



ETHICAL POLICY

Ethical behavior in business is the foundation of trust in business and in society as a whole. We believe that businesses are only as great as their reputation.

O.M.C.A.P. S.r.l. is proud to have built strong relationships with our customers, suppliers, employees, and local communities, conducting our business with a high level of integrity. This lets us ensure that the reputation of all stakeholders is protected over time. Our specific commitments are described below, illustrating the approach taken by our management and supported by all our employees with respect to this Ethics Policy and our Code of Ethics.

Ethical Objectives

- We act honestly and fairly with internal and external stakeholders and expect the same from all stakeholders along the entire value chain and within our social community.
- We respect all applicable laws and regulations.
- We respect data protection, data security, and the rights of individuals to make their own decisions about who may process their data and for what purpose. We are committed to protecting and safeguarding this data from unauthorized access and data corruption throughout the data's lifecycle. The collection, storage, processing, or other use of personal data is subject to the consent of the data subject or is governed by contractual agreements and legal provisions.
- We comply with the prohibition on disclosing confidential information. We take responsibility for disclosing financial and non-financial information in compliance with applicable regulations and prevailing industry practices and, where applicable, communicating information about the workforce, health and safety practices, environmental practices, commercial activities, our financial position, and performance.
- We combat corruption, extortion, and bribery through the application of our Code of Ethics. We commit to supporting fair competition and antitrust actions, and avoiding conflicts of interest, including in our customer relations. We respect fair trade and competition rules, including but not limited to avoiding trade practices that unlawfully impede competition, unfair exchange of competition information, pricing, bid manipulation, and market misallocation. We have created a system for reporting offenses by email (segnalazioni@omcapsrl.it), which also ensures protection against retaliation, in accordance with Legislative Decree no. 24/2023, "Whistleblowing." We do not tolerate any form of public or private corruption, whether active or passive.
- We adhere to the principle of financial responsibility, which requires that our income statements are correctly prepared and that the management of our finances is healthy and virtuous through accurate record.



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- Ethical principles when using works protected by intellectual property rights. All O.M.C.A.P. S.r.l. personnel must use any work protected by intellectual property rights (licenses) in compliance with said rights (books, publications, software, databases, and so forth). No personnel is authorized to waive this provision or have it waived even if it were to emerge in the clear interest of or advantage to the company.
- We respect current legislation on export control and economic sanctions to discourage the illicit trafficking of specific products.

Management

Guido Granchi