



1. Introduction

- This Code of Ethics ("Code") sets forth the ethical principles and rules of conduct that Compagnia Lattiero-Casearia S.r.l. ("CLC" or "Company") requires its directors, employees, and all other persons acting in any capacity on behalf of CLC ("Recipients") to adhere to. The Code applies to Recipients in the performance of their duties both within and outside the company, in dealings with economic counterparties, public administrations, entities, and third parties with an interest in the correct conduct of CLC's business operations. The Code is disseminated within the Company and published on the CLC website.

2. Compliance with Laws and Regulations

- Recipients shall conduct their activities in full compliance with the applicable laws and regulations governing the company's business and their respective roles, both in Italy and abroad. These include, but are not limited to, European Union regulations, directives, and decisions, national laws and legislative acts, government and territorial public authority measures, regulations issued by independent authorities, public administration acts, and judicial and arbitral decisions.
- All actions undertaken by Recipients on behalf of CLC must comply with these laws and regulations and give correct execution to the obligations they impose upon the Company. Given the nature of CLC's business, special attention is paid to laws concerning food safety, workplace hygiene and safety, and environmental protection.
- This does not preclude CLC's right to challenge or oppose specific measures within the limits permitted by law.
- CLC ensures that Recipients are adequately informed of the applicable laws and regulations relevant to their roles, provided such knowledge is not inherently required by the nature of their duties.

3. Integrity

- Recipients must not exploit their positions within the Company for personal gain or to benefit others. They shall avoid situations where their private interests, either personal or on behalf of others, conflict with the interests of CLC. Should such conflicts arise, Recipients must refrain from acting and promptly inform Management, which will assess the situation and determine whether to authorize or prohibit the activity in question.
- Recipients must not accept or solicit, even as a promise, from customers, suppliers, or other business partners any monetary gifts, goods, or other benefits, including but not limited to valuable items, clothing, travel, vacations, or job opportunities. Recipients must immediately report any offers of such benefits received to Management. This provision does not apply to gifts of modest value in line with customary business practices.
- Under no circumstances does the pursuit of the Company's interests justify a conduct that contradicts principles of fairness and transparency.

4. Protection of Company Information

- Recipients shall not use corporate information acquired in the discharge of their duties for personal gain or any purpose unrelated to their responsibilities. For the purposes of this Code, "corporate information" includes, but is not limited to, Company's information regarding production processes, product formulations, customer and supplier details, sales prices, procurement costs, business plans, investments, financial situation, financing relationships, outstanding receivables, legal disputes, and extraordinary transactions.
- Recipients must maintain strict confidentiality concerning such information, regardless of whether the Company explicitly designates it as "secret," "confidential," or with similar terms. They shall not disclose such information to third parties unless required by law or to enforce the Recipients' rights towards the Company in legal proceedings, and only to the extent strictly necessary.

5. Employment Relations

- The recruitment and management of personnel are guided by the Company's foremost interest in a rational and efficient labor organization. Candidate evaluations and human resources management decisions are based on impartiality and merit, without discrimination or bias based on age, gender, race, religion, nationality, political opinions, union membership, or sexual orientation.



- CLC provides employees with clear information regarding their roles, duties, and responsibilities. Employees shall not be required to perform tasks for the personal benefit of superiors and others, or beyond their contractual obligations, except where legally permissible.
 - CLC promotes the professional development of employees through engagement in the management of the Company's activities, according to their respective skills and roles, training programs, and a suitable work environment.
 - Relations between employees and between employees and other Recipients must be based on loyalty, mutual respect, and civil coexistence. The Company actively monitors workplace relations to prevent, address, and punish any instances of mobbing, straining, or other abusive behaviors using all legal means available.
 - CLC does not employ underage workers and service providers. It repudiates child labor, labor in violation of applicable legal protections, and all forms of labor exploitation. It ensures the enforcement of this principle throughout its supply chain.
6. **Workplace Environment and Safety**
- CLC is committed to maintaining a dignified and suitable work environment. The Company adopts all necessary measures to ensure the safety and health of employees and others present in its offices and facilities, in compliance with workplace hygiene and safety regulations. Recipients must strictly adhere to safety and prevention measures and promptly report to Management any deficiencies, malfunctions, or failures in protective equipment or accident prevention systems.
7. **Relations with Customers and Suppliers**
- The Company's relationships with customers and suppliers are based on professionalism, transparency, and good faith. Recipients, within their respective roles, must fully comply with the Company's agreements with such counterparties and give execution to the Company's obligations toward them.
 - Supplier selection aims to achieve the best possible result for the Company by balancing cost-effectiveness and quality. It is conducted impartially, avoiding discrimination or favoritism. Recipients must not solicit suppliers, directly or indirectly, to give the Company undue advantages in exchange for gifts, money, or other benefits. This provision does not apply to gifts of modest value in line with customary business practices.
8. **Relations with Public Authorities**
- The Company's dealings with public authorities are based on fairness and transparency. Recipients must cooperate fully with public officials exercising Public Authorities' institutional functions. Relations with Public Authorities are handled by authorized Recipients only.
 - Recipients shall not, directly or indirectly, solicit public officials to provide undue advantages to the Company in exchange for the gift or promise of money, goods or other benefits. This provision does not apply to gifts of modest value in line with customary business practices.
9. **Violations of the Code**
- The principles and rules set forth in this Code are binding on all Recipients. Any violations must be promptly reported to Management by Recipients.
 - Violations of the Code will be punished in proportion to their severity: for employees, as disciplinary breaches, and, for other Recipients, through measures appropriate to their relationships with the Company.

Ludriano, November 11, 2024

The Management
