe and healthy workplace by complying with the relevant regulations, by continuously providing training and information on health and safety issues, by being available to undergo inspections and audits by control authorities and by implementing all the necessary actions to minimise the hazards of the work environment.

_ We respect the right of the workers to form and join trade unions of their choice and the right to take part in collective bargaining.

_ We are committed to pursuing a policy that does not promote discriminatory practices in hiring, remuneration, access to training, promotion, dismissal or retirement, based on race, class, national origin, religion, disabilities, sex, sexual orientation, union membership, political affiliation, age.. We are committed to offering equal opportunities to all employees of OMETEC SRL and equal employment opportunities to new qualified candidates.

_ We intend to work in the utmost respect for the privacy and dignity of workers.

_ We do not use and in no way do we intend to support the use of corporal punishment, mental or physical coercion, verbal abuse. Any disciplinary fines applied to employees are implemented in full compliance with the "Workers' Statute" and with the National Collective Labour Agreement in force.

_ We are required to fully comply with international and national labour laws in the work relationship.

_ We are required to work in compliance with the confidentiality and dignity of employees and partners. OMETEC SRL requests and records only the personal data required for the efficient management of the staff or required by law. Access to this data must be limited to those who have an objective need to know certain details (control authorities). OMETEC SRL must comply with all the laws in force regarding the disclosure of the personal data of its employees.

Respecting the dignity of the private life of its employees and partners also means that OMETEC SRL must not interfere with their conduct outside the workplace, provided that such conduct does not harm the person's performance

CODE OF ETHICS ON SOCIAL RESPONSIBILITY

at work or the company's reputation.

_ We are committed to punctually providing our employees and partners with information on the performance of OMETEC SRL, on the services it offers, on relations with its customers and on the results achieved by the employees and partners.

_ We have set up an anonymous communication channel that allows the employees and partners to openly express opinions, attitudes and concerns. We are committed to guarantee adequate answers to the anonymous reports / claims received. No fines will be imposed on the employees or partners who should provide any reports or submit any issues or claims to OMETEC SRL.

_ We are committed to stimulating the training and professional growth of our employees and partners, encouraging them to improve and increase their professional abilities.

2.2 OMETEC SRL's commitment to Suppliers and Sub-Contractors

The policy of OMETEC SRL in the purchase of equipment, materials and services is based on the intrinsic value of the same. The suppliers, the providers of services and the sub-contractors of OMETEC SRL must be treated equally, fairly and without discrimination.

_ We are committed to ensuring the payment of the goods or services delivered within the terms indicated by the contract or purchase order.

_ We are committed to promoting a collaborative relationship based on trust, the exchange of information, transparency and professional fairness.

_ We must respect confidential information and trade secrets of suppliers and sub-contractors.

CODE OF ETHICS ON SOCIAL RESPONSIBILITY

_ We are committed to pursuing a policy aimed at informing our suppliers and sub-contractors of any accounting or administrative error and correcting any error immediately by means of payments, refunds or other measures acceptable to both parties.

2.3 OMETEC SRL's commitment to Customers

_ We are committed to design and deliver quality products and consulting services of high technical-professional profile, by selecting the materials and professionals who are prepared and suitable for the type of task

_ We are committed to manufacture products able to guarantee quality and durability

_ We are required to meet our customers' needs by offering quality services, at competitive prices and conditions

_ We must sell our services honestly, based on the intrinsic qualities of the same and to abstain from selling them if this has to be done illegally or in ways against these rules.

_ We must respect confidential information and customer data held by OMETEC SRL.

_ We are committed to pursuing a policy aimed at informing our customers of any accounting or administrative error and correcting any error immediately by means of payments, refunds or other measures acceptable to both parties.

CODE OF ETHICS ON SOCIAL RESPONSIBILITY

*2.4 OMETEC SRL's commitment to other parties involved
(Institutions, local community, Trade Unions, NGOs, voluntary
associations, etc.)*

OMETEC SRL is a socially committed "citizen" and pursues a policy aimed at informing all external parties involved of its ethical-social performance through direct dialogue.

_ We are actively committed to supporting social organisations and activities of the local community. Our employees and partners are urged to take part in public life.

_ We are committed to promoting the respect for human rights, with particular attention to the protection of children and young workers engaged in dangerous work activities.

3. BEHAVIOURAL RULES

3.1 The commitment of the Employees and Partners to OMETEC SRL

_ Child labour

All workers must give the Management of OMETEC SRL any information they may have on cases of child labour at the suppliers or sub-contractors of OMETEC SRL.

_ Health and safety at the workplace

In order to protect the health and safety of the workers and customers/users of OMETEC SRL, all workers must:

_ Respect and strictly observe all the safety procedures while carrying out their work;

_ Not smoke at the company premises, not even in the toilets;

CODE OF ETHICS ON SOCIAL RESPONSIBILITY

_ Give the Manager of the Prevention and Protection Service any information that may prevent the occurrence of a harmful event for the health of the workers and of the customers/users.

_ Discrimination

The workers must not carry out discriminatory practices of any nature towards their work colleagues or any newly recruited ones, and they must have a constructive attitude.

Relationships between people must be inspired by the principles of mutual respect and dignity.

_ Drug abuse and alcohol abuse

All personnel are required to comply with the regulations in force regarding the possession or use of alcohol and drugs. OMETEC SRL prohibits the illegal use, sale, purchase, possession or presence of drugs in the premises of OMETEC SRL, except from medicines prescribed by a doctor.

OMETEC SRL, also prohibits the use, sale, purchase or possession of alcoholic beverages by the employees of OMETEC SRL within its premises.

_ Protection of the tangible and intangible assets of OMETEC SRL

OMETEC SRL's assets consist of tangible assets, such as computers, printers, equipment, television sets, property, etc. and intangible assets, such as confidential information, know-how and knowledge.

The protection and preservation of these assets and information is an essential value for the protection of the interests of OMETEC SRL and the personnel (in carrying out their work) must not only protect these goods and information, but also prevent fraudulent or improper use

The use of these assets by the employers must be functional and only for carrying out their tasks.

CODE OF ETHICS ON SOCIAL RESPONSIBILITY**_ Behaviour at the office**

All partners and employees must:

- provide truthful and correct information on their professional experience;
- carry out their tasks with the utmost professionalism and seriousness;
- always work with the aim to stimulate learning and knowledge;
- be available for the continuous refreshing and refinement of their professional training, preserving it and enhancing it;
- not enforce any kind of discrimination towards users and customers, neither must they create ambiguous situations with them;
- maintain a conduct that is morally compliant with the ethical and social principles of OMETEC SRL;

3.2 The commitment of Users and Customers to OMETEC SRL

_ All the users and customers must be committed to:

- behaving politely and correctly with all employees;
- using the classrooms and equipment of OMETEC SRL (computers, printers, television sets, etc.) with the utmost care;
- not smoking in any of the rooms of the premises of OMETEC SRL, not even in the toilets;
- not possessing, using or selling drugs or alcohol in the premises of OMETEC SRL;
- informing the Management of OMETEC SRL of any incorrect behaviour on part of the employees;

CODE OF ETHICS ON SOCIAL RESPONSIBILITY

3.3 The commitment of the Suppliers and Sub-Contractors to OMETEC SRL

_ Our suppliers and sub-contractors must fulfil their commitments to OMETEC SRL in terms of punctuality, safety standards, quality of the products and services provided.

_ We are committed to establishing supply relationships with companies that also meet the requirements.

Our current suppliers and sub-contractors must therefore commit to:

- _ complying with all the requirements of the;
- _ signing the Letter of Commitment;
- _ signing this Code of Ethics to share the corporate values and formally commit to respecting its rules;
- _ filling out the information questionnaire, in the cases where a detailed inquiry of the supplier is required;
- _ giving their readiness to be subjected to possible inspections by OMETEC SRL.

4. APPLICABILITY OF THE CODE OF ETHICS

4.1 Compliance with the regulations

OMETEC SRL must ensure that the principles, values and commitments set forth in this Code are respected.

All its employees and partners, as well as its users and customers, are required to comply with the rules of conduct defined in this Code of Ethics.

All the suppliers and sub-contractors of OMETEC SRL are required to comply with the rules of conduct defined in this Code of Ethics.

CODE OF ETHICS ON SOCIAL RESPONSIBILITY

OMETEC SRL shall fine any personnel whose behaviour does not respect the values and principles of the Code of Ethics, depending on the severity of the offences committed and of the behaviour. As with all disciplinary matters, the company will consider the principles of justice and fairness, as well as compliance with the relevant rules.

OMETEC SRL will take action also against any suppliers and sub-contractors who do not respect the rules of the Code of Ethics, in accordance with the terms established by the relative supplier management procedure.

4.2 Contact persons for the interpretation and application of the Code of Ethics

For the complete observance and interpretation of the Code of Ethics, the personnel can refer to the Management of the Social Responsibility Management System or to the Employee Representative for Social Responsibility.

The Manager of the Social Responsibility Management System has the following tasks:

- _ intensely and functionally disseminate the Code of Ethics among the employees of OMETEC SRL,
- _ manage, implement, examine and verify the provisions of the Code in order to adapt it to the evolution of laws;
- _ give support in the interpretation, implementation and assessment of the Code, as a constant reference of how to behave while carrying out work;
- _ verify, check and assess the cases of violation of the written rules, taking appropriate measures in the event of violations, in collaboration with the Management, in compliance with the laws, regulations and CCNL in force;
- _ promote and prepare employee communication and training programs, aimed at better understanding the objectives and conduct required to achieve them.

CODE OF ETHICS ON SOCIAL RESPONSIBILITY

The Employee Representative for Social Responsibility has the following tasks:

- _ protect and assist any employees who report behaviour that does not comply with the Code, protecting them from pressure, interference, intimidation and retaliation;
- _ collaborate for the dissemination of the Code among employees and all third parties involved.

4.3 Reporting violations

Everyone is required to draw the attention of the Manager of the Social Responsibility Management System or of the Employee Representative for Social Responsibility, or anonymously via the dedicated claim / report mechanism, on any real or alleged violations of the rules of conduct indicated in the Code of Ethics. OMETEC SRL is will not undertake any kind of action against anyone who has reported a violation.

Date

01/10/2021

THE MANAGEMENT TEAM



OMETEC S.r.l.
Il Presidente C.O.E.
