



**PRECISION  
COMPONENTS FOR  
DIESEL INJECTION  
SYSTEMS**



# **OMC2 DIESEL S.P.A.**

## **PRECISION COMPONENTS FOR DIESEL INJECTION SYSTEMS**

### **CODE OF ETHICS**

#### **FOREWORD**

To mark 50 years since its foundation, OMC2 diesel S.p.A. has decided to set a Code of Ethics, renewing its own support of the values it has always based its tradition and integrity on.

Complying with the law and defending individuals' rights, while respecting people and safeguarding the environment, is the basis on which a sensitive and responsible management is built, in accordance with the principles of transparency, fairness and efficiency. All members of OMC2 are required to take active part in achieving these aims.

Decades' of experience working with leading manufacturers of injection systems has enabled OMC2 to constantly improve quality and develop a vast range of products for the main types of diesel engine.

Thanks to the company's fully qualified workforce, and the know-how acquired over the years, the OMC2 brand name is renown worldwide as a quality guarantee.

#### **OMC2'S MISSION**

OMC2's mission is to become a benchmark in the production of pumps, valves and nozzles for the manufacturers of high quality diesel injection systems used in engines for the following applications:

- marine engines
- stationary engines
- locomotive engines

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FOR DIESEL INJECTION  
SYSTEMS**

## **CODE OF ETHICS**

### **OMC2'S VISION**

OMC2 intends to strengthen its global market position, with a special emphasis on emerging countries.

This can only be achieved by continuously improving the firm's quality standards, investing in new state-of-the-art infrastructures, and developing the know-how of the entire workforce.

### **INTRODUCTION**

This Code of Ethics contains all the fundamental values and principles on which all actions by OMC2 are based. It sets out the following main targets:

- improvement in internal relations and the creation of a truthful and transparent external image;
- enhancement of the organisation efficiency, by abolishing opportunistic behaviour, encouraging everyone to achieve the set targets and increasing the ability to produce benefits for all the stakeholders and for the environment as a whole;
- a good reputation – as an organisation with good rules, one that displays its values univocally and transparently, and generates a sense of security in its customers and business partners, one that identifies and corrects negative behaviors, while publicly appreciating the positive ones.

These three targets and the following guidelines are the elements guiding all corporate activities. "Ethical" behaviour is defined as behaviour that complies with this Code and implements the values it sets out.

This Code contains a series of ethical guidelines and rules of conduct that all the company's directors, employees and collaborators at all levels must follow, with a spirit of cooperation, when conducting business and performing tasks.

The Code is intended for all the people working in or for OMC2 and those involved directly or indirectly in achieving its aims, regardless of their position and responsibilities.



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**PRECISION COMPONENTS  
FOR DIESEL INJECTION  
SYSTEMS**

## **CODE OF ETHICS**

In addition to the provisions set out below, OMC2 adopts the following corporate ethical values:

- 1.1 Impartiality**
- 1.2 Honesty**
- 1.3 No conflicts of interest**
- 1.4 Confidentiality**
- 1.5 Personal integrity**
- 1.6 Value of employees, collaborators and other human resources**
- 1.7 Quality of corporate activity**
- 1.8 Responsibility towards the community and the environment**
- 1.9 Transparency and completeness of information**
- 1.10 Personnel involvement**
- 1.11 Diligence and fairness in contract relations**
- 1.12 Fair competition**

Furthermore OMC2 undertakes to guarantee the utmost quality of its products – granting their efficiency, innovation, and continuous improvement, but also involving all the stakeholders, valuing our personnel qualification, and creating social-environmental responsibility.

### **PRINCIPLES**

#### **1. GENERAL PRINCIPLES**

##### **1.1 Impartiality**

When making decisions that involve the selection of and relations with its employees, collaborators and suppliers - especially those having an impact on the end product, such as the suppliers of raw materials - and relations with the surrounding community, OMC2 is committed to avoiding all discrimination based on gender, including sexual orientation, state of health, race, nationality, political opinion and religious beliefs.



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**PRECISION COMPONENTS  
FOR DIESEL INJECTION  
SYSTEMS**

## **CODE OF ETHICS**

### **1.2 Honesty**

In performing their work, OMC2's employees and collaborators are required to comply diligently with the applicable laws, the behavioural model, this Code, internal regulations, and procedures, and operating instructions contained in the corporate Management System, which is certified to UNI EN ISO 9001.

Any kind of conduct differing the above principles is always unjustifiable, even if allegedly operated in the interest of OMC2, as it can never actually be considered in the company's interest or to its advantage.

### **1.3 No conflicts of interest**

In performing their work, OMC2's employees and collaborators must avoid any conflict of interest, be it based on proven grounds or just apparently so. A conflict of interest is hereby defined as a situation in which a collaborator's interests would be in conflict with the company's aims, or he would derive personal advantage from business opportunities, especially the ones involving existing or potential customers, suppliers or partners.

### **1.4 Confidentiality**

OMC2 treats all data in its possession as strictly confidential.

OMC2's employees and collaborators are required not to divulge confidential information unless their purposes are strictly connected with the core business, especially with the operations relating to suppliers of raw materials and production equipment, and with customers.

### **1.5 Personal integrity**

OMC2 recognises the physical and moral integrity of its employees and collaborators as a fundamental value and as an essential mean to the company's aims.

The company is therefore committed to guaranteeing upstanding working conditions and provide a safe and healthy work environment, in accordance with the Conventions of the International Labour Organization, the Declaration of Human Rights, the UN Convention on Children's Rights, and the UN Convention on the Elimination of all Forms of Discrimination against Women.



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PRECISION COMPONENTS  
FOR DIESEL INJECTION  
SYSTEMS

## CODE OF ETHICS

No oppressive behaviour or detrimental action towards our employees or collaborators will therefore be tolerated, nor will any conduct aimed at avoiding OMC2's health and safety targets for all personnel.

### **1.6 Value of employees, collaborators and other human resources**

OMC2 considers its employees, collaborators and other human resources involved as a primary corporate asset indispensable for the company's success, and therefore it is committed to respecting them and promoting their growth and professional development. OMC2 is willing to support its employees in times of difficulty over and beyond any contract obligations. OMC2 is also committed to the continuous training of its employees and collaborators with regard to technical and professional skills, on-the-job safety and the practices required to guarantee a product that meets the quality and safety requirements.

### **1.7 Quality of corporate activity**

OMC2 places great importance on meeting its customers' expectations. The company is therefore committed to working to a high standard of quality, in accordance with national and international standards on mechanical production, technical standards in the industry and internationally approved quality standards. The company also complies with international standards on system certifications (UNI EN ISO 9001).

### **1.8 Responsibility towards the community and the environment**

OMC2 is committed to pursuing its aims in full respect of the community in which it operates. This applies to all activities, even if performed outside the company. OMC2 considers the environment a primary asset for the community, and undertakes to implement programmes to achieve ongoing compliance with environmental legislation.

OMC2 always operates in full compliance with the applicable laws on waste disposal and environmental management, and promotes the training of its employees and collaborators in order to assure the sound management of the environmental risks associated with each activity.



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**PRECISION COMPONENTS  
FOR DIESEL INJECTION  
SYSTEMS**

## **CODE OF ETHICS**

### **1.9 Transparency and completeness of information**

OMC2 provides its stakeholders with complete, clear and true information through its corporate bodies, partners and collaborators. It is therefore committed to promoting cooperation between employees and stakeholders with the purpose of achieving the utmost transparency of information originating from the company.

### **1.10 Personnel involvement**

OMC2 encourages all personnel to take active part in the life of the company, by means of regular meetings with our Management and the opportunity to fill the provided Suggestions Box with positive comments, suggestions, criticisms or any other kind of message they feel should be shared, in named or anonymous form, and without any form of discrimination.

### **1.11 Diligence and fairness in contract relations**

OMC2 guarantees the utmost diligence and fairness in the execution of all contracts and related activities. It is committed to acting in accordance with the laws in force and the rules of good practice.

### **1.12 Fair competition**

OMC2 refrains from engaging in practices conflicting to the rules of the market and free competition. It also undertakes to act with fairness and transparency in dealing with its customers, suppliers and competitors.

## **2. RULES OF CONDUCT**

### **2.1 Rules of conduct in relations with employees and collaborators**

#### **Definition of employee and collaborator**

For the purpose of this Code, an employee, collaborator or worker is anyone, regardless of the legal classification, who has a work relationship with OMC2 aimed at achieving its goals or participating in the production process.



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*Since 1962*

**PRECISION COMPONENTS  
FOR DIESEL INJECTION  
SYSTEMS**

## **CODE OF ETHICS**

### **2.1.1 Personnel selection**

Assessments of personnel to be recruited are carried out on basis of reciprocal expectations and OMC2's actual requirements, also considering the tasks to assign to the candidate.

Personnel selection is based on equal opportunities criteria: the person making the selection and everyone else involved in personnel recruitment must avoid all forms of favouritism and patronage at all stages of our selection process.

OMC2 undertakes to use the information provided for the sole purpose of assessing the candidate's professional profile, in terms of psychological aptitude and skill, in full respect of the candidate's private life and opinions, and in compliance with the provisions of law.

### **2.2 Employment**

All employees are hired under a regular work contract; no form of irregular employment is tolerated.

On accepting the post, the worker must be given full details of the following:

- a full description of the job and of the tasks it involves;
- statutory regulations and pay, in accordance with the national labour agreement;
- rules and procedures to avoid occupational and health & safety risks connected with the work;
- the internal regulations and the Code of Ethics, which are posted on the premises and have to be accepted in writing by the employee.

### **2.3 Personnel management**

In executing the work contract, OMC2 refrains from all discrimination against its employees.

All decisions concerning any employment are based on the employee's abilities and their correspondence with OMC2's expectations, as well as on merit considerations.

OMC2 also encourages flexibility in work organisation to facilitate motherhood and childcare, and where possible agrees to accept requests for leave for family reasons.



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Since 1962

PRECISION COMPONENTS  
FOR DIESEL INJECTION  
SYSTEMS

## CODE OF ETHICS

Employees and collaborators are assessed jointly by management representatives and the heads of the concerned departments.

### **2.4 Personnel enhancement and training**

Being aware of the fundamental value of each worker, OMC2 is committed to efficiently using and enhancing the skills of all personnel involved in the organisation.

OMC2 also undertakes to train all its workers in order to improve their skills.

### **2.5 Occupational health and safety**

OMC2 organises specific educational and training courses to enhance employees' awareness of the health & safety risks involved in the workplace and encourages them to behave responsibly.

OMC2 is committed to safeguarding the health and safety of all employees in the workplace, especially by means of preventive action. To this end, the company undertakes to comply fully with all the applicable laws and to make occupational health and safety a priority.

The company's commitment to occupational health and safety is backed up by regular personnel training, and it is verified by the Head of the Prevention and Protection Service. OMC2 requires the continuous cooperation of all personnel in pursuing this objective. Occupational health and safety management is also assigned to external consultants, who assess the risk of each activity and determine, together with Management, any improvements that can be made to reduce the risks.

Being aware of the fundamental importance of the dignity and physical integrity of all its employees, OMC2 does not tolerate any violation of the accident prevention protocol and the occupational health and safety rules. It follows that any conduct going against these rules will be construed as contrary to the company's intentions and interest, and to its detriment.

### **2.6 Protection of confidentiality**

In order to protect the employees' privacy, OMC2 has set rules describing what personal data the company can ask employees to disclose and how the information is handled and recorded.





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*Since 1962*

**PRECISION COMPONENTS  
FOR DIESEL INJECTION  
SYSTEMS**

## **CODE OF ETHICS**

Specific legal requirements aside, these rules prohibit the disclosure and dissemination of personal data without the consent of the person involved. They also specify how employees can access their personal data and determine whether they are kept in accordance with the privacy law. OMC2 refrains from investigating the private life, personal opinions and behaviour of its employees and anyone else working with the company.

### **2.7 Protection of personal integrity and dignity**

OMC2 is committed to protecting the moral integrity and dignity of all its employees and collaborators.

Acts of psychological violence, discrimination and personal offence, such as insults, threats, isolation, excessive intrusiveness or unjustified professional limitation, are therefore not tolerated. Sexual harassment, namely behaviour likely to offend a person's sensitivity, such as the display of pictures of an explicit sexual nature, is not permitted.

Cases of harassment or discrimination based on age, gender, sexuality, race, health, political opinion, nationality, religion and so on should be reported to Management, which will ascertain whether the Code of Ethics has been breached and take appropriate action.

### **2.8 Employees' obligations**

Employees must meet the obligations undertaken by signing the work contract, and the rules set forth in the Code of Ethics and in our internal regulations.

The following actions are prohibited:

- disclosure of information concerning the activities performed at and by OMC2;
- publication of articles or writings concerning the work carried out at OMC2 and collaboration with newspapers or magazines without the prior permission of Management.

#### **2.8.1 Conflicts of interest**

OMC2 employees must avoid situations likely leading to conflicts of interest and refrain from gaining personal advantage from business opportunities arising in the course of their work.



MADE IN ITALY  
Since 1962

PRECISION COMPONENTS  
FOR DIESEL INJECTION  
SYSTEMS

## CODE OF ETHICS

OMC2 employees are also required to immediately inform their superiors of the potential or actual existence of conflicts of interest.

This obligation also applies to activities performed outside work hours when they are or are likely to be against the interest of OMC2.

All employees must comply with:

- this Code of Ethics
- the internal regulations
- the Quality System procedures.

### 2.8.2 Use of OMC2's assets

All employees and collaborators must use OMC2's assets in a responsible and diligent manner, and in accordance with any operating procedures.

All personnel are required to:

- keep the premises, furniture, machinery and instruments they are assigned to, always clean and in good condition;
- keep all common areas clean and in good condition, for the benefit and decorum of themselves, the other workers and the company as a whole;
- avoid bringing onto the premises hazardous objects or items likely to cause offence;
- avoid dealing, during work hours, with matters that have nothing to do with the job.

## 3. RULES OF CONDUCT GOVERNING RELATIONS WITH CUSTOMERS

### 3.1 Transparency, fairness and impartiality

#### Definition of customer

A customer is anyone enjoying the services or products supplied by OMC2. The company undertakes not to discriminate between its customers arbitrarily and to always adopt the utmost transparency in relations with them.

#### 3.1.1 Business transparency and correctness

All OMC2 contracts, communications and documents:

- are drawn up in a language that is easy for the recipients to understand, and when possible in their own language;



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Since 1962

PRECISION COMPONENTS  
FOR DIESEL INJECTION  
SYSTEMS

## CODE OF ETHICS

- comply with the applicable laws and are based on the principles of truthfulness;
- are complete and comprehensive.

### **3.2 Personnel conduct with customers**

All personnel working for OMC2 at any level, must behave towards existing and potential customers with the utmost cooperation and courtesy in order to achieve long-lasting and fruitful relations. They should also act with the utmost transparency in their relations with customers and safeguard the interests, even when financial, of OMC2.

### **3.3 Service quality and customer satisfaction**

OMC2 is committed to supplying products that meet high standards of quality and regularly monitoring customer expectations. OMC2 also takes into due consideration any suggestions or complaints from customers regarding the company's products, again in the interests, even when financial, of the company.

## **4. RULES OF CONDUCT GOVERNING RELATIONS WITH SUPPLIERS**

### **Definition of supplier**

A supplier is any party that supplies the goods, services or resources required to make the products, thereby helping to achieve OMC2's aims.

### **4.1 Supplier selection criteria**

In selecting its suppliers, OMC2 seeks not only to achieve a competitive edge in terms of the quality of the goods sold but also to set up a relationship based on mutual cooperation in view of growing together, and to avoid all cases of arbitrary discrimination. To this end, the choice of suppliers is based on a series of objective and documented criteria.

OMC2 behaviour is based on the utmost loyalty, honesty and transparency, before and during the execution of the contract.

OMC2 takes the following requirements into account when choosing suppliers:

- the quality of the product purchased, especially as regards the raw materials;



**MADE IN ITALY**  
*Since 1962*

**PRECISION COMPONENTS  
FOR DIESEL INJECTION  
SYSTEMS**

## **CODE OF ETHICS**

- the affordability of the product or service;
- the ability to meet requirements and urgent requests promptly;
- technical and professional qualifications in accordance with the applicable standards for the supply of services;
- environmental protection.

All suppliers are asked to read this Code of Ethics, which is available on the company's website.

In case a supplier, while executing their contract with OMC2, failed to adopt the rules of conduct set out herein, the company reserves the right to take the necessary measures to protect its own business or even to terminate the business relationship and cease all dealing with that supplier.

### **4.2 Integrity and independence in relations with suppliers**

OMC2 constantly monitors relations with all its suppliers.

Supplier contract relations must be based on the utmost clarity and avoid situations of dependency as far as possible.

### **4.3 Ethical aspects of supplies**

OMC2 undertakes to procure supplies and services in accordance with the rules of ethics set out herein.

OMC2 requires the suppliers of certain goods and services to meet specific requirements of an ethical and social nature.

In particular, when contracting suppliers based in countries defined as "at risk" by organisations of an international standing, OMC2 integrates their contract with appropriate clauses requiring the supplier to meet specific social obligations, such as the adoption of measures to guarantee respect of the fundamental rights of workers, avoid child labour, and comply with the ethical principles of equal opportunities and discrimination.

## **5. RULES OF CONDUCT GOVERNING RELATIONS WITH THE TERRITORY: ENVIRONMENT, COMMUNITY AND INSTITUTIONS**

### **5.1 Environmental protection**

OMC2 undertakes to ensure its activities are carried out in accordance with the principles of environmental protection, sustainable development and compatibility with the environmental health of the area in which it operates.



MADE IN ITALY  
Since 1962

PRECISION COMPONENTS  
FOR DIESEL INJECTION  
SYSTEMS

## CODE OF ETHICS

The company is also aware that, in a market that places increasing emphasis on operators quality and behaviour, its respect for the environment can represent a competitive edge.

OMC2 does its utmost to ensure that its production activities are performed in accordance with the applicable environmental laws.

OMC2 promotes activities to create environmental awareness among its personnel, holds in-house environmental training courses and encourages the use of eco-efficient technologies.

### **5.2 Relations with local institutions and the community**

OMC2 carries out its operations and its relations establishment – including temporary and occasional ones – in full respect of the local institutions and the surrounding community. All the companies, directors, employees and collaborators are required to behave with integrity and honesty in their dealings with local institutions and the community. In order to guarantee the utmost clarity and transparency, OMC2 designates specific representatives for all dealings with the local institutions.

In its dealings with the local authorities, OMC2 undertakes to supply all the information required, in a complete, correct, suitable and prompt manner.

In its relations with the local community OMC2 takes all reasonable requests into due consideration.

The company also promotes and sponsors social and cultural events in general as they are considered opportunities to develop interactions between the company and the local community.

OMC2 does not make contributions to political parties or election candidates and refrains from applying any kind of pressure on representatives of the public authorities in order to obtain an advantage for the organisation.

The company does not permit nor tolerate behaviours aiming to defraud, corrupt or divert money or contributions received from the public authorities. Any action contrary to the rules or the principles of good faith and transparency by personnel working with or for OMC2 is to be considered forbidden, punishable, and however in direct contrast with the principles adopted by the company.



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**PRECISION COMPONENTS  
FOR DIESEL INJECTION  
SYSTEMS**

## **CODE OF ETHICS**

### **6. RULES OF CONDUCT GOVERNING RELATIONS WITH ALL THE OTHER STAKEHOLDERS**

#### **6.1 Handling of information**

OMC2 handles all information concerning its stakeholders in accordance with the principles of confidentiality and privacy.

#### **6.2 Gifts and other benefits**

OMC2 does not accept any kind of apparent or tangible gifts over and above the ones associated with normal business relations or acts of courtesy, or bestowed in view of obtaining favours in connection with the company's core business.

No one is allowed to offer or promise gifts or other benefits (e.g. the promise of a job or free attendance at conferences) to Italian or foreign public officials, and to independent or internal auditors, or their families, that are likely to influence their impartiality or in an attempt to obtain a favour.

OMC2 abstains from any conduct against the rules of law, commercial practices, or the codes of ethics, if known, of the companies and other public and private entities it has dealings with. Free gifts promoting the company's image are instead allowed.

Any gifts distributed must be duly documented and authorised by the head of the department involved, in order to allow the necessary checks.

#### **6.3 Communication with the stakeholders**

OMC2 acknowledges and guarantees all its stakeholders the right to information.

The disclosure of any information or details that are false, intentionally incomplete or in any way misleading is not permitted.

All forms of communication must comply with the applicable laws and appropriate professional standards.

The company reserves special attention to the safety of industrial secrets, its own and others' patents and trademarks, and any intellectual property disclosed to it.