

Preamble

This Code of Ethics applies to the company **Tommet Mechanics S.r.l.**, a manufacturer of mechanical components on behalf of third parties, headquartered at Via dell'Artigianato 7, Castelgomberto (VI), whose Board of Directors has officially approved and promoted its content.

In addition to the high-quality standards already certified under **UNI EN ISO 9001** and **UNI EN ISO 14001**, and the decision to implement an **Organizational, Management and Control Model (MOG)** according to Legislative Decree 231, the ethical and moral principles that constitute the company's overall *modus operandi* are outlined below. No internal distinction based on role, seniority, specific duties, or employment status will be considered a limiting factor.

Tommet Mechanics recognizes the importance of maintaining quality and ethical standards in line with the expectations of the major multinational companies it has collaborated with for years. Therefore, the company promotes the dissemination and implementation of this Code to ensure essential values such as fairness, transparency, and moral integrity.

The **Recipients** of this document are all employees, collaborators, or associates who interact with the company. Every individual within this definition is bound to this document through rights and duties that must be respected without exception.

In accordance with the agreements contained in the National Collective Labor Agreement (CCNL), any violation of the principles contained in this Code is considered a disciplinary offense, whether it concerns internal relations or relations with third parties. For this reason, the Board of Directors will take appropriate action in relation to applicable sanctions.

1. General Principles:**1.1 Compliance with Laws.**

Within the scope of their duties, Recipients are expected to comply with the laws of the national or international jurisdictions in which they operate and, consequently, refrain from committing any violations or illegal acts. Each Recipient is encouraged to inform themselves of these regulations and act accordingly, taking into account potential criminal or civil consequences.

1.2 Morality.

The Board of Directors considers it vital for the company's proper functioning that its reputation is protected and remains intact over time. It is therefore the responsibility of



each Recipient to ensure that their conduct within the company reflects commonly shared moral and ethical principles.

1.3 Fair Competition.

Tomet Mechanics is committed to complying with current antitrust regulations and prohibits any criminal practices inside or outside the company that violate these laws.

1.4 Meritocracy and Equal Opportunities.

Creating a healthy and collaborative work environment requires that all employees are guaranteed equal opportunities for work and professional growth. No discrimination will be tolerated on the basis of gender, ethnicity, race, religion, culture, sexuality, disability, union membership, or geographic origin. Each employee will be evaluated based on objective criteria such as competence, potential, professionalism, punctuality, and intellectual honesty. In accordance with current regulations, all **Tomet** personnel are employed under regular contracts that define their essential rights and duties. The Board of Directors strictly prohibits any irregular or disguised forms of employment. The company is responsible for ensuring that no incidents of physical or verbal violence, or any form of harassment, occur.

1.5 Protection of Industrial and Intellectual Property Rights.

The company undertakes to comply with current regulations concerning intellectual (IPR) and industrial property rights, as every creation is considered not only protected by copyright but also a valuable asset for the company's uniqueness and competitiveness.

1.6 Transparency and Freedom of Expression.

Any action or communication of public interest will be shared within the company with maximum transparency, ensuring a relationship based on truth, honesty, and moral integrity. Employees will always have the opportunity to express their opinions through appropriate company channels and/or trade unions. Anonymous communications will be handled in accordance with current whistleblowing regulations.

1.7 Efficiency.

Each employee is expected to contribute equally and to the best of their ability to the company's well-being. It is everyone's responsibility to report, through the appropriate channels, any violations or negligence that could cause economic or reputational damage to the company.

1.8 Environment and Safety.



In line with the directives contained in the CCNL and the 2030 Agenda, an internal **Environmental Sustainability Policy** has been drafted. Recipients are requested to consult this document for all guidance approved by the Board of Directors regarding these matters.

CEO

Concato Armando

Armando Concato - CEO

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