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## 1. INTRODUCTION

This Corporate Code has been drawn up by the General Management to ensure that the ethical values of the company OMF srl are clearly defined and constitute the basic element of the Corporate culture, as well as the standard of behaviour for all the Company's workers and collaborators in conducting the Company's activities and business.

The Corporate Code has been drawn up with the intention of sanctioning and disseminating principles and rules of conduct that OMF srl considers fundamental for the performance of its activities.

## 2. GENERAL ETHICAL PRINCIPLES AND COMPANY MISSION

The principles on which the Company Code is based are the following:

- behaviour of the Company and its various stakeholders that is ethically correct and compliant with the law;
- loyalty of employees and collaborators towards the Company;
- fairness, courtesy and respect in relations between colleagues;
- professionalism and professional diligence;
- respect for the environment and the health and safety of employees and collaborators.

The Company endeavours to give concrete expression to the values and principles contained in the Code, taking responsibility both internally and externally, and also strives to strengthen trust, cohesion and corporate spirit. It therefore engages in training/information actions on the contents of the Code with the objectives of:

- promoting and strengthening the corporate culture around the recognised values;
- disseminate the rules, procedures and practices to be followed;
- broaden acceptance of the basic principles of this Code.


The ethical standards of conduct that the Company intends to pursue are as follows:

- fair and equal treatment and recognition of the value of human resources;
- diligence, transparency, honesty, confidentiality and impartiality in the performance of company activities;
- protection of the person and the environment.

## 3. RECIPIENTS

The Company Code is addressed to all those who, whether employees or collaborators, establish relationships or relations with the Company, whether direct or indirect, on a stable or temporary basis, or in any case work to pursue the Company's objectives. They will hereinafter be referred to as "recipients".

Recipients who violate the principles and rules contained in this Code damage the relationship of trust established with the Company.

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All addressees are required to be familiar with the Corporate Code, to contribute to its implementation, improvement and dissemination. The Company commits to distribute a copy of this Code to all employees and collaborators and to disseminate its contents and objectives.

## 4. STANDARD RULES OF CONDUCT

### 4.1 Guiding criteria in the policies towards recipients

OMF srl is committed to ensuring:

**Impartiality:** offering equal work opportunities to all employees and collaborators on the basis of professional qualifications and performance capacities, without discrimination based on ethnicity, religion, opinions, nationality, sex, age, physical and social conditions.

**Working environment:** to ensure that in working relationships, both internal and external, there is no sexual harassment or behaviour or initiatives that create an intimidating, hostile or isolating working environment for individuals or groups of workers, that negatively interfere with the performance of others' work or that hinder the work and/or career prospects of others, for mere reasons of personal competitiveness.

**Development:** to develop the skills and competencies of each employee and collaborator through training and refresher courses.

**Value of Resources:** to ensure fair treatment based on criteria of merit and competence.

**Privacy:** to protect information concerning employees and collaborators generated or acquired inside and outside the Company and to implement all useful measures to avoid improper use of such information.

**Health and safety:** to promote and protect the health and safety of its employees and collaborators. It is also committed to paying special attention to the condition of those who feel uncomfortable in the presence of smoke, without prejudice to the no-smoking policy in the workplace.


**Environment:** to promote a gradual improvement in the environmental performance of the company's organisational system, through effective use of energy and raw materials and minimising waste, respecting legal compliance and setting improvement objectives.

**Recipients** are committed to observing:

**Responsibility:** to provide the contracted service, consistently with the tasks, objectives and responsibilities assigned, without delegating to other employees or collaborators the performance of activities or the taking of decisions within their competence.

**Diligence:** to respect working hours, if employed, unless justified, and to limit absences from the workplace to those strictly necessary; to devote the appropriate resources in terms of time and dedication to the tasks assigned for the pursuit of the relevant objectives, if collaborating.

**Respect:** to adopt a respectful and sensitive behaviour towards others, refraining from working under the influence of alcohol, drugs or similar substances and from consuming or giving such substances for any reason during work.

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**Company environment:** contributing to the creation of a professional environment in which all colleagues feel positively involved in the achievement of company objectives.

**Honesty:** to use the goods and resources made available to them in compliance with their intended company use and in such a way as to protect their preservation and functionality, since each recipient is considered directly and personally responsible for the protection and preservation of the goods and resources entrusted to them for the performance of their duties; therefore, they also commit themselves not to use the office telephone lines for personal needs, except in cases of emergency, and to comply with the provisions of the company regulations for the use of the computer system for Internet and e-mail; they also commit themselves not to use company vehicles to perform personal tasks and not to carry persons external to the company, unless expressly authorised by the latter.

**Confidentiality:** to use extreme caution and care when using non-public information obtained in the performance of your work tasks. Information and any other material obtained in the performance of one's work is the property of the Company. Recipients are committed not to disclose, use or communicate information and/or any other kind of news, documents, data, etc., related to the acts and operations pertaining to each task or responsibility that are confidential without specific authorisation.

**Conflict of interest:** to avoid all situations and activities in which a conflict of interest may arise between personal economic activities and duties held in the Company or interests of the Company itself. If, however, situations of conflict or situations of potential conflict should arise occasionally, maximum communication and transparency is required towards the manager or the function responsible for any necessary measures.

**Gifts, gratuities, hospitality:** to accept or offer directly or indirectly acts of business courtesy, such as gifts, gratuities, payments and benefits (including, for example, trips, meals, recreational activities, etc.), only when they are such that they cannot be interpreted as aimed at acquiring advantages for oneself or for the Company in an improper manner.

Any employee or collaborator who receives/offers gifts such that they cannot be attributed to normal courtesy must directly inform their supervisor or the relevant function and refuse.


In any case, making or receiving gifts in cash or cheques is strictly prohibited, regardless of value.

**Health and Safety:** to participate in the process of preventing risks, safeguarding the working environment and protecting health and safety for themselves, colleagues and third parties.

**Environment:** to contributing to the achievement of environmental performance improvement objectives through the adoption of appropriate behaviour.

**Administrative responsibility:** particular importance is attached to the transparency, accuracy and completeness of financial statement information. In this regard, each employee is required to cooperate to ensure that management facts are correctly represented.

Employees and collaborators, who become aware of falsifications in the accounts or in the documentation on which the accounting records are based, must report the information to the supervisor or to the relevant function. Should the report prove to be deliberately unfounded, the Company may initiate disciplinary proceedings against the employee or terminate the relationship with the employee.

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## 4.2 Guidelines for policies towards third parties

Employees and collaborators must adequately inform third parties of the content of the provisions of the corporate code, in order to bring their conduct in line with these provisions.

All employees and collaborators are committed to ensuring that all activities are carried out in full compliance with the applicable competition regulations.

### 4.2.1 Relations with Customers and Suppliers

Each recipient is required to perform their duties with the aim of achieving maximum customer satisfaction. When requested, each recipient shall provide assistance and information in a courteous, polite, correct and comprehensive manner.

The selection of suppliers and the determination of purchasing conditions must be based on an objective assessment of:

- quality of goods and services required;
- price of the goods and services requested;
- the counterparty's ability to supply and promptly guarantee goods and services of a level appropriate to the Company's needs.

### 4.2.2 Relations with political organisations, trade unions, and the media

OMF srl does not make contributions, direct or indirect and in any form, to parties, movements, committees, trade unions and political organisations, nor to their representatives and candidates.


Relations with the press are maintained by authorised functions and are carried out consistently with the communication policy defined by the Company. The information provided must be truthful, complete, accurate, transparent and consistent with each other.

Employees and collaborators must refrain from issuing statements or interviews concerning the Company to representatives of the press and other media and to any third party without authorisation from the competent managers.

### 4.2.3 Relations with Related Parties and Conflicts of Interest

In order to avoid those situations in which there may be the possibility of realising personal advantages from business opportunities that may have come to one's knowledge in the performance of one's duties, and there may be the possibility of enabling in some way (or not realising in full) the company's interest, the recipients of this Code agree to the total absence or non-existence of any conflicts of interest relating to the performance of one's work and professional activities.

It is therefore excluded:

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- having interests (such as shares, shareholdings, assignments) with clients, customers, suppliers or competitors, even through relatives, relatives-in-law, spouses, on the part of representatives or collaborators of the Company;
- carry out activities, paid or unpaid, even occasionally, for clients, customers, suppliers or competitors, even through relatives, relatives-in-law, spouses;
- accepting advantages, economic or otherwise, from persons who are or aspire to enter into relations with the Company; and the presence of even a single case will be assessed to examine the effects on the Company and take action to eliminate the conflict.

## 5. REPORTS

In general, employees who believe that facts/behaviours considered detrimental to the Company Code or cases of fraud are occurring, may make reports, even completely anonymously or complete with name and surname, through the means that OMF srl makes available to them.

## 6. DIFFUSION

The Management of OMF srl is at your complete disposal for any clarification and explanation concerning the contents of the Company Code.

Any amendment to the Code of Ethics will be adequately communicated to all Company collaborators.