

REVISION LIST

Revision	Issue Date	Reason
0	26/07/2024	First Issue
1	24/09/2025	Update of O.M. 231 and replacement of B.O.D. with S.D.
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Preamble

This Code of Ethics applies to the company Tomet Mechanics S.r.l., a manufacturer of mechanical components for third parties, headquartered at Via dell'Artigianato 7, Castelgomberto (VI), whose Sole Director (hereinafter S.D.) has officially approved and promoted its content.

In addition to the high-quality standards already certified under UNI EN ISO 9001 and UNI ISO 14001, and to the adoption of an Organizational and Management Model pursuant to Legislative Decree 231, the ethical and moral principles forming the company's *modus operandi* are outlined below. These principles apply across the board, without any distinction based on position, specific role, seniority, or type of collaboration.

Tomet Mechanics recognizes the importance of maintaining quality and ethical standards consistent with the requirements of the major multinational companies with which it has long collaborated. Therefore, it 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. Each individual within this definition is bound by this document, with rights and obligations to be respected without exception.

In accordance with the terms of the applicable National Collective Labour Agreement (CCNL), any violation of the principles set forth in this Code is considered a disciplinary offense, whether concerning internal relations or relations with third parties, and will be duly considered by the S.D. in relation to the applicable sanctions.



1. General Principles

1.1 Compliance with Laws

Within the scope of their duties, recipients are expected to comply with the laws and regulations of the national or international legal system in which they operate and, consequently, refrain from committing any violations or unlawful acts. Recipients are therefore encouraged to familiarize themselves with these regulations and act accordingly, also taking into account potential criminal or civil consequences.

1.2 Morality

The S.D. considers it vital for the company's proper functioning that its reputation is protected and preserved over time. It is the responsibility of each recipient to ensure that their conduct within the company reflects shared moral and ethical principles.

1.3 Fair Competition

Tomet Mechanics is committed to complying with applicable antitrust regulations and strictly prohibits any criminal or unlawful practices, both inside and outside the company, that violate such regulations.

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. Discrimination based on gender, ethnicity, race, religion, culture, sexuality, disability, union affiliation, or geographic origin will not be tolerated. Employees are evaluated based on objective criteria such as competence, potential, professionalism, punctuality, and intellectual honesty. In accordance with applicable law, all personnel are covered by a regular employment contract outlining essential rights and duties. The S.D. condemns and prohibits any irregular or disguised form of employment. The company is responsible for preventing any incidents of physical or verbal violence or harassment of any kind.



1.5 Protection of Intellectual and Industrial Property Rights

The company is committed to respecting applicable regulations concerning intellectual and industrial property rights, as every creation is considered not only copyright-protected 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 to ensure a relationship based on truth, honesty, and moral integrity. Employees may always express their opinions through the appropriate channels provided by the company and/or via trade unions. Anonymous communications will be managed and reviewed in accordance with current whistleblowing regulations.

1.7 Efficiency

Each employee is expected to contribute to the company's well-being to the best of their abilities. It is everyone's responsibility to report, through appropriate channels, any violations or negligence that may 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 asked to review this document for all indications discussed and approved by the S.D. regarding these matters.

Sole Director
Concato Armando

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