

## SUPPLIER CODE OF CONDUCT

## INDEX

### THE PURPOSE OF OUR GROUP

#### PREMISE

- Supplier Code of Conduct
- References
- Realization and Control
- Reporting of violations
- Sanctions
- Improvement of the Code of Ethics

### OMNIA TECHNOLOGIES GROUP AND ETHICAL VIEW

#### OUR COMMITMENTS

- General principles and behavior rules
- Specific principles and behavior rules

## THE PURPOSE OF OUR GROUP

*“Omnia Technologies Group is a multinational diversified reality, operating in the design and manufacturing of machines for the “food & beverage” industry.*

*We aim to pursue our goals, generating value for our customers, our people, our shareholders in the first place, but also our partners, institutions and our whole reference environment.*

*Our ambition is to become a great leader in the “food & beverage” sector, promoting ecological transition and contributing to establish the conditions of sustainability for the environment where we work.*

*Toward this end, we direct our productive and planning decisions with the aim of enhancing the local region, in order to preserve his history and his extraordinary uniqueness.*

*We are in harmony with our people, that we consider as our most precious wealth: in this regard, respect, equity, listening, merit are the basis of our identity.*

*We always tolerate mistakes, but we don't accept negligence.*

*In our workplace, we promote diversity and gender equality, which we cultivate as management orientation and practice, measuring the metrics, to guarantee concrete results in terms of ESG (Environmental, Social, Governance).*

*We respect the Laws of the Countries in which we work throughout the commercial action, we promote a healthy competition and we always base our actions on respect for legality and compliance in all its forms.*

*We are a great community of people, but we consider technology and digital transformation as positive opportunities to improve our product solutions and process efficiency.*

*In the financial management, our principles are transparency and prudence, which fuel our conduct standards and the method of our communication.*

*I invite you to take a look at our “Code of Ethics”, a means of and for everyone, a means that guide and direct our behaviors and the professional pact that needs to inspire all our actions”.*

*Andrea Stolfa*  
CEO Omnia Technologies Group

## PREMISE

### **Supplier Code of Conduct**

The present Code has the purpose of ensure that the suppliers adhere to the system of values defined by the” Code of Ethics” of Omnia Technologies Group with a particular attention to the adequate standards relative to security in the workplace, ethical and equal working practices, environmental sustainability policies.

The Group believes that a sustainable procurement is an effective way to promote values and responsible behaviors throughout the entire supply chain.

The Code constitute an integral part of all the agreements with consultants, suppliers, contractors, sub-contractors, commercial partners and all the people that cooperate with Omnia Technologies Group in general, who are required to respect the rules and the applicable regulations, but also to share the principles and the purposes of the present Code.

### **References**

The present Code has been arranged following the main norms, guidelines and existent documents at national and international level, concerning Human Rights, corporate social responsibility and corporate governance.

The Code specifically refers to:

- the Bill of Rights of United Nations, the Bill of Rights of European Union, the Italian Constitution;
- the “*core labour standards*” covered in the convention of ILO (International Labour Organization), the Guidelines for the Multinational Companies of OCSE (Organization for Economic Co-operation and Development), the Global Compact of United Nations, the principles of Social Accountability 8000 and the Bill of Corporate Values of the European Institute for Social Balance;
- the Guidelines from Confindustria for the constitution of Organization, Management and Control Models ex D.Lgs. 231/2001.

## **Realization and Control**

The Code, approved by the Administration Council of the Group Leader, constitute an element of the “Organization, Management and Control Model” pursuant Article 6 D.Lgs. 231/01, that the Group itself agrees to continuously apply, enhance and develop.

The procedures of realization and control of this Code are aimed to guarantee, with appropriate preventive measures, the respect of ethical principles and of the conduct rules set out in the Organization, Management and Control Model document.

This model includes, among others:

- an adequate and continuous training and awareness program on the issues related to the Code of Suppliers Conduct;
- protocols aiming to plan the training and the realization of the decisions in connection with the offences to be prevented;
- measures suitable to guarantee the course of the activities, in compliance with the Law, and to find out and immediately stop any dangerous situations;
- modality of management of financial resources;
- the supervision and the attention to update the Model by the Supervisory Body specifically authorized (“OdV”);
- Duties to inform the Supervisory Body, OdV;

The OdV has the responsibility to monitor the enforcement of the present Code. The OdV, nominated according to the provisions of the D.Lgs 231/01, will rely on the operational support from the Human Resources Department/Group Counsel to supervise the actual implementation of the principles contained in it and to review the information of possible violations, by conducting the appropriate verifications.

## **Reporting of violations**

The violations, suspected or confirmed, of the present Code must be reported to the Human Resources Department/Group Counsel and/or to the Supervisory Body, by sending an email to the dedicated mail account, as well: [odv\\_231@dellatoffola.com](mailto:odv_231@dellatoffola.com)

The Group guarantee total confidentiality on the identity of the reporter and protection from every kind of retaliation.

The violations committed by the members of the Supervisory Body must be reported to the Leaders of the Group.

### **Sanctions**

The violations of the present Code will not be tolerated and will lead to different measures towards who made them, as appropriate (firing, termination of consulting, collaboration or supply contract).

The sanctions and procedures required for the employees of Omnia Technologies Group are detailed in the document "Disciplinary System", included in the "Organization, Management and Control Model", pursuant the Article 6 D.Lgs. 231/01.

### **Improvement of the Code of Ethics**

The Code establish the principles and the behaviors adequate to the actual organization of Omnia Technologies Group and the relative working environments. Since the Group and the operational settings are constantly changing, the Code is continually updated.

All recipients of the Code are asked to evaluate its suitability, by contributing to its improvement.

The proposals should be addressed to the Human Resources Department/Group Counsel and/or to the Supervisory Body.

## OMNIA TECHNOLOGIES GROUP AND ETHICAL VIEW

Omnia Technologies Group, with the headquarter in Trevignano (Treviso), is leader in the design and manufacturing of machines and automation lines technologically advanced for the entire productive process of a wide range of beverage sectors. The Group works as well on bottling, water treatment and packaging systems in the winemaking, alcoholic and alcohol free beverages and dairy products industries.

The Group is formed by 24 societies and 14 production plant and has many commercial branches in the most important wine regions in the World, such as France, Spain, UK, USA, Australia, Argentina, Chile and Mexico, with more than 1000 employees.

**OMNIA TECHNOLOGIES GROUP FULFILL ALL ITS COMMITMENTS AND PRESERVE ITS OWN VALUE  
BY OBSERVING THE CONSTITUTION AND THE LAWS, BY RESPECTING THE RIGHTS OF THE  
STAKEHOLDERS AND CONSIDERING THEIR LEGITIMATE EXPECTATIONS**

The principles, that Omnia Technologies Group is engaged to follow, and the resulting rules of conduct, derive from this Ethical View.

Along this journey, Omnia Technologies Group aims to involve its supply chain by maintaining commercial relations with suppliers, able to guarantee high quality standards, that share the same values.

In this context and in accordance with the content of its own Code of Ethics, The Group provides the present Code, that declines requirements and expectations to which all the suppliers should conform.

## OUR COMMITMENTS

### General principles and behavior rules

#### **We work ethically**

- All the behaviors during the execution of the activities, undertaken in the interest or for the benefit of Omnia Technologies Group, should be based on transparency, goodwill, fairness, impartiality, honesty and legality and should be carried out with the utmost diligence, collaboration, equity, loyalty and moral and professional rigor.

#### **We respect the Constitution, the Laws, the rules, Human Rights and international standards**

- All the activities undertaken in Omnia Technologies Group or for it should be carried out in compliance with the Italian Republic Constitution, the current laws and rules in Italy. It is necessary to observe the current laws and rules of all the Countries in which the Group works as well, notwithstanding the principles of the already mentioned Constitution. This applies for every administrator, executive, agent, employee, collaborator, supplier, commercial partner and anyone who has relationships with the legal entities of Omnia Technologies Group. The pursuit of the interest of Omnia Technologies Group can not, under no circumstances, justify a behavior that doesn't respect the Constitution, the laws and the rules. Omnia Technologies Group will not pursue any relations with those who don't want to comply with this principle.
- Every member of the organization should know the duties and the tasks established by the law and by the relevant Authorities, in relation to their function and should scrupulously observe and enforce this duties and tasks.

#### **We balance the interests of Suppliers**

- The interests of all the Suppliers should be balanced according to standards of equity and social and environmental sustainability.

### Specific principles and behavior rules

#### **We ensure that all of our operation and transition is lawful, legitimate, coherent and appropriate and is correctly reported, authorized and verifiable**

- All the actions and operations of the Group should have an adequate registration and the verification of the decisional, authorization and performance process should always be possible. For every operations there should be a supporting documentation that allows in every moment to conduct some controls that certify the characteristics and the motives of the operation and that identify who has authorized, carried out, reported and verified the operation itself.

#### **We are coherent with our business goals and with social purposes**

- It's forbidden to accomplish actions not finalized to the mission and the Group objectives, in the context of business activities.
- It's forbidden to use the business processes and resources for different aims other than those to which are specifically and legitimately intended for, according to the activities and the purposes of the Group. Every business decisions should be taken in the interest of the Group, avoiding every interest conflict situation, between personal or family economic activities and the jobs held in the Group.
- Anyone who uses any of the Group goods should guard and preserve them and should also use them in an appropriate way and in accordance with the interest of the Group itself, by adopting behavior that reasonably stop their improper use by third parties and/or for any illegal purpose.



### **We guarantee the transparency of external information**

- Anyone, in the context of the correct development of personal business functions, that should communicate and spread information, should also guarantee their truthfulness and completeness, in relation to the purposes and to privacy rights. The information should be provided in order to not mislead the recipients.

### **We specify every commitment with clarity and we respect the commitments made**

- Anyone, according to their internal function, is responsible of taking commitments on behalf of Omnia Technologies Group towards a Supplier, should specify these commitments in written form, making sure that every duty is clearly indicated. The contracts with or toward third parties should be based on respect to principles of correctness and goodwill.
- Anyone, according to their internal function, is responsible for the execution of commitments toward third parties, should guarantee, as far as is within his competence, that the execution itself is compliant with the indicated obligations.

### **We exclusively work with legitimate resources**

- It's forbidden to acquire to any purpose money, goods or other benefit of illicit and dubious origin.
- It's forbidden to replace or transfer money, goods or other benefits of illicit origin and perform operations that obstruct the assessment of the origin.
- It's forbidden to acquire, produce or use intellectual property, industrial products, patent, designs or industrial models, with labels or distinguishing marks that have been counterfeited or without having the permission in any case.

### **We protect safety and security**

- Anyone who works as part of Omnia Technologies Group should respect safety and security needs of all interested parties.

### **We protect the privacy and the confidentiality of strategic or confidential information**

- Anyone who processes personal data and strategic or confidential information should do it to the fullest extent permitted by law and according to the statement of the subjects to whom the data refer.

### **We safeguard the integrity of systems and documents, either paper or electronic format**

- Anyone who manage data and documents in electronic or paper format should work by respecting their integrity.
- It's forbidden to illegally log in to computer systems or to their zones without the permission of their owners and handler.
- It's forbidden to subtract and/or communicate or hand to third parties codes or access devices to telematic and computer systems.
- It's forbidden to slow down or stop the functioning of websites, email servers or other telematic or computer systems.
- It's forbidden to erase information if not by observing specific provisions or with a legitimate authorization.
- It's forbidden to interfere in telephone communication, or in communication in paper or electronic format.
- It's forbidden to fake computer documents or in paper format of any kind – including money, stamps, certificates – or acquire and use them in any way.
- It's forbidden to obtain, produce, replicate or spread computer programs or equipment that could be used to perform the activities described in the present paragraph.
- Anyone who uses computer supports and internet connections of the company should stick to what is necessary for his duty. It's forbidden to keep personal documents or programs that have not been

authorized or that violate intellectual property of third parties on the computer or on other computer supports of the Group.

### **We do not exchange neither gifts nor favors with benefits**

- It's forbidden to offer, directly or indirectly, for example through the family, presents, gifts, money, homages, either material or intangible (services, discounts, promotions, ecc.), except for customary gifts, as long as they are of modest value, and according to the Policy of the Group Leader.
- It's forbidden to accept gifts that may seem connected with the business relations in place in any kind of way, included the relations with Public Administration, and aimed to acquire preferential treatment or improper benefits. Customary gifts are excluded, as long as they are of modest value, and according to the Policy of the Group Leader.
- Anyone who receive gifts as a consequence of the activities undertaken should return them, except if they are of modest value and respect the normal courtesy, explaining that the return of the gifts is in compliance with the present Code.
- Preferential treatments are forbidden toward everyone (for example in selection and retribution of employees, purchases, use of business goods, ecc.), except for normal fairness and courtesy.

### **We accede only to lawful initiatives**

- It's forbidden to make associative agreements of any kind if the purposes are not completely legitimate and correct.
- It's forbidden to anyone who works in the Group or on its behalf to have relations, directly or indirectly, with subjects with a well-known or suspect belonging to criminal organizations or operating outside legality.

Omnia Technologies Group expect that all the Suppliers share these principles, have responsible behavior and adopt adequate ethical measures, according to our values. The Group will never tolerate any justification from who is responsible of behavior against these values.

### **Relations with Partners and Suppliers**

We ask to our Partners and suppliers:

- To loyally cooperate and in compliance with the agreements of Omnia Technologies Group and claim that all the subjects involved act in accordance with the laws and the ethical principles of the Code.
- To guarantee the supplies based on the capacity of fulfill the requirements of the product/service requested, at a reasonable price and ensuring the respect of all the requirements from the law, the ones that involve safety and security included.
- To act with correctness and in compliance with the agreements.
- To not acquire, spread and use inside of Omnia Technologies Group other people's works (for example software, technology solutions, ecc.) that are protected by copyright, without acquire the permissions and the provided licenses.
- To engage to act in a sustainable way, minimizing the environmental impact and optimizing the use of resources.
- To conduct the personal activities by using the resources in a responsible way and promoting the respect of the society.
- To engage to proactively take part in the risk's evaluation process and in the environment safeguard, according to the principles of precaution, prevention, protection and continuous improvement.
- To engage to contribute to the achievement of the objectives of efficiency of the plants and of reduction of direct discharges.
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- To manage and monitor the environmental aspects related to the personal activity, by adopting standard and models of environmental management internationally recognized.
- To integrate the sustainability principles inside the supply chain, supporting Omnia Technologies Group through the challenging journey to carbon neutrality.

### **We comply with anti-corruption regulations**

We ask the recipients of this Code:

- To respect those who exercise public functions without influencing their actions in any way.
- To comply with the anti-corruption regulations provided at the Group level.
- To firmly refuse any corrupt or collusive practice, to offer, receive or promise gifts, favors and advantages from or to public officials or private parties, possibly even through the work or collaboration of third parties.
- To steadfastly refuse favorable treatment to those who hold public office or to persons connected with them for any reason whatsoever.
- To steadfastly refuse to communicate, draft or contribute to the drafting of false documents to be submitted to the Public Administration.
- To firmly refuse to communicate partial, inaccurate or reticent information to the Public Administration or the Judicial Authority.
- To report without delay any corrupt practices in compliance with the Group's policy of "zero tolerance" against corruption.

### **We reject requests contrary to our ethical principles**

We ask the recipients of this Code:

- To commit to ensuring the highest quality in every activity undertaken, consistent with the Company's long-term strategy, guaranteeing the utmost attention to services rendered/received and scrupulous compliance with agreed requirements.
- Not to indulge in requests and behavior that does not comply with applicable laws and our Ethical Vision.
- To oppose requests that may result in an infraction under the law and/or the Group's ethical principles as well as to report such improper requests to management using the channels provided in this Code.

### **We work professionally**

We ask the recipients of this Code:

- To not operate under the effects of alcohol, narcotics or psychotropic substances in the course of work performance.
- To direct all activities and behavior to the utmost care in achieving high quality standards.
- To provide correct and non-misleading information regarding the service rendered and the terms and conditions of the contract.

**We protect the health and safety of workers in our workplaces and any other places where we carry out our activities, taking all measures required by law and resulting from the application of the best available techniques**

We ask the recipients of this Code:

- To fulfill the obligations and carry out the tasks specified in the regulations on the protection of occupational health and safety. Regarding these tasks, it must be ensured compliance with the general measures for the protection of the health and safety of workers established by law, fulfilling with particular care the obligations relating:
  - to compliance with legal technical and structural standards relating to equipment, facilities, workplaces, chemical, physical and biological agents;
  - to the activities of risk assessment and the preparation of consequent prevention and protection measures;
  - to activities of an organizational nature, such as emergencies, first aid, contract management, periodic safety meetings, consultations with workers' safety representatives;
  - to health surveillance activities;
  - to the activities of information and training of workers;
  - to supervisory activities with reference to compliance with procedures and instructions for safe work by workers;
  - to the acquisition of documentation and certifications required by law;
  - to periodic checks on the application and effectiveness of the procedures adopted.
- To ensure that everyone works while wearing the mandatory safety equipment and uses it in a manner that complies with applicable laws and any regulations issued by Omnia Technologies Group companies.

**We ensure impartial treatment of all our workers in the selection and management of personnel**

We ask the recipients of this Code:

- To commit to an impartial attitude toward workers, who must be assured fair opportunities and fair working conditions.
- To commit to ensuring training plans with a view to the continuous improvement and professional growth of all employees.
- To oppose the employment of workers who do not meet requirements related to lawful residence and/or lack other legal requirements.

**We do not tolerate any behavior that is discriminatory or violates personal dignity**

We ask the recipients of this Code:

- To categorically prosecute all forms of intolerance, violence, harassment and discrimination.
- To ensure compliance with all applicable regulations and the provisions of collective bargaining, without any distinction based on political opinion, union activity, religious faith, gender, sexual orientation, ethnicity or nationality, age or health status, or any other characteristic of the person.
- To report insulting, discriminatory or defamatory attitudes perpetrated in the workplace, or even outside the work context, where seriously detrimental to the principles inspiring the work of the company

### **We respect work/life balance**

We ask the recipients of this Code:

- To support work-life balance through balanced and flexible work schedules and by fostering the search for shared solutions to enable the social, emotional and cultural development of workers, also taking into account the different geopolitical realities where it operates.

### **We work as a team and collaborate fairly**

We ask the recipients of this Code:

- To encourage loyal collaboration between parties and proactive participation in team activities, bringing in ideas and solutions that can improve the quality of everyone's work.
- To support any opportunity aimed at fostering the exchange of information, cooperation and the spirit of cohesion, even at a distance, in any mode and using traditional and innovative tools.

### **We seek a balance between productive necessity and environmental protection**

We ask the recipients of this Code:

- To place, in every activity, special attention to environmental sustainability and, in particular, to the consumption of resources, the containment of emissions, and the optimization of production cycles.
- To oversee the scrupulous application of applicable regulations, reporting without delay to the Top Management of Omnia Technologies Group any non-compliance and, where necessary, any proposals to improve the environmental impact in general and of Omnia Technologies Group in particular.