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INTRODUCTION

The Group, led by a family business, its companies OMET, O-PAC, and other subsidiaries, form one of the most important industrial and dynamic concerns located in the Lecco area. Overall, OMET employs more than 300 employees and turnover shows steady growth of approximately 10% every year since 2010.

The Group and its companies have always operated with responsibility and care towards the community and the environment by voluntarily committing beyond the requirements of law.

The Group has drawn up this document to implement the company's commitment and policy on social responsibility: a "Code of Ethics" aimed at establishing the value system it refers to and sharing them with all stakeholders, to contribute to a consistent and sustainable development of the entire civil, industrial, environmental and social system in which it operates.

The founding principles of the "Code of Ethics" are legality, honesty, integrity, fairness, transparency, sustainability, respect for work, for the environment and people with a special focus on family-work balance, fair competition.

The Group considers it a duty to disclose its ethical principles in a clear and transparent way, and to demand that all group companies and their stakeholders share these principles, to protect the image and consistency of the corporate image.

This Code is therefore aimed at all members of the Board, corporate bodies, employees and associates of the companies belonging to the Group at all levels, and all those who, for various reasons, act in the name, on behalf or in the interest of the Group, regardless of the legal nature of their relationship. All recipients are required to observe and enforce the principles of the Code within their own departments and responsibilities, in Italy and abroad.

OMET Srl, founded in Lecco in 1963, groups 3 business units in the following market sectors: printing (manufacturing of narrow and mid-web machines for label and packaging printing), tissue converting (manufacturing of automatic machines for tissue napkins and disposable towels production), and moving systems (production and testing of bearing moving systems), each located in a different site. OMET has a worldwide presence with three branches that follow high growth markets in the Far East, (OMET Suzhou, China), Latin America (OMET Ibéricas based in Spain) and Central and North America (OMET AMERICAS in the United States), as well as a number of qualified international agencies.

O-PAC Srl has been a leader for 25 years, specialising in the production of wet wipes that are designed, formulated and manufactured totally in house. Building on a cutting-edge R&D department, consolidated technological know-how and customised systems, the new production facility inaugurated in 2012 assures controlled atmosphere premises and certified quality standards. Innovation-focused, attentive to consumer needs and to market specificities, O-PAC provides highly targeted products for country and distribution channel (cosmetics, pharmaceuticals, mass retail). In 2016 O-PAC purchased:

- **NCT srl, a young and dynamic company able to design, formulate, produce and package dermo-cosmetic products for third parties, with a "beauty driver" soul able to anticipate trends and create innovations with high quality standards**
- **Wet Wipes International s.r.o. established in the Czech Republic, manufacturer of wipes specialising in the home and basic child sector, with a strong presence on the German and Balkan markets.**

The Code of Ethics is also shared with all parties the Group has business relationship with.

Mission

“Great customer focus, thorough knowledge of the market and user needs, customised design and constant, efficient and qualified service are part of the corporate DNA upon which the Group Companies establish their presence on the market. The foregoing without ever forgetting the community and stakeholders, who are the recipients of constant interest and a sense of responsibility, which translate into ad hoc projects and initiatives designed to benefit employees and the territory”.

CHARTER OF VALUES AND PRINCIPLES

The Charter of values and principles identifies the ethical cornerstones that underpin the Group’s activities and sets the behavioural coordinates for all those working for and with its companies.

1. Legality

Compliance with local regulations in all countries where the Group operates is an essential principle for its Companies and all the people and organisations which they liaise with.

2. Respect for people

The Group operates in compliance with the laws, rules and regulations, as the basis of the social coexistence agreement, according to a logic of mutual respect and recognition, equal dignity, enhancement and synthesis of the differences. Each employee is entitled to fair, courteous and respectful treatment by their managers, subordinates and peers. In internal and external relationships, no discrimination based on race, nationality, age, health status, physical disability, sexual orientation, political opinions or trade union affiliation, philosophical or religious beliefs is permitted. Sexual, physical or psychological harassment are not tolerated in any form.

3. Transparency and recording of financial actions and movements

All Companies belonging to the Group are aware of the importance of transparency, accuracy and completeness of accounting information and endeavour to provide a reliable administrative and accounting system, correctly representing management and providing the tools to identify, prevent and manage, as far as possible, financial and operational risks, including fraud against the Company or third parties.

In accounting the facts relating to the management of the company, employees and associates are required to comply strictly with the regulations in force and internal procedures so that each transaction is not only properly recorded but also authorised, verifiable and legitimate.

4. Respect for the market

The principle of legality and compliance with the rules are the foundation of the company’s operations. The Group operates in compliance with fair and balanced competitive mechanisms,

assuring the achievement of its objectives in compliance with all regulations protecting fair competition, within a solid ethical framework and compliance with and defence of the law.

Group Companies undertake to only market high quality products for which compliance with strict controls is certain.

5. Accountability

The Group is responsible for the decisions taken, activities undertaken and the effects generated, and for fulfilling commitments to the various stakeholders.

6. Honesty

Honesty is the fundamental value inspiring the whole company management and which the conduct of employees in the performance of their duties must adhere with.

7. Ethics and communication

There can be no development of sound economic activities and a free and aware civil society where ethics and transparency do not exist. The Group always operates according to conduct geared to transparency, based on integrity, correctness, honesty, fairness, impartiality, independence and autonomy of judgement, clarity of positions taken and decision-making and implementation mechanisms adopted, and the absence of conflicts of interest. It strives to disseminate complete, clear and comprehensible information, to enable its stakeholders to make informed decisions regarding relations to be maintained with the same.

8. Sustainability

Combining economic growth with social cohesion and protection of the natural capital of every territory is a duty for any individual or business. The Group adopts a sustainable approach, aimed at efficient and effective use of resources, at increase productivity and respecting the environment in which it operates, to create long-term sustainable value, benefiting the whole community.

COMMITMENT CHARTER

The Group requires of customers, suppliers and stakeholders in general, attitudes and approaches in line with the values, principles and commitments contained herein. In no way can the conviction of acting for the Group's benefit justify the implementation of conduct that is in conflict with the principles stated in this Code or with applicable laws.

1. Customers and suppliers

The Group calls on all its suppliers, wherever located, to fully abide by national laws and this Code of Conduct for the entire period in which they are to provide products and/or services: this is an essential requirement for establishing and continuing positive working relationships with them.

Relations with customers are based on criteria of honesty and clarity. The Group undertakes to provide high quality products and comprehensive information, paying the utmost attention to the health and safety of its customers and end consumers. All communication must comply with criteria of truth and any form of misleading advertising is rejected.

2. Human resources

The Group is aware that the contribution of its human resources is essential for the success of its business activities. Therefore it ensures its employees and associates enjoy working conditions that are fair, safe, respectful of dignity and equality and free from any form of discrimination or exploitation (see next paragraph).

Furthermore, the Group arranges for training, development and enhancement of the skills and talents of its employees and associates, thus encouraging their personal and professional growth. In a perspective of Corporate Social Responsibility, the Group seeks to invest on improving the quality of life of its employees and associates, helping them achieve better work-life balance.

Conduct in line with policies supporting the promotion of human resources outlined herein is expected from Group Companies and their suppliers and employees and associated are expected to behave based on utter correctness, fairness, integrity and loyalty, consistent with the duties expected from their position. The Group demands full compliance with applicable laws and the highest willingness and cooperation by employees towards representatives of Public Institutions, Judicial Authorities, Law Enforcement, Public Officials or Control Bodies that have powers of inspection on behalf of any other Public Administration.

3. Partners, shareholders and directors

Management, partners and shareholders are required to comply with the contents of the Code in their activities. The Group assures to all correctness, clarity and equal access to information, establishing fees according to market conditions, always in justifiable conditions.

4. Associations, institutions and Bodies (national and international)

The Group interacts -- at different levels and in relation to the issues in question -- with associations, organisations and institutions, respecting mutual and specific areas of responsibility, roles and prerogatives, and with a view to cooperation, loyalty and transparency.

5. Social partners

The Group has several second level trade union agreements and has always been a loyal and reliable partner on issues of labour and industrial relations, to constructively address together the changing scenarios which involve everyone and require a systemic and responsible approach.

6. Community and territory

The role of business is crucial for the development of the regions and communities in which they are based. Due to its size, solidity and history, the Group plays a significant role in the market, economic development and welfare of the communities where it operates. It pursues sustainable development, creating value in the region, especially by supporting schools and education initiatives. It operates according to a logic of *corporate citizenship*, that is of commitment to integrate within its strategies the needs of its local, national and global setting as well as socially responsible actions.

7. Environment

The Group considers the protection of natural resources as fundamental, and acts and invests to foster environmental protection and prevention, recycling and resource recovery, and conscious preservation and enhancement of ecosystems. It recognises eco-efficiency and green economy as factors for success and market competitiveness on the international arena.

The Group companies act in accordance with all laws and environmental regulations of the Country in which they operate.

Environmental permits - Companies must have the permits and environmental licenses required for their operations.

Handling of chemical materials - Chemical containers must be labelled and stored safely. A material safety data sheet (MSDS) must be available (in the local language) in the workplace. The instructions in the MSDS must be followed.

Water management and wastewater treatment - Water is a scarce resource in many parts of the world and should be used with the greatest possible efficiency. All the waste waters resulting from processes must be treated before discharge. The treatment of waste water must comply with the provisions of local laws.

Waste Management - Any waste and in particular hazardous waste must be handled in a responsible manner and in accordance with local laws.

WORK ETHICS

Group Companies shall ensure the widest possible dissemination of the Code of Ethics to employees and associates. Group Companies identify and select employees with complete impartiality, autonomy and independence of judgement, in full compliance with current regulations and internal procedures.

Employees should be made aware and comply with the requirements of the Code of Ethics and, consistently with individual possibilities, they should promote awareness thereof among newly recruited employees, as well as third parties affected by application of the same who they come into contact with for reasons of their duties.

Employees have an obligation to:

- refrain from conduct contrary to the Code of Ethics and require compliance therewith;
- refer to their superiors or responsible departments if clarifications are required on the method or application thereof;
- immediately report to their superiors or to the Supervisory Body any information, either obtained directly or reported by others, regarding possible breaches to the Code of Ethics or any request to breach its rules received by them;
- cooperate in verifying possible breaches with the structures intended for such purposes.

Group Companies place great importance and attention in the constant development of human resources. As a result they consider merit-based criteria, professional competence, honesty and ethical conduct as the best foundations for implementing any decision concerning career and any other aspect related to an employee.

Employees are also bound to constantly acts respecting the rights and the personality of colleagues, associates and third parties, regardless of their hierarchical position within the Company.

Group companies recognise and respect the right of employees to take part in investments, business or other kinds of activities outside those performed in the interest of the Company itself, provided that such activities are permitted by law and/or the Industry National Collective Bargaining Agreement, as well as compatible with the obligations assumed as employees.

1. Protection of employees' dignity and integrity

Group Companies recognise that human resources are an indispensable element for the Company's existence, development and success, and that motivation and professionalism of their staff are an essential factor for maintaining competitiveness and the creation of values for members.

Group Companies are therefore committed to developing the skills and stimulating the abilities and potential of their employees so that they can fully succeed in reaching the goals.

Group companies provide equal employment opportunities to all employees on the basis of specific professional qualifications and performance abilities, without any discrimination since the competent department selects, recruits and manages employees based on competence and merit, without any consideration of race, religion, gender, age, ancestry, in compliance with the laws and regulations in force.

Employees who believe they have suffered discrimination may report the incident to the Human Resources Department and/or their manager who will verify the actual breach of the Code of Ethics.

The Company reaffirms its commitment to preserve the moral and physical integrity of its employees, associates and consultants.

The competent departments ensure the working environment is not only adequate from a personal health and safety point of view, but that it is also free from prejudices and that every individual is treated with respect, without any intimidation and respecting their moral personality, avoiding unlawful influence and undue discomfort.

2. Occupational health and safety

Group Companies consider the environment and nature as core values and the heritage of all, to be protected and defended. For this purpose the Companies, as part of their activities, undertake to contribute to the development and welfare of the communities in which they operate, with the objective of assuring the safety and health of employees, associates, customers and communities concerned by the activities and reducing environmental impact.

Group Companies are committed to managing their business in full compliance with current regulations regarding the environment, health and safety. The operational management must refer to advanced standards of environmental protection and energy efficiency, pursuing the improvement of occupational health and safety.

Group Companies undertake to disseminate a culture of safety by developing risk awareness and promoting responsible behaviour by employees and associates who, within their duties and responsibilities, participate in the process of risk prevention, environment preservation and health and safety protection for themselves, their colleagues and third parties.

Group Companies undertake to adopt the following general measures for the protection of the health and safety of workers:

- assessment of health and safety risks;
- minimising risks and limiting the number of workers exposed to the risk to a minimum;
- prevention planning;
- compliance with ergonomics principles in the workplace;
- priority of collective protective measures over personal protective measures;
- health measures and medical checks of workers depending on the specific risks;
- emergency measures to be implemented in case of first aid, fire fighting, evacuation of workers and serious and immediate danger;

- use of warning and safety signs;
- regular maintenance of premises, equipment, machines and devices;
- information, training, consultation and participation of workers or their representatives, on matters regarding occupational health and safety;
- appropriate instructions to workers.

3. Conflict of interest, fair competition, antitrust and anticorruption

All employees must ensure that all business decisions are made in the interest of the company. Therefore they must avoid any situation of conflict of interest between personal or family economic activities and the posts held in the Company.

If a manager, associate or employee is in a situation that, even potentially, might result in or cause a conflict of interest, they must promptly report it in writing to their superior in order to effectively assess existence of a conflict of interest and establish any action. No activities in favour of a competitor of Group Companies may be conducted, nor may anyone engage in any competitive activities, even as side activities.

In the event of remunerated side activities, the individual must inform their direct superior or manager prior. Occasional or sporadic activities or engagements are not considered side activities. Authorisation will be refused if the applicant has relations with the company/third party during the performance of their duties for Group Companies.

Employees and associates are required to comply with the regulations on fair competition. The conducts that may constitute a breach of antitrust laws include:

- Discussing with competitors prices, production, capacity, sales, offers, profits, profit margins, costs, methods of distribution or any other parameter that may determine or influence the competitive behaviour of Group Companies in order to force the competitor to align to said behaviour;
- Exerting any influence on resale prices to customers or attempting to impose export or import restrictions on goods supplied by Group Companies.

Lastly, they must abstain from obtaining competition information using industrial espionage, bribery, theft or electronic eavesdropping, or deliberately disseminating false information on a competitor or their products/services.

Group Companies compete fairly on the market with the quality and price of their products, without providing third parties with any unfair advantages. Consequently, no employee or associate may either directly or indirectly offer, promise, grant or authorise the donation of money or any other valuables to employees and/or Public officials, to influence an act of office or to obtain unfair advantage. Any offer, promise, grant or donation must be made in compliance with applicable laws and with internal policies and must not give the impression of bad faith or impropriety. This means that no offer, promise, grant or donation may be made if it may be reasonably construed as an attempt to unlawfully influence an employee or public officer or be construed as an act of bribery to a trading partner for granting a business advantage to Group Companies.

4. Harassment at work

Group Companies demand that no harassment occurs in internal and external working relationships, including:

- the creation of a threatening, hostile work environment or mobbing against individuals or groups of workers;
- unjustified interference in the execution of other people's work;
- hindering other people's individual employment prospects merely for reasons of personal competitiveness.

Mobbing and personal harassment of all kinds, also including sexual harassment are prevented as much as possible, and in any case are prosecuted.

5. Anti-money laundering

Group companies and all their employees must never engage in or be involved in any activity which may imply laundering (i.e. acceptance or processing) of proceeds from criminal activities in any form or manner.

The Companies and all their employees must verify in advance available information (including financial information) on their business partners, suppliers and third parties in general, in order to ascertain their respectability and the legitimacy of their activities before establishing business relations with them. They must also comply with all the provisions relating to accounting, recording and financial reporting applicable to monetary flows and payments in connection with other transactions and contracts.

Group Companies must always comply with anti-money laundering legislation in any competent jurisdiction.

6. Child labour

The Group Companies do not accept child labour. No person under the age established by Law may be employed.

Each company shall use all necessary measures to ensure that no workers below the legally established age and/or age limit under national collective bargaining agreements are employed for the work hours that each individual company implements.

Any legal limitation on the employment of persons aged under 18 years must be complied with.

The Group Companies, in accordance with the UN Convention on children's rights, considers every person under 18 years of age a child. We acknowledge the rights of every child to be protected from economic exploitation and from performing any job that is hazardous or interferes with education, or is harmful to the health or mental, physical, spiritual, moral and social development.

7. Worker's rights

a) The Group Companies do not accept any form of forced labour and do not employ detainees or illegal migrant workers.

b) Migrant workers will have the same rights as local workers. Every commission or other tax related to the employment of migrant workers shall be borne by Group Companies, which shall never ask workers to leave their identity documents at the company.

c) Every worker has the right to establish or join peaceful associations of their own choice in compliance with the law. Workers shall not be subject to disciplinary or discriminatory actions by the Group Companies in compliance with rights of association.

d) No worker may be discriminated against on the basis of gender, race, colour, age, pregnancy, sexual orientation, religion, political opinion, nationality, ethnicity, illness or disability.

e) All workers are entitled to a written employment contract, in the local language, which stipulates the terms and conditions of employment. Every company has the responsibility to ensure that all employees are aware of their obligations and legal rights.

8. Salaries, benefits, work hours and leave

“Everyone who works has the right to just and favourable remuneration ensuring for himself and his family an existence worthy of human dignity...” (*Universal Declaration of Human Rights*).

a. Wages must be paid regularly, under the terms established by Law or the National Collective Labour Agreement, and must be fair, based on the worker’s experience, qualifications and performance. The employee must receive at least the minimum wage laid down by Law or the National Collective Labour Agreement, in addition to the allowances or benefits under both the National Collective Labour Agreement and Level II Company agreements. No unfair deduction is allowed and workers are entitled to have the details of how the salary has been calculated.

b. Regular working hours may not exceed the legal limits and must never exceed 40 hours per week. Overtime may never exceed the limits set by Law or by the National Collective Labour Agreement and must be carried out and paid under the National Collective Labour Agreement and on a voluntary basis. Workers have the right to at least one day off during the week and shall be paid the hours of leave which every worker is legally entitled to.

CODE OF CONDUCT

The Group operates with full accountability towards all parties involved in their activity. Therefore it asks all parties with whom it operates to acknowledge the Code of Ethics and implement consequent behaviour.

By signing the Code of Ethics, all parties who work with and for the Group at various levels shall comply with and promote the values, principles and commitments towards the various stakeholders.

These parties therefore undertake to ensure:

- in all the communities in which they operate, compliance with the laws, regulations and rules, as the basis of the covenant of civil coexistence;
- their contribution to the economic, social, civil and cultural development of the country, through innovative processes for widespread creation of value, promotion of the common good and affirmation of outstanding models;
- to provide to their employees and associates working conditions that are fair, safe, respectful of their dignity, equality and free from any form of discrimination or exploitation, able to foster their human and professional development;
- in any context, conduct based on ethics and transparency, founded on responsibility, integrity, correctness, honesty, fairness and the free market;
- that ethical, social and environmental criteria are fostered in supplier selection processes (vendor rating);
- fairness, independence, integrity and compliance with the mutual and specific areas of responsibility, roles and prerogatives in relations with Organisations, Institutions, political parties, mass media and other public or private entities;
- in environmental management, advanced management practices, aimed at prevention, recycling and recovery of resources, and towards conscious protection and enhancement of ecosystems.

Contract Value of the Code of Ethics

The compliance with the rules and provisions contained in the Code of Ethics is an integral and essential part of the contractual obligations undertaken towards Group Companies, whether arising from employment relationships for employees, from contractual regulations for contract workers, or from business relations.

Communication

All recipients are made aware of the Code of Ethics by communication and training activities, and acceptance of the principles contained therein is required by signing the special acknowledgement form. This Code is available on the website of the Group Companies and is distributed to recipients in the manner considered most appropriate from time to time for effective dissemination.

Amendments

The code may be amended and supplemented only by signature of the legal representative or by resolution of the Board of Directors.

Breaches

The Group Companies undertake to enforce compliance with this Code by applying penalties provided by the internal disciplinary system, applicable National Collective Labour Agreement or by the applicable contracts entered into with their counterparts.

Violations to the Code of Ethics constitute a breach of the obligations which the associate or business partner has undertaken towards the Group Companies and/or the Parent Company, whether they relate to employment, contract work, administration or supply relationship.

In the event of breach of the principles contained in this Code of Ethics, where it appears necessary for the protection of corporate interest and consistent with the existing regulatory framework, even in terms of provisions arising from collective bargaining agreements, the suitable Company bodies will assess any initiatives to be undertaken and measures, including disciplinary action and sanctions, to be taken against persons who have put in place practices that do not comply with this Code of Ethics.

In the latter case, any penalties, which may include additional claims for compensation by the Company, may be applied:

- a) against employees of the Company (production and office workers and managers), within the limits of the legal framework on labour law and also in relation to due diligence obligations of the employee in performing their duties;
- b) against executives, as specifically provided in this connection by employment law;
- c) against directors, by way of suspension or withdrawal of office;
- d) against external associates and third parties, including in terms of termination of their contractual relationships.

All the foregoing procedures must however assure the confidentiality of the relevant information and indications, subject to legal provisions and/or specific provisions to the contrary under applicable law.

The Group is committed to protecting those who report issues of alleged or apparent breaches to the Code in good faith from any intimidation or retaliation, by prosecuting those responsible with disciplinary actions applicable from time to time. Any unfounded report and made in bad faith in order to cause harm to colleagues and/or associates shall be considered a disciplinary offence and subject to disciplinary action.

Control bodies and implementation procedures

The person responsible for the implementation and monitoring of the Code of Ethics is the Supervisory Body, set up for this purpose and composed of representatives of the various Group Companies. It reports directly to the Board of Directors.

The supervisory board has the following functions:

- clarifies doubts on interpretation and ethical dilemma situations;
- collects the reports of alleged breaches;

- makes the appropriate inquiries, reporting the outcome to the relevant departments and ensuring the penalties are imposed;
- assures confidentiality on the identity of the person who made the report, protecting them from any retaliation;
- liaises with the relevant departments to stimulate appropriate training courses.

The supervisory board may be directly contacted by any person whom this Code is intended for, via email codiceetico@omet.it or codiceetico@opac.it, according to the Company of reference.