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Management of OSAR S.r.l., whose activity has been operating since 1975, in hot forged products field, immediately recognizes respect for human rights as a central value in business decisions. The ethical policy below therefore constitutes the basis of its actions in the Company's operational and management strategies.

OSAR S.r.l., undertakes to work so that its activities create benefit to the stakeholders in full compliance with the requirements contained in laws and regulations about safety and workers' rights.


Furthermore, where possible, we are committed to ensuring that the development of our activities is sustainable and compatible with the needs of safety, workers' rights and the environment (see specifically the ENVIRONMENTAL POLICY - A02M01A - 26/09/2015).

Ethical values in which OSAR S.r.l. believes and recognizes:

- **Moral integrity:** OSAR is a company in which the legality, fairness, honesty, respect for men and women, fairness and impartiality of behavior inside and outside the company constitute a common way of acting.
- **Transparency:** OSAR undertakes to provide all its stakeholders (internal and external) in a clear, complete and timely manner, information relating to the actions carried out at all levels of the company with the aim of meeting the expectations of information and knowledge of the economic, social and environmental impacts of corporate activities.
- **Personal Commitment:** Working in OSAR involves a commitment to establish a trusting relationship with colleagues and managers. It is considered essential and of fundamental importance, to commit oneself loyally and effectively in order to achieve the corporate objectives, with the awareness of one's duties and responsibilities.
- **Consistent with the objectives:** OSAR believes it is of fundamental importance for everyone, to commit themselves to daily implement, in every action, the values and operating principles of the company and the objectives set. They are considered the basis for achieving the corporate objectives.
- **Refusal of corruption:** OSAR categorically fights and rejects any attempt at corruption by third parties in order to profit from contingent jobs or situations
- **Moral Commitment:** OSAR undertakes not to use and not favor child labor; not to carry out any type of discrimination by avoiding differentiated treatments based on race, social class, national origin, birth, religion, disability, sex, sexual orientation, family responsibilities, union membership, marital status, age or other condition that could lead to discrimination

OSAR, believing in the behavioral pillars previously described and in compliance with the rules and laws effective in the country in which it operates, therefore makes it mandatory for all its employees to respect, in turn, the laws and regulations imparted.



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Employee commitment

All employees must therefore:

- Abstain from conduct contrary to the ethical rules and / or procedures governing the activities in place in OSAR S.r.l.;
- Be timely in communications regarding possible violations of a rule of the Code, or regarding requests contrary to it (in case of reports it is possible to write to ivan.pelle@apito.it);
- Representing with one's own ethical behavior an example for one's colleagues;
- The Managers have the task of urging employees to comply with the safety, ethical and compliance rules of the current Code;
- Directors, employees and collaborators undertake to avoid situations that could represent a conflict of interest between them and the company.

Company commitment

The company will commit itself promptly and carefully to:


- To ensure the maximum diffusion of the Code of Ethics in the company and in third parties;
- To adopt adequate disciplinary measures once the infringements of ethical rules and internal procedures have been ascertained;
- To adopt the maximum transparency and correctness in its management and control activities, such as: Attention to the completeness and transparency of information; legitimacy from a legal and substantial point of view; clarity and truth of the accounting records according to current regulations and internal procedures;
- OSAR S.r.l. it also undertakes to carefully select its suppliers in order to verify that the moral and ethical code that the company intends to follow and promote and to follow its convictions with the aim of establishing a relationship of moral trust and mutual business.
- The company is committed to protecting the physical and moral integrity of employees and collaborators, ensuring safe and healthy work environments; working conditions respectful of individual dignity. OSAR S.r.l. will constantly strive to ensure that its suppliers have the same respect for their employees and collaborators, therefore implementing specific controls on the matter;
- OSAR S.r.l. firmly believes in the value of training as an indispensable and winning factor to increase its corporate value and will promote and encourage the growth of the skills of its collaborators and employees;
- The company undertakes to manage its activities with respect for the environment (for this purpose, ISO 14001 environmental certification has been carried out and its maintenance and management);

Mission

O.S.A.R. srl is a production company in the mechanical processing sector.

A good reputation is an essential intangible resource, because it favors investments, gives value to work, increases customer loyalty, attracts the best human and professional resources, guarantees the serenity of suppliers and supports reliability towards creditors.



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The key points of this item are:

- correct use of available resources, applying functional control mechanisms, reducing waste and malfunctions and enhancing the professional resources available;
- growth of managerial culture and attention to the market as a tool to pursue corporate objectives;
- staff involvement through the definition of common objectives;
- the continuous enhancement of the product offer by aligning with the continuous needs of the market.

Ethical principles in Internal Relations

Relations with employees and collaborators

OSAR srl, believing that the main success factor of each company is the contribution of people who work in it, recognizes centrality of human resources, which require professionalism, dedication, loyalty, honesty and a spirit of collaboration.

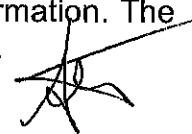
Rules of conduct for staff


Employees, collaborators and continuous consultants of O.S.A.R. srl must:

- commit to taking care of their skills and professionalism, enriching them with the experience and collaboration of colleagues, taking a constructive and proactive attitude, stimulating the professional growth of their collaborators;
- contributing, through constant professional commitment and correct personal behavior, to the achievement and maintenance of the objectives of O.S.A.R. srl.
- update independently on current legislation, with respect to its duties;
- protect and keep confidential the information acquired in carrying out the assigned activities;
- use the company tools in a functional and exclusive way to carry out work activities or for the purposes authorized by the internal functions proposed;

Confidentiality of Information

- Each information on company activities, according to their respective positions, is confidential and in the exclusive interest of the company.
- OSAR S.r.l. ensures the confidentiality of personal data in its possession. Administrators, employees and collaborators are required, if they become aware of it for business purposes, to use the data exclusively for purposes related to the exercise of their respective duties, observing all the security measures for the non-disclosure of such information. The company also undertakes to guarantee respect for the private sphere of people.



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Management and attention to the Customer

- OSAR is committed to ensuring fair treatment and provision of information to all existing and potential customers;
- Our behavior towards the customer wants to be based on availability, respect, courtesy and mutual participation and we are committed to their satisfaction; We firmly believe in the values of listening and dialogue as determining factors to ensure customers timeliness and quality in order to satisfy the customer's need;
- We are committed to providing clear and simple information, formulated in the most comprehensible language possible as we will be respectful of the privacy protection provisions;

Management and attention to Suppliers

- OSAR's conduct in procurement of goods, services and works is based on the search for quality and economy with particular attention to the recognition of equal opportunities for each supplier; We are committed to developing cooperation relationships with suppliers based on the mutual exchange of skills and information that foster the creation of value.
- OSAR pays particular attention to safety and health both internally and towards suppliers; therefore, we will constantly strive to supervise, in the forms and ways provided for by the contracts and laws in force in the country in which they operate, in order to preserve the health and safety of the workers of the companies involved in their supplies.
- The selection and qualification criteria of suppliers are based on fairness and fairness between them. The selection is based on the assessment of the quality and cost-effectiveness of the services, technical-professional suitability, respect for the environment and social responsibility, according to the rules dictated by specific regulations, procedures and certifications.
- The signed acceptance of this Code by the supplier represents one of the selection criteria and becomes an integral part of the contractual relationship
- Suppliers will be periodically subjected to a relative assessment including their behavior, their skills and their commitment to adapt and improve their performance;
- OSAR S.r.l. refuses any receipt of gifts that can be interpreted as an addition to normal commercial practices or in any case aimed at acquiring favorable treatments.

Implementation and Control

This Code of Ethics has been developed to ensure that the ethical values of O.S.A.R. srl are clearly defined and constitute a basic element of the corporate culture as well as standards of behavior of all those who generally have relations with the Company in the conduct of corporate activities and affairs.

The adoption is also aimed at encouraging the dissemination and sharing of the principles contained therein and at acting as a distinctive and identifying element of the company vis-à-vis the market and third parties who have relationships with it.

Robassomero, 12/07/2021

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General Management