

# Code of Ethics 2024



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The Code of Ethics is a set of values, principles and rules guiding the conduct of all stakeholders dealing with the Organisation.

2024 EDITION

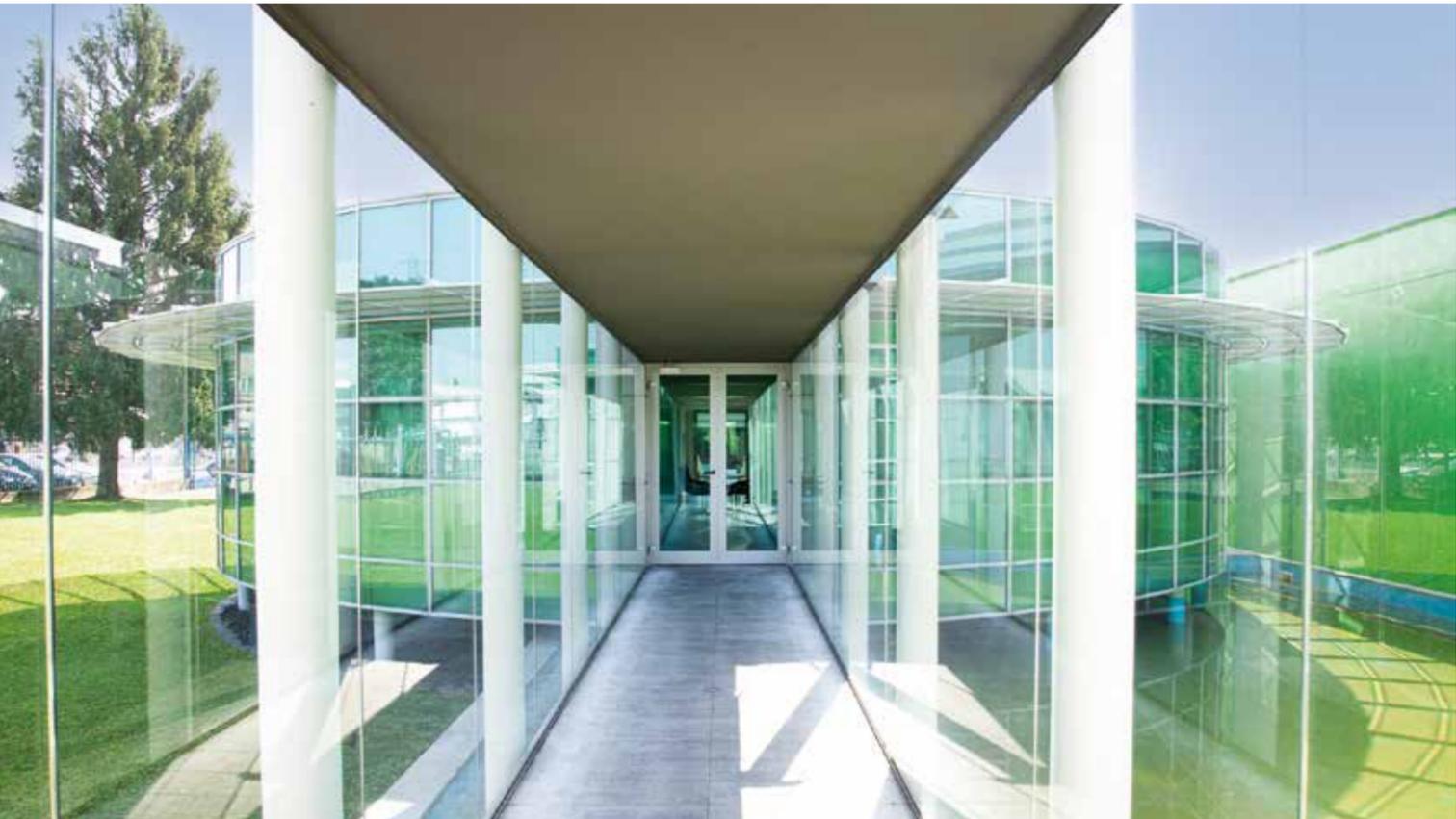
## About us. Our values

**CMO Group** is an Italian industrial group that has been **forging** and **mechanically processing** non-ferrous **metals** for over a century.

Today it is **one the top three European operators in the industry**, working in strategic markets such as energy, transport, aerospace and security, with a strong international vocation. Its growth is based on continuous **innovation**, engineering excellence and responsible business management. The Group collaborates with universities and research centres to develop new materials and sustainable solutions, contributing to the industry's future development.

At the heart of its corporate culture are ethics and **compliance**, which are not only regulatory obligations, but also fundamental **values** guiding all Group decisions. **Integrity**, **transparency** and **respect** are the **principles** regulating the Group's relations with its employees, **customers**, **suppliers**, partners and all **stakeholders**, in the belief that sustainable development goes hand in hand with proper and responsible conduct.

# Purpose, vision and mission



The **Code of Ethics** is grounded on the key concepts of **purpose, vision and mission**. These represent the ultimate reason for our daily operations (**purpose**), our guiding **values for our presence and actions on the market (mission)**, our way of seeing the company into the future (**vision**).





# Our commitment

## VISION

We strive to be a recognised leader in our industry, creating value through **innovation**, operational excellence and trusted relationships with our **customers**, **suppliers** and employees.

## MISSION

We work to provide innovative and sustainable solutions to our **customers**, contributing to their success and to the **well-being** of the **communities** in which we operate. We believe it essential to be a technical leader to which our **customers** can turn to have innovative solutions, thanks to our advanced technical skills and our constant commitment to tackling new challenges. Customer centricity, **quality** and product **safety** are at the heart of the company's philosophy. We support long-term business relationships.

## PURPOSE

We care about future generations and are engaged for them.



## Objective of the Code of Ethics

The **Code of Ethics** is a guide for anyone working within our **Organisation** (directors, managers, employees, consultants, partners, **suppliers**).

The document is intended to guide people's **behaviour** towards the **values**, principles and rules of **conduct** that are regarded by CMO Group as fundamental to daily actions, both in its internal and external relations.

It is primarily a useful tool to protect the value and **integrity** of **the organisation** over time.

Therefore, it is a set of positive principles and standards of conduct that our **Organisation** has voluntarily chosen to adopt and disclose as a concrete expression of its intentions towards all **stakeholders**.

## Scope of application

Anyone acting on behalf of CMO Group - employees, directors, consultants, agents and **collaborators** - must comply with the rules set out in the **Code of Ethics**.

Everyone is responsible for acting

in **accordance** with company policies and applicable laws. The Code is communicated to anyone dealing with the company and may be updated in case of changes within or outside **the organisation**.

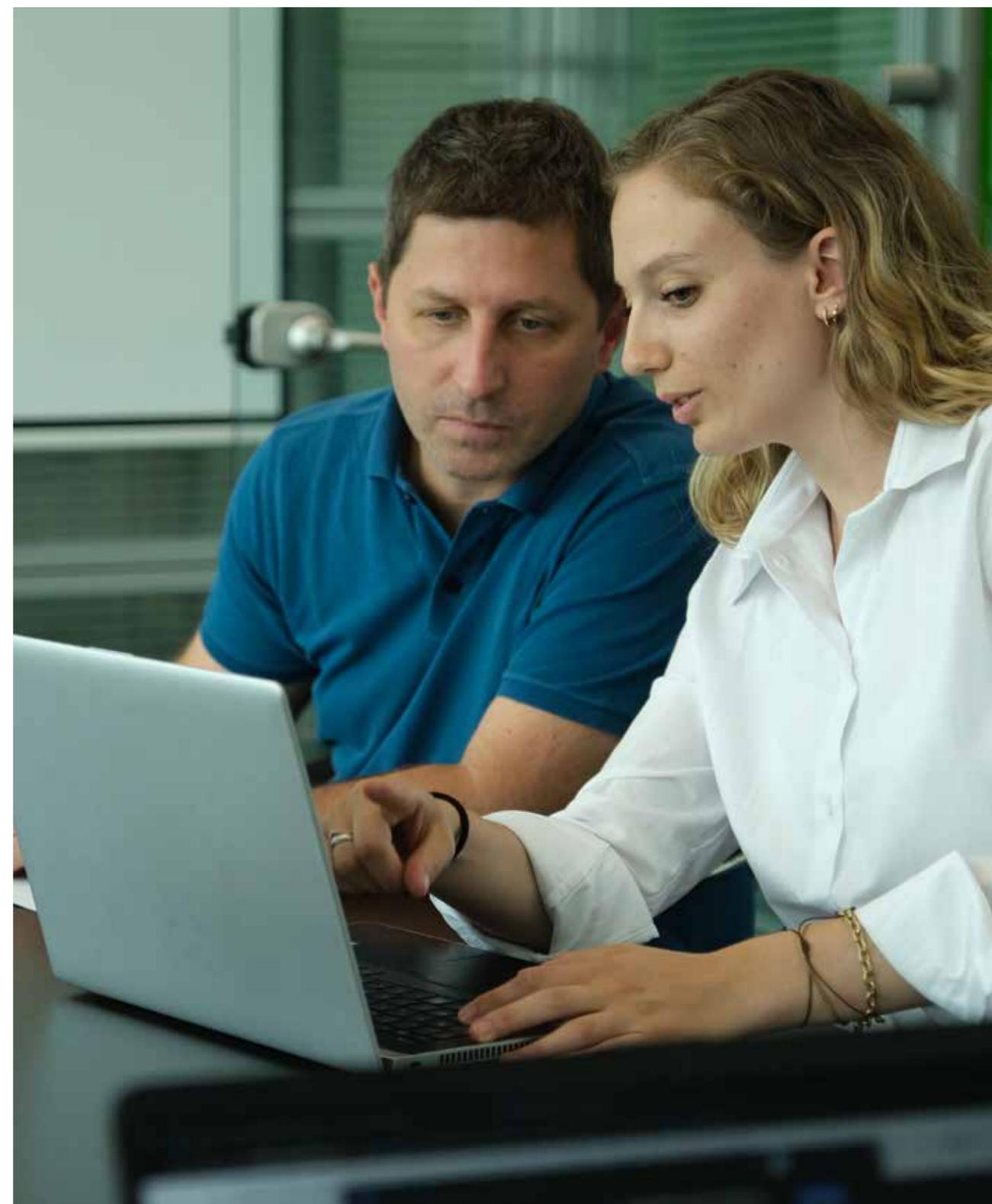


# Stakeholder relations



Our **Organisation** expects all stakeholders to **act** in an **ethical** and **responsible** manner, in accordance with the principles and rules of conduct set out in this document.

Systematic forms of **stakeholder** engagement are adopted, seeking dialogue on **sustainability** and corporate **responsibility** issues.



# Fundamental principles

## Lawfulness

We believe that compliance with the law is an essential condition. All our activities must be carried out in full **compliance with** the national laws in force in Italy and in the countries where we operate. We are committed to

maintaining high ethical and regulatory standards, ensuring **transparency accountability** and **integrity** in every aspect of our operations and in the relationship with our **suppliers, customers** and **stakeholders**.

## Respect for human rights

CMO protects the fundamental rights of its employees and their **well-being, gives value to** people by fostering their professional and personal growth, and seeks to create a collaborative, inclusive and safe working **environment**.

Our **Organisation** does not tolerate any discrimination based on age, gender, sexual orientation, health, race, political opinions or religious beliefs. Child labour is strictly forbidden.



# Integrity of human resources

Protecting the physical and moral **integrity** of our resources is of utmost importance to us. We are thus committed to providing our workers with **decent** working **conditions** and hazard-free safe and healthy environments, equipped with

adequate prevention and protection tools. Threats aimed at inducing a person to act against the law and this **Code**, or conducts that are detrimental to anyone's moral beliefs and preferences, are neither permitted nor tolerated .

# Transparency

We are committed to establishing an active dialogue with all our **stakeholders**, communicating clear, truthful and comprehensive information.

At the same time, we expect all our interlocutors to act transparently, whilst **complying with** any **confidentiality** obligations laid down by law.

# Environmental protection

Today, more than ever, we are aware of the importance of fighting climate change and of everyone's role in achieving this goal.

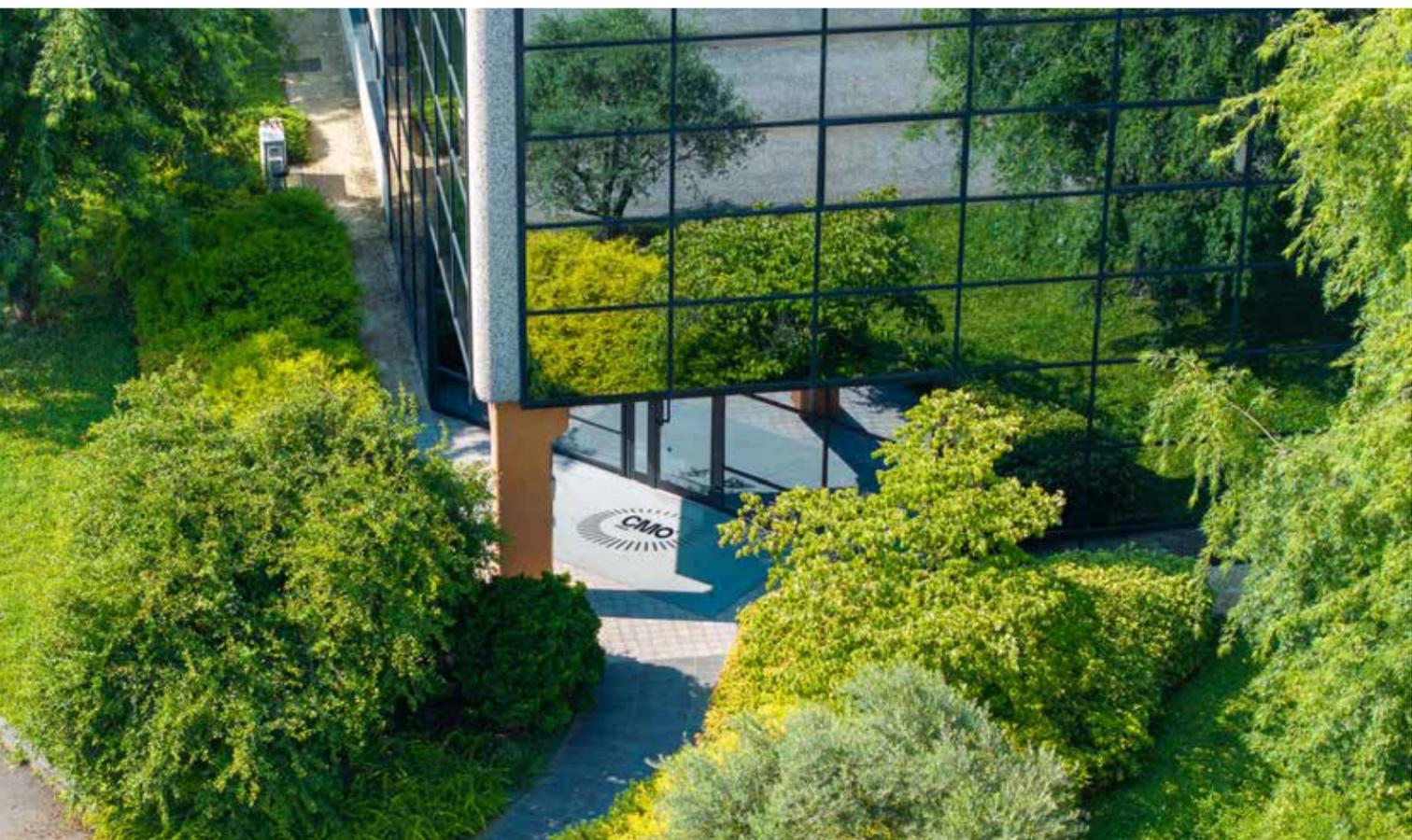
For this reason, we are concretely committed to **environmental** protection, starting with the activities that are the core of our business - such as **energy**

**efficiency** and environmental remediation - and taking all necessary measures to:

- **reduce** the CO<sub>2</sub> **emissions** generated by our activities;
- **compensate for unavoidable emissions**;
- **reduce** waste and ensure proper waste disposal and recycling.



# Responsibility towards the community



Financial growth is not an exclusive goal for CMO Group; rather, it is part of a broader **vision** centred around the economic and social development of the **communities** in which we operate.

With our activities, we are committed to creating employment opportunities and supporting social and cultural initiatives that **give value to the territory we work in.**

# Confidentiality

We are committed to ensuring that all **personal** and sensitive **information** held by us is processed in full **compliance** with applicable laws, taking all the **necessary measures** to protect

**the inviolability** of data concerning our **employees, collaborators** and third parties, and to use them **correctly according** to the type of **processing.**

# Innovation and quality

We invest in research, development and **innovation** to provide high-level solutions and remain competitive in the industry.

improvement, we provide our **customers** with reliable and safe solutions complying with both sectoral and international standards applying to production in the industries in which we operate.

We pay the utmost attention to **product** and process quality, ensuring that all our products and services meet the **highest** industry **standards.**

**We strengthen trust** and satisfaction in the **long term.**

As a result of **strict controls,** certified processes and constant

# Administrative and accounting management

All our documents must give an accurate and transparent representation of all facts, in full **compliance with applicable laws**. In particular, our annual financial statements and any other economic-financial document are prepared and managed in

**accordance** with applicable regulations and national and international accounting **standards**. The financial statements must clearly, truthfully and fairly mirror the company's assets and liabilities and financial position, as well as its profit (loss) for the year.



# Standards of conduct



# Information handling

Any **information** received from our **stakeholders** is processed in full **compliance with** applicable

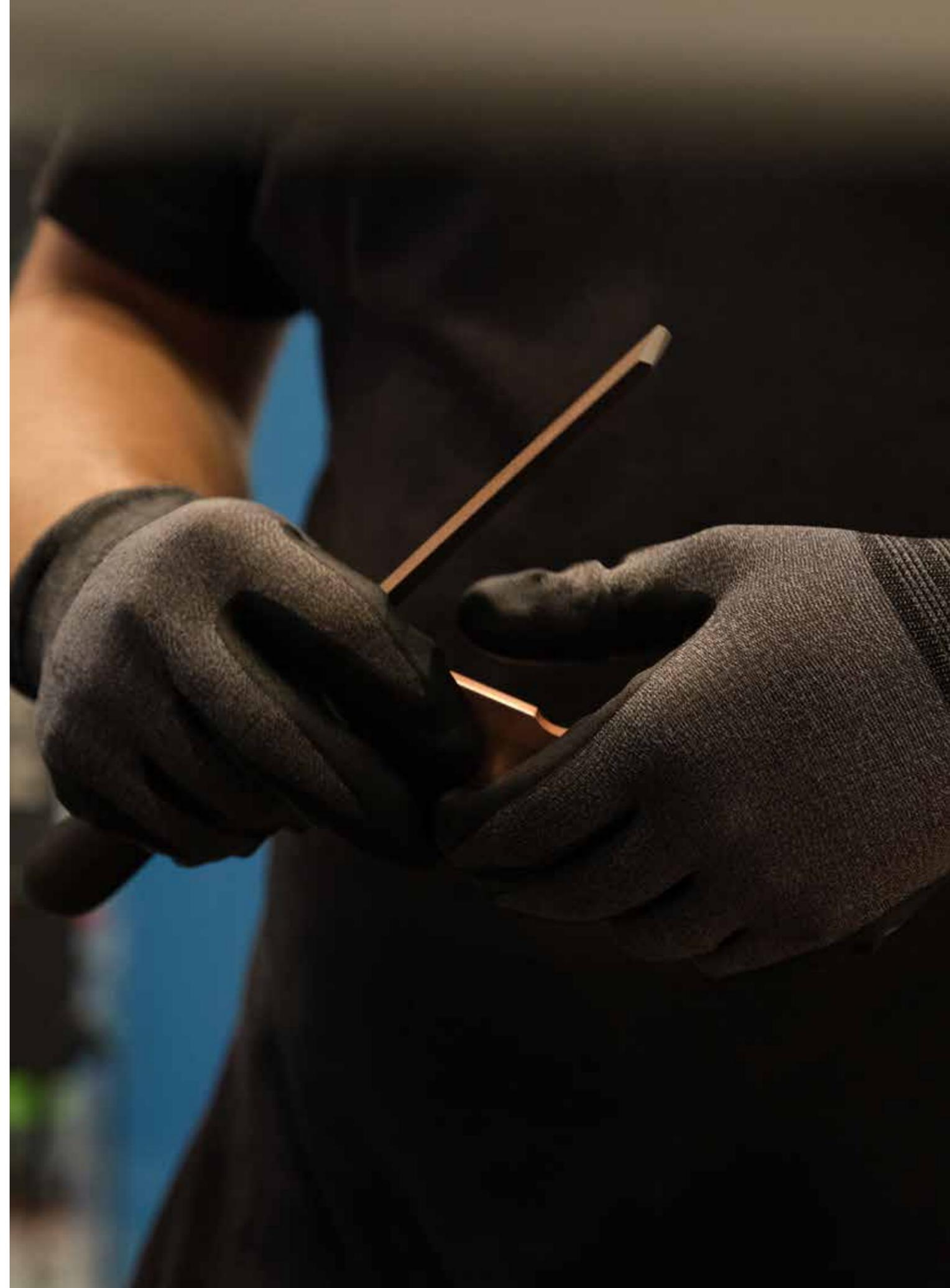
laws, taking care to protect the privacy and **confidentiality** of data subjects.

# Conflicts of interest

A conflict of interest arises when a member of **the Organisation** (at any hierarchical level) does not act in the interest of the Organisation in order to obtain an immediate or deferred advantage for himself/herself, his/her relatives or acquaintances. All employees, collaborators and

partners must avoid situations in which their personal interests may interfere with those of the company.

Any **conflicts of interest** must be promptly **reported** .



# Relations with collaborators



The company promotes a working **environment** based on **respect**, fairness and cooperation. All **collaborators** must act professionally, avoiding any discrimination and conduct that might injure another person's dignity. Equal opportunities for growth

and a climate of trust are ensured, encouraging **clear** and transparent **communications**. **Compliance with safety, privacy** and health protection laws is **fundamental**. Any reports of misconduct will be handled **confidentially** and without retaliation.

## PROTECTING OCCUPATIONAL HEALTH AND WELL-BEING

The greatest value of our **organisation** is its people. That is why we protect them with an **Occupational Health and Safety Management System** based on **compliance** with the relevant mandatory laws. We promote a culture of safety by ensuring continuous training and investment in technology. We are committed to:

- Preventing and eliminating risks at source;
- Assigning duties that are suited to each individual's physical and mental abilities;
- Integrating prevention,

- organisation, environment and social relations;
- Prioritising collective over individual protection;
- Providing clear instructions to increase risk awareness, for example on:
  - Properly using personal protective equipment (PPE)
  - Keeping one's workstation clean
  - Staying focused, avoiding distractions
  - Always following the applicable procedures
- Reporting and managing near misses.





## STAFF SELECTION AND MANAGEMENT

Our **organisation** chooses its internal and external **collaborators** in an objective and merit-based manner, **giving value to expertise and professionalism**, without any favouritism. We guarantee equal opportunities for all, **without any discrimination** based on gender, ethnicity, nationality, political opinions or religion. We foster the inclusion of the most **vulnerable** people, assigning duties that are suited to their abilities.

**We believe in women's empowerment** and are committed to increasing the number of women in our structure. **We give value to individual skills** and promote professional growth with **ongoing training** programmes. Lastly, we offer **training on ESG topics and the Sustainable Development Goals of the 2030 Agenda**, so as to spread a sustainability-based culture.

## PROTECTION OF INTEGRITY

Our **Organisation** is committed to: **Avoiding any kind of discrimination**, humiliation, isolation or psychological violence at work. **Punishing sexual harassment**, including any offensive conduct or content. **Protecting employee privacy**, clearly specifying the use of personal data and ensuring that such data are not disseminated without the data subject's consent (except as required by law).

Respecting the **right of workers** to join **trade unions** and promoting dialogue with the most representative organisations.



# Customer relations

Our **Organisation** attaches utmost importance to the **quality of customer relations**, regarding customers as fundamental partners for its growth and continuous improvement. For this reason, we are committed to building customer relations based on trust, **respect**, **transparency** and listening.

## KINDNESS AND AVAILABILITY

Every customer must feel welcomed, respected and listened to. Our **collaborators** are expected to act in a professional, polite and cooperative **way**.

## CLARITY AND TRANSPARENCY

We provide complete, correct and comprehensible information on our products and services so that every customer can make an **informed decision**.

## QUALITY AND RELIABILITY

We offer solutions that actually meet our customers' needs, ensuring high **quality** standards and **compliance** with current laws.

## ACTIVE LISTENING AND CONTINUOUS IMPROVEMENT

We collect reports, suggestions and complaints proactively in order to **improve customer** experience and our internal processes. Customer satisfaction is a key indicator for our group.

# Supplier relationships

All our **suppliers** must comply with the principles and standards of conduct set out in this **Code**.

When choosing our **suppliers**, we take into account their professionalism, experience and the **quality** of their goods and services as well as their **endorsement of** our principles. In our procurement policies, we choose our suppliers taking into account their commitment to **Corporate Social Responsibility issues** and in particular, their focus on **environmental protection**, respect for **Human Rights** and **territorial protection**.

In any case, regardless of the relevance of their business, all our suppliers must provide **suitable evidence of compliance** with all current laws applying to them, especially with regard to Labour Law, Contributions, Occupational Safety and the Environment.

For this reason, we are engaged in establishing specific supplier qualification procedures aimed at verifying the commitment of our suppliers to these issues.

# Actual commitment to the environment



# Environmental protection

We are committed to fighting climate change by: Improving the energy efficiency of our customers, reducing heat loss from installations.

Progressively reducing CO<sub>2</sub> **emissions**. Promoting **recycling** and **proper waste management**

to increase the circularity of our activities. For several years, we have been using an **ISO 14001-certified Environmental Management System**, which helps us comply with environmental laws and continuously improve our material and waste treatment and disposal processes.



# How we give value to our principles

Our **Organisation** requires the full effectiveness of its **Code of Ethics** and **expects compliance with** its contents to become established practice on the part of its employees and stakeholders. To this end, it is committed to:

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*Promptly disseminating the Code of Ethics to its internal and external stakeholders.*

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*Ensuring that the Code of Ethics is fully understood and providing the necessary clarifications to all its staff and collaborators.*

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*Periodically monitoring **compliance with** the Code, regularly reminding all **stakeholders** of their commitments resulting from **the adoption of this document**.*

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*Making the Code of Ethics **available** on its **website** and **accessible** to anyone interested in it.*

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***Integrating and/or revising the Code** and company procedures when there arise new cases that are not covered by its current version, in addition to clarifying aspects that are already covered **and adapting to new policies**.*

How the Code is implemented

# Listening and reporting channels

Anyone who becomes aware of a violation within the Organisation of the principles and/or **standards of conduct** set out in this **Code of Ethics** has a duty to report it promptly. We will examine the reliability of each **report** and the level of seriousness of the possible violation. Threats, retaliation or any form of discrimination **against whistleblowers** or those expressing concerns about ethical issues will not be tolerated.

Reports may be submitted via the following channels:

- Reserved email address *compliance@cmogroup.it*
- CMO S.p.A, web portal <https://wb.ostisistemi.it/reporting/6eb85c80-a4c6-11ee-a97d-a724931ce7fc/create>
- For Masperotech s.r.l. web portal <https://wb.ostisistemi.it/segnalazione/8dee3ca0-af02-11ee-a384-bf948265bb32/crea>

Reports will be handled with the **utmost confidentiality**. No retaliation will be tolerated against anyone making a report in good faith.

# Complaints and reports

# Responsibility and consequences



**Respect** for and compliance with the principles and rules of conduct set out in this Code of Ethics are part of our **contractual obligations**. Therefore, any violation of this Code by CMO Group employees and collaborators amounts to a **breach** of their employment obligations, with all ensuing legal consequences. Any violation of the Code of Ethics by all its other recipients will lead to enforcement of the **contractual remedies** provided for by law.

# Disciplinary system

# Approval and revision of the Code of Ethics

This Code is approved by the Executive Board and is periodically updated in case of developments in the regulatory, industrial and organisational environment.

## Alignment with standards

The Code of Ethics complies with the main standards on corporate responsibility:

- GRI Standard (Global Reporting Initiative);
- Ecovadis (sustainability assessment);
- EU regulations on whistleblowing and data protection;
- ISO 9001, ISO 14001 and related standards.

Approval,  
revision,  
and reference  
standards

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