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CODE OF ETHICS AND CONDUCT

(OCME Supplier Code)

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Introduction

OCME s.r.l. promotes at every level of its organization, as well as when conducting its business, awareness in business transactions, sustainability, the environment, labour standards, protection about safety and health of the workers establishing certain non-negotiable minimum standards (see points 2.1 – 2.5 here below) that we ask our suppliers, their employees, agents and subcontractors, to respect and to adhere to when conducting business.

Not only Ocme s.r.l. delivers high quality products but they do so in a way that reflects the Company's commitment to conduct our business activities in full compliance with applicable laws and to be guided by integrity and honesty.

Such principles are present in this Code of Ethics and Conduct (hereinafter referred as "the Code") about which Ocme s.r.l., as it happened until now, both calls for a spontaneous sharing, adhesion and spreading and requires its adoption by any party operating on behalf of or being in contact with Ocme.

The Code is a collection of principles and guidelines conceived to inspire OCME activities and to direct the behaviour not only of its employees but also of all those who come into contact with the Company in the course of business, with the aim of ensuring that Ocme s.r.l. is not only run efficiently and reliably but also ethically.

OCME s.r.l. requires its suppliers and business partners to follow principles of conduct that are aligned with its own principles, believing this aspect to be of fundamental importance for the creation or the continuation of a business relationship.

Our customers expect the similar conduct from all our third-parties partners, specifically from our suppliers. It is the Supplier's responsibility to educate its employees, agents and subcontractors accordingly.

By acceptance of the Code, the Supplier commits that all existing and future agreements and business relationships with OCME will be subject to the provisions contained herein.

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1. Application scope and addressees

The principles and provisions contained in the present Code are binding for the Administrators, for all people linked by business relationships with OCME s.r.l. and for whoever works for OCME s.r.l. in any capacity.

The principles and provisions contained in the present Code are specific examples of general obligations of diligence, correctness and fairness that qualify the fulfilment of both the business performance and the behaviour that employers or the collaborators must follow.

OCME s.r.l. undertakes the commitment to ask anyone who acts within its organization (OCME subsidiaries or owned, partners, clients, suppliers) to keep a conduct in line with general principles mentioned in the present Code, to this purpose promoting this message to all those who come into contact with the company.

OCME s.r.l. considers the observance of the regulations and provisions included in the Code as an integral and essential part of the contractual obligations arising from the employment relationship (cf. 2140 of the Civil Code) , for employees, and from specific contract regulations for partners.

The breach of these regulations will be considered a non-fulfilment of the obligations arising from the employment or partner/contractor relationship with all the relevant legal or contractual consequences.

2. General principles and criteria of conduct

OCME s.r.l. carries out its activity guided by the ethical principles outlined in this document, and ask the parts involved in these transactions to comply with them as well.

2.1 Business integrity

The Suppliers when hiring and employing staff, as well as in internal and external relationships, will avoid any discrimination based on age, race, nationality, sex, sexual orientation, political affiliation, union membership, religion, or health.

The Supplier, in performing its activity, is committed to avoid using child labour or of non-consenting personnel.

All activities carried out by the Supplier, internal and external the OCME premises, shall be based on maximum loyalty and fairness, acting responsibility and with good faith, establishing correct business and professional transactions as well as aiming to the optimisation and safeguard of the corporate assets.

All actions and transactions with interested parties and the shareholders shall be performed with the guaranty of transparency, lawfulness, accuracy, prompt and complete information according to the applicable regulations and the market best practice, within the limits for the know how and corporate assets safeguard.

OCME s.r.l. avoids and condemns any form of conflict of interests, as to say any situation that could jeopardize the independence or impartiality of judgement in the transactions with suppliers; the Supplier is required to respect the prohibition to offer or promise favours or gifts exceeding the common commercial courtesy aimed at obtaining undue benefit with regards to the business activities performance.

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2.2 Health and safety protection

OCME s.r.l. undertakes to promote and spread the culture of safety, developing the awareness of risks and promoting responsible behaviour among all personnel; moreover, it shall apply its best efforts to protect, primarily with preventive actions, the health and safety of its workers and of people concerned.

The Supplier shall guarantee its employees a working environment that is safe and healthy, with premises built and maintained according to the regulations and norms in force.

The Supplier, when performing its activity, shall observe all preventive actions and protections according to the regulations in force about health and safety, in order to avoid any possible hazard for employees and subcontractors.

Each Supplier shall comply with instructions and rules given from the subjects that OCME has appointed to fulfil obligations for the matter of safety regulation.

The Supplier undertakes to promote an internal control system in order to guarantee over time health and safety of its employees, collaborators and subcontractors.

2.3 Environment protection

The Supplier shall operate with care for the environment and ensure compliance with all applicable laws and regulations in the country where products or services are manufactured or delivered.

2.4 Sustainability

Ocme s.r.l. supports and encourages operating practices and production systems that are sustainable: is an integral part of OCME's supply strategy and supplier development.

OCME s.r.l. expects its Suppliers to continuously strive towards improving the efficiency and sustainability of their operations.

2.5 Audit and termination of the supply agreement

Ocme s.r.l. reserves the right to verify the Supplier's compliance with the Code. In case Nestlé becomes aware of any actions or conditions not in compliance with the Code, Ocme s.r.l. reserves the right to demand corrective measures. Ocme s.r.l. reserves the right to terminate an agreement with any supplier who does not comply with the Code while maintaining any rights for damages and the possibility of legal action in the event of a the breach which constitutes a criminal offence.