



**F.Ili Saclà S.p.A.**

## **CODE OF ETHICS**

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## INTRODUCTION

F.Ili Saclà recognises that a company's reputation is built on more than just the expertise of its staff and the quality of its customer service. It is also built on the attention a company pays to the needs of the wider community.

The principles that have always guided the work of F.Ili Saclà S.p.A. are formalised in a Code of Ethics (also referred to as the "**Code**") based on the principle that reliability is built day by day through compliance with regulations and respect for people.

This Code serves as a distinctive feature that identifies the company in relation to the market and third parties. Understanding and adhering to the Code is required of everyone who works for or collaborates with the company. It forms the foundation of their work and is the first step towards contributing to the company's mission.

Therefore, F.Ili Saclà S.p.A.'s objective is to achieve excellence in its target market through sustainable development, while ensuring the safety of everyone involved and protecting the environment. All of this is accomplished through practices that align with and respect social ethics. The goal is to ensure satisfaction and create added value for employees, customers and the community at large.

F.Ili Saclà S.p.A. is committed to promoting the Code by taking the most appropriate and effective means and initiatives.

The Board of Directors of F.Ili Saclà S.p.A. will periodically review the Code to ensure that it remains up to date.

The Code of Ethics applies to all employees, independent contractors, representatives, contractual counterparties and third parties working for or with F.Ili Saclà S.p.A., a benefit corporation.

# 1. RECIPIENTS AND SCOPE OF APPLICATION

## 1.1. BENEFIT CORPORATION

As a benefit corporation, F.Ili Saclà S.p.A. pursues a range of objectives for the common good. The company operates in a responsible, sustainable and transparent manner towards people, the local community, the environment and other stakeholders.

The company also pursues the following specific objectives for the common good:

- building a culture of collective well-being, based on a sense of belonging to a team, where each individual's realisation of their full potential is the driving force behind the company's passion for its products;
- acting as an advocate for high-quality food while promoting a positive social and environmental impact;
- pursuing innovative solutions that prioritise product circularity and production with a positive environmental impact. This will specifically facilitate a gradual shift in the business model towards a net-zero greenhouse gas emissions economy, in line with European climate neutrality targets and national ecological transition targets;
- promoting the economic, social, cultural and ethical growth of the community in which it operates and instilling its values throughout the supply chain, building a foundation of trust with suppliers while respecting the local area.

## 1.2. SCOPE OF APPLICATION

This Code of Ethics is binding for all employees, independent contractors, representatives, contractual counterparties and third parties of F.Ili Saclà S.p.A., a benefit corporation, and its subsidiaries, in Italy and abroad (also referred to as "**Fratelli Saclà Group**" or "**F.Ili Saclà**").

As a benefit corporation, F.Ili Saclà S.p.A. ensures that the Code of Ethics is incorporated into relevant contracts and agreements through its system of delegated powers. This establishes the significant role of the Code of Ethics regarding any conduct that conflicts with its provisions. The company's directors, senior executives, representatives, relevant departments and, in general, management adhere to the Code of Ethics when proposing, managing and implementing projects, initiatives and investments.

This Code of Ethics sets out the principles, guidelines and rules of conduct that underpin the Organisation and Management Model of F.Ili Saclà S.p.A. (a benefit corporation), as adopted under Article 6 of Italian Legislative Decree No. 231/2001, and is intended to serve as an additional document in this regard.

In fact, in addition to the rules set out in this Code of Ethics, F.Ili Saclà S.p.A. implements specific safeguards when running the company and conducting business, based on transparent and objective internal procedures. Together with the specific requirements set out in the Organisation and Management Model adopted by the company under Article 6 of Italian Legislative Decree No. 231 of 2001, these safeguards are designed to prevent unlawful conduct and/or conduct that is detrimental to the company's values.

## 1.3. UNETHICAL CONDUCT

Any conduct by any person, whether an individual or an organisation, acting on behalf of F.Ili Saclà S.p.A., that constitutes a breach of the rules of civil coexistence and proper social and commercial relations, as set out and governed by the laws and regulations in force, is unethical.

Engaging in unethical conduct undermines relationships within F.Ili Saclà S.p.A., including those between senior management and employees, independent contractors, and commercial, business and financial partners, whether public or private.

## 2. ETHICAL AND MORAL PRINCIPLES

### 2.1. COMPLIANCE WITH REGULATIONS

F.Ili Saclà S.p.A. is committed to complying with national and supranational regulations on worker protection, as well as the principles of corporate social responsibility. F.Ili Saclà S.p.A. undertakes to encourage its employees to comply strictly with the relevant national collective bargaining agreement, while cooperating with and respectfully engaging with the freely elected trade union representatives, in a spirit of constructive industrial relations.

### 2.2. PROTECTION OF RIGHTS AND EQUAL OPPORTUNITIES

F.Ili Saclà S.p.A. endeavours to maintain and foster a working environment that protects individual freedom, dignity and personal integrity. The company is committed to ensuring that employees are not subjected to inhumane treatment and to complying with the collective bargaining agreements relevant to its sector, as well as tax, social security and insurance legislation.

These principles apply to all areas of F.Ili Saclà's business, including its corporate policies and practices, as well as its relations with customers, suppliers and the community.

F.Ili Saclà S.p.A.'s recruitment policy is non-discriminatory with regard to race, gender, age, religion and political views. The company respects diversity and promotes inclusion as a source of competitive advantage.

In order to foster engagement, motivation and professional development, and to achieve set objectives when managing human resources, the company consistently implements ongoing training and awareness-raising initiatives. To ensure these principles are upheld to the fullest extent, the company has vested the Board of Directors with full responsibility for the commitment set out herein.

## 2.3. OCCUPATIONAL HEALTH AND SAFETY

F.Ili Saclà S.p.A. is committed to fostering and consolidating a safety culture that promotes risk awareness and encourages responsible behaviour among all its employees and independent contractors.

To this end, the company has appointed an in-house occupational safety and health manager (RSPP), who assists the employer with the ongoing analysis of risks associated with production processes and their preventive measures. This manager also monitors and updates working methods to ensure compliance with workplace safety regulations, determines and develops training and communication initiatives, raises awareness of the use of personal protective equipment and ensures that any anomalies encountered are promptly reported.

## 2.4. CONFLICTS OF INTEREST

When carrying out any activity on behalf of F.Ili Saclà S.p.A., any situation involving a conflict of interest must be avoided. This applies to situations in which a recipient of the Code has a personal interest that could interfere with their duties towards the company.

## 2.5. DUTY OF CONFIDENTIALITY

Without prejudice to the transparency of activities undertaken and disclosure obligations imposed by current provisions, F.Ili Saclà S.p.A. employees are required to maintain confidentiality regarding any information they become aware of during their employment, even in the event of termination or change of duties.

Any information or data obtained or processed during the course of one's work or duties belongs to F.Ili Saclà S.p.A. and must not be used, disclosed or communicated without the authorisation of the relevant management department and in accordance with the relevant procedures.

Each recipient is responsible for protecting any information produced and/or obtained during their operations, thereby preventing any misuse or unauthorised use.

## **2.6. HUMAN RESOURCES**

The employees and independent contractors of F.Ili Saclà S.p.A. are the company's greatest asset.

For this reason, the company protects and encourages the development of its human resources, aiming to improve and enhance the experience and knowledge of each employee and independent contractor.

## **2.7. FAIRNESS IN ARRANGEMENTS WITH EMPLOYEES**

In terms of reporting lines, F.Ili Saclà S.p.A. ensures that the exercise of authority does not undermine the dignity, professionalism or autonomy of its employees.

F.Ili Saclà S.p.A. makes organisational decisions while safeguarding its employees' professional standing.

## **2.8. RIGHT TO PERSONAL INTEGRITY**

F.Ili Saclà S.p.A. protects the physical, cultural and psychological well-being of its employees and independent contractors. The company ensures that working conditions respect the dignity of the individual and promotes occupational health and safety.

## **2.9. TRANSPARENCY AND COMPLETENESS OF INFORMATION**

When carrying out their duties and within the scope of their responsibilities, recipients of this Code must process, disseminate or communicate any data, information or knowledge in their possession accurately, precisely and completely. They must also avoid providing incomplete, biased or untruthful information.

## **2.10. FINANCIAL REPORTING AND ACCOUNTING**

F.Ili Saclà S.p.A. prepares its periodic financial and accounting reports in accordance with the principles of accuracy, transparency, completeness and traceability with regard to the information and data they contain.

All financial, earnings and accounting information must be supported by the relevant documentation, so that the processes underlying the transactions that generated that information can be verified at any time. All recipients of this Code are required to cooperate in ensuring that management events are recorded correctly and promptly in the accounts, based on truthful, accurate, complete and verifiable information. Therefore, every operation and transaction must be correctly recorded,

authorised, verifiable, legitimate, consistent and appropriate, and must reflect the content of the supporting documentation produced and received, in terms of both form and substance.

Company representatives are expressly prohibited from engaging in, collaborating in or causing conduct that constitutes the offences set out in Article 25-ter of Italian Legislative Decree No. 231/01. This includes behaviour that, while not a criminal offence in itself, could potentially become one or facilitate the abovementioned offences.

## **2.11. INTERNAL AUDIT SYSTEM**

F.Ili Saclà S.p.A. promotes and requires full compliance with internal audit processes at every level, in order to improve operational efficiency and ensure compliance with current legislation and the principles set out in this Code. Within the scope of their responsibilities and remit, each department is responsible for ensuring the proper functioning of the internal audit system. To this end, they must provide all necessary assistance and cooperate in establishing an effective and efficient system.

Internal auditing is the term used to describe the set of processes and tools adopted by F.Ili Saclà S.p.A. to guide, manage and monitor the company's activities, ensuring compliance with legislation and company procedures, protecting company assets, managing operations efficiently and providing accurate, complete accounting and financial data.

## **2.12. ENVIRONMENTAL PROTECTION**

All activities carried out by F.Ili Saclà S.p.A. comply with current environmental legislation and the requirements set out by the relevant authorities in the environmental authorisations issued.

F.Ili Saclà S.p.A. recognises the importance of protecting the environment for the benefit of the community and future generations. The company is committed to safeguarding the environment during its business activities. To this end, it strives to minimise the environmental impact of its activities by continuously improving its environmental performance and implementing measures designed to minimise environmental impact, maximise energy efficiency, reduce and recover waste, and limit pollutant emissions.

F.Ili Saclà S.p.A. is committed to fostering and consolidating a culture of environmental protection and pollution prevention among all its employees, independent contractors and suppliers. This involves raising awareness of the risks and encouraging everyone to behave responsibly.

## 3. RULES OF CONDUCT TOWARDS EXTERNAL REALITIES

Recipients of this Code must act fairly and with integrity when interacting with individuals and organisations outside the Group.

### 3.1. CONSUMER RELATIONS

F.Ili Saclà S.p.A. prioritises quality, food safety and hygiene in its production processes and food products. The company is committed to continuous innovation,

- investing significantly in research and development to enhance the quality and competitiveness of its products in terms of both nutritional value and taste; and
- conducting thorough checks to ensure the quality and safety of its products.

F.Ili Saclà S.p.A. provides consumers with accurate, complete and truthful information to help them make rational and informed decisions.

F.Ili Saclà S.p.A. adopts an efficient, collaborative and courteous communication style, including when engaging with consumers.

### 3.2. ARRANGEMENTS WITH SUPPLIERS

The company's relationships with its suppliers are founded on the principles of balanced competitive advantage, equal opportunities, fairness, impartiality and recognition of professional expertise.

The procedures for selecting a supplier comply with the internal procedures of F.Ili Saclà S.p.A.

Suppliers are selected and goods and services of any kind procured in accordance with the principles of competition and equal treatment. Objective assessments based on competitiveness, quality, utility and price shall be used to inform these decisions. F.Ili Saclà S.p.A.'s selection process applies objective and transparent criteria, as set out in its internal procedures. These criteria do not prevent any supplier that meets them from competing with other suppliers.

F.Ili Saclà S.p.A. requires its suppliers to adhere to high-quality standards in their production processes, comply with environmental requirements and ensure their operations comply with current legislation.

When selecting suppliers, F.Ili Saclà S.p.A. aims to prevent the use of suppliers of goods or services that employ or (in turn) condone the employment of workers who are subjected to systematic labour exploitation.

Such workers are often non-EU nationals who are subjected to degrading conditions, limited freedom of choice, derisory wages and threats and pressure. This includes the purchase of goods or services from suppliers who employ staff who are not properly contractually employed and who work in inadequate conditions.

F.Ili Saclà S.p.A. awards professional assignments based on criteria of expertise, cost-effectiveness and fairness. Any remuneration or sums paid to persons appointed to professional posts, for whatever reason, must be properly documented.

Employees must report any personal relationships they have with suppliers or the company to their line manager before any negotiations take place.

They must also report any attempt or instance of interference with normal commercial practices immediately and thoroughly to their line manager or the Supervisory Body directly.

It is also strictly forbidden to:

- offer goods or services, specifically in the form of money or benefits, to directors, managing directors, senior managers responsible for preparing the company's financial statements, statutory auditors and liquidators, as well as persons under the management or supervision of any of the abovementioned individuals in other companies or organisations, with a view of inducing them to perform or omit acts that breach the duties incumbent upon them or their duty of loyalty, to obtain confidential information or any direct or indirect benefit for themselves and/or F.Ili Saclà S.p.A.; and
- accept goods or services from parties outside the company that would breach the obligations associated with their position or their duty of loyalty to the company, or that would favour such parties, even if there are no direct repercussions for F.Ili Saclà S.p.A. Any information obtained during the course of arrangements with customers and suppliers must be kept strictly confidential.

### **3.3. ARRANGEMENTS WITH COMPETITORS**

For F.Ili Saclà S.p.A., a fair and honest market is of the utmost importance. F.Ili Saclà S.p.A. is committed to complying with all relevant legislation and cooperating with market regulators. The company also undertakes not to intentionally infringe the industrial or intellectual property rights of third parties.

### **3.4. ARRANGEMENTS WITH SUPERVISORY AUTHORITIES, REGULATORY BODIES AND THE MANAGEMENT OF INSPECTIONS**

F.Ili Saclà S.p.A. fully cooperates with the supervisory authorities. The company ensures that its staff are available should a request be made for access to its premises, and it provides full cooperation in locating and making the relevant documentation available. The

staff at F.Ili Saclà S.p.A. are required to provide support for internal audit and control operations. Both internal and external supervisory bodies have full access to all the data, information and documents necessary for their supervisory and auditing activities. Employees responsible for preparing and submitting documents intended for supervisory authorities or the public must ensure that these documents are complete, accurate, reliable, clearly written and easy to understand.

Any information requested by other regulatory bodies during their supervisory activities must not be withheld, concealed, omitted or delayed. F.Ili Saclà S.p.A. employees shall proactively cooperate during preliminary investigations and shall not prevent or hinder the conduct of audit activities in any way.

Any inspections are handled by F.Ili Saclà S.p.A., with two employees present at all times to ensure compliance with the rules and to guarantee the independence and impartiality of its staff when dealing with such situations.

## **3.5 ARRANGEMENTS WITH INTEREST GROUPS, PUBLIC INSTITUTIONS AND REPRESENTATIVE BODIES**

F.Ili Saclà S.p.A. maintains relations with trade associations, trade unions, environmental organisations and other similar bodies. The company aims to develop its business by establishing mutually beneficial forms of cooperation and presenting its viewpoints. F.Ili Saclà S.p.A. must obtain the consent of senior management or the relevant departments before presenting specific positions to the associations.

## **3.6. CONTRIBUTIONS OR SPONSORSHIPS**

In accordance with the established procedures and with appropriate disclosure, F.Ili Saclà S.p.A. is willing to make charitable contributions and provide sponsorship to support initiatives proposed by public and private bodies, as well as non-profit organisations that are duly incorporated in accordance with the law and which promote the values underpinning this Code.

The term "contributions" refers to all disbursements, whether in cash or in kind (including gratuitous loans).

F.Ili Saclà S.p.A. will consider grant applications from organisations or associations that are explicitly non-profit-making and can provide valid articles of association and deeds of incorporation.

Sponsorship activities, which may relate to social, environmental, sporting, entertainment or artistic issues, are intended solely for events or organisations that can guarantee quality, and for which any personal or corporate conflicts of interest can be ruled out.

Sponsorship activities are managed in accordance with specific company procedures, which are designed to ensure that the allocation of funds and resources is transparent and can be documented.

Contributions and sponsorship arrangements must be accurately and transparently recorded in the company's accounts and records. The organisations to which they are made must also undergo an internal audit (due diligence process). Political contributions may constitute direct or indirect corruption. As such, they may result in liability for breaches of anti-corruption laws. More specifically, political contributions may be used improperly as a bribe to secure or maintain a business advantage, including landing a contract, obtaining a permit or licence, or influencing legislation to favour one's own business.

Given these risks, any direct or indirect contribution, in any form, to political parties, movements, committees, and political and trade union organisations, as well as their representatives and candidates, is prohibited.

### **3.7. CORRUPTION, FREE GIFTS AND BENEFITS**

F.Ili Saclà S.p.A. rejects and condemns all forms of corruption in its business dealings with private or public entities. More specifically, employees must not offer or accept donations, gifts or any other tokens of appreciation that go beyond normal commercial courtesies from any party, whether private or public, that has or may have dealings with the company. Such gifts must be authorised in advance by senior management.

Similarly, F.Ili Saclà S.p.A. does not provide any gift, present, payment or complimentary item under any circumstances that could be interpreted as exceeding normal commercial or friendly business practices, or that is intended to secure favourable treatment in decision-making or any activity relating to F.Ili Saclà S.p.A. In all cases, donations, gifts and gratuities offered to or received by staff of F.Ili Saclà S.p.A. from third parties, or vice versa, must be authorised by senior management and properly documented for audit purposes. Moreover, the value of these items must not exceed EUR 100.00 in any calendar year.

The purpose of donations is solely for the benefit of social solidarity, and they are allocated according to a rotation system that meets specific criteria. F.Ili Saclà S.p.A. maintains specific records and documentation relating to donations in order to comply with the law and enable the relevant departments to verify them.

In the event of a case of corruption, anyone with knowledge of it must report it promptly and in accordance with the circumstances via the internal whistleblowing system established by F.Ili Saclà S.p.A. for the purpose of preventing, identifying and/or managing unlawful conduct, in accordance with Italian Legislative Decree No. 23/2024 and/or the Company's Organisation and Management Model adopted under Article 6 of Italian Legislative Decree No. 231/2001.

### **3.8. SCHOLARSHIPS**

In accordance with an appropriate rotation policy, scholarships may only be awarded to the beneficiary organisation that submits an application for them. Scholarships must be awarded in accordance with written agreements.

F.Ili Saclà S.p.A. is not involved in the candidate selection process.

### **3.9 CONTRACTUAL ARRANGEMENTS, AGREEMENTS AND CONSULTANCY SERVICES WITH UNIVERSITIES AND OTHER SCIENTIFIC INSTITUTIONS**

Any research collaboration with an organisation must be accompanied by a protocol and approval or notification of the relevant Ethics Committee (where applicable).

A written contract or collaboration agreement must also be signed with the organisation carrying out the research.

An appropriate fee must be established, as well as any equipment that may be made available.

In accordance with relevant legislation, F.Ili Saclà S.p.A. may enter into consultancy agreements with professionals in the public and private sectors if there is a scientific, research-related, assessment-related or certification-related interest. Such appointments must be recorded in writing, either in an agreement or a letter of appointment.

This document should specify the activities and services to be performed, the remuneration to be paid and any incidental expenses.

It must also be accompanied by the relevant governing body's prior authorisations.

### **3.10 MANAGEMENT OF FUNDING OR CONTRIBUTIONS TO THE COMPANY**

In the management of loan applications, as well as in the use and reporting of loans, F.Ili Saclà S.p.A. prohibits any conduct that contravenes the following principles: (i) providing false information or failing to disclose material facts where required, which may mislead lending institutions in their assessment of submitted documentation; (ii) using grants, subsidies and public funding for purposes other than those for which they were obtained; (iii) providing lending institutions with false and/or incomplete information, or circumventing legal or regulatory obligations.

F.Ili Saclà S.p.A. prepares its financial statements in accordance with the principles of accuracy, transparency, completeness and traceability with regard to the information and data they contain.

F.Ili Saclà S.p.A. maintains specific documentation and records relating to contributions, loans and financial assistance received, along with the corresponding reports submitted to the relevant institutions. This information is kept for legal purposes and for verification by the relevant departments.

### **3.11 ARRANGEMENTS WITH CONTRACTUAL COUNTERPARTIES AND DUE DILIGENCE OBLIGATIONS**

F.Ili Saclà S.p.A. representatives must conduct preliminary checks on available information regarding business partners and suppliers to verify their integrity and the legitimacy of their operations.

F.Ili Saclà S.p.A. verifies appointments made to third parties, payment and cash flow regularity and tax obligation compliance. It also verifies the selection of suppliers of goods and services, the establishment of tender evaluation criteria and all information relating to the commercial and professional reliability of suppliers and partners.

Even when hiring employees, F.Ili Saclà S.p.A. first checks for any circumstances that might give rise to a conflict of interest in relation to the candidate.

### **3.12 ARRANGEMENTS WITH THE MEDIA**

Information communicated to the general public must be accurate, truthful and clearly stated. It must also be transparent and free from ambiguity, manipulation, falsehoods and bias. Such information may only be disclosed by company departments specifically authorised to do so, subject to authorisation from senior management.

Recipients of this Code are prohibited from:

- making any commitments in response to enquiries from the press or other media without prior authorisation;
- providing any information to media representatives without the express authorisation of the relevant company departments.

When attending conferences or public events, or when drafting publications, recipients of this Code who are required to disclose any information regarding objectives, strategies and results to the general public must obtain authorisation from the department responsible for media relations and from senior management, so that the content can be agreed and shared.

### **3.13 ARRANGEMENTS WITH THE PUBLIC ADMINISTRATION**

Without prejudice to the general provisions of this Code, it is not permitted to offer or promise money, gifts or remuneration in any form, nor to exert pressure or promise any item, service, benefit or favour to managers, officials or employees of the public administration, or to persons entrusted with public service duties, or to their relatives or cohabitants, with the aim of inducing them to perform an official act or act contrary to their official duties, either directly, indirectly or through a third party.

Anyone who receives any kind of explicit or implicit request for benefits from public administration officials, as defined above, must immediately stop dealing with them and inform their line manager or the Supervisory Body directly.

## **4. RULES OF CONDUCT ON THE MANAGEMENT OF COMPANY BUSINESS**

### **4.1. CONFLICT OF INTEREST**

Recipients of this Code and anyone else who may influence the decisions of F.Ili Saclà S.p.A. must not use their position, either within or outside the company, to influence decisions in their own favour or that of relatives, friends or acquaintances for personal gain, either explicitly or implicitly. Furthermore, if they find themselves in a situation of potential conflict of interest, they must immediately notify their line manager so that appropriate measures can be taken to ensure the independence of their judgement and decision-making.

If a violation occurs, F.Ili Saclà S.p.A. will take all necessary steps to resolve the conflict of interest, while retaining the right to take action to protect its interests.

## 4.2. GIFTS AND BENEFITS RECEIVED

Any gifts or benefits received by recipients that are not of a modest value or could be seen as exceeding normal standards of courtesy must be reported to the line manager. These gifts or benefits will then be assessed for appropriateness, and the most expedient measures will be taken.

## 4.3. INFORMATION MANAGEMENT

When carrying out their duties and within the scope of their responsibilities, recipients of this Code must process, disseminate or communicate any data, information or knowledge in their possession accurately, precisely and completely. They must also avoid providing incomplete, biased or untruthful information.

To ensure the integrity, confidentiality and availability of information, each recipient must familiarise themselves with and comply with F.Ili Saclà S.p.A.'s information security policies.

## 4.4. PERSONAL DATA PROTECTION

F.Ili Saclà S.p.A. is committed to ensuring that the collection and processing of personal data concerning its employees, independent contractors and third parties is carried out in accordance with the fundamental rights, freedoms and dignity of the data subjects, as required by the Data Protection Legislation in force (Regulation (EU) No. 2016/679 of the European Parliament and of the Council and Italian Legislative Decree No. 196/2003, as amended by Legislative Decree No. 101/2018, the "Italian Personal Data Protection Code").

Personal data will be processed lawfully, fairly and transparently. The data will be processed solely for specific, explicit and legitimate purposes. It will be retained for no longer than is necessary for these purposes and in accordance with the law.

## 4.5. USE OF COMPANY PROPERTY

All recipients of this Code are required to act with due care to protect the company's property and behave responsibly in accordance with company policies.

F.Ili Saclà S.p.A. is committed to protecting its own data and that of third parties, as well as its IT systems, and guarantees compliance with any copyright laws that may apply. To this end, each recipient of this Code is expressly prohibited from violating these principles by altering company property received for use, or by gaining unauthorised access to IT systems.

Each recipient of this Code is responsible for safeguarding and preserving any property entrusted to them by F.Ili Saclà S.p.A. as part of their duties. They must use this property appropriately, in the company's best interests and to prevent its misuse by third parties.

F.Ili Saclà has drawn up an IT Policy, which has been distributed to all employees. The policy sets out the scope of application, procedures and rules governing the use of IT equipment by authorised users. The aim is to protect company property and prevent inadvertent or improper conduct that could expose the company to security, reputational and financial risks arising from any damage caused, including to third parties.

## **4.6. RECRUITMENT, MANAGEMENT, DEVELOPMENT AND PROTECTION OF STAFF**

F.Ili Saclà S.p.A. guarantees compliance with all national and supranational employment relations regulations. The company recognises all forms of voluntary workers' association permitted by law. It is committed to ensuring that every employee is treated with respect and protected from unlawful influences, harassment and discrimination.

More specifically, F.Ili Saclà S.p.A. recognises the central role of its human resources. The company believes that the key to its success lies in the professional contributions of its staff, within a framework of loyalty and mutual trust. Accordingly, during the stages of staff selection, recruitment and career progression, F.Ili Saclà S.p.A. carries out assessments based solely on matching the desired and required profiles, and on transparent, verifiable, merit-based criteria in accordance with established procedures.

Persons responsible for overseeing and managing the recruitment process for employees at F.Ili Saclà S.p.A. are prohibited from accepting or soliciting promises or payments of money, goods or benefits, or from exerting pressure or requesting favours of any kind that may be intended to facilitate the transfer or promotion of an employee. Staff assessments are carried out based on how well candidates' profiles match the desired criteria and company requirements. These assessments are conducted in accordance with the principles of impartiality and equal opportunities for all.

All staff must be hired under a proper employment agreement. No form of child labour or irregular employment is permitted. More specifically, F.Ili Saclà S.p.A. does not employ foreign workers who do not possess a valid residence permit, or whose permit has expired without an application for renewal having been submitted within the legally stipulated timeframe, or whose permit has been revoked or cancelled. To this end, F.Ili Saclà S.p.A. routinely monitors and verifies that foreign employees continue to meet the necessary criteria and that their residence permits remain valid, even after they have been hired.

The management of employer-employee relations aims to provide equal opportunities and promote employees' professional development.

F.Ili Saclà S.p.A. is committed to safeguarding the health and safety of its employees in all working environments and encourages responsible behaviour from everyone.

To this end, the company promotes a policy based on implementing principles and practices that ensure the health and safety of its employees and is committed to communicating the results achieved.

F.Ili Saclà S.p.A. ensures that its employees and independent contractors work in environments that protect their health, safety and physical and psychological well-being, in compliance with applicable laws and regulations, including those designed specifically to prevent offences such as manslaughter and causing serious or grievous bodily harm through gross negligence, as detailed in Articles 589 and 590(3) of the Italian Criminal Code. Such offences are committed when accident prevention regulations and occupational health and safety rules are violated.

## **5. DISSEMINATION OF THE CODE OF ETHICS AND ADVERTISING**

F.Ili Saclà S.p.A. and its Board of Directors undertake to promote and ensure adequate awareness of the Code of Ethics. They do this either directly or through their delegated departments. They also distribute the Code to all relevant parties through appropriate communication initiatives and, where appropriate, training programmes.

In accordance with their respective responsibilities, F.Ili Saclà S.p.A. representatives shall communicate the existence and binding nature of the Code of Ethics to third parties. They shall also demand compliance with the Code and ensure that, before entering into any contractual arrangement with the company, the third party expressly agrees in writing to the Code's provisions, including those by reference.

When they are hired, every employee expressly and unconditionally accepts the provisions and values of the Code of Ethics.

The Code of Ethics, as updated and supplemented as necessary by the governing body, is also brought to the attention of all those with whom F.Ili Saclà S.p.A. has business dealings in the most appropriate manner and is available to all stakeholders in a specific section of the company's website.

## **6. MONITORING THE CORRECT APPLICATION OF THE CODE**

The senior management team at F.Ili Saclà S.p.A. ensures that the Code of Ethics is correctly applied, either directly or through delegation, and monitors its effective implementation and ongoing compliance.

Specifically, the Supervisory Body established by F.Ili Saclà S.p.A., in accordance with the requirements set out in Italian Legislative Decree No. 231/2001, is responsible for the following duties, among others falling within its remit:

- a) monitoring the dissemination, understanding and implementation of the general principles of conduct, including those specified in the Code of Ethics;
- b) managing reports received concerning situations or conduct that conflict with the principles set out in the Code of Ethics; and
- c) contributing to establishing disciplinary/sanctioning measures for serious breaches.

In all cases, the Board of Directors (or its delegated representatives, if applicable) is responsible for disseminating information on the correct interpretation of and compliance with the Code of Ethics through the appropriate channels.

## **7. VIOLATIONS OF THE CODE OF ETHICS AND COMPLAINTS**

All recipients of the Code of Ethics are encouraged to report, and are indeed duty-bound to report, any suspected violations of its principles of conduct of which they are aware. They should also report any conduct or situation that may give rise to concerns.

F.lli Saclà encourages the reporting of any suspicious conduct or violations of current rules and regulations through a whistleblowing procedure, which can be accessed via the website [www.WB24.it](http://www.WB24.it). Thanks to this mechanism, any unlawful conduct can be reported confidentially and anonymously in a simple and straightforward manner. This allows the company to promptly verify any violations and take appropriate action.

The Supervisory Body shall take steps to protect whistleblowers against any form of retaliation, discrimination, penalisation or other consequences arising from their reports, while ensuring the confidentiality of their identity. This is subject to compliance with legal obligations and the protection of the company's rights, as well as the rights of persons who have been wrongly and/or falsely accused.

The Supervisory Body assesses reports in accordance with its adopted internal procedures. To this end, all individuals are required to cooperate with the Supervisory Body to enable the collection of any further information that may be necessary for a proper and comprehensive assessment of the reports received.

## 8. PENALTIES/SANCTIONS

Adherence to the provisions of the Code of Ethics is an essential obligation for all company employees and contractual counterparties.

Any violation of the Code of Ethics, whether alleged or actual, must be reported to the Supervisory Body. The Supervisory Body is responsible for monitoring compliance with the principles set out in this Code of Ethics.

Following a preliminary investigation, the Supervisory Body will share the report and the evidence with the relevant company departments. Where deemed appropriate, these departments will take the necessary disciplinary action.

F.lli Saclà S.p.A. will take disciplinary action against any employee found to have committed a violation, regardless of whether the conduct in question constitutes a criminal offence and whether criminal proceedings are brought. This is in accordance with the Italian National Collective Bargaining Agreement for the chemical industry, under Article 7 of Italian Law No. 300/70. If the violation was committed by directors, consultants, clients, suppliers or other contractual counterparties, the clauses providing for termination of the contract/agreement shall apply.

## 9. FINAL PROVISIONS

The Code of Ethics has the force of a company regulation and is approved and adopted by the Board of Directors of F.lli Saclà S.p.A. through a formal resolution. Any substantial amendments and/or additions to this Code will be approved in the same manner, communicated promptly to its recipients via the company's official channels and published on the F.lli Saclà S.p.A. website.

If necessary, the Chief Executive Officer may make the appropriate amendments to the wording and/or update the content to align with the current legislation.