

Messrs

OMB Valves s.p.a con socio unico

Via Europa, 7 – Cenate Sotto

24069 (Bergamo) Italy

The undersigned.....

in his/her capacity

as.....(acting in the name and on behalf of a Company)

of (hereinafter referred to as the "Company")

hereby declares that:

A) he/she has received a copy of the OMB Valves "Code of Ethics" and of the "Vendors code of conduct" as extension of the Code both approved by OMB Valves and adopted by all the subsidiaries of OMB Valves. He/She acknowledges that OMB Valves' employees and officers are obliged to comply with the principles stated in the "Code", in particular in all dealings, present and/or future, between Contractors/Suppliers and OMB Valves with regard to tenders and contracts for the supply of goods and services;

B) he/she has reviewed, also in the name of the Senior Management of the Company he/she represents, the contents of the "Code";

C) he/she undertakes, also in the name of Company's directors, employees and/or agents, to comply fully with the principles stated in the "Code" and to respect Human Rights in accordance with OMB Valves Sustainability Policy (available on the website www.ombvalves.com), in all dealings, present and/or future, between Company and OMB Valves with regard to tenders and contracts for the supply of goods and services;

D) he/she has received copy of the Organization, Management and Control Model (the "Model 231 includes the Code of Ethics") adopted by OMB Valves in accordance with Italian Legislative Decree no. 231 dated 8 June 2001 (also available at the following address: www.ombvalves.com).

He/She also acknowledges that OMB Valves' group companies have adopted their own Organizational, Management and Control models;

E) the Company has given and implemented instructions to its directors, employees and/or agents aimed at preventing the commission or the attempt of any offence under the "1997 OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions" (the OECD Convention"), the United Nations Convention Against Corruption and any applicable anti-corruption laws (for instance, the Italian Legislative Decree N. 231 of 8 June 2001, the U.S. Foreign Corrupt Practices Act or any other anti-bribery laws, as the case may be). Furthermore, the Company undertakes OMB Valves to continue effectively implementing such instructions for the entire duration of this business relationship;

F) all the employees of the Company are regularly mentioned on the "Pay Roll" or all equivalent documents as requested by the corresponding national applicable law and all the obligations with regards to contributions and insurance have been fulfilled by the Company;

G) the Company is familiar with and understands the provisions of the anti-bribery and anti-corruption laws of the countries in which it performs the order. The Company declares that it has not engaged and will not engage in any conduct that violates the provisions of the anti-bribery and anti corruption laws of these countries, and shall abide by such legislation while performing any business. Neither the vendor neither any person acting for or on behalf of the Company shall offer, promise, arrange for or pay, either directly or indirectly, anything of value to "any government official" or any other person for the purpose of obtaining any improper advantage.

H) to have received the OMB Valves informative for the treatment of personal data in accordance with Italian Legislative Decree No. 196 dated 30 June 2003 (that implements in Italy the European Union Directive 95/46/EC);

I) If so requested by OMB Valves, the Company shall promptly provide information concerning its control structure (including the identity of its shareholders and their relevant stakes). In the event of Trust(s) and/or fiduciary registration, however established, the Company shall also provide the identity of the relevant grantor(s), and its/their respective stake(s).



FORM OF COMPLIANCE QUESTION & DECLARATION

Vendor Name: _____

Vendor Address: _____

The Vendor is requested to reply to the following Questions by checking each box for either "CONFIRM" or "NOT CONFIRM":

- | | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|----------------|
| <p>Q1. The Vendor confirms that the Vendor will comply with OMB Code of Ethics</p> | <p><input type="checkbox"/> CONFIRMED
<input type="checkbox"/> NOT CONFIRMED</p> | <p>---></p> |
| <p>Q2. The Vendor confirms that, to the best of its knowledge, NO Public Official^(Note1) privately holds an ownership interest of any kind in the Vendor.</p> | <p><input type="checkbox"/> CONFIRMED
<input type="checkbox"/> NOT CONFIRMED</p> | <p>---></p> |
| <p>Q3. The Vendor confirms that the Vendor is NOT held or controlled by or for the benefit of a Public Official on a private basis.</p> | <p><input type="checkbox"/> CONFIRMED
<input type="checkbox"/> NOT CONFIRMED</p> | <p>---></p> |
| <p>Q4. The Vendor confirms that NONE of the Vendor's employees, officers or directors is a Public Official.</p> | <p><input type="checkbox"/> CONFIRMED
<input type="checkbox"/> NOT CONFIRMED</p> | <p>---></p> |
| <p>(Q5 is applicable only in case "Not Confirm" in Q4)</p> | | |
| <p>-> Q5. The Vendor confirms that: ^(Note2)</p> <p>The Vendor is currently owned or controlled in whole or in part by a governmental body (such as government, government agency, government controlled organization, international organization, or other organization performing governmental functions),</p> <p>and;</p> <p>The Public Official(s) who are employees, officers or directors of the Vendor, belong to, or are seconded from, the governmental body specified above.</p> | <p><input type="checkbox"/> CONFIRMED
<input type="checkbox"/> NOT CONFIRMED</p> | <p>---></p> |

Order is subject to further Investigation or Due-Diligence by OMB Compliance Manager.



The Vendor hereby declares, warrants and represents to OMB valves s.p.a. that all the replies to the above questions are true.

Date: _____ (DD/MMM/YYYY)

Signature: _____

Name: _____

⁽³⁾ Title: _____

Company Name: _____

NOTE:

⁽¹⁾ Public Official is defined as: (a) a person who engages in public services for a foreign, state, or local government; (b) a person who engages in services for an entity established under a special law to carry out specific affairs in the public interest; (c) a person who engages in the affairs of an enterprise of which the number of voting shares or the amount of capital subscription directly owned by one or more of the foreign, state, or local governments exceeds 50 percent of that enterprise's total issued voting shares or total amount of subscribed capital, or of which the number of officers (which means directors, auditors, secretaries, and liquidators and other persons engaged in the management of the business) appointed or designated by one or more of the foreign, state, or local governments exceeds half of that enterprise's total number of officers, and to which special rights and interests are granted by the foreign, state, or local governments for performance of its business, or a person specified by a Cabinet Order as an equivalent person; (d) a person who engages in public services for an international organization (which means an international organization constituted by governments or intergovernmental international organizations); or (e) a person who engages in the affairs under the authority of a foreign, state, or local government or an international organization, and which have been delegated by such organization.

⁽²⁾ This Question No. 5 is intended to evaluate if the presence of such Public Official(s) in the Vendor does NOT increase the risk to breach OMB Code of Conduct.

⁽³⁾ The signer should be President or other authorized representative of the Vendor.

