



Ethical Code of OMEN Die Casting

OMEN (and its subsidiaries) strives to maintain an adequate business culture among its employees and position holders in performing their tasks and duties at OMEN (in this code, OMEN's employees, managers and position holders will be called "The Employees" or "OMEN's employees"). Consequently, OMEN's Management decided to write and establish a set of proper behavior rules. This set of rules is OMEN's ethical code. It consolidates standards designed to lead to the establishment and maintenance of a moral organizational culture, intended to maintain the interpersonal relations among OMEN's employees and establish relations of trust, reliability and integrity between OMEN and its shareholders, customers and the general public. Please note, that the rules of the ethical code do not replace the State law, yet these rules are an integral part of OMEN's disciplinary rules, applied to all its employees. The rules of the ethical code are an integral part of the employment terms of all OMEN employees.

1. **Strict Fulfillment of the Directives of Any Law** : OMEN's employees are obliged to fulfill the directives of all the laws applied to them and/or OMEN and avoid any illegal action. Every employee must acknowledge that any illegal action he/she performs in relation to OMEN may sometimes oblige OMEN or any other employees to assume responsibility for such an action.
2. **Preventing a Conflict of Interest**: Every employee of OMEN who is authorized to decide on an action or transaction of OMEN, which will result in benefiting him/her or his/her relatives or other friends directly or indirectly, will refrain from making a decision on such an action or a transaction and will delegate the decision on the subject to his/her superior, while disclosing the said expected benefit. OMEN's employees will avoid any private, personal commercial relations with business parties, except public service providers with whom they will interact within the framework of their tasks.
3. **Prohibition to Take Advantage of OMEN's Business Opportunities and Prohibited Competition**: OMEN's employees will refrain from performing any action that competes with OMEN's business and will refrain from exploiting a business opportunity of OMEN for the purpose of gaining a personal benefit. Employees, who maintain business relations on behalf of OMEN with different service providers related to OMEN, will strictly act to place the interest of OMEN first, over considerations of their own personal interests.
4. **Prohibited Gifts Receipt and Giving**: OMEN employees will not receive benefits and/or gifts from business parties engaged by OMEN, except acceptable symbolic items with negligible financial value (Cost up to 40\$), classified as public relations and/or sales promotion items. Insofar as OMEN will decide on granting gifts within its sales promotion actions (usually related to events/ holidays, etc.), such gifts will be distributed only by employees authorized to this purpose, who will strictly observe detailed implementation of OMEN's procedures applied to such actions. Please note that the sales promotion subject is a delicate and sensitive subject, where any deviation is viewed adversely by OMEN.
5. **Discrimination and Harassment**: OMEN is strongly committed to providing equal opportunity in all aspects of employment and absolutely forbids any type of discrimination or harassment. Examples to such behavior include, but are not limited to despising comments or any approach based on racial, ethnic or gender prejudice.



6. **Abuse of Status**: OMEN's employees who supervise other employees will not abuse their position in their relations with their subordinates on any personal issue which is not related to work and will refrain from receiving any benefit from their subordinates. OMEN's employees will not use their status in OMEN to promote their personal interests or interests of other parties.
7. **Confidentiality** : OMEN's employees are committed to maintain the confidentiality of its business and commercial affairs, while employing precautions to prevent exposure thereof to others within or outside OMEN. It is clarified, that the business confidentiality includes, inter alia, information about customers and other parties with which OMEN interacts; OMEN's documents, business and strategic plans. OMEN's employees will also strictly refrain from providing information about OMEN to the media, the social networks, or to web logs, without advance approval of their superior.
8. **Protection of OMEN's Assets** : OMEN's employees are obliged to protect its assets and use the assets correctly only for the purpose of OMEN's business actions. Use of such assets for personal needs is permitted only and insofar as it is explicitly permitted (e.g., use of vehicles). In any case, employees are obliged to use these assets correctly.
9. **The Person Responsible for Implementing the Ethical Code**

OMEN's CEO determined that the Human Resources Manager will be responsible for the activation and implementation of the ethical code at OMEN (The Person Responsible for the Ethical Code). The Person Responsible for the Ethical Code is at the service of OMEN's employees for guidance, training, direction and advise on all subjects related to proper behavior according to the rules of the ethical code. OMEN's employees can also consult with their superiors, or any other relevant professional party at OMEN, in the event of a doubt on the correct mode of performing their duties at OMEN.

10. **Reporting Violation of the Directives** : OMEN's employees will report to the Person Responsible for the Ethical Code, on any action taken by any of the employees, which in their opinion is in breach of the directives of the law or the ethical code. OMEN will handle such reports in maximum confidentiality, while protecting the reporting person from any harm or injury. It is clarified, that in the event that the reporting person deliberately provides a false report (aiming to harm another employee), he/she will be subject to sever disciplinary sanctions enacted by OMEN. OMEN's position is that any failure to report a said misconduct is a violation of this code. OMEN's policy does not permit reciprocal actions on reported improper behavior of others and OMEN is committed to protect individuals against retaliations. OMEN expects employees to cooperate on internal investigations related to improper behavior and will employ the penal actions available in relation to code violations.
11. **Complaints Submission**: Complaints on the subject of violating the law or the ethical code may be submitted, in any form, to the direct manager of the reporting person, or to the Person Responsible for the Ethical Code, through the following channels:
The Person Responsible for the Ethical Code (Human Resources Manager): Anat Yaniv, Tel.: 052-6851616, or through a fax: No. 08-8579552, or through the e-mail: ayaniv@omendiecasting.com. Out of understanding the need for anonymity in certain situations, OMEN will receive anonymous reports. To ensure the anonymity of all the complaints, especially complaints related to accounting reporting procedures, internal accounting audits and other audited subjects.



**I hereby declare that I read the Ethical Code of OMEN Die Casting,
understood it and I undertake to act according to it:**

Name: _____

Employee No.: _____

Signature: _____