



**Omnia  
Technologies**

Enabling Evolution

# **CODE OF ETHICS**

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## THE PURPOSE OF OUR GROUP

*“The Omnia Technologies Group is a diversified multinational company active in the design and manufacture of machinery for the food and beverage industry.*

*We intend to pursue our goals by generating value for our customers, our people and our shareholders first and foremost, but also our partners, institutions and our entire ecosystem.*

*Our ambition is to become a leader in the food and beverage chain by promoting an ecological transition and contributing to the creation of sustainable conditions for the environment in which we operate.*

*To this end, we orient our production and design choices with a goal of enhancing the land to preserve its history and extraordinary uniqueness.*

*We are in harmony with our people, whom we consider our most precious capital: in this sense respect, fairness, listening and merit are the codes of our identity.*

*We are always tolerant of mistakes, but we do not accept negligence.*

*We promote diversity and gender equality in our workplaces and cultivate it as a management guideline and practice, and measure metrics for them to ensure concrete ESG (Environmental, Social, Governance) results.*

*In our business activities, we adhere to the laws of the countries where we operate, promote healthy competition and are guided by respect for lawfulness and compliance in all its forms.*

*We are a large community of people but we see technology and digital transformation as positive opportunities to improve our product solutions and make our processes more efficient.*

*In financial management, our principles are transparency and prudence, which underpin our standards of conduct and the way we communicate.*

*I invite you to review our “Code of Ethics”, a tool of and for everyone, the instrument to guide and direct our behaviour and the professional pact that must inspire all our actions.”*

Andrea Stolfa

**CEO, Omnia Technologies Group**

## FOREWORD

### The Code of Ethics

This Code of Ethics (or “Code”) sets out the principles and rules of conduct that have been adopted by the Omnia Technologies Group (or the “Group”).

This Code sets forth:

- a) the **Ethical Principles** adopted by the Omnia Technologies Group, namely, the Group’s commitments to its stakeholders, which are binding on the Omnia Technologies Group’s legal entities as legal persons and for every person operating within the Group; and
- b) the **Rules of Conduct**, i.e., specific criteria for conduct that people working in the Omnia Technologies Group must comply with in application of the Ethical Principles.

Both the **Ethical Principles** and the **Rules of Conduct** are MANDATORY and cannot be derogated from by any measure or provision, except by amending this Code of Ethics. Any such amendment must adhere to the procedures laid down in the Organisational, Management and Control Model pursuant to Italian Legislative Decree No. 231/2001.

### Target audience

The Code of Ethics is binding on:

- a) individuals who hold positions of representation, governance or management of the legal entities in the Omnia Technologies Group and, where applicable, organisational units with financial and functional autonomy, as well as individuals who manage and control them, including on a de facto basis; and
- b) individuals subject to the direction or supervision of any of the individuals referred to in subparagraph a) above.

Suppliers and other external parties who collaborate with the Omnia Technologies Group are required to comply with applicable laws and regulations and adhere to the principles and goals of this Code.

In particular, the Group requires suppliers of goods and/or services to do their utmost to adhere to high quality standards for production processes, requirements, certifications and regulations in force as well as best practices in ethics, health and safety protection and respect for the environment.

### References

This Code of Ethics was produced in accordance with the primary Italian and international laws, guidelines and documents on human rights, corporate social responsibility and corporate governance. In particular, the Code is based on

- the United Nations Universal Declaration of Human Rights, the Charter of Fundamental Rights of the European Union and the Italian Constitution;
- the “core labour standards” as laid down in the ILO (International Labour Organisation) conventions, the OECD (Organisation for Economic Co-operation and Development) Guidelines for Multinational Enterprises, the UN Global Compact, the Social Accountability 8000 principles and the Charter of Corporate Values of the European Institute for Social Accounting;
- the Confindustria [*Confederazione Generale dell’Industria Italiana* (General Confederation of Italian Industry)] Guidelines for the creation of Organisational, Management and Control Models pursuant to Italian Legislative Decree No. 231/2001.

## **Implementation and control**

The Code, which was approved by the Board of Directors of Omnia Technologies Group, is a fundamental aspect of the “Organisational, Management and Control Model” under Article 6, Italian Legislative Decree No. 231/01, which the Group is committed to applying, enhancing and continuously developing.

The methods of implementation and control in this Code, which are aimed at ensuring, through appropriate preventive measures, compliance with the Ethical Principles and Rules of Conduct set out therein, are indicated in the Organisational and Management Model.

This Model shall provide, *inter alia*:

- an adequate training and continuing awareness programme on issues relating to the Code of Ethics;
- protocols to plan the development and implementation of decisions relating to the offences sought to be prevented;
- appropriate measures to ensure that actions are carried out in compliance with the law and promptly detect and eliminate risk situations;
- ways of managing financial resources;
- monitoring and updating the Model by a Supervisory Body (“SB”) specially appointed for that purpose;
- obligations to report to the Supervisory Board; and
- a disciplinary system that sanctions failure to comply with the Code of Ethics and the measures set forth in the Model.

The Supervisory Board, which is appointed in accordance with Italian Legislative Decree No. 231/01, is responsible for monitoring implementation of this Code. That Board will rely on the operational support of the Group’s Human Resources/Legal Department to monitor effective implementation of the Code’s principles and to examine reports of possible violations and will make the investigations it deems appropriate.

## **Questions about proper conduct**

Individuals may be confronted with ethical issues that are difficult to resolve and that this Code does not specifically address.

In such cases, the following questions should be asked about the proposed conduct:

- is it legal? is it Ethical?
- can I explain it to my family and friends?
- would I feel comfortable if it were published in a newspaper?

For any situations about actions to be taken that are not specifically addressed in this Code, the general “reasonable diligence” principle (Article 1176 of the Italian Civil Code) applies and the Group’s Human Resources/Legal Department and the Supervisory Body can answer any questions about proper conduct under the Code.

## **Reporting violations**

Suspected or confirmed violations of this Code must be reported to the Group’s Human Resources/Legal Department and/or to the Supervisory Body, including by sending them to the dedicated e-mail address: [odv\\_231@dellatoffola.com](mailto:odv_231@dellatoffola.com)

The Group will ensure that the whistleblower’s identity is kept confidential and that he or she is protected from retaliation.

Violations committed by members of the Supervisory Body must be reported to the Group’s Board of Directors.

## **Sanctions**

Violations of this Code will not be tolerated under any circumstances and will result, depending on the situation, in various measures being taken against the perpetrator (dismissal or termination of consultants, independent contractors or suppliers' contract).

The sanctions and procedures for employees of the Group are detailed in the document "Disciplinary System", which is also part of the "Organisational, Management and Control Model" under Article 6, Italian Legislative Decree No. 231/01.

## **Improving the Code of Ethics**

The Code of Ethics represents the interpretation of the Omnia Technologies Group's values.

That Code sets out principles and conduct that are appropriate to the Omnia Technologies Group's organisation and the settings in which it does business. Since the Group and the contexts in which it operates are constantly evolving, the Code is subject to revision.

All persons covered by the Code are requested to review its appropriateness and provide suggestions to improve it.

Suggestions should be addressed to the Group's Human Resources/Legal Department and/or to the Supervisory Body.

Revisions of the Code of Ethics are approved by the Board of Directors of Omnia Technologies Group, at the behest of its Chief Executive Officer.

## **1. THE OMNIA TECHNOLOGIES GROUP, STAKEHOLDERS AND THE ETHICAL VISION**

### **1.1 The Omnia Technologies Group**

The Omnia Technologies Group, headquartered in Trevignano (Treviso), is a leading designer and manufacturer of technologically advanced machines and automation lines for the entire production process in a wide range of beverage sectors. The Group is also active in bottling, water treatment and packaging systems in the wine, alcoholic and non-alcoholic beverage, dairy and life science-chemical markets.

The Group, operates with over 40 Production Plants, and numerous sales branches located across all Continents, employing more than 2,500 people in total.

### **1.2 Stakeholders and our ethical vision**

Stakeholders are defined as groups or sets of individuals or institutions representing the interests of groups or categories who are “involved” in managing the company because they make contributions of various kinds or because the effects of the company’s business have a significant impact on their interests.

The Omnia Technologies Group’s stakeholders include:

- **The State, public bodies and entities providing public services;**
- **Trade unions;**
- **Customers and recipients of products and services;**
- **Employees;**
- **Management;**
- **Shareholders, investors and credit institutions;**
- **Partners (consortia, joint ventures, etc.) and suppliers;**
- **The public, local communities and non-profit organisations;**
- **Competitors;**
- **Media and organs of communication; and**
- **The environment.**

The Omnia Technologies Group is aware that the company’s prosperity and value, particularly over the long term, depend significantly on respect for the rights of its stakeholders and consideration for their interests.

The Group has therefore adopted the following **Ethical Vision**:

**THE OMNIA TECHNOLOGIES GROUP HONORS ITS COMMITMENTS AND PROTECTS ITS VALUE BY COMPLYING WITH THE CONSTITUTION AND LAWS, RESPECTING THE RIGHTS OF THE STAKEHOLDERS AND TAKING THEIR LEGITIMATE EXPECTATIONS INTO ACCOUNT**

This Ethical Vision yields the principles that the Omnia Technologies Group undertakes to observe and the resulting Rules of Conduct. These principles and rules are set out in the following sections.

The Omnia Technologies Group expects its stakeholders to comply with the corresponding Ethical Principles and Rules of Conduct. Where applicable, this mutual expectation will be set forth in specific contractual provisions.

## **2. COMMITMENTS TO ALL STAKEHOLDERS**

### **2.1 General principles and rules of conduct**

#### **We operate ethically**

- Actions taken when engaging in activities in the interest of or to benefit the Omnia Technologies Group must be based on transparency, good faith, fairness, impartiality, honesty and lawfulness, and must reflect the utmost diligence, cooperation, fairness, loyalty and moral and professional rigour.

#### **We adhere to the Constitution, laws, regulations, human rights and international standards**

- All activities carried out within the Omnia Technologies Group or on its behalf must comply with the Constitution of the Italian Republic and the laws and regulations in force in Italy. Laws and regulations in force in all countries where the Group does business must also be adhered to, subject to the principles of the Italian Constitution. This applies to all directors, officers, representatives, employees, independent contractors, suppliers and business partners of, and everyone who has dealings with, the legal entities of the Omnia Technologies Group. Under no circumstances may the pursuit of the Omnia Technologies Group's interests justify conduct that does not comply with the Constitution, laws and regulations. The Omnia Technologies Group will not initiate or continue any dealings with anyone who will not adhere to this principle.
- Each member of the organisation is required to be familiar with the duties and responsibilities imposed by law and by the competent authorities in relation to his or her position and to observe and enforce these duties and tasks scrupulously.

#### **We balance stakeholder interests**

- The interests of all stakeholders must be balanced based on criteria of fairness and social and environmental sustainability.

### **2.2 Specific principles and rules of conduct**

#### **We act in such a way that all our transactions and operations are lawful, legitimate, consistent and appropriate and are properly recorded, authorised and verifiable**

- All actions and operations of the Group must be adequately recorded and the decision-making, authorisation and implementation process must be verifiable. For every transaction, there must be documentary support that allows controls to be performed at all times that demonstrate the characteristics of and rationale for the transaction, and that demonstrate the individuals who authorised, performed, recorded and verified the transaction.

#### **We are consistent with the company's goals and objectives**

- In the context of the company's business, taking actions that are inconsistent with the Group's mission and objectives is prohibited.
- It is forbidden to use corporate processes and resources for purposes other than those for which they are specifically and lawfully intended in connection with the Group's activities and goals. All business decisions must be made in the interest of the Group, while avoiding any conflict of interest between personal or family financial activities and positions held within the Group.
- Anyone who has access to the Group's assets is obliged to look after and preserve them and must use them appropriately and in accordance with the Group's interests and must act in a reasonable manner to prevent their being used improperly by third parties and/or for illegal purposes.



### **We ensure transparency in external disclosure**

- All persons who are required to communicate or disseminate information as part of the proper performance of their corporate functions, shall ensure that such information is truthful and complete in relation to its purposes and shall take rights to confidentiality into due account. The information must be provided in a way that recipients are not misled.

### **We specify each commitment clearly and honour our commitments**

- Individuals who, because of their internal functions, are responsible for making commitments on the Omnia Technologies Group's behalf to a stakeholder, must specify those commitments in writing and ensure that each obligation is clearly stated. Contracts with or affecting third parties must be based on the principles of fairness and good faith.
- Any person who, because of his or her internal function, is responsible for performing obligations to third parties must ensure, to the extent of his or her responsibility, that such performance fulfils the stated obligations.

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

- Obtaining money, goods or other benefits of unlawful or dubious origin for any purpose whatsoever is prohibited.
- Replacing or transferring money, goods or other benefits of unlawful origin, and engaging in transactions that hinder determination of provenance is prohibited.
- Acquiring, producing or using intellectual works, industrial products, patents, designs or industrial models with counterfeit trademarks or distinctive signs or without having the right to do so is prohibited.

### **We protect health and safety**

- All persons working within the Omnia Technologies Group must respect the health and safety needs of all persons involved.

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

- Anyone who handles personal data and strategic or other confidential information must do so within the limits laid down by law and as indicated to the persons to whom the data relate.

### **We safeguard the integrity of systems and of IT and paper documents**

- Individuals handling data and documents in electronic or paper format must maintain their integrity.
- Gaining unauthorised access to computer systems or areas of such systems without the permission of the owners or operators is prohibited.
- Removing and/or disclosing or providing codes or devices to access computer and electronic systems to third parties is prohibited.
- Slowing down or interrupting the operation of websites, e-mail servers or other computer or telematics systems is prohibited.
- Deleting information, except in accordance with specific rules or with legitimate authorisation, is prohibited.
- Interfering with telephone, computer or paper communications is prohibited.
- Falsifying computer or paper documents of any kind - including currency, stamps or certificates - or obtaining or using them in any way is prohibited.
- Procuring, producing, reproducing or disseminating computer programs or equipment which maybe used to engage in any of the activities listed in this paragraph is prohibited.
- Individuals using the company's computer media and internet connections must take only the actions necessary for their task. Keeping documents of a personal nature or programs whose installation was not authorised or which infringe third party intellectual property rights on the Group's computers or on other computer media is prohibited.

**We do not exchange gifts or favours for advantages**

- Offering, directly or indirectly (such as through family members), gifts, presents, money or gratuities of any kind, whether tangible or intangible (services, discounts, promotions, etc.) is prohibited, with the exception of gifts of modest value that comply with the policies of Omnia Technologies Group.
- Accepting gifts that may appear to be in any way connected with existing business relations, including with governmental agencies, and those aimed at obtaining preferential treatment or undue advantages is prohibited. Gifts of modest value that that comply with the policies of Omnia Technologies Group are excluded.
- Individuals who receive gifts as a result of their activities must return them, unless they are of modest value and within the limits of normal courtesy, and must explain that returning the gift is in pursuant to this Code.
- Preferential treatment of any person (e.g., when hiring and compensating personnel, purchases, use of company assets, etc.) that goes beyond normal fairness and courtesy is prohibited.

**We engage only in lawful initiatives**

- Association agreements of any kind are prohibited unless the purposes are fully lawful and appropriate.
- It is prohibited for anyone working in the Group or on its behalf to have direct or indirect dealings with persons known to belong or suspected of belonging to criminal organisations or otherwise operating outside the law.

### **3. COMMITMENTS TO SPECIFIC STAKEHOLDERS**

#### **3.1 Commitments to the State, public bodies and public service providers**

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

- We respect persons who perform public functions and do not influence their actions in any way.
- We comply with Group-wide anti-corruption regulations, as well as with specific locally applicable anti-corruption laws.
- All Omnia Technologies Group employees are forbidden from engaging in corrupt or collusive practices, offering, receiving or promising gifts, favours and advantages to or from public officials or private individuals, including through the work or assistance of third parties.
- Giving preferential treatment to persons exercising public functions or persons connected with them for any reason is prohibited.
- Directors or their delegates shall ensure that there is no conflict of interest on the part of persons who represent the Omnia Technologies Group in their interactions with governmental agencies.
- Disclosing, preparing or contributing to the preparation of false documents to be submitted to governmental agencies is prohibited.
- Providing partial, inaccurate or omissive information to the Public governmental agencies or judicial authorities is prohibited.
- All persons undertake to report any corrupt practices without delay to their superiors, in compliance with the Group's "zero tolerance" policy towards corruption.

##### **We comply with laws regarding customs and trade compliance**

- We are honest and transparent in our dealings with the countries where we do business and their customs authorities.
- Dealings with persons subject to commercial sanctions, unless expressly authorised by the competent authorities is prohibited.
- Providing customs authorities with inaccurate, incorrect or false information about products being exported is prohibited.
- Contravening laws that impose restrictions on imports and exports of goods, information and services is prohibited.

#### **3.2 Commitments to political and trade union organisations**

**We undertake to liaise, through the appropriate officials, with political and trade union organisations, with the aim of fostering a healthy dialogue and cooperation regarding legitimate interests, without discrimination or difference of treatment, based on principles of transparency, confidentiality, independence and integrity.**

**We do not make direct or indirect contributions in any form to parties, movements, committees or political and trade union organisations or their representatives or candidates.**

#### **3.3 Commitments to customers and recipients of services**

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

- We are committed to ensuring the highest quality in every activity we undertake, consistent with the Company's long-term strategy. We therefore promise our utmost attention to the recipients of services and the utmost compliance with the requirements of that service.
- We do not comply with requests and conduct that do not comply with applicable laws and our Ethical Vision.

- Individuals who receive requests from our customers and/or recipients of services that may involve an infringement of the law and/or our ethical principles shall politely but firmly refuse, and shall report such improper requests to management using the channels set forth in this Code of Ethics.

#### **We work in a professional manner**

- Individuals interacting with customers and/or recipients of services shall respond to requests and handle complaints in a professional manner, and shall involve their superiors if they cannot adequately handle requests or complaints.
- Working under the influence of alcohol, narcotics or psychotropic substances is prohibited.
- All corporate activities and conduct must be based on the utmost attention to customers and/or recipients of services, with the aim of achieving high quality standards.
- Persons directly providing information to customers or recipients of services must provide accurate and non-misleading information concerning the service and the contractual terms and conditions.

### **3.4 Commitments to employees**

#### **We protect the health and safety of workers in our workplaces and all other places where we do business, and take all measures required by law and in accordance with best available techniques.**

- Individuals in charge of workplace safety must fulfil the obligations and perform the tasks set out in workplace health and safety laws. When performing these tasks, they must ensure compliance with general measures for protecting workers' health and safety imposed by law, and take particular care to fulfil their obligations in relation to:
  - compliance with legal technical and structural standards relating to equipment, plants, workplaces and chemical, physical and biological agents;
  - risk assessment and preparation of the resulting prevention and protection measures;
  - activities of an organisational nature, such as emergencies, first aid, contract management, regular safety meetings, and consultation with workers' safety representatives;
  - health surveillance;
  - information and training for workers;
  - supervisory activities regarding workers' compliance with safe working procedures and instructions;
  - obtaining documents and certifications required by law; and
  - regular checks as to the implementation and effectiveness of the procedures adopted.
- We make sure that everyone wears mandatory safety equipment and uses it in compliance with applicable laws and any regulations issued by the Omnia Technologies Group companies.

#### **We guarantee impartial treatment of all our employees in the hiring and management of staff**

- We are committed to hiring staff on the basis of skills, experience and merit.
- We are committed to acting impartially towards employees, who must be guaranteed fair opportunities and working conditions.
- We are committed to developing training plans with a view to the continuous improvement and professional growth of all employees.

- We will not employ workers without legal residence and/or who fail to meet other requirements required by law.

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

- We categorically oppose all forms of intolerance, violence, harassment and discrimination.
- We promise to comply with all applicable laws and collective bargaining agreements, without distinction based on political opinions, trade union activity, religious belief, gender, sexual orientation, ethnicity or nationality, age or health status, or any other personal characteristic.
- All persons are required to report insulting, discriminatory or defamatory actions perpetrated in or outside the workplace that are seriously detrimental to the principles underlying the company's operations.

**We respect a work/life balance**

- We support a balance between professional and personal life through balanced and flexible working hours and by encouraging the pursuit of shared solutions to enable the social, emotional and cultural development of the people who are part of the Omnia Technologies Group, which also reflects the different geopolitical contexts in which it does business.

**We work in teams and collaborate fairly**

- We encourage loyal cooperation with colleagues and proactive participation in team activities, with the contribution of ideas and solutions that can improve the quality of work for everyone.
- We support any opportunity that fosters the exchange of information, cooperation and spirit of cohesion, including remotely, in any fashion and using both traditional and innovative tools.

**3.5 Commitments to management**

**We provide management with the conditions to operate appropriately**

- Workers must interact with their managers in a transparent manner and pass along any areas for improvement or any misconduct that has come to their attention at work.
- Individuals under the direction and supervision of management must report transparently and frankly in relation to the work entrusted to them.
- We set achievable goals that are commensurate with financial, organisational and human resources.

**3.6 Commitments to shareholders, investors and credit institutions**

**We act transparently regarding shareholders, investors and credit institutions**

- All of our actions and dealings with shareholders, investors and credit institutions allow interested parties to make informed and timely decisions, clearly identify the responsibilities of the parties involved in the decision-making process, and have up-to-date and truthful information about the performance of companies in the Omnia Technologies Group.
- Directors must promptly provide true and complete information in response to legitimate requests from shareholders, corporate bodies and Supervisory Authorities.
- Individuals responsible for relations with credit institutions must be transparent, honest and accurate when exchanging information.

- Spreading false information or engaging in simulated transactions or other contrivances that may cause a significant change in the price of shares, quotas or financial instruments is prohibited.
- Individuals who come into possession of inside information in the context of corporate activities may not misuse that information.

#### **We report conflicts of interest, including potential or apparent conflicts of interest**

- All persons must report and avoid situations in which their own interest, even a potential interest, is in conflict with that of the Omnia Technologies Group. All employees, at all levels, are requested to openly report conflict of interest situations, even if they are merely apparent, and to indicate the specific situations and activities in which the individual or persons connected to him or her have conflicting economic and financial interests, so that the solution most suited to the company's well-being can be found.

#### **We respect the confidentiality of information we receive**

- Disclosing confidential information and data you have become aware of in dealings with shareholders, investors and credit institutions for any purpose whatsoever is prohibited.

### **3.7 Commitments to partners (consortia, joint ventures, etc.) and suppliers**

#### **We insist on compliance with the rules from our Partners and Suppliers**

- Individuals taking part in the selection of partners must ensure that the selection uses parameters of fairness, is based on the company's objectives and complies with the Omnia Technologies Group's policies.
- Assisting in conduct or requests that are unlawful and, in any case, contrary to our principles, on the part of parties with whom we collaborate that are targeted to private parties or national and supranational public bodies and entities is prohibited.
- Individuals interacting with partners and/or suppliers must collaborate with integrity and in compliance with agreements entered into by the Omnia Technologies Group, and in turn must expect partners and suppliers to act in accordance with law, the ethical principles of the Code and agreements with Omnia Technologies Group.
- Individuals involved in the selection of suppliers must ensure that the selection is made on the basis of the supplier's ability to meet the requirements of the product or service requested, at a fair price and in strict compliance with all legal requirements, including health and safety laws.
- Persons involved in dealings with suppliers must deal with them fairly and in accordance with agreements.
- Obtaining externally copyrighted works of others (such as software, technological solutions, etc.) without obtaining the necessary permits and licences and disclosing and using such works within the Omnia Technologies Group without obtaining necessary permits and licences is prohibited.

### **3.8 Commitments to the public, local communities and non-profit organisations**

#### **We consider the needs of the public and local communities and actively promote their development**

- All of Omnia Technologies Group's activities are respectful of the communities where it does business and seek to enhance the social, cultural, economic and ecological development of the public and local communities.
- All individuals who, for reasons associated with company operations, interact with representatives of the public, local communities and/or non-profit organisations, must maintain relations based on dialogue and

listening, and shall agree to requests to participate in projects that can enhance the community, culture and well-being of the individuals and companies we come into contact with.

### **3.9 Commitments to competitors**

#### **We have fair business practices and promise fair competition**

- It is forbidden to engage in commercial practices whose purpose is to harm Omnia Technologies Group's competitors. In this regard, entering into agreements that harm competition with partners and suppliers, or offering products on the market at unfair prices, is prohibited.

### **3.10 Commitments to the mass media and institutional communication**

**We provide the media with communications that are transparent, compliant and consistent with company policies and programmes. We make sure that information about the Group and public statements (including forecasts, targets, results, press releases and speeches) are honest, accurate, timely and representative.**

- Relations with the press and other mass media in general are the exclusive province of the parent company's Chief Executive Officer and the responsible corporate functions and/or specifically delegated individuals, which is partly a function of the fundamental need for confidentiality that internal information requires.
- Individuals who are not part of the function/body that is specifically responsible for interacting with mass or institutional media are asked to notify their supervisors if they receive media requests for information about the Omnia Technologies Group.
- Information about the Group's objectives, results and views is provided by the parent company's Chief Executive Officer and/or senior management after consulting with the Chief Executive Officer.
- Any information provided to the media must be accurate and consistent with the company's policies and contain no personal judgements, comments or opinions. It must comply with laws and regulations and principles of professional conduct, and be clear and transparent.
- Releasing false information is absolutely prohibited. Directors, officers, employees and partners/consultants must not disclose confidential non-public information relating to the Group to representatives of the media or contact them to release confidential company news.
- The parent company's Chief Executive Officer must authorise giving any public speeches, including through the media, participating in conferences, conventions and seminars and producing articles and essays, after he or she has reviewed the proposed reports and materials.
- Disseminating information that is disrespectful of market participants and stakeholders' interests is prohibited.

### **3.11 Commitments to the environment**

#### **We seek a balance between production needs and protecting the environment**

- In implementing its corporate strategies and activities, the Omnia Technologies Group focuses particular attention on environmental sustainability and, in particular, consumption of resources, limiting emissions and optimising production cycles.

Responsible company officers must monitor careful application of applicable laws, promptly report areas for improvement to senior management and make proposals for improving Omnia Technologies Group's environmental impact.