

# CODE OF ETHICS | EURICOM S.p.A.

## Rev.1 of 30/10/2023

<b>Definitions .....</b>	<b>3</b>
<b>1. PREAMBLE .....</b>	<b>4</b>
<b>2. RECEIPTS.....</b>	<b>5</b>
<b>3. ADOPTION, UPDATING AND PUBLICATION OF THE CODE .....</b>	<b>5</b>
<b>4. APPLICATIONS OF THE CODE .....</b>	<b>6</b>
<b>5. VALUES AND ETHICAL PRINCIPLES OF EURICOM S.p.A. ....</b>	<b>8</b>
<b>6. BUSINESS MANAGEMENT .....</b>	<b>12</b>
<b>6.1. TRANSPARENCY OF ACCOUNTS AND INTERNAL CONTROLS .....</b>	<b>12</b>
<b>6.2. TREATMENT AND CONFIDENTIALITY OF INFORMATION .....</b>	<b>12</b>
<b>6.3. GIFTS, PRESENTS AND OTHER FORMS OF BENEFITS .....</b>	<b>13</b>
<b>6.4. CONFLICT OF INTEREST .....</b>	<b>13</b>
<b>6.5. USE OF EQUIPMENT, DEVICES AND CORPORATE STRUCTURES, WITH PARTICULAR         REFERENCE TO IT TOOLS .....</b>	<b>13</b>
<b>6.6. PROTECTION OF INDUSTRIAL AND INTELLECTUAL PROPERTY AND COPYRIGHT .....</b>	<b>14</b>
<b>6.7. PROHIBITION OF POSSESSION OF PORNOGRAPHIC MATERIAL.....</b>	<b>14</b>
<b>7. RELATIONS WITH STAKEHOLDERS.....</b>	<b>15</b>
<b>7.1. SHAREHOLDERS .....</b>	<b>15</b>
<b>7.2. HUMAN RESOURCES .....</b>	<b>15</b>
<b>7.3. HEALTH AND SAFETY IN THE WORKPLACE.....</b>	<b>16</b>
<b>7.4. PRINCIPLES OF CONDUCT FOR EMPLOYEES AND COLLABORATORS .....</b>	<b>16</b>
<b>7.5. USE OF ASSETS, MEANS, CORPORATE RESOURCES AND PROTECTION OF CORPORATE         ASSETS.....</b>	<b>16</b>
<b>7.6. CUSTOMERS .....</b>	<b>17</b>
<b>7.7. SUPPLIERS AND BUSINESS PARTNERS.....</b>	<b>17</b>
<b>7.8. PUBLIC ADMINISTRATION .....</b>	<b>17</b>
<b>7.9. PUBLIC SUPERVISORY AUTHORITIES AND CONTROL BODIES.....</b>	<b>18</b>
<b>7.10. EXTERNAL COMMUNICATIONS.....</b>	<b>19</b>
<b>7.11. CONTRIBUTIONS TO CHARITIES AND ONLUS, DONATIONS AND SPONSORSHIPS.....</b>	<b>19</b>
<b>7.12. ENVIRONMENTAL PROTECTION .....</b>	<b>19</b>
<b>8. VIOLATIONS OF THE CODE OF ETHICS AND RESULTING SANCTIONS.....</b>	<b>21</b>
<b>8.1. COMPLIANCE WITH THE CODE, VIOLATIONS AND SANCTIONS .....</b>	<b>21</b>
<b>8.2. REPORTING .....</b>	<b>21</b>

## Definitions

In this document and its annexes, the following expressions have the following meanings:

- **"Code of Ethics" or "Code"**: a document, officially approved by the Euricom Group as an explanation of the corporate policy of the entity, which contains the ethical principles of conduct - that is, the recommendations, obligations and / or prohibitions - to which the Recipients must comply and whose violation is sanctioned.
- **"Decree 231" or "Decree" or "Legislative Decree 231/2001 of 8 June 2001"**: decree containing the "Discipline of the administrative liability of legal persons, companies and associations even without legal personality, pursuant to art. 11 of Law no. 300 of 29 September 2000", published in the Official Gazette no. 140 of 19 June 2001, and its subsequent amendments and/or additions.
- **"Recipients" or "Addressees"**: all persons, such as employees, members of the Board of Directors and the Board of Statutory Auditors and external collaborators, who contribute to the achievement of the Group's objectives.
- **"Euricom S.p.A." or "Head Company"**: head company of the Euricom Group.
- **"Group" or "Euricom Group"**: the corporate group of which Euricom S.p.A. is the head company.
- **"Organization, Management and Control Model" or "Model 231" or "Model"**: model of organization, management and control considered suitable to prevent crimes of the Decree.
- **"Administrative Organ"**: Board of Directors and/or Board of Statutory Auditors of the Group's companies.
- **"Supervisory Authority" or "OdV"**: authority provided by art. 6 of the Decree, with the task of supervising the effectiveness of the Organization, Management and Control Model adopted by Euricom S.p.A., as well as its updating.
- **"PA"**: Public Administration. The concept of Public Administration includes Public Institutions, Public Officials and Public Service Representatives.
- **"Company"**: companies that are part of the Euricom Group.

## 1. PREAMBLE

Euricom Group, founded in 1988, is one of the main players in the rice sector worldwide, present with its products in more than 40 countries around the world.

The Group operates in all segments of the rice market, as well as in the flour sector in Italy and in the pasta sector in the Balkan area. In addition, the Group is a producer of green energy in Italy.

The Group has 13 production plants in 7 countries of the European Union and sales offices in the United Kingdom, Central and South America and India.

The company is a dynamic reality, constantly evolving thanks to strategic acquisitions and joint ventures aimed at strengthening its presence on the European and international market. Its strategy is aimed at the supply needs of the countries that request it, technological innovations and the taste of the final consumer.

The vision that distinguishes the Group is the result of a complete control over the supply chain, of which it can guarantee high quality standards in every step, thanks to a constant certification work. The certifications obtained, in fact, confirm full compliance with the legislative parameters, provided for in all countries of the world, in all processes and transformation processes and prove the achievement of industrial excellence, also in environmental matters and corporate responsibility.

## 2. RECIPIENTS

The Code of Ethics is addressed to the members of the statutory organ, to the Shareholders, to all employees and collaborators of the Company, to suppliers, to Commercial partners, to customers, as well as all those who, directly or indirectly, permanently or temporarily, operate behalf of the Companies. All third parties who have business relationships with the Companies of the Euricom Group must accept and respect this document. Compliance with the contents of the Code of Ethics, by all those who work in the name and on behalf of the Company, is essential for the proper functioning, reliability, reputation on the Market of the Company.

In the planning of corporate objectives, the members of the Board of Directors of the Group Companies are inspired by the principles of the Code of Ethics that acts as a compass in decisions in line with company policy and in the daily actions of the Recipients.

Euricom Group Company is committed to ensuring full respect for the ethical values of conduct. In the first place, it is up to the managers to give substance to the values and principles contained in the Code, taking on the responsibilities internally and externally and strengthening the trust, cohesion and spirit of the Companies.

All actions, operations, negotiations and behaviors put in place by the Recipients in the performance of the work activity are inspired by the maximum correctness from the point of view of management, the transparency of the information, the legitimacy, under the formal and substantial aspect, the clarity and truth in accounting records, according to current regulations and internal procedures. Relations between employees, at all levels, must be based on fairness, cooperation, loyalty and mutual respect.

The Code of Ethics applies its standards and its principles to all Group Companies, both in Italy and abroad.

## 3. ADOPTION, UPDATING AND PUBLICATION OF THE CODE

The Code of Ethics is approved by the Board of Directors of Euricom S.p.A. and implemented by all the Group's subsidiaries. Any "substantial" amendments and/or updates to the Code of Ethics (i.e. changes to the values and ethical principles) will be approved by the Board of Directors and communicated to the Addressees through the appropriate channels. For the adoption of changes other than substantial ones, the Board of Directors will delegate to the Chief Executive Officer who will report to the Board on the nature of the changes made. Euricom also reserves the right to modify or supplement the Code of Ethics, based on the indications of the Addressees, the Controlling Bodies and in accordance with the evolution of the relevant legislation.

The Code is published on the company website and is made available on the company intranet in order to make it available to all interested parties, both internal and external to the Group.

The Company, through the functions in charge, promotes the dissemination of the Code throughout the Group and among the Addressees and provides them with adequate information and training support.

The Company, through the appropriate functions, promotes the dissemination of the Code of Ethics throughout the Group and among the Addressees, and provides them with adequate information and training support. In fact, specific information activities are planned in order to ensure the correct understanding of the Code of Ethics; the Companies prepare and implement, also on the basis of any indications from the Euricom S.p.A. OdV, a periodic communication/training plan aimed at promoting awareness of the principles and ethical standards contained in the Code of Ethics. Training initiatives

must be differentiated according to the role and responsibility of the Recipients.

#### 4. APPLICATIONS OF THE CODE

The Board of Directors of Euricom S.p.A. is responsible for the application, observance and compliance with the ethical principles set out in the Code, as well as the application of sanctions in more serious cases.

Euricom S.p.A. guarantees the following

- the dissemination of the Code of Ethics among its recipients;
- the updating of the Code of Ethics in order to adapt it to changes in legislation relevant to the Code of Ethics;
- the provision of adequate cognitive tools and clarification on the interpretation and implementation of the rules contained in the Code;
- carrying out checks on any reports of violations of the Code or of the rules of relevance for the Code itself;
- the assessment of alleged breaches of the Code and the consequent implementation, in case of ascertained breach, of appropriate sanctioning measures;
- that no one may suffer retaliation of any kind for having provided information on possible violations of the Code or of the rules of reference.

Recipients are required to be familiar with the ethical principles contained in the Code and the reference rules governing the scope of their function, deriving from the law or from internal procedures and regulations. Therefore, at the time of establishing the employment or business relationship, all Addressees must clearly and explicitly accept their commitments arising from this Code of Ethics.

In particular, the Addressees are obliged to

- refrain from conduct contrary to the rules contained in the Code of Ethics;
- to refer to the OdV in case of request for clarification on how the rules are applied or interpreted
- promptly report to the OdV any information concerning possible violations of the provisions of this Code, as well as any request for violation made to it. The Companies shall protect whistleblowers from any form of retaliation;
- cooperate with the structures in charge of verifying possible violations.

Each Head of function within the Companies has the obligation to

- set an example to his employees by his own behaviour;
- direct their colleagues to comply with the Code and encourage them to raise problems and issues regarding the rules;
- ensure that employees understand that compliance with the rules of the Code is an essential

part of the quality of work performance;

- carefully select, to the extent of their competence, employees and external collaborators in order to prevent the appointment of persons who do not fully trust their commitment to observe the rules of the Code;
- promptly report possible cases of violation to one's superior;
- take immediate corrective action when required by the situation;
- prevent any kind of retaliation.

In relation to third parties, Addressees shall take care to

- adequately inform them about the commitments and obligations imposed by the Code;
- demand compliance with the obligations that directly concern their activity;
- take appropriate internal and, if within their competence, external initiatives in the event of failure by third parties to comply with the Code.

## 5. VALUES AND ETHICAL PRINCIPLES OF EURICOM S.p.A.

In carrying out its business activities and achieving its objectives, the Euricom Group is guided by the following ethical principles.

It is essential that these principles are translated into concrete conduct and behaviour by all Group companies.

### HONESTY AND LEGALITY

The Group business is in accordance with the principles of honesty and legality. In particular, each Group Company is required to comply with laws, rules and corporate procedures to execute and report business transactions, obtain appropriate authorisations and comply with all aspects of internal and external accounting control.

Corrupt practices, fraud and swindling, illegitimate favours, collusive behaviour, solicitation, directly and/or through third parties, of personal and career advantages for oneself or others, are prohibited. In no case, in fact, the Group's interest can justify conduct that does not comply with the Principles and to the anti-corruption rules.

Therefore, all conducts relevant to any type of offence and, in particular, those provided for by the Decree and subsequent amendments and additions, are prohibited.

It should be noted that the conviction of acting in some way to the advantage of the Company to which one belongs does not justify the adoption of Group conducts in contrast with the rules expressed in this document; therefore, the violation of these rules will lead to the adoption of the relevant sanctions.

The Addressees, within the framework of the relations established with the Group, without prejudice to the applicable regulations in force, shall refrain from carrying out activities in contrast with the interests of the Companies themselves or which may interfere with their ability to take decisions, in an impartial manner, in the best interest of the Companies of the Group on behalf of which they operate and in full compliance with the rules of the Code of Ethics.

The style of conduct of the Companies towards their customers is marked by availability, respect and courtesy, as well as the maintenance of high standards of professionalism. Illegal, collusive practices and behaviour, illegal payments, attempts at corruption and favouritism are prohibited.

### INTEGRITY

Company activities are carried out with integrity, commitment and professional rigour.

Relations between employees and collaborators, at all levels, must be based on behavioural criteria of fairness, collaboration, loyalty and mutual respect.

Each addressee must act with diligence and common sense and avoid any involvement in illegal activities or actions that may cause damage to the organisation for which he or she works, also in terms of reputation. Each recipient must also disclose company information externally only if required by his or her role or by law and comply with the corporate policy of the organisation for which he or she works, when ethical and legitimate.

### TRANSPARENCY

Euricom Group companies guarantees compliance with the principles of transparency, truthfulness



and completeness in the preparation and transmission of documents showing economic and financial elements and any other company information.

### **EQUALITY AND IMPARTIALITY**

The Company takes its business decisions respecting the personal dignity, the private sphere and the personality rights of any individual and avoiding any discrimination on the basis of age, language, sex, sexuality, state of health, race, nationality, political opinions and religious beliefs of its interlocutors.

### **LOYALTY, FAIRNESS AND GOOD FAITH**

All the Recipients of this Code must act fairly and in good faith, directing their behaviour towards rules of loyalty and legitimate trust in collaborative, commercial and professional relations.

In the performance of business activities, situations where the persons involved are, or may even just appear to be, in conflict of interest must be avoided.

In the presence of conflicts of interest in business, commercial and professional relations, the person concerned must inform his or her manager immediately.

Irrespective of specific contractual obligations or extra-contractual duty, each addressee shall act in such a way as to preserve the interests of the counterparty, provided that this does not generate damage or harm the Group's reputation.

### **CLARITY**

The communication and management of information must be based on real, accurate, exhaustive and, where possible, comparable data over time. Recipients shall allow effective and, where appropriate, schematic and concise communications, without prejudice to compliance with company regulations and procedures, as well as with applicable legislation.

Documents shall be formalised, filed and catalogued in such a way as to facilitate the retrieval of the information they contain.

### **COMPLIANCE WITH THE STRICTEST RULES OF CONDUCT IN RELATIONS WITH THE PUBLIC ADMINISTRATION IN FULL RESPECT OF INSTITUTIONAL FUNCTIONS**

In relations with the Public Administration and other Public Institutions, all Addressees must comply with the principles of legality, honesty, transparency and clarity, as well as comply with the legislation in force in all the countries in which they operate and refrain from behaviour that may appear to be corruptive or intimidating.

In case of attempted bribery or induction to give or promise money or other benefits by a public official, the person concerned shall

- not follow up the request or contact;
- promptly inform their manager (in the case of a manager/employee) or the internal contact (in the case of third parties), also in order to activate the reports to the competent control bodies.

### **RESPECT FOR INDIVIDUALS**

The Companies of the Group undertake to avoid any discrimination towards their employees and collaborators on the basis of age, sex, sexuality, state of health, race, nationality, political opinions,

membership of trade unions and religious beliefs, respecting the physical and cultural integrity of the person. In particular, each Company promotes and protects the value of human resources, in order to improve and increase the wealth and complementarity of skills possessed by its employees.

The Group does not tolerate requests or threats aimed at inducing people to act against the law or against the Code of Ethics, or to adopt behaviours detrimental to each person's moral or personal convictions and preferences.

#### **FORCED LABOR AND MODERN SLAVERY**

Euricom Group does not use forced labor. Forced labor includes any work or service required of a person, under penalty of punishment, for which the person has not volunteered.

The Group observes the ban on modern slavery and any other slavery-like practices. These include serfdom or other forms of exercising power or oppression in the work environment, for example through extreme economic or sexual exploitation or humiliation.

The Group shall also respect its employees' right of termination.

#### **FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

The Group guarantees its employees freedom of association and the right to engage in collective bargaining. Employees have the right to hold meetings in accordance with applicable laws and to establish or join unions and representative bodies. Employees also have the right to engage in collective bargaining, and the statutory right to strike, to resolve workplace and wage issues. Under no circumstances may the exercise of such rights be met with threats of reprisal.

#### **DISCIPLINARY ACTION**

Disciplinary action must be in accordance with national law and internationally recognized human rights.

No unreasonable disciplinary action may be taken, particularly including withholding pay, social security contributions or documents (e.g., identification cards) or placing a ban on leaving the workplace. When deploying private security forces, Euricom Group ensures appropriate control and instruction measures, especially to prevent torture, cruel, inhumane, or humiliating treatment, injury to life, limb or health, or the impairment of freedom of association.

#### **LAND RIGHTS**

Euricom Group respects the prevailing land rights and refrains from any form of unlawful forced eviction or unlawful deprivation or dispossession of land, forest, or bodies of water whose use secures a person's livelihood or the livelihood of several people, in particular in connection with acquisition or development.

#### **COMPLIANCE WITH THE RULES OF THE SUPERVISORY AUTHORITIES AND THE PRINCIPLE OF FREE COMPETITION**

The Group considers free competition as an asset to be protected and recognises that fair and loyal competition affects the reputation and is functional to the sustainable development of the company and the market in which it operates. In view of this, the Group refrains from any conduct aimed at favouring the conclusion of business to its own advantage in an unfair manner or in violation of laws or regulations in force, condemning any act carried out in violation of the regulations in force to protect the same, even more so through the use of threats and/or violence. The Group therefore refrains from

making false statements, defaming or intentionally attacking competitors.

The Group also undertakes to avoid agreements of any kind with companies in the sector that may alter free competition, establishing sales prices or production volumes, agreeing on sales areas or customers to be served.

### **ENVIRONMENTAL PROTECTION AND SAFETY, ALSO WITH REFERENCE TO THE WORKPLACE**

The environment is a primary asset that the Group is committed to safeguarding by managing its activities and organising its processes with the aim of preserving the environment in which it operates and complying with current environmental protection regulations.

The Group is committed to achieving and maintaining adequate health and safety standards and guarantees the adoption of the necessary measures to prevent accidents and illnesses at work, in full compliance with the provisions of Legislative Decree 81/2008 (Consolidated Safety Act) and subsequent amendments and additions, as well as with the other relevant regulations in force.

### **RESOURCES AND POLLUTION OF THE ENVIRONMENT**

The Group shall not cause any harmful changes to the soil, water pollution, air pollution, harmful noise pollution, or excessive water consumption resulting in significant impairments to the natural foundations to protect and produce food, preventing access to clean drinking water, making access to sanitary facilities difficult or having the potential to be harmful to the health of an individual or several individuals. Any further pollution of the environment shall be avoided to the extent reasonably possible, or at least minimized. Protection of the environment and climate and promoting biodiversity is an ongoing challenge which can only be met by consistently improving the level of protection, achieved by permanently reducing the consumption of resources and reducing waste. Euricom Group shall make a reasonable effort to do this during its business activities.

### **CONFIDENTIALITY, PROTECTION OF INFORMATION AND PRIVACY**

The Companies of the Group ensure, in compliance with the provisions of the law in force, the confidentiality of the information in their possession, undertaking to protect the confidential, sensitive or personal data of their collaborators or third parties.

The companies, in full compliance with the provisions of Legislative Decree 196/2003 and the GDPR, ensure the proper handling of personal and sensitive data that they may come into possession of in the management of business activities.

### **QUALITY OF PRODUCTS AND SERVICES**

The production and working activities of the Group's companies are aimed at satisfying and protecting their customers. The companies are committed to listening to their customers' requests in order to improve the quality of their products and services.

The Group therefore directs its research, development and marketing activities towards high quality standards for its services and products.

## 6. BUSINESS MANAGEMENT

### 6.1. TRANSPARENCY OF ACCOUNTS AND INTERNAL CONTROLS

The Group ensures maximum transparency for its Shareholders and internal and external control bodies on the significant facts concerning the management of its companies.

Accounting transparency is based on the truth, accuracy and completeness of the basic information for the relevant accounting records.

Each Addressee shall cooperate to ensure that management facts are correctly and promptly represented in the accounts.

Addressees who become aware of omissions, falsifications, negligence in the accounts or in the documentation on which the accounting records are based, are required to report the facts to their superior.

Financial, accounting and management evidence and any other communication that the Company issues to third parties shall meet the requirements of truthfulness, completeness and accuracy.

The Group prohibits Addressees from:

- expose material facts that are not true;
- omit information, the disclosure of which is required by law, on the economic, equity or financial situation of the Companies;
- conceal data or information in such a way as to mislead the recipients thereof;
- prevent or in any case hinder the performance of the control activities legally attributed to the Shareholders to other corporate bodies or to the competent supervisory authorities.

### 6.2. TREATMENT AND CONFIDENTIALITY OF INFORMATION

The Group ensures the confidentiality of the information in its possession, unless specifically requested by the competent authorities, and refrains from using illegally acquired data.

The Group has adopted specific policies, procedures, rules and tools aimed at achieving an adequate level of security in the management of the company's information assets, in terms of

- confidentiality (access to information allowed only to authorised persons);
- integrity (guarantee of accuracy and completeness of information and of the processes of its treatment/processing);
- availability (accessibility to information by authorised persons when they need it).

It is the primary objective of the Group to guarantee and protect the security and protection of data and confidential or personal information relating to Shareholders, customers, employees, consultants, collaborators or third parties in its possession.

It is forbidden for Addressees to disseminate information not in the public domain, of which they have become aware, even accidentally, in the course of their activities, to misuse privileged information, manipulate it and disseminate false information.

### **6.3. GIFTS, PRESENTS AND OTHER FORMS OF BENEFITS**

It is not allowed to pay or offer, directly or indirectly, payments and material benefits of any entity to third parties, public officials or private individuals, which may be interpreted as exceeding normal business practices or courtesy, or aimed at acquiring favourable treatment in the conduct of any operation related to the company's business or to influence or compensate the activity of the third party itself.

This rule does not allow exceptions even in those countries where offering valuable gifts to business partners is considered customary.

Acts of commercial courtesy, such as gifts or forms of hospitality, are permitted when they are of modest value and in any case such as not to compromise the integrity or reputation of one of the parties and cannot be interpreted, by an impartial observer, as aimed at acquiring improper advantages. In any case, this type of expenditure must always be authorised by the position defined by the Group's internal protocol and adequately documented.

### **6.4. CONFLICT OF INTEREST**

The Group, in accordance with the values of honesty and fairness, undertakes to put in place the necessary measures to prevent and avoid phenomena of conflict of interest.

This applies both in the event that an Addressee pursues an interest different from the Group's mission and takes personal advantage of business opportunities of the Companies, and in the event that representatives of customers or suppliers, or public institutions, act in contrast with the fiduciary duties linked to their position.

Any situation that may constitute or give rise to a conflict of interest must be promptly communicated to the superior or to the relevant function. In particular, all Addressees of the rules of this Code of Ethics are required to avoid conflicts of interest between personal and family economic activities and the duties/functions they hold within the structure they belong to.

Recipients are required to avoid all situations and all activities in which a conflict may arise with the interests of the Companies of the Group or which may interfere with their ability to take impartial decisions in the best interests of the Companies in line with the technical aspects of their profession and in full compliance with the rules of the Code of Ethics. They must also refrain from taking personal advantage of acts of disposition of corporate assets or business opportunities of which they have become aware during the performance of their duties.

By way of example and without limitation, the following situations may give rise to a conflict of interest

- performing operational functions or having economic or financial interests with customers, suppliers, competitors or business partners;
- using one's position in the Company or the information acquired in one's work in such a way that may create a conflict between one's personal interests and the interests or pursuit of the Company's mission;
- allow the choices to be made by the Group regarding contracts with external parties in various capacities to be influenced by personal interests.

### **6.5. USE OF EQUIPMENT, DEVICES AND CORPORATE STRUCTURES, WITH PARTICULAR REFERENCE TO IT TOOLS**

Each Addressee is required to work diligently to protect corporate assets, through responsible behaviour in line with the operating procedures established to regulate their use.

To this end, each Addressee is responsible for guarding, preserving and defending the assets and resources of the Company entrusted to him/her within the scope of his/her activity and shall use them in a manner consistent with the corporate interest as well as with the law, preventing and avoiding any improper use thereof or by unauthorised third parties. It is expressly forbidden to use company assets for personal or non-work-related needs, for purposes contrary to the law, public order or morality.

With particular reference to the IT tools made available by the Companies to the Addressees, it is expressly forbidden to engage in conduct that may damage, alter, deteriorate or destroy the IT or telematic systems, programmes and data of the Companies themselves or of third parties. It is also expressly forbidden to illegally enter computer or telematic systems protected by security measures or to remain there against the express or tacit will of those who have the right to exclude them, as well as to procure, reproduce, disseminate, communicate and/or deliver codes, passwords or other means of access to computer or telematic systems protected by security measures, or, in any case, to provide indications or instructions suitable for the above purpose.

It is also expressly prohibited to destroy, damage, delete, alter or suppress information, data or computer programs of others, including those used by the State or by another public entity or pertaining to it, or in any case of public utility, as well as to introduce or transmit data, information or programs likely to destroy, damage, make, in whole or in part, useless the computer or telematic systems of others or of public utility or seriously hinder their operation.

Finally, it is expressly prohibited to falsify any document, including computer documents.

## **6.6. PROTECTION OF INDUSTRIAL AND INTELLECTUAL PROPERTY AND COPYRIGHT**

The Group's conduct is based on legality and transparency in every sector of its activity and condemns any form of disturbance to the freedom of industry and commerce, as well as any possible form of fraud, counterfeiting, usurpation or alteration of goods susceptible of patent arising from an industrial or intellectual property right, calling on all those who work on behalf of the Companies to comply with the regulations. The industrial and/or intellectual property rights on goods susceptible of protection, possibly created, developed or realised in the framework of the working activity, (such as, by way of example and not limited to, trademarks, patents, logos, signs of recognition, know-how, industrial secrets, software, studies and publications etc.) belong to the Companies, which retain the right to use them in the ways and forms it considers most appropriate, without prejudice to the moral right of the author of the same to be recognised as such.

Each Addressee undertakes to protect the industrial and intellectual property rights owned by or in use by the companies of the Group and not to use the goods protected by industrial and/or intellectual property rights.

## **6.7. PROHIBITION OF POSSESSION OF PORNOGRAPHIC MATERIAL**

The Group prohibits within the premises of the Companies, also outside, or in any other place attributable to them, the viewing, use, downloading, storage and reproduction of pornographic material or virtual images, by any electronic means or not, through the use of the equipment in use by the Addressees.

## **7. RELATIONS WITH STAKEHOLDERS**

### **7.1. SHAREHOLDERS**

One of the Group's objectives is to enhance its shareholders' investment by pursuing a development and risk management policy capable of guaranteeing satisfactory economic results over time and the preservation of assets for future generations.

The Group undertakes to create the conditions for a widespread and conscious participation of the Shareholders in the decisions within their competence, through the promotion of equality and completeness of information to protect their interest.

### **7.2. HUMAN RESOURCES**

The Group acknowledges the centrality of the human capital (meaning both the Shareholders and the employees and collaborators who provide their services in favour of the Companies in contractual forms different from the employment one) and the importance of establishing and maintaining relations based on loyalty and mutual trust.

In selecting employees and collaborators, Group companies refrain from discriminatory behaviour, assessing candidates on the basis of criteria of merit, competence and professionalism, taking into account specific company needs.

Contracts with employees and collaborators are stipulated in compliance with the rules established by the regulations applicable from time to time and by the collective bargaining agreement in force.

In managing relations with employees and collaborators, the Group recognises and protects all the rights enjoyed by them, also in consideration of their position of subordination to management, organisational and hierarchical power.

Employees and collaborators may not be required to behave in a manner contrary to the provisions of this Code, as a duty to their superior.

These are the responsibilities assumed towards staff

- always treat others with respect, courtesy and dignity;
- create an environment that encourages open communication
- respecting the privacy of each individual;
- finding the right balance between work requirements and private life;
- contribute to respect for 'diversity' by committing to offer equal employment rights and equal career opportunities to all job applicants and employees;
- not tolerate sexual harassment or harassment of any other kind;
- protect the dignity, physical and moral integrity of individuals;
- use the company's communication tools in a professional and ethical manner;
- strive to maintain a healthy, safe and environmentally sound workplace.

### **7.3. HEALTH AND SAFETY IN THE WORKPLACE**

The protection of the environment and health and safety in the workplace are of the utmost importance to the Companies of the Euricom Group. Each Company has adopted specific policies, procedures and control tools regarding health and safety in the workplace, fulfilling legal obligations and promoting and disseminating a culture of safety. The aim is to develop awareness of risk management, promote responsible behaviour and preserve, especially through preventive actions, the health and safety of all employees and collaborators.

The knowledge of and compliance with current regulations on health and safety in the workplace is, therefore, a priority requirement for the Companies, for all their collaborators and employees, as well as for third parties with whom the Companies have relations.

### **7.4. PRINCIPLES OF CONDUCT FOR EMPLOYEES AND COLLABORATORS**

The behaviour of each employee and collaborator shall comply with the principles of professionalism, transparency, fairness and honesty expressed by our law as well as with the rules dictated by the Code of Ethics, the contractual rules governing the employment relationship and the provisions and instructions relating to the company's activities.

The Companies of the Group shall ensure that employees and collaborators operate in line with company policies and behave with loyalty, helpfulness and courtesy towards their colleagues and other people with whom they come into contact during the performance of their duties, both in the workplace and when carrying out company activities outside of it.

Any employee, or collaborator in any capacity, who becomes aware of violations or attempted violations of this Code of Ethics shall report them to his/her superior.

Where reports prove to be unfounded and made in bad faith, the sanctions provided for in this Code of Ethics may be applied to the employee or collaborator responsible.

### **7.5. USE OF ASSETS, MEANS, CORPORATE RESOURCES AND PROTECTION OF CORPORATE ASSETS**

Company assets consist of tangible physical assets (e.g. computers, printers, equipment, cars, buildings, infrastructures) and intangible assets (e.g. know-how, confidential information, names of strategic suppliers and customers, etc.).

The preservation of assets is a fundamental value for the safeguard of corporate interests.

Recipients, in the performance of their corporate activities, must protect the company's assets and prevent their fraudulent or improper use.

The use of corporate assets and information by the Addressees must be exclusively functional to the performance of corporate activities.

Employees and collaborators are required to use assets, means and resources made available to them in such a way as to protect their preservation and functionality.

In the use of goods, means and corporate resources, the Addressees are therefore bound to behave responsibly and in line with the operating procedures established to regulate their use.

Each employee and collaborator is responsible for the assets, means and resources entrusted to him/her and is required to promptly inform his/her supervisor about their improper use or use that



is harmful to the company's assets.

## **7.6. CUSTOMERS**

Over time, the Company has become aware of the importance of appreciating its products and services in order to cultivate its success and establish itself on the market.

Customers are, today, a fundamental asset for the Group. For this reason, all Addressees must pursue maximum customer satisfaction and provide, with efficiency and courtesy, high quality food products and complete and truthful information on their characteristics.

## **7.7. SUPPLIERS AND BUSINESS PARTNERS**

Relations with suppliers and business partners are based on the search for the right efficiency in the supply, on loyalty in the relationship, on the recognition of the professionalism and competence of the interlocutor.

When selecting and establishing relations with suppliers, Group companies objectively and comprehensively assess the cost-effectiveness, technical and economic capabilities and overall reliability of their interlocutors.

In particular, the Companies take into account elements such as financial solidity, skills, professionalism, design resources, know-how and the adoption of appropriate quality control systems.

The Company shall ensure that negotiations and negotiation relationships with suppliers and other stakeholders are regulated by specific agreements that are clear and traceable ex post, are based on the utmost fairness, seriousness and conducted in compliance with current legislation. The Company prohibits any form of corruption towards third parties in order to obtain commercial opportunities and favours.

The Group undertakes to require its suppliers to comply with behavioural principles corresponding to its own, considering this aspect of fundamental importance for the establishment or continuation of a business relationship. Core suppliers, business partners or external collaborators are informed of the existence of the Code of Ethics and of the relevant commitments and, to this end, individual contracts include special clauses requiring or regulating compliance with it.

Furthermore, the Group does not use child labour and does not enter into contracts with suppliers or other collaborators who do so, guaranteeing that its products are not manufactured by people who are denied the opportunity to receive an education and live a life appropriate to the rights of the child.

## **7.8. PUBLIC ADMINISTRATION**

Relations between the Company and Public Institutions and Administrations are based on the principles of fairness, transparency and cooperation. Any type of behaviour that could be construed as collusive or likely to undermine the principles expressed in this Code is rejected.

The assumption of commitments with Institutions and Public Administrations is reserved to the Directors, according to the delegations conferred, unless special powers of attorney are conferred to other internal resources.

The Group rejects any behaviour that could be interpreted as a promise or offer of payments, goods or other benefits of any kind in order to promote and favour its interests and take advantage of them.

The Company is committed to avoid any form of gift to public officials or persons in charge of a public service, of any kind, whether Italian or foreign, or to their relatives, even through an intermediary, such as to influence the independence of judgement or induce them to ensure any advantage for themselves. This commitment does not allow for exceptions even in those countries where offering valuable gifts to business partners is considered customary. Gifts or gratuities are permitted only if they are of modest value and, in any case, if they cannot be interpreted in any way as a means of receiving illegitimate favours, and always in compliance with the internal procedures laid down for this purpose.

Any employee who directly or indirectly receives proposals for benefits from public officials, public service appointees or employees in general of Public Institutions and Administrations which might constitute such a case, must immediately report it to OdV, or to the contact person, if a third party.

When any business negotiation, request or relationship with the Public Administration is in progress, the personnel in charge must not try to improperly influence the decisions of the counterparty, including those of the officials who negotiate or take decisions on behalf of the Institutions and Public Administrations.

In the specific case of conducting a tender with Institutions and Public Administrations, one must act in accordance with the law and proper business practice.

In the event of the use of a consultant or a "third party" representing the Companies in relations with Institutions and Public Administrations, the same guidelines apply to the consultant and his staff or to the "third party" as to the Company's employees.

Moreover, the Companies shall not be represented in relations with Institutions and Public Administrations by a consultant or a "third party" when conflicts of interest may arise.

In the course of a business negotiation, request or commercial relationship with Institutions and Public Administrations, the following actions shall not be undertaken (directly or indirectly)

- examining or proposing employment and/or business opportunities that may benefit employees of Institutions and Public Administrations in a personal capacity;
- solicit or obtain confidential information that may compromise the integrity or reputation of either party; or
- deny, conceal or delay any information requested by such authorities and other regulatory bodies in their inspection functions.

## **7.9. PUBLIC SUPERVISORY AUTHORITIES AND CONTROL BODIES**

The Companies undertake to scrupulously observe the rules dictated by the Supervisory Authorities in order to guarantee compliance with the regulations in force in the sectors connected with their activity (for example, the Competition and Market Authority, the Authority for the Protection of Personal Data, Ministry of Economic Development, etc.).

The Addressees undertake to comply with any request from the regulatory bodies in their inspection functions and to provide their full cooperation during the preliminary investigation procedures.

In communications with State or international institutions, public supervisory authorities or control bodies aimed at explaining the Group's activity, responding to requests or acts of inspection (questions, interpellations, requests for information related to professional appointments in progress or concluded, etc.), or in any case at making known the position of the Companies on relevant issues,

each Group Company is committed to

- adopt an attitude of maximum helpfulness and cooperation and not knowingly hinder in any way the functions carried out by the above-mentioned subjects;
- operate, without any kind of discrimination, through the communication channels appointed for this purpose with the institutional interlocutors at national and international, community and territorial level;
- represent its interests and positions in a transparent, rigorous and consistent manner, avoiding collusive attitudes;
- avoid falsification and/or alteration of data, statements, reports in order to obtain an undue advantage or any other benefit for the Company.

### **7.10. EXTERNAL COMMUNICATIONS**

External communications must be clear and based on the principles of truthfulness and transparency of information. Under no circumstances shall Addressees divulge false or tendentious news or comments concerning company activities or the results of professional activities, as well as relations with third parties in general.

Relations with the mass media are reserved exclusively to the corporate functions delegated for that purpose.

In particular, in the conviction that business activities and results must be strictly linked to a responsible business conduct, the external communication, including that aimed at spreading the brand and/or image, of the Companies shall

- be accurate and consistent with the Principles and policies of the Companies;
- comply with laws, rules, practices of professional conduct;
- be carried out with clarity and transparency: independent from any form of conditioning, both internal and external.

It is forbidden to disclose false, incomplete and misleading information.

### **7.11. CONTRIBUTIONS TO CHARITIES AND ONLUS, DONATIONS AND SPONSORSHIPS**

The sponsorship and patronage activities promoted by the Group may concern sports events, shows, restoration of artistic and archaeological heritage, cultural events and initiatives linked to social, humanitarian and environmental issues.

In any case, when stipulating sponsorship or patronage contracts, the Companies of the Group shall maintain a correct and transparent conduct, avoiding any pressure on the subjects concerned.

The Group condemns the improper use of donations as a tool to obtain favours and concessions from the beneficiary and is committed to ensuring the achievement of social and public interest purposes.

### **7.12. ENVIRONMENTAL PROTECTION**

The environment is a primary asset of the community that the Group wants to contribute to

safeguard. To this end, it plans its activities by seeking a balance between economic initiatives and environmental needs, in compliance with applicable laws and regulations. The Euricom Group is therefore committed to improving the environmental and landscape impact of its activities by taking into account the development of scientific research and best practices.

As part of its activities, the Group supports the rational and sustainable use of energy through the production of clean energy using husk, a by-product of paddy rice processing. The Group's environmental policy is supported by the awareness that the environment can represent a major competitive advantage in a constantly expanding market that is increasingly attentive to factors such as quality and behaviour.

## 8. VIOLATIONS OF THE CODE OF ETHICS AND RESULTING SANCTIONS

### 8.1. COMPLIANCE WITH THE CODE, VIOLATIONS AND SANCTIONS

The rules of conduct defined in the Code constitute a basic reference to which the Addressees must comply in their relations with their interlocutors. In fact, the Company considers the Code as an instrument of guarantee and reliability, to protect the assets and reputation of the entire Group and recognises the legal relevance and mandatory effectiveness of the principles and rules of conduct established by the Code itself.

In addition, the Company makes all those who, for various reasons, have dealings with the Euricom Group responsible for compliance with these principles, and prepares a specific system of sanctions to ensure the effectiveness and efficacy of the Code, and undertakes to apply it indiscriminately to all categories of recipients.

Compliance with the rules of the Code of Ethics must be considered an essential part of the contractual obligations of employees pursuant to and for the purposes of the applicable legislation. Violations of the rules of the Code of Ethics may constitute a breach of the primary obligations of the employment relationship or a disciplinary offence, with all the consequences of the law, including with regard to the preservation of the employment relationship, and may lead to the payment of compensation for damages resulting from the same.

The Company undertakes to provide for and impose, with consistency, impartiality and uniformity, sanctions proportionate to the respective breaches of the Code and in accordance with the provisions in force on the regulation of labour relations.

For individuals who hold positions of representation, administration or management within the Euricom Group, violation of the rules of the Code will result in the competent corporate entity taking the most appropriate sanctioning measures in relation to the nature and seriousness of the violation committed and the status of the individual who committed the violation, in accordance with applicable law.

For all other Recipients with whom the Company has contractual relations, since compliance with the Code is a prerequisite for the continuation of the professional/collaborative relationship existing with the Company, the violation of the rules of the Code may constitute a breach of contractual obligations, with all legal consequences, including the termination of the contract and/or assignment, and may lead to the payment of damages by the Company or the Companies of the Euricom Group. The Company will not establish business relationships with anyone who does not agree with or refuses to comply with the principles of the Code.

### 8.2. REPORTING

Employees of the Group may ask for clarification on the meaning and application of the Code, in general, from the Chief Executive Officer, who is also responsible for its dissemination and integration into the Company's decision-making processes of the ethical criteria adopted towards the various company stakeholders. In carrying out his activities, the Managing Director may avail himself of the operational support of the competent Group functions.

If Group employees become aware of alleged violations of this Code of Ethics or of conduct that does not comply with the rules of conduct adopted by the Company, they must promptly report them through the following alternative channels

- e-mail: [odv@euricom.it](mailto:odv@euricom.it)

- a letter, addressed to the attention of the OdV, to the following address:

Euricom S.p.A.  
Valle Lomellina (PV)  
Via Stazione 119  
CAP 27020

Reports or complaints may also be made anonymously, unless prohibited by local legislation.

The Company considers reports made in good faith as a gesture of loyalty to the Company and ensures the confidentiality of the reporter's identity, without prejudice to legal obligations. The Company will not tolerate acts of retaliation against anyone who, in good faith, raises an issue concerning a possible violation of the Code as a result of a report or participation in an investigation, and will appropriately sanction the perpetrators.