

# CODE OF CONDUCT



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Summary	3
Commitments to generate common benefit	4
Destinators	6
Founding values	7
Rules of conduct for the company's internal recipients	12
Rules of conduct for suppliers and other external recipients of the company	46
Reporting of violations	47

# INDEX





# Summary

As of March 2, 2022, Cereal Docks Food S.r.l., established in 2013 and part of the Cereal Docks Group, changed its name, brand and logo to Nateeo S.r.l. (hereinafter, also, the "Company").

Nateeo S.r.l. has always focused its efforts on the product, aiming to create products with high added value, especially ingredients, food additives and functional blends to meet the specific needs of the related markets: food, baby food, pharma, animal nutrition and non-food, achieving excellence in the area of vegetable emulsifiers (lecithin, functional blends, protein flours and oils).

Nateeo S.r.l. is committed to be an ideal place to work: for this reason, enhancing the ability of each person, recognizing talent, rewarding merit and encouraging creativity are a constant focus on the market and ecosystems.

We offer quality, healthy, safe and wholesome products, paying the utmost attention to environmental, economic and social sustainability, goals that have always guided us.



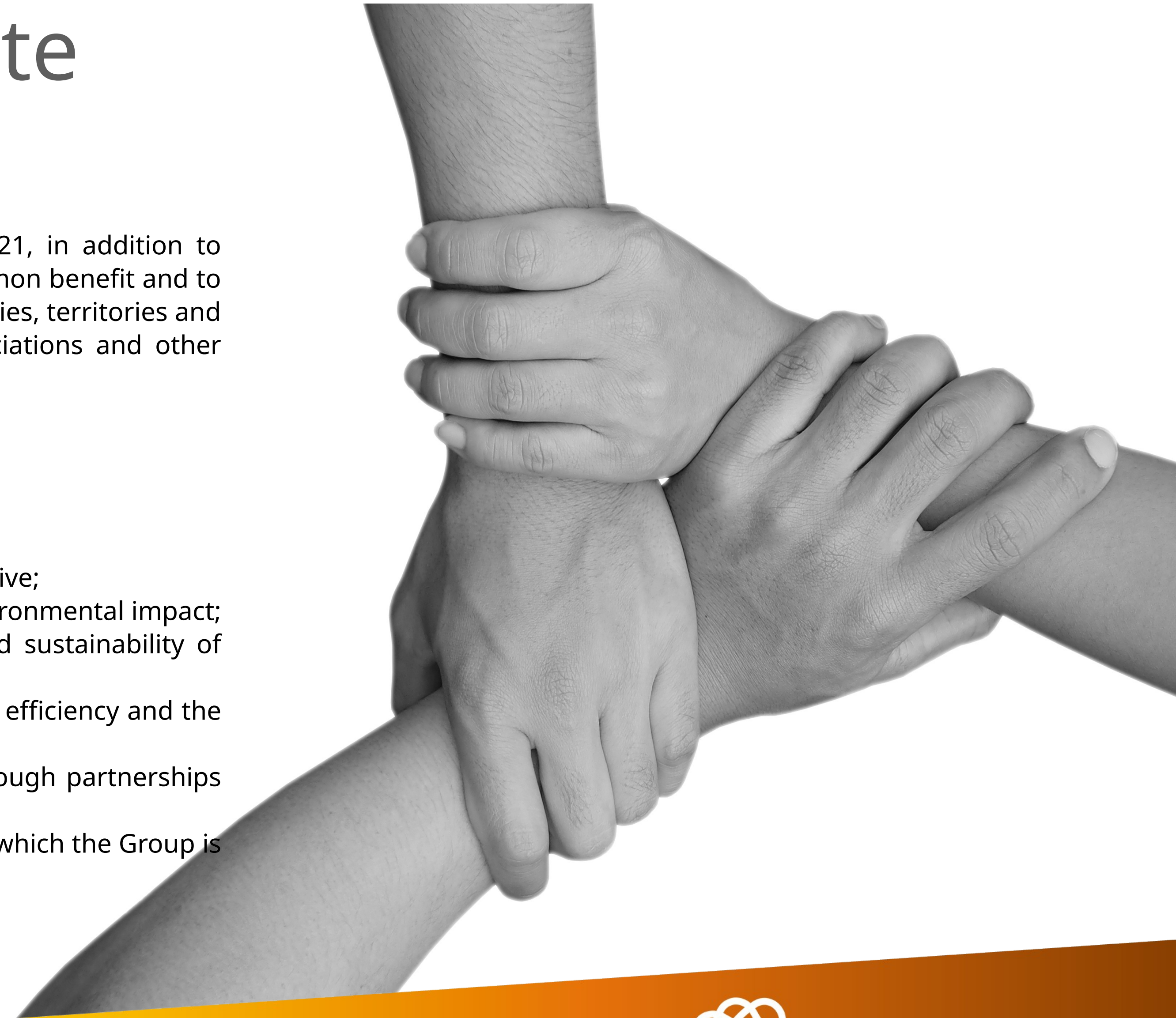


# Commitments to generate common benefit

As the parent company Cereal Docks S.p.A., a Benefit Society (SB) since 2021, in addition to generating profit we are committed to pursuing one or more purposes of common benefit and to operating responsibly, sustainably and transparently towards people, communities, territories and the environment, cultural and social assets and activities, entities and associations and other stakeholders.

**In particular, the Company shares the following objectives:**

1. The enhancement of internal and external human capital;
2. The improvement of environmental performance;
3. The study of new systems and technologies from a circular economy perspective;
4. The study, creation and application of new logistics models with reduced environmental impact;
5. The application of new technologies to increase the safety, efficiency and sustainability of industrial processes;
6. The study and application of technologies and systems for improving energy efficiency and the use of renewable energy;
7. The promotion of young talent and the search for innovative products through partnerships with an open innovation approach;
8. The development of strong and inclusive relationships with the territories in which the Group is present and with local communities.







**Nateeo S.r.l. actively supports the Banco Alimentare**, a non-profit association founded in 1989 and present in Italy with the Foundation of the same name and 21 territorial Organizations. The Banco Alimentare association works to reduce food waste by promoting the collection of food to be redistributed to people in need through 8,000 charitable facilities located throughout our country. The collected products, which are still edible, often cannot be marketed by companies and large retailers for market reasons: they are therefore redistributed free of charge to affiliated facilities thanks to the work of valuable volunteers.



# DESTINATORS

Nateeo S.r.l.'s Code of Ethics involves both the human resources within the company and the external stakeholders with whom we deal.

The Recipients of this Code of Conduct (hereinafter also referred to as the "Recipients") are:

- the members of the Board of Directors;
- the members of the corporate control bodies;
- the employees, both on temporary and permanent contracts;
- external collaborators (e.g. project consultants) who carry out activities in the name and on behalf of the Company;
- suppliers of goods and services;
- anyone who has business relations with Nateeo S.r.l.



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# Founding Values

"Everyone is only as good as the things to which he gives importance."  
Marcus Aurelius



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All our decisions and actions are inspired by our values:



PEOPLE



CUSTOMER SATISFACTION



QUALITY



PASSION



INNOVATION



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We pursue these values based on a sustainable model founded on certified supply chains, innovative technologies and products, and essential, waste-free production to protect, nourish, and respect the environment and all living things, and for a zero-emission future. These principles guide our behavior with the stakeholders with whom we collaborate and engage, with the people who work with us, and with the market.

This Code of Conduct is meant to summarize, also in the light of Legislative Decree no. 231 of 2001 and following, the rules of Conduct that the Company places at the core of the management of its business. This Code of Conduct (hereinafter also referred to as the "Code") was adopted by Nateeo S.r.l. by resolution of the Board of Directors, which may amend and supplement it also in consideration of the suggestions and indications coming from the control body. The Code of Ethics is binding on the conduct of the Recipients, indicated below, who work with the Company. Nateeo S.r.l. undertakes to disseminate it as widely as possible in corporate communication channels, in particular by delivering a copy to all Recipients, receiving a confirmation of delivery and a commitment to compliance.

Nateeo S.r.l. also agrees that the principles of this Code will be made public to companies, partners, suppliers and customers the Company meets for the achievement of its goals.

Nateeo S.r.l. carefully monitors the compliance with the Code, providing adequate information, prevention and control tools and intervening, if necessary, with corrective actions.



**In pursuing its industrial goals, Nateeo S.r.l. considers the following principles to be the foundation of its organisation and the reference standards of its operations:**

- legality, through compliance with the laws and regulations of the countries in which the company operates, as well as with this Code of Conduct and company procedures;
- respect for People's individual rights;
- integrity, transparency and loyalty in relations with collaborators and all third parties;
- safety and health care of all people working in the workplace;
- protection, enhancement and involvement of the company's human resources;
- fight against the exploitation of minors and women;
- flexibility and mutual availability between the parties;
- protection of privacy and information;





- respect and protection of the environment including through attention to sustainable development and commitment to energy efficiency, the use of renewable energy sources, and the circular economy;
- product safety and quality with particular reference to the protection of human and animal health, the final link in the food chain;
- transformation of raw materials into innovative, safe and sustainable ingredients for healthy and balanced nutrition;
- responsibility towards the community;
- efficiency and commitment to improvement with particular reference to the above-mentioned cases, to the company's performance, quality of the product and service offered and the satisfaction of other interested parties;
- protection of corporate assets;
- promotion and dissemination of the values and contents of the Code of Conduct.

**The values expressed above must be pursued regardless of any corporate or personal interest that may be in conflict with them.**



# Rules of conduct for the company's internal recipients

In compliance with the principles that represent the founding values of the Company and in consideration of the required sharing of the same, Nateeo S.r.l. asks all Recipients to comply with the rules of conduct set out below regardless of the specific conditions, restrictions and market circumstances.



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# Relations with members

The Company shall provide all shareholders with accurate, truthful and timely information, through its Directors and avoiding preferential or illegal conduct.



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# Relations with customers, suppliers and partners

## **With regard to customers, Recipients are required to:**

- carry out an assessment of the customer prior to the conclusion of the transaction, also with regard to the customer's ability to honour contractual commitments. To this end, the Recipients shall acquire the widest possible information relating to the potential partner, using tools such as, for example, information from the media, information from operators in the sector, direct visits, commercial information, analysis of the financial statements and investigations of the credit insurance company. These activities are carried out analytically in the event of initial contact with a new potential partner and, in any case, on a continuous basis for the commercial partners already acquired. For the purposes of the stipulation and consequent execution of commercial contracts, the Recipients strictly comply with the company procedures relating to "Customer Assignment";



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- provide an efficient service and the best assistance in all phases of the relationship, respecting the commitments undertaken and the principles of legality, providing accurate, complete and truthful information (including in relation to the geographical indication, designation of origin of food products and the genuineness of the product offered), and not discriminating in any way, nor taking advantage of any unforeseen conditions of ignorance or weakness;
- not to counterfeit or alter trademarks, distinctive signs of industrial products, patents, industrial designs and models and to use counterfeit or altered trademarks, distinctive signs, patents, designs and models.

**Recipients are asked to select suppliers and external collaborators on the basis of the principles expressed in this Code of Conduct** and to operate with transparent information, guaranteeing mutual independence, respecting the commitments undertaken and legality.







## In relations with customers and suppliers, the Recipients:

- must not accept gifts and gratuities that are not of modest value; any gifts of greater value, as they can be understood as means to influence the independence and loyalty of the recipient, must be reported to their hierarchical superior or to the Supervisory Board in order to decide on the possible return of the same, informing the sender of the Company's policy on the matter;
- inform the company management of any gifts and presents of modest value that they have received by virtue of their company function, also on the occasion of holidays and recurrences, in order to allow the company management, the possible destination of the same to the community of company employees or for social purposes;
- agree with their hierarchical superior any gifts to be distributed to commercial partners (with the absolute exclusion of any gift or benefit to subjects of the Public Administration).



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# ACCOUNTING AND CORPORATE NOTICE

The Company defines adequate information flows from the individual operational company functions to the Directors in order to ensure that this information is up to date, correct, complete and truthful.



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The Recipients are required to cooperate so that the management facts are correctly documented and promptly represented in the accounts and that the documentation is easily traceable, ordered according to logical criteria and made available by the company functions in charge of this, in a correct and complete form to all those entitled, including for control activities at any time in the process of decision-making, authorization, execution, registration and verification of the transaction and its existence, legitimacy, consistency and appropriateness.

**In particular, the Recipients, each to the extent of its competence:**

- for each accounting record, they shall prepare, request and keep, in accordance with the rules of correct administration, the documentation appropriate to the type of operation;
- carry out in the company's information system only surveys that are correct in accordance with current legislation and the accounting principles applied by the Company; in the event of uncertainty, they shall immediately contact their hierarchical superior;
- provide diligently and accurately, to the extent of their competence, the correct information necessary for the reporting of both internal and external relevance;







- participate in the updating and professional training activities promoted by the Company or offer their activation for specific topics;
- promptly report errors or omissions in documents and in the company information system of which they become aware;
- provide maximum collaboration to the internal control bodies, keeping their hierarchical superior constantly informed of the requests received and of the information provided, especially if of an extraordinary nature;
- refrain from spreading false information concerning the Company, both inside and outside the Company.

The use of company funds for illegal or improper purposes is strictly prohibited. No one and for no reason shall be given payments not based on adequately authorised company transactions or illegal forms of remuneration.



# Fiscal regularity

The Company counteracts conduct suitable for making illicit profits of a fiscal or customs nature. It implements procedures to ensure documentation for tax purposes of company operations by defining different levels of authorization and control over the existence and legitimacy of such operations.

**Recipients, to the extent of their competence and in accordance with company procedures:**



**document company operations recorded in company systems and relevant for tax purposes**



**carry out the invoicing cycles according to the different phases defined**



**carry out tax compliance in scrupulous compliance with tax regulations**



**verify the regularity of tax and contribution payments, monitoring the use of tax credits**



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# Dealing with receiving money laundering and self-money laundering

The Recipients must avoid conduct, such as the acceptance or possession of goods or receipts deriving from illegal activities, which may lead to the presumption of the commission of the crime of receiving stolen goods or money laundering or must avoid all behaviour aimed at impeding the illegal origin of said goods or receipts.

Recipients must therefore refrain from engaging in commercial relations with persons for whom it is known or even suspected of being involved in illegal activities, regardless of the economic convenience of the transaction.

Goods and services provided to the Company shall be paid only through means of transfer approved by internal procedures. Payments should not be made to entities or persons in countries other than the country in which they conduct their economic activities or reside there.

It is required to do business only with customers who provide all necessary information to verify that their economic activities are legitimate and that the source of the funds used are lawful. The Company shall undertake to comply with all national and international rules and regulations concerning the fight against money laundering.





# Relation with Public Administration

The contacts and management of relations of any kind with the P.A. both in Italy and abroad are reserved exclusively to the company functions appointed and/or authorised for this purpose, in strict compliance with the following rules of conduct:

- reports are properly documented;
- it is forbidden to promise or pay sums, promise or grant in-kind contribution or other benefits either directly or indirectly, also through consultants or third parties, to public officials with the aim of favouring the interests of the Company also as a result of illegal pressures;
- it is forbidden to give or promise any form of gift, gratuity or benefit, including employment or commercial opportunities, to public officials, or to their relatives or other subjects connected to them;
- no attempt shall be made to obtain confidential information from public officials;



# Relation with Public Administration

- the alteration of computer or telematics systems or data, programmes contained in a computer or telematics system, the use of altered or falsified declarations or documents or the omission of information or, in general, the performance of tricks and deceptions aimed at obtaining concessions, authorisations, financing, contributions from the European Union, the State or other public bodies are prohibited;

- contributions, subsidies or financing obtained from the European Union, the State or another Public Body, even if of modest value, must be used for the purposes for which they were requested or granted, where requested;

- it is forbidden to set up extra accounting reserves for the bribery of public officials (e.g. black money);

- it is prohibited to be represented in dealings with the Public Administration by consultants who may present conflicts of interest;

- for each accounting entry, i.e. for each corporate transaction, documentation must be kept and filed according to appropriate criteria;

- it is prohibited to expose untrue facts to Public Authorities regarding the Company's economic, equity or financial situation.



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# RELATION WITH OTHER CATEGORIES

## It is not allowed:

- any involvement in initiatives or contacts with competitors (for example but not limited to: agreements on prices or quantities, division of markets, production restrictions, cartel agreements, etc.) that may appear to violate competition and market protection regulations;
- misappropriation of industrial property rights of others;
- acts of competition with violence or threat.



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## Relation with organised criminal associations or anyone committing crimes for terrorist purposes

It is forbidden to allow or favour the commission of crimes for terrorist purposes with one's own activity and to promote, set up or organise criminal associations, including mafia-type or transnational ones.

## Relation with the judicial authorities

The incitement not to make statements or to make untrue statements by any person called upon to provide evidence which may be used in legal proceedings before a judicial authority shall be prohibited.

In case of participation in investigations and judicial proceedings, it is forbidden to give or promise money or other benefits to magistrates, judges or others in order to condition the outcome of the proceedings in a favourable way for the Company.



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# ADMINISTRATION OF HUMAN RESOURCES

Attention to people is of fundamental importance to Nateeo S.r.l., which aims to create a stimulating and positive work environment in which to grow and develop one's skills. The Company protects the freedom, inviolability, dignity of the person and fairness in interpersonal relationships.



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The recruitment phase must be based on the principles of **equal opportunities** and without any discrimination, making an objective assessment of the personal and professional characteristics of the candidate in relation to the job to be filled and therefore excluding any favouritism, facilitation or recommendation.

No discrimination or harassment based on political or trade union opinions, religion, race, language, nationality, sex, sexual orientation, state of health, marital status or in general any intimate characteristic of the human person is permitted. The hiring of employees and their subsequent management must be carried out in compliance with the **law and collective agreement**. Compliance with local laws on the minimum age for hiring personnel is guaranteed.

The candidate is provided with comprehensive and fair information about the job position for which he or she is selected and about the organization. The evaluation of the candidate involves Human Resources, managers and those who will come into contact with the evaluated person and is done through **transparent and fair systems**.

Concerning the development of human resources, the necessary conditions must be preserved and favoured so that the skills, competences and professional knowledge of each employee can be expanded, also through the use of training initiatives for the more effective pursuit of company targets. For these purposes, the promotion and incentive policy for employees must be based on the **recognition of personal and team merits**.







The Company protects people in **situations of fragility**, people with **disabilities** and/or belonging to protected categories; it verifies, in relation to each of them, the existence of suitable conditions of access and permanence in the Company's work environment (also regarding alternative solutions to any architectural barriers, workstations, equipment).

The Company recognizes diversity as a richness, an asset to be preserved and encouraged; it fosters an **inclusive corporate culture** and a climate respectful of all diversity including, but not limited to, race, ethnicity, gender, sexual orientation, identity, religion, political opinion, health status, disability, and national origin, through actions consistent with the principles of the Cereal Docks Group's *Diversity & Inclusion Policy*.

The involvement of workers is promoted, stimulating their **participation** and the **exchange of ideas** for safe and value-generating growth.





The Company ensures respect for the individual personality by combating child labour and refraining from any form of exploitation of child and female labour, forced and coercive labour, within its area of influence and along the entire production chain. The principles set out in the **Universal Declaration of Human Rights** are complied with and child and female slavery and all practices that exploit children and women are strongly condemned, exposing them to harmful or dangerous conditions.

Likewise, the Company supports the fight against illegal immigration by refraining from the employment of personnel without regular and suitable work permits, and against the exploitation of workers employed (including taking advantage of their state of need) under irregular working conditions.

Behaviour by Recipients that takes the form of (i) any form of harassment and exploitation, (ii) behaviour or speech that may offend individual sensibilities, (iii) abuse of one's hierarchical position to the detriment of the individual dignity of collaborators is not tolerated.

We ensure the exercise of the right to trade union bargaining and freedom of association. Our conduct within the company is based on **mutual loyalty and trust between colleagues**, on **transparency** towards the Company and towards all those external parties with whom we deal daily.



# Xenophobia and racism

The principle of **repudiation** of **racism** and **xenophobia** is to be considered as the rejection of all acts of propaganda, incitement and encouragement to commit war crimes, crimes against humanity, crimes of genocide and in denial of the Shoah.

To this end, the Company is committed to manage the activities relating to advertising and marketing, including relations with the mass media and so-called institutional relations, in order to avoid in any way and by any means the dissemination of news, information, messages, such as to incite, encourage and also propagate the commission of the crimes referred to above.

In this regard, the Company shall take all necessary precautions for the screening of advertising messages, commercial communications, and marketing campaigns, in order to verify their admissibility, pursuant to the provisions of this Code of Conduct and national, European and international regulations, aimed at preventing the commission of the crimes listed above.

The Company adopts the most suitable behaviours in order to avoid the propaganda, instigation and incitement of the above-mentioned crimes also within the company environment, with its own employees and/or collaborators.



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# WORK ENVIRONMENT HEALTH AND SAFETY

"Health is not everything, but without health, everything is nothing"

Arthur Schopenhauer



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## Nateeo undertakes to consolidate and spread the culture of safety and provides for the protection of the health and safety of each worker:

- by carrying out the assessment of risks to health and safety in the workplace, implementing initiatives to eliminate risks or, where elimination is not possible, their reduction to minimum levels already at the source, at the design stage of plants and processes, or even subsequently, in relation to the knowledge made available by technological progress; evaluating the risks that cannot be eliminated by identifying organizational solutions and appropriate collective and individual protection devices accordingly;
- by designing workplaces, production methods and the choice of equipment, respecting the principles of healthfulness and ergonomics, also in order to reduce the negative effects of monotonous and repetitive work;
- taking a census of hazardous substances present in the company, evaluating possible substitutions with less hazardous products;
- by subjecting workers, depending on the task performed, to the health surveillance program;



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- by providing workers with adequate training on the risks related to the task performed, the environments and equipment used, with training interventions at all levels of the organization;
- by informing workers about hazardous situations that may arise;
- by training workers on the safe use of machinery, plant, equipment or protective devices that are found to be dangerous;
- equipping workers with appropriate personal protective equipment, again in relation to the task performed and the equipment used and training them in its proper use.



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## Recipients, in turn, must take care of their own health and safety and that of other persons present in the workplace:

- complying with legal requirements and company rules;
- by actively participating in training activities;
- cooperating in the prevention of hazardous situations by promptly reporting any hazardous conditions of which they become aware;
- by using protective equipment appropriately;
- not removing or modifying safety, warning and control devices;
- submitting to health surveillance actions.

In the workplace, before and during work performance, it is prohibited to possess, consume and offer alcohol, substances of similar effect and drugs.

Moderate consumption of low-alcohol beverages is permitted only at institutional moments or festive occasions (company dinners or Christmas toasts) and in any case in compliance with local regulations.

Smoking is prohibited in the workplace except in designated areas.



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# WORK LIFE BALANCE

Subject to the fundamental requirements of efficient work organization, forms of flexibility aimed at family care are favoured.



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# ORGANIZATIONAL MODEL

In carrying out their activities, Recipients are required to operate in accordance with the hierarchical-organizational structures defined by the company's organizational model, so that the activity can be carried out harmoniously and the maintenance of a precise framework of responsibilities is guaranteed, which allows for the proper and orderly activation of the chain of internal controls.



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# Conflict of interests

Recipients must avoid, through abstention, situations in which conflicts of interest may arise. Recipients shall promptly report to their hierarchical superior or to the Supervisory Board any situation that could potentially give rise to a conflict of interest for themselves.

Recipients are also prohibited from using their company function or the information they learn during their business relationship with the Company to obtain personal benefits, including economic ones, not provided for in the contract with the Company.

It is also forbidden to disseminate false information in the market as well as to carry out simulated operations capable of causing a significant alteration in the price of financial instruments.



# Use of time, company assets and IT tools

The Recipients carry out their business activities with **diligence**, **competence** and **loyalty**. During working hours, Recipients shall refrain from carrying out personal activities or in any case activities that are not part of their professional relationship with the Company.

Recipients are responsible for the **protection of the resources** entrusted to them and are required to use them only within the scope of their corporate role (remaining excluded any use for private personal interests) and through responsible behaviour.

Recipients must avoid improper use of **company assets** and have a duty to promptly inform Nateeo S.r.l. if there are any damaging events or threats.

It is mandatory to use the information technology made available, within the limits of legality, in compliance with the procedures and the "Regulations for the use of the information system" and limited to the needs related to the performance of their work. Any use of company computer technology to access or facilitate unauthorised access to others' computer systems, the interception or facilitation of the interception of computer or telematics communications of others, the damage to information, data and computer programs or computer systems of others is prohibited.



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# Confidentiality and protection of information (data and documents)

For the purposes of the **correct management of confidential information**, it is mandatory not to disclose it to any person inside or outside the Company, not even through answers to interviews and surveys conducted by research companies, media and similar, unless it is required by law or necessary to pursue the business purposes and in any case with prior specific authorization of their hierarchical manager.

In the case of improper disclosure of information, Nateeo S.r.l. may suffer harm: therefore, information must be protected and handled with care, and employees must refrain from disclosing outside Nateeo Srl any kind of company information that is not in the public domain. This must be done both during and after termination of employment.



The Recipient is responsible for keeping sensitive information **confidential** by not leaving documents containing confidential information in plain sight on his or her desk, in common areas or in his or her work area. In addition, he/she must not leave received computer devices or media unattended. In the performance of company activities, the personal data of collaborators and third parties must be particularly protected, in compliance with the reference regulations and internal procedures.

Nateeo S.r.l. collects a significant amount of information and personal data from employees, customers, suppliers, collaborators and is committed to:

- take the **utmost care** in the collection and storage of **personal data**, making sure that the data subject has given consent and thus authorized the Company, where required by law;
- not disseminate or communicate personal data to unauthorized third parties;
- treat personal data in compliance with all applicable laws on **confidentiality**;

The Company pursues protection from malicious attempts of intrusion from the outside to its IT infrastructure and information systems, and in any case to electronically managed data and information, through continuous technological upgrades, definition of management and control policies, and training initiatives for users of the systems.

Recipients must also protect company data and documents from damage or loss with the utmost diligence and in compliance with company regulations.



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# ENVIRONMENTAL PROTECTION

“I see everywhere in nature, for example in trees, a capacity for expression and, so to speak, a soul”.

Vincent Van Gogh



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**The Company pursues policies to mitigate the impact of its activities on the environment, however conducted in compliance with current regulations.**

To this end:

- evaluates and implements in advance suitable measures to prevent or cancel or limit the possible negative impacts of the economic activity on the environment, also making use of the solutions provided by technological evolution;
- performs constant monitoring of emissions;
- defines management procedures and protocols;
- collaborates with the competent authorities for the implementation of the prescriptions, during inspections and controls, for the comparison of any new measures;
- carries out training activities of Recipients involved in issues of environmental concern.

Recipients are prohibited from illegally introducing dangerous substances or energy into the environment in such a way as to compromise the quality of the soil, subsoil, water, air, wildlife and flora. Compliance with the regulations and requirements of the competent authorities for the proper handling of waste must be ensured.

Our plants are operated using raw materials, water resources, energy and materials in a sustainable manner with the aim of reducing emissions, managing waste correctly and eliminating waste.



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## The company is committed to:

- manage waste responsibly and reduce, reuse or recycle it as much as possible by promoting the circular economy;
- minimise the environmental impact of packaging;
- give preference to the use of recycled materials by reducing materials from non-renewable sources; recycling and/or reuse of packaging should be encouraged;
- reduce energy consumption by using renewable sources and fuels and favouring logistical activities with low fuel consumption;
- limit the use of chemical substances; in particular, substances considered harmful to people and/or the environment should not be used;
- adopting precise procedures for their management along the entire supply chain;
- preserve soil quality;
- recognise that working in a safe, sustainable and clean environment is indispensable and a right of its employees.



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### All employees are required:

- to properly separate waste for proper disposal;
- to use energy resources correctly, avoiding waste (e.g.: print documents only when strictly necessary, do not use plastic bottles, switch off lights and electrical equipment when they are not needed, or you are not at work).



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# Product safety and quality

All those who operate in the supply chain, from the acquisition of raw materials to the shipment of the finished product, must collaborate in order to produce and place on the market products that meet the highest **standards of quality and food safety** for animals and humans, also through a system of **traceability** of the supply chain and in full compliance with the legislation applicable in the country of destination, the applicable regulations, contractual or business more restrictive.

Our quality system guarantees the traceability of raw materials to safeguard nutritional and organoleptic characteristics.

We carefully and meticulously **select** suppliers for both raw materials and packaging in order to maintain the highest quality of our ingredients.


All incoming raw materials are subjected to conformity analysis before they enter the production cycle.



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# Compliance and responsibility. Disciplinary system and sanction mechanisms

Recipients must comply at all times with the rules prescribed by this Code of Ethics in the performance of their business activities for the company.

Failure to comply with one or more of the rules contained in this Code may lead to disciplinary proceedings with the possible application of the disciplinary sanctions indicated in the document 'General Section' of the Organisational Model.

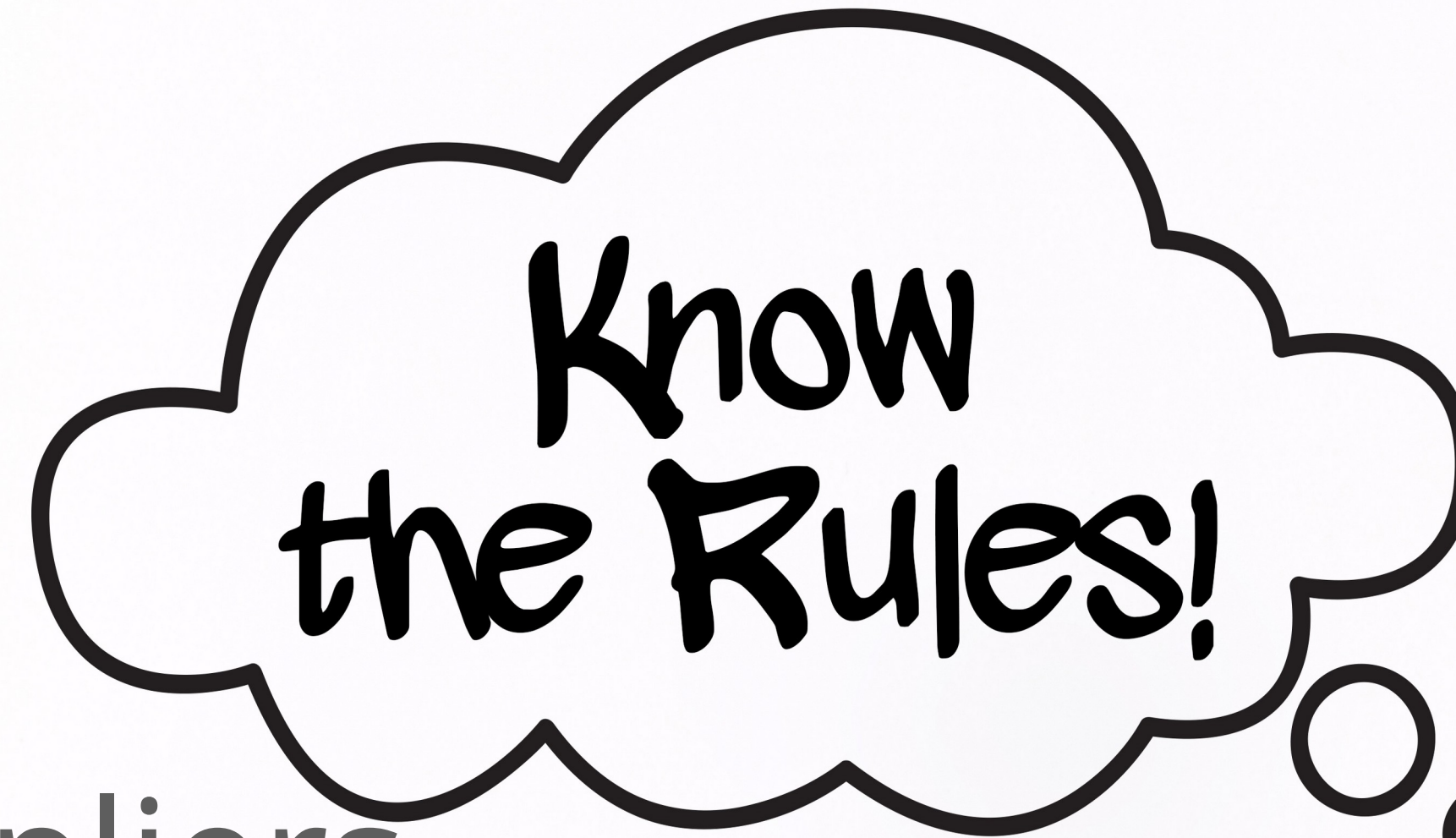
Anyone who holds a managerial or departmental position must set an **example** to his or her collaborators by carrying out activities in accordance with the principles and rules of conduct contained in the Code of Ethics.



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# Rules of conduct for suppliers

Companies, partners and suppliers the Company comes into contact with to achieve its goals are required, in the performance of their activities, to be familiar with the contents of this [Code of Conduct and Supplier Code of Conduct](#) and to strictly comply with its principles.

In addition, these Recipients are required to comply with the obligation to work at the Company's facilities in full compliance with Article 26 and, where applicable, Title IV of Legislative Decree 81/08 and ss.mm.ii,.

Failure to comply with one or more of the rules contained in this [Code and in the Supplier Code of Conduct](#) may lead to the application of the sanctions and other contractual remedies provided for self-employed workers, suppliers or other parties having contractual relations with the Company in the document 'General Section' of the Organisational Model.



# Communications

For information concerning the rules of conduct laid down in this Code of Ethics, the unlawful conduct relevant pursuant to Legislative Decree 231/01 and the Organisational Model, each Recipient must contact his or her hierarchical superior; if the Recipient has difficulty or discomfort in contacting his or her hierarchical superior, he or she may contact a Managing Director or the Supervisory Board.

Communication with the Supervisory Board may take place by ordinary postal service, at the addresses periodically communicated to the Recipients, or by e-mail at the following address:

[nateoodv@gmail.com](mailto:nateoodv@gmail.com)





# Reporting of violations

The Company is active in the prevention and verification of conduct contrary to the principles of this Code of Ethics and the Organisational Model. To this end, it has set up an internal reporting channel and adopted a **Procedure for the management of reports** (so-called 'whistleblowing') in compliance with the relevant legislation in force.

Anyone who becomes aware, in the context of his or her work with the Company, of unlawful conduct relevant pursuant to Legislative Decree 231/01 or of violations of the Organisational Model may also make a report on the online platform indicated in the Procedure for the management of reports (so-called 'whistleblowing').

Please refer to the Whistleblowing Procedure for all aspects of the functioning and application of internal reporting channels.

The **Reporting Manager** undertakes to keep the information sources of the reports confidential.



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**Recipients** who report possible violations shall not be subject to any retaliation resulting from the report. For this reason, the disciplinary system explicitly sanctions the conduct of any person who engages in retaliatory and/or discriminatory acts against such whistleblowers.

**Reports** must be circumstantiated and based on precise and concordant factual elements. The conduct of all those for whom liability is established, even by a judgment of first instance, for offences of defamation or slander (or in any case for the same offences committed in connection with whistleblowing) or civil liability in cases of wilful misconduct or gross negligence shall be sanctioned. In such cases, moreover, the reporting person will not benefit from the protection measures.

The **penalties** for disciplinary offences are set out in the Disciplinary System and are imposed in the manner specified therein.

## **DECORRENCE**

**This revised Code of Ethics shall enter into application on 17 December 2023.**





**'Ethics is, in the broadest sense of the term,  
a sense of responsibility extended to everything that has life'.**

**Albert Schweitzer**

**Thank you**



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