



# CODE OF ETHICS

01.01.2021

### DOCUMENT STATUS: LIST OF REVISIONS

REVISION / DATE	DESCRIPTION	EDITING	VERIFICATION	AUTHORISATION
00/01.01.2021	First issue	Legal and Organisation Service	Chief Executive Officer	Chief Executive Officer
01/01.03.2022	Revision	Legal and Organisation Service	Chief Executive Officer and General Manager	Board of Directors

## CONTENTS

<b>1. ....</b>	<b>CODE OF ETHICS</b>	<b>5</b>
<b>2. ....</b>	<b>DISSEMINATION OF THE CODE</b>	<b>5</b>
<b>3. ....</b>	<b>OBLIGATIONS OF RECIPIENTS</b>	<b>5</b>
<b>4. ....</b>	<b>GENERAL PRINCIPLES OF CONDUCT</b>	<b>6</b>
<b>4.1 ....</b>	<b>Lawfulness</b>	<b>6</b>
<b>4.2 ....</b>	<b>Integrity and fairness</b>	<b>7</b>
<b>4.3 ....</b>	<b>Conflict of interests</b>	<b>7</b>
<b>4.4 ....</b>	<b>Promoting the value of human resources</b>	<b>7</b>
<b>4.5 ....</b>	<b>Mutual respect, combating discrimination and bullying.</b>	<b>8</b>
<b>4.6 ....</b>	<b>Occupational health and safety</b>	<b>8</b>
<b>4.7 ....</b>	<b>Environment and Sustainability</b>	<b>9</b>
<b>4.8 ....</b>	<b>Participation and reciprocity</b>	<b>9</b>
<b>4.9 ....</b>	<b>In managing the production of corporate accounting documents and corporate communications</b>	<b>10</b>
<b>4.10 ....</b>	<b>Care and attention in commercial transactions</b>	<b>10</b>
<b>4.11 ....</b>	<b>Prohibition on transactions aimed at money laundering</b>	<b>10</b>
<b>4.12 ....</b>	<b>Protection of data and IT systems</b>	<b>11</b>
<b>4.13 ....</b>	<b>External communications</b>	<b>11</b>
<b>5. ....</b>	<b>SPECIFIC PRINCIPLES OF CONDUCT</b>	<b>11</b>
<b>5.1 ....</b>	<b>Principles of conduct for all Employees</b>	<b>11</b>
<b>5.1.1 ....</b>	<b>Selection and choice of personnel</b>	<b>12</b>
<b>5.1.2 ....</b>	<b>Transparency in business relationships and communications</b>	<b>12</b>
<b>5.2 ....</b>	<b>Relationships with the Public Administration and the Supervisory and Control Authorities</b>	<b>12</b>
<b>5.2.1 ....</b>	<b>With the Public Administration</b>	<b>12</b>
<b>5.2.2 ....</b>	<b>With Supervisory and Control Authorities</b>	<b>12</b>
<b>5.3 ....</b>	<b>Relationships with Vendors</b>	<b>13</b>
<b>5.3.1 ....</b>	<b>Selection and choice of vendors</b>	<b>13</b>
<b>5.4 ....</b>	<b>Relationships with vendors, competitors and other stakeholders</b>	<b>13</b>
<b>5.5 ....</b>	<b>Relationships with Customers</b>	<b>13</b>
<b>5.5.1 ....</b>	<b>Correctness and completeness of information</b>	<b>13</b>
<b>5.5.2 ....</b>	<b>Customer involvement</b>	<b>13</b>
<b>5.6 ....</b>	<b>Relationships with other stakeholders</b>	<b>13</b>

<b>5.6.1 .....</b>	<b>Shareholders, Board of Statutory Auditors, Independent Auditing Company</b>	<b>13</b>
<b>5.6.2 .....</b>	<b>Trade associations, trade unions and political parties</b>	<b>14</b>
<b>5.6.3 .....</b>	<b>Provision / acceptance of gifts or other utilities</b>	<b>14</b>
<b>6. ....</b>	<b>BREACHES OF THE CODE</b>	<b>14</b>

### 1. CODE OF ETHICS

This Code of Ethics (hereinafter known as *Code*) is the document that expresses the values and principles of conduct that *GENERALE CONSERVE S.p.A.* (hereinafter also known as *Company*) follows in managing its business activities and in relationships with all those who interact with it.

In order to regulate the reciprocal collaboration, the *Code* indicates behavioural standards aimed at the various **Recipients**, whether internal or external to the Company, including:

- company bodies;
- employees;
- freelance work providers, also temporary;
- consultants and collaborators in any capacity;
- stakeholders in general;
- and any other entity that acts in the name and on behalf of *GENERALE CONSERVE S.p.A.*

For all those who perform their activity on behalf of *GENERALE CONSERVE S.p.A.* and for all third parties, respect of the ethical principles envisaged in the *Code* is a necessary condition for continuing the relationship with the Company itself: the *Code* forms an integral part of the signed contract.

In fact, any breach of the rules of conduct indicated in this document prejudices the relationship of trust with the Company, which may apply the most appropriate disciplinary actions and claim compensation for damages, subject to - for employee workers - respect of the procedures indicated in Art. 7 of Italian Law no. 300 of 20 May 1970 (known as Workers' Statute) as amended and supplemented, the applicable collective labour agreements and any regulations adopted by the Company.

### 2. DISSEMINATION OF THE CODE

*GENERALE CONSERVE S.p.A.* disseminates the *Code* in particular:

- to internal personnel, by affixing the same in the workplaces, publishing it on the company portal and presenting it at specific training sessions, to encourage awareness of the Code and the implementation of the conduct indicated therein;
- to external collaborators, vendors and other third parties that perform activity in the name and on behalf of *GENERALE CONSERVE S.p.A.*, by means of appropriate and clear informative communication, on paper and/or digitally, so as to place the Recipient in a position to understand its content and to subscribe to it in full awareness.

To ensure the *Code* is disseminated as widely as possible, it is published on the Company's internet website.

### 3. OBLIGATIONS OF RECIPIENTS

All Recipients are required to read and accept the *Code* and to know and understand the rules of conduct contained therein as well as all the behavioural rules that regulate the various company activities.

In particular, the internal Recipients must:

- consult their superiors, or company representatives, if they require clarifications on the methods of applying the rules contained in the Code;

- report promptly, in non-anonymous form, any information ascertained directly or reported by others, in relation to possible breaches or attempted breaches of conduct, sending a written communication to the dedicated email address [segnalazioni-codice-etico@generaleconserve.it](mailto:segnalazioni-codice-etico@generaleconserve.it), Legal and Organisation Service, for the attention of Ms Maria Cristina Merani;
- collaborate with the departments in charge of verifying any behavioural breaches;
- appropriately inform any third party, with which they come into contact during work activity, on the existence of the Code and on the commitments and obligations imposed by the same for external parties.

Each Head of company department is also asked to:

- represent, through their own conduct, an example for direct collaborators;
- emphasise that respect of the Code constitutes an essential part of the performance of work;
- perform, with the relative scope of competence, a role of control regarding the correct implementation of the Code;
- adopt, when required by the context, immediate corrective measures;
- prevent any type of retaliation against whistle-blowers.

#### 4. GENERAL PRINCIPLES OF CONDUCT

The company bodies, employees, work providers, even temporary, consultants and collaborators in any guise of *GENERALE CONSERVE S.p.A.* undertake, in respecting the Company's ethical principles, to:

- manage commercial relationships and employment contracts in conformity with all rules and regulations in force;
- act with mutual respect at all times;
- fulfil all regulations on the protection, health and safety of individuals;
- save resources and protect the environment;
- never use company resources and/or assets for personal profit;
- never make decisions based upon personal gain;
- contribute to the development of the local communities in which the Company operates, behaving in a manner that guarantees commitment, honesty, fairness and respect of the rules.

**Below are some general principles of conduct of which *GENERALE CONSERVE S.p.A.* requires respect by all Recipients.**

##### 4.1 Lawfulness

*GENERALE CONSERVE S.p.A.* recognises lawfulness as a basic principle for running any business and requires its collaborators to respect this *Code*, the Law, the legislation in force and the specific company regulations: the Company does not justify any contrary conduct, even if motivated by the pursuit of the Company's interests, and it sanctions such conduct.

*GENERALE CONSERVE S.p.A.* prevents, with specific controls, the establishment and maintenance of any form of relationship with entities whose conduct is not based upon principles of verified lawfulness.

### 4.2 Integrity and fairness

The conduct of personnel of *GENERALE CONSERVE S.p.A.* in relation to its competitors is based upon principles of integrity and fairness, always in respect of the Law: the Company disapproves of and condemns any conduct that may constitute an impediment or disturbance to the exercise of a business or that may in any case be aimed at committing crimes against trade and industry (including the illegal possession of trade secrets or other information regarding the economic activity of third parties).

Personnel of *GENERALE CONSERVE S.p.A.* must avoid offering, requesting or accepting, directly or on behalf of third parties, gifts, payments, entertainment, trips, sponsorships, philanthropic donations or other benefits that are not proportionate to the circumstances and that could be seen as an attempt to exercise an undue influence over the commercial relationships between the Company and any of its existing or potential commercial counterparties or associates, or may be likely to engender the impression of illegality or immorality.

Collaborators therefore undertake to accept or give exclusively gifts or other forms of benefits if they are proportionate to the circumstances and in line with social customs and of reasonable value, including gifts of small value containing the Company logo, goods of value equal to or less than Euro 50.00, lunches where both parties are present and perishable goods.

Otherwise, employees must reject said gifts and promptly inform the Legal and Organisation Service, sending a written communication to the dedicated email address [segnalazioni-codice-etico@generaleconserve.it](mailto:segnalazioni-codice-etico@generaleconserve.it) for the attention of Ms Maria Cristina Merani.

### 4.3 Conflict of interests

Personnel of *GENERALE CONSERVE S.p.A.* must avoid any situation that may determine a conflict with the interests of the Company or that may interfere with the right to make impartial decisions in the interest of the Company and in full respect of the rules of the Code. Those conditions may occur if collaborators:

- pursue an interest that differs from the Company mission;
- personally benefit from business opportunities of the Company or of which they have become aware during the performance of their functions;
- act in contrast with the fiduciary duties connected to their position.

If collaborators find themselves in a situation, even only potential, of conflict of interest, they must refrain from any action and inform the Legal and Organisation Service, sending a written communication to the dedicated email address [segnalazioni-codice-etico@generaleconserve.it](mailto:segnalazioni-codice-etico@generaleconserve.it), for the attention of Ms Maria Cristina Merani.

### 4.4 Promoting the value of human resources

All collaborators of *GENERALE CONSERVE S.p.A.* contribute to defining, maintaining and improving the image of the Company and the quality of the services provided.

For this reason *GENERALE CONSERVE S.p.A.* constantly promotes the value of its human resources, stimulating collaboration and teamwork and supporting continuous training and lifelong learning actions.

Employees are, for the Company, a strategic resource and multiculturalism represents a strength of the entire Group.

The Company thus emphasises the importance of attracting and retaining the best talents and it stimulates honest, open and constructive interaction, participation and collaboration, along with the sharing of information and knowledge.

*GENERALE CONSERVE S.p.A.* enhances its human resources by implementing a personnel management policy and more precisely by promoting the criterion of meritocracy and recognising the quality of the work as well as the growth and development of collaborators through training activities.

The Company is able to grasp the productive potential originating from the community and implements all those conditions that render teamwork effective, without distinction on gender, ethnicity, language, religion, political opinions or personal and social conditions.

#### **4.5 Mutual respect, combating discrimination and bullying.**

*GENERALE CONSERVE S.p.A.* protects individual freedom in all its forms and rejects any manifestation of violence or intolerance, valuing the skills and expertise of each individual. Authority must be exercised with fairness and impartiality, avoiding any form of abuse. In particular, authority must never be transformed into the exercise of power which is harmful to the dignity and autonomy of persons; any decisions on the organisation of work must encourage the professional value of the individuals.

Each employee of *GENERALE CONSERVE S.p.A.* must interact with other colleagues in a collaborative manner in order to maintain in the company a climate of mutual respect, in which each person feels encouraged to achieve their goals. All employees at any level must avoid disrespectful conduct with colleagues and customers or language that offends the beliefs and morals of others and in general they must avoid attitudes and comments that are harmful to individuals.

Any demands or threats aimed at inducing people to act in violation of the law or in a manner not compliant with the Code of Ethics, or aimed at adopting conduct harmful to the beliefs and moral and personal preferences of others, will not be tolerated in any way.

Conduct harmful to the personal and professional dignity of workers, as well as to their mental and physical health, are considered to be highly damaging to the individual and in complete contrast with the principles of the Code of Ethics of *GENERALE CONSERVE S.p.A.*

#### **4.6 Occupational health and safety**

The protection of the health and safety of its collaborators, customers and the surrounding population, along with the reduction and elimination of accidents and occupational diseases, are the foundations of the ethical commitment of *GENERALE CONSERVE S.p.A.*

The Company therefore undertakes, in protecting the physical and moral integrity of its collaborators, and all those present in the workplaces under its remit, to adopt scrupulously what is laid down by the legislation in force on occupational health and safety and periodically to analyse its company processes to identify and eliminate or to control risk situations.

Particular attention is also paid to raising the awareness of employees and collaborators on the issue of prevention, by way of preventive, educational and informative actions.



### 4.7 Environment and Sustainability

GENERALE CONSERVE S.p.A. carries out its activities in a manner that is compatible with the balance between economic requirements and environmental needs of the community in which it operates, as well as prioritising sustainability, carefully assessing the impact of the individual decisions on the environment and on the surrounding community.

Protecting the seas and the biodiversity of species is a key condition to be able to operate according to the company values, where “quality and respect” are at the basis of the strategic decisions. Protection of natural capital also translates into paying the utmost attention to the impact of production activities, which materialises in the field of energy efficiency and correct management of waste and external odours.

Respect is the value that best expresses the actions of the Company for 100% sustainable fishing. This is a commitment to respect the sea, which offers its resources, but also a way of approaching the continuity of work and of production. The Sustainable Fishing Policy, available at the following address: <https://www.asdomar.it/pdf/PolicySostenibilitaPesca.pdf>, is applied to the whole supply chain.

GENERALE CONSERVE S.p.A. operates in respect of the environmental legislation in force and prohibits any activity that leads to the pollution of the waters, soil and subsoil and undertakes to ensure that the maintenance activities of the systems and the management of waste are carried out in the utmost respect of the environment.

To that end, the Company applies the principles of the circular economy, by eliminating production waste of fish raw materials in its plants. Tuna processing generates more than 50% of waste products which are usually disposed of in landfills. Through circular economy processes and working methods, Generale Conserve reuses 100% of this waste, giving it new life and using it for the production of wet pet food and fishmeal for animal husbandry.

If potential phenomena of pollution are identified, the Company undertakes to intervene promptly to manage the emergency and, if appropriate, to carry out remediation interventions.

GENERALE CONSERVE S.p.A. prohibits any activity that constitutes illegal trafficking of waste and selects only providers of environmental services in possession of the necessary authorisation requirements.

### 4.8 Participation and reciprocity

GENERALE CONSERVE S.p.A. recognises in the comments and suggestions of its *Stakeholders* an important participatory tool of involvement through which to improve the company as a whole and to satisfy the needs of the interested parties. For this reason, it disseminates internally and externally a policy of extreme openness to dialogue and discussion, promoting and facilitating the achievement of balanced solutions and limiting the onset of disagreements and conflicts.

In that participatory perspective, the Company considers the agreement and signature of the principles of the *Code* to be an essential requirement for any relationship with the *Stakeholders* to be established and maintained.

### 4.9 In managing the production of corporate accounting documents and corporate communications

*GENERALE CONSERVE S.p.A.* respects the rules of correct, complete and transparent accounting, according to the criteria indicated by Law and by national accounting standards.

The Company also produces corporate communications (financial statements, explanatory notes, accompanying reports and other documents) in respect of the shareholders, creditors and any interested *stakeholder*, in accordance with the articles of the Italian Civil Code.

In the activity of accounting and in communicating information on the Company operations, the directors, employees and collaborators scrupulously respect the legislation in force and the internal procedures so that each transaction is, in addition to being correctly recorded, also authorised, verifiable, legitimate, coherent and congruous.

In particular, in managing the preparation of corporate accounting documents and corporate communications, employees act in respect of the principles of diligence and loyalty. Diligence means the set of precautions to be applied and the attention to be paid in carrying out the performance. The obligation of loyalty consists, on the other hand, of the prohibition on disseminating information relating to the organisation and the operating procedures and of using the knowledge acquired in such a way as not to damage the Company.

Employees implement the instructions concerning the performance of their roles or duties imparted to them by their superiors. If the order is believed to be clearly illegitimate, the employee demonstrates the reasons for the illegitimacy to the person who imparted the order; if the order is renewed in writing, he/she must implement it, except where the act is contrary to the provisions of this *Code* or prohibited by law or constitutes an administrative offence. Any failure to execute the order and the reasons for the same must be communicated to the Legal and Organisation Service, sending a written communication to the dedicated email address [segnalazioni-codice-etico@generaleconserve.it](mailto:segnalazioni-codice-etico@generaleconserve.it) for the attention of Ms Maria Cristina Merani.

### 4.10 Care and attention in commercial transactions

In commercial transactions, particular care and attention must be paid when receiving and spending coins, bank notes, credit instruments and valuables in general, in order to avoid the danger of placing on the market counterfeited or altered instruments.

### 4.11 Prohibition on transactions aimed at money laundering

The Recipients of this *Code* must never perform or be involved in activities likely to involve the laundering (namely the acceptance or handling) of the proceeds of criminal activities in any form or manner, strictly respecting the anti-money laundering laws.

Employees and collaborators must verify in advance the available information (including financial information) on commercial counterparties, consultants and vendors, in order to ascertain their moral integrity, their respectability and the legitimacy of their business before establishing business relationships with them.

The Company must always comply with the laws on organised crime and anti-money laundering, both national and international, in any competent jurisdiction.

The directors, employees and collaborators of the company must strictly respect the laws, *policies* and company procedures in any economic transaction, even intergroup, in which they are involved, guaranteeing the full traceability of the incoming and outgoing cash flows and full compliance with anti-money laundering laws.

### 4.12 Protection of data and IT systems

*GENERALE CONSERVE S.p.A.* protects the privacy and confidentiality of the information and data belonging to employees, collaborators or third parties, obtained on the basis or on the occasion of the conduct of the working activity, and each employee and collaborator is required to comply with those principles; the management of personal data processing fully complies with the legislation in force in that regard.

The Recipients guarantee the utmost confidentiality of news and information constituting the business property of the Company in respect of the legislation on personal data protection: the directors, employees and collaborators strictly respect the procedures / *policies* defined by the Company on IT security, and use the company resources in conformity with the aforementioned procedures and *policies*, avoiding any conduct that may compromise the functionality and protection of the company IT system.

It is not permitted in any way to alter the functioning of an electronic or IT system of the Company or the data and information contained therein, or to intervene on programs and archives, for whatever purpose.

*GENERALE CONSERVE S.p.A.* prohibits any practice that may violate the confidentiality of its own IT systems or those of third parties or may cause damage to them, or any actions aimed at falsifying a public IT document and/or a document that may be used as evidence.

### 4.13 External communications

In supplementation of what is stated in relation to confidentiality, external communications and dissemination (also via the *mass media*) of news, information and data relating to the Company is based upon respect of the right to information and is reserved exclusively to the company departments in charge; in no case is it permitted to disseminate false or biased news or comments.

All communication activities respect the laws, rules and practices of professional conduct and are implemented with clarity, transparency, timeliness and accuracy. Any form of pressure or the acquisition of favourable stances by the media is avoided.

## 5. SPECIFIC PRINCIPLES OF CONDUCT

Below are some specific principles of conduct referable to the different types of Recipients and/or to particular relationships with *GENERALE CONSERVE S.p.A.*:

### 5.1 Principles of conduct for all Employees

Respect of the rules contained in the *Code* must be considered an integral and essential part of the contractual obligations envisaged for employees of the Company, in accordance with Art. 2104 of the Italian Civil Code (Diligence of the worker).

In order for the *Code* to be able to become the foundation of conduct shared by the whole organisation, *GENERALE CONSERVE S.p.A.* requires its employees to know and respect the same and to promote its knowledge among newly-recruited employees and among third parties with which they come into contact for work reasons.

### 5.1.1 *Selection and choice of personnel*

All senior functions of *GENERALE CONSERVE S.p.A.* involved in the selection and choice of personnel must guarantee:

- respect of transparent and impartial criteria of selection and choice;
- verification of the correspondence between the candidates' profiles and the needs of the Company;
- the application of regular forms of work;
- respect of the right of workers to working conditions based upon individual dignity.
- the absence of any form of patronage.

### 5.1.2 *Transparency in business relationships and communications*

Transparency in business relationships and communications between employees of *GENERALE CONSERVE S.p.A.* is an important presupposition for achieving the business goals.

Transparent relationships and communications facilitate continuous improvement both in terms of the quality of the service provided and in relation to the quality of life within the Company.

Transparency, clarity and communicative effectiveness are also elements that facilitate the authentic and complete implementation of this *Code*.

## 5.2 **Relationships with the Public Administration and the Supervisory and Control Authorities**

### 5.2.1 *With the Public Administration*

*GENERALE CONSERVE S.p.A.* undertakes to adopt, in relationships with the Italian and foreign Public Administration, and with entities that perform activities of public utility or public interest, the strictest respect of the applicable international, national and company regulations.

The Company and, on its behalf, every employee, collaborator or consultant must not seek to influence improperly the decisions of the relevant institution, in order to obtain the completion of acts compliant with or contrary to official duties, particularly by offering or promising, directly or indirectly, gifts, cash, favours or utilities of any nature.

Any employee or collaborator who receives instructions to operate in that sense must inform the Legal Department immediately.

*GENERALE CONSERVE S.p.A.* requires personnel in charge of requesting and submitting declarations, documents and information for the obtaining of contributions, grants and loans, to act in respect of the Law, preparing the necessary documentation without trickery or deception. The Company guarantees that the funding granted is used for the purposes for which it was requested.

### 5.2.2 *With Supervisory and Control Authorities*

*GENERALE CONSERVE S.p.A.* bases its relationships with the Supervisory and Control Authorities (of the Public Administration or of entities authorised by it) on the utmost collaboration in full respect of their institutional role, undertaking to execute their instructions promptly.

### 5.3 Relationships with Vendors

#### 5.3.1 Selection and choice of vendors

Vendor management must be based upon criteria of impartiality, autonomy and independence in order to:

- avoid any form of discrimination and allow all those having the requirements to compete for the assignment of the contracts;
- avoid conflicts of interest and unlawful or immoral practices that damage the individual entities and the entire business system.

To that end, *GENERALE CONSERVE S.p.A.* lays down specific procedures and internal operating instructions to regulate relationships with vendors and in particular their selection, choice and qualification, as well as regulating the management of documentation and the control activities over the same by those who deal with purchases of raw materials, goods and services, along with product quality.

### 5.4 Relationships with vendors, competitors and other stakeholders

*GENERALE CONSERVE S.p.A.* respects its *competitors*, along with its customers, vendors and commercial partners. All vendors are required to read and accept it, in the awareness that *GENERALE CONSERVE S.p.A.* considers behaviours contrary to the principles defined in the *Code* to be detrimental to the fiduciary relationship and a just cause to terminate the contractual relationships. In no case does the company use the contribution of vendors that are able to offer more competitive prices due to a breach of legal provisions and, in particular, those concerning the health and safety of workers.

### 5.5 Relationships with Customers

#### 5.5.1 Correctness and completeness of information

Employees are asked to define and make communications to Customers that are:

- clear, simple and comprehensible;
- compliant with existing legislation, without making recourse to elusive or vexatious practices;
- complete, avoiding omissions or claims open to interpretation, to allow the Customer to make a fully informed decision.

*GENERALE CONSERVE S.p.A.* also undertakes to communicate promptly to its Customers, using the most appropriate and effective means of communication, any changes to the contracts and alterations to the economic and technical terms of the product.

#### 5.5.2 Customer involvement

Paying attention to the reports and indications coming from Customers is essential for providing a satisfactory service. To that end, *GENERALE CONSERVE S.p.A.* provides direct communication channels between the Customer and the many professional figures at its disposal.

### 5.6 Relationships with other stakeholders

#### 5.6.1 Shareholders, Board of Statutory Auditors, Independent Auditing Company

The company undertakes to provide its shareholders with accurate, truthful and timely information and to ensure the best conditions for their participation in corporate decisions, in full compliance with current legislation and the Articles of Association.

In relationships with members of the Board of Statutory Auditors and the Independent Auditing Company, the persons involved must provide the utmost transparency, clarity and correctness in order to establish a relationship of professionalism and collaboration, subject to supervision and coordination by the company functions in charge.

### 5.6.2 *Trade associations, trade unions and political parties*

*GENERALE CONSERVE S.p.A.* refrains from implementing behaviours aimed at applying direct or indirect pressure on political representatives.

*GENERALE CONSERVE S.p.A.* may cooperate, also financially, with non-political associations for specific projects, based upon the following criteria:

- purpose related to the Company activity;
- clear and documented allocation of resources;
- express authorisation from the functions in charge of managing those relationships within the Company.

### 5.6.3 *Provision / acceptance of gifts or other utilities*

It is not permitted to offer or provide, directly or indirectly, cash, gifts or benefits of any nature to managers, officers or employees of Customers, vendors and consultants with the aim of influencing them in the performance of their duties and/or obtaining an undue advantage, or that may even just be interpreted as exceeding normal commercial practices or courtesy, or in any case be aimed at acquiring favourable treatment in the conduct of any activity linked to the Company.

Acts of commercial courtesy are permitted provided that they are of small value (indicatively €50) or in any case not likely to compromise the integrity or reputation of one of the parties, and not likely to be interpreted, by an impartial observer, as being aimed at acquiring undue and/or improper advantages.

The directors, employees and collaborators are prohibited from accepting, even on the occasion of festivities, for themselves or for others, gifts or other utilities, except for customary gifts of small value and/or those ascribable to normal correct relationships of courtesy, unlikely to compromise the integrity or reputation of one of the parties or to be interpreted, by an impartial observer, as being aimed at acquiring undue and/or improper advantages.

Employees or collaborators who, independently from their will, receive gifts or other utilities not of small value and in any case contrary to what is established above, must promptly inform the Legal and Organisation Service, sending a written communication to the dedicated email address [segnalazioni-codice-etico@generaleconserve.it](mailto:segnalazioni-codice-etico@generaleconserve.it) for the attention of Ms Maria Cristina Merani, which may require them to be returned; if this is not possible, the gifts must be handed over to the Company.

The Recipients may not provide gifts, donations or sponsorships whose amount and/or beneficiary does not correspond to what has been formally defined and authorised based upon the system of powers and delegations in place in the Company and based upon the indications of the company procedures.

## 6. BREACHES OF THE CODE

*GENERALE CONSERVE S.p.A.* promotes the prevention and verification of any unlawful conduct or, in any case, any actions contrary to the Code of Ethics and Conduct.

Employees must report openly and promptly any breach or attempted breach of the Code.

*GENERALE CONSERVE S.p.A.* has activated a dedicated email address [segnalazioni-codice-etico@generaleconserve.it](mailto:segnalazioni-codice-etico@generaleconserve.it) to which employees and *stakeholders* can send reports of circumstances that may constitute potential breaches of the law and the principles of the Code of Ethics.

The confidentiality of the aforementioned communications is guaranteed by the restricted access to the dedicated email address which can only be accessed by the Head of the Legal and Organisation Service, Ms Maria Cristina Merani and, in the case of her temporary absence, by the General Manager, Mr. Giovanni Battista Valsecchi.

The communications will be answered by email within 30 days from the date of receipt by the Head of the Legal and Organisation Service, Ms Maria Cristina Merani or, in the case of her temporary absence, by the General Manager, Mr. Giovanni Battista Valsecchi.

Breaches committed by employees with respect to the behavioural standards, procedures and operating instructions, resulting from the general guidelines formalised in the *Code*, are sanctioned by *GENERALE CONSERVE S.p.A.*, in accordance with and for the effects of Art. 7 of the Workers' Statute and the National Collective Labour Agreements (NCLA) applicable in the Company.

A specific breach will therefore constitute a disciplinary offence and, as such, will be prosecuted and sanctioned.

Any groundless report made in bad faith in order to cause damage to colleagues and/or collaborators is considered a disciplinary offence.

Any breach of the rules of the *Code*, when perpetrated by members of the corporate bodies, may involve the adoption, by the competent entities, of the most appropriate measures envisaged and permitted by the Law.

Finally, breaches committed by third parties will be sanctioned in conformity with the provisions of the respective contractual assignments, subject to breaches of the law of greater significance.

*GENERALE CONSERVE S.p.A.* undertakes, in any case, to do everything necessary and permitted in order to protect itself and to distance itself from such unlawful conduct.