



Manlus

Code of Conduct

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# Vision, mission, values



expectations.

### Sole Manager's message

CONSERVE MANFUSO wants to grow in a profitable and sustainable way. We want to be able to ensure a future to the company over time through our values: commitment, people, quality, innovation.

We aspire to be an exemplary company and a reference point in the sector.

We are a family-class company in the food sector, we work tireless to offer consumers nutrients and healthy products. It is an important and great satisfaction work, based on trust that consumers rest in us. It is therefore fundamental that all activities aimed at bringing our products into their homes are characterized by integrity, ethics, legality, transparency.

The Conserve Manfuso Code of Conduct helps to define the principles that govern the professional behavior of all those are part of this great company.

In 2019 the company has undertaken the road of certification according to the SA 8000 standard and today in 2021 the Board of Directors approved the first edition of this company Code of Ethics.

In this code, we do not claim to contemplate all possible situations, but define the general guidelines of conduct to orient our actions.

It is essential to have clear that all the collaborators of CONSERVE MANFUSO are ambassadors of our brand; We therefore have the obligation to guarantee the trust that consumers have placed in it.

#### Manfuso Enrico

The Sole Manager

### Purpose and Scope

This Code is aimed at establishing the expected basic principles and commitments and which must be requested from the respective employees, managers and directive bodies, to constitute a framework of common integrity in carrying out professional activities and relations with interest groups.

It must therefore be compulsorily respected by all the collaborators of the Manfuso preserved, regardless of the geographical context, from the hierarchical position in the organization chart or the type of contract stipulated with the company. The observance of this code is also requested to suppliers or those others work for and with CONSERVE MANFUSO.

The CONSERVE MANFUSO code of conduct show a framework of common integrity for managers, employees and employees, without exception.



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# Obligations arising from this code

As your are an integral part of CONSERVE MANFUSO, you're forced to:

	1	Knowing, applying and promoting the values, principles and commitments contained in this Code, as well as the policies and procedures that develop them and complement them, which together with the applicable legislation will regulate the assets of the preserved manfuse. In the event of discrepancies between local laws and regulations and this code, you will be required to apply the most restrictive standard. For its part, CONSERVE MANFUSO undertakes to disseminate the corporate ethics code among all its collaborators and interest groups and promote its knowledge through appropriate training activities, in order to ensure that your actions are guided by the principles and commitments On which the code was built.
	2	Participate in training activities promoted by CONSERVE MANFUSO company regarding this code.
OBBLIGHI	3	Zero tolerance against distributing behaviors from the principles and values shown in this code. No one can authorize or request an action that involves a violation, regardless of the position held within the company.
ō	4	In case of doubt, you have to contact your manager for the SA 8000 or write an email or use the ideas cottage to convey your doubts. This Code does not claim to contemplate all possible situations that may arise, but want to establish general guidelines that allow you to orient your conduct.
	5	If you suspect about an action or a situation of potential violation of the Code, even if it is not part of your scope of responsibility, it will communicate through the reporting channels responsible for CONSERVE MANFUSO, always in good faith and avoiding using such instruments unfair or to draw a personal advantage.
	6	Collaborate on the conduct of internal audits and of what else is necessary for the purposes of compliance with this Code.

# **Our Values**

The Conserve Manfuso Code of Conduct was built on the values of integrity, legality, transparency and respect for people.

### Integrity

Always act in accordance with the ethical standards of this code in all situations related to your professional activity. You have to act with honesty, rectitude, respecting the commitments made and without pursuing personalities in any case personal or in favor of third parties, exploiting your function or position within the company improper.

#### Legality

You have the responsibility to know and respect the laws applicable to your function, the scope of responsibility and to the workplace. Likewise, you have the responsibility to know and respect the internal policies and procedures established by the preserved manfuso. **If you have doubts, I always ask for advice before acting.** 

#### Transparency

Communications must be clear and relevant but always in compliance with the company's confidentiality commitments, as well as those relating to customers, consumers, suppliers, competitors, employees and shareholders, always paying particular attention to the protection of personal data to which you can have access .

#### Respect for the people

CONSERVE MANFUSO rejects any hostile or humiliating attitude towards people.

## Important

In our daily activities and during the decision-making process, it is also necessary to consider four important aspects:

We obtain raw materials from nature and it is therefore essential to work in order to safe resources and guarantee sustainability; otherwise, the future of the company itself would endanger.



We need to work so that our foods reach more and more families and are able to respond to the needs of our consumers.

Our brand is synonymous with responsible quality and management as well as Organic. We must therefore do everything possible to protect our image and to strengthen the relationship of trust with consumers.



We work to become a reference point in the field of corporate social responsibility.

## **Commitments and responsibilities**

#### **Commitment to ethical behavior**

#### **Commitment to people**

- Prohibition of the use of child labor
- Prohibition of forced or mandatory work
- Prohibition of illegal labor and illegal immigration
- Compliance with the right of trade union affiliation
- Respect for diversity and for equal opportunities
- Absolute rejection of any form of abuse

- Right to privacy
- Professional growth
- Remuneration
- Respect for the rest of the collaborators
- Safety, health and hygiene at work
- Refusal and condemnation of harassment to the workplace
- Effective communication and teamwork

#### **Commitment to corporate resources**

- Responsible use of corporate resources
- Use responsible for information

• Communications with the media and good use of social networks



### **Company commitment to people**

We carry out our activity in total respect for rights, promoting a healthy and productive work environment, adequate for the growth of all collaborators, at such a professional level.

PROHIBITION OF CHILD LABOR USE	<ul> <li>We support and promote the fight against child labor and, for this reason, we make sure that CONSERVE MANFUSO and its supply chain do not carry out practices relating to the use of child labor.</li> <li>Follow to the checks established or request that all the checks needed to ensure that, in your work area are established, practices are incompatible with the rights set out in the agreements of the International Labor Organization for the minimum age for the recruitment as Employee at any stage of extractive or industrial processes.</li> </ul>
PROHIBITION OF FORCED OR MANDATORY WORK	All forms of work in our companies are voluntary and all collaborators can leave the work by means of appropriate notice, in accordance with the agreements in force and at the same time as the rejection of forced or mandatory work. Follow expect to the established controls or request that all the checks needed > to ensure that, in your work area and at any stage of extractive or industrial processes, non-practices are incompatible with the rights set out in the agreements of the International Labor Organization Forced or mandatory work at any stage of extractive or industrial processes.
PROHIBITION OF ILLEGAL LABOR AND ILLEGAL IMMIGRATION	The constant respect for immigration legislation, the entry and transit of foreigners will be guaranteed. No form of illicit labor or illegal immigration traffic will be permitted. Follow the checks established or request that all the checks needed to > ensure that, in your work area are established, practices are not carried out incompatible with the rights set out in the agreements of the International Labor Organization about the use of illegal labor or immigration Clandestine at any stage of extractive or industrial processes.
COMPLIANCE WITH TEH RIGHT OF THE TRADE UNION AFFILIATION	We recognize the right of all our collaborators to train and adhere to trade unions and organizations of workers of their choice, as well as to organize and agreement collectively pursuant to current legislation.

RESPECT FOR THE DIVERSITY PEOPLE AND FOR EQUAL OPPORTUNITIES	<ul> <li>CONSERVE MANFUSO respects cultural diversity, ideas or any other differentiation factor. For this reason, we guarantee that no discrimination situations occur. CONSERVE MANFUSO encourages the growth of all its collaborators, ensuring equal opportunities.</li> <li>Do not participate, promote or tolerate breed-based discrimination situations, sex, nationality, religion, beliefs, ideologies, age, orientation or sexual identity, civil status, membership of family members to an ethnic group, race or country, or for reasons of illness or physical or mental disability.</li> </ul>
ABUSE REJECT	<ul> <li>CONSERVE MANFUSO rejects incorrect and dishonest treatments, especially towards minors, people with disabilities or requiring specific attention.</li> <li>Report any situation that can cause, encourage, encourage or facilitate abuse in any of its forms, paying particular attention to cases where fewer or disabled people could be involved.</li> </ul>
RIGHT TO PRIVACY	We respect the right to privacy of all our collaborators and interest groups, in particular in relation to personal data. Access to these data is exclusively limited to persons responsible for processing data for the purposes for which they were previously collected. We have implemented the necessary measures to protect the personal data of employees, customers, consumers, suppliers, shareholders or third parties that are stored and exchanged due to our activity. This commitment of confidentiality is maintained even after the conclusion of the relationship with the company. In cases where you have access to personal data, it respects the requirements established by the legislation and internal procedures, engaging to not to disclose the personal data of professionals or interest groups of CONSERVE MANFUSO, except for the explicit consent of the related owners and except in the cases of legal obligation or compliance with the decisions of the judicial or administrative bodies. In no case, personal data can be treated for purposes other than those legally or contractually provided.
PROFESSIONAL GROWTH	CONSERVE MANFUSO promotes personal and professional growth of its collaborators, through their involvement in management processes and continuous improvement. Our goal is to guarantee opportunities for professional growth for our collaborators, based on their respective capabilities.

REMUNERATION	The remuneration policies will be commensurate to the labor market in which the activity is carried out, in constant compliance with legally established work and social security obligations. Our goal is to recognize and reward the performance of collaborators with equity, clarity in criteria and equal treatments and opportunities.
RESPECT FOR TEH REST OF TEH STAFF	We must ensure that our collaborators work in compliance with the laws and agreements in force in the matter of Monte hours, working days and rest periods. We will incorporate and promote the balance between personal and labor life, as possible and provided that the customer service or the correct functioning of the work centers is not compromised.
SAFETY, HEALTH AND HYGIENE AT WORK	<ul> <li>Our priority is to promote and preserve a risk prevention policy, safety and health at work, through the adoption of preventive measures established by current legislation and improving them where possible. We always provide the necessary means to allow you to carry out your business with adequate safety and hygiene measures, so that you always prevail the protection of your life, your health and your psychophysical integrity.</li> <li>You must carry out your work respecting the rules on health and safety at work applicable to work centers, curating to comply with preventive measures and communicating to the competent department any worrying situation, accident or violation of the safety regulations you are at knowledge.</li> <li>You will have to make sure that your colleagues comply with the safety and prevention rules of health implemented in every place of work; You will also try to actively participate in improving prevention systems, offering suggestions through the channels in charge.</li> <li>During the day of work, you cannot make use of tobacco, alcoholic beverages or other illegal drugs, nor do you find yourself under the effects of them during working hours. CONSERVE MANFUSO will promote, when possible, training plans and fighting against dependencies that help professionals and their families when necessary, always in collaboration with national authorities.</li> <li>It is not allowed to carry or use weapons at the workplace, except for the case of surveillance personnel or if expressly authorized by the Management in the context of current national regulations.</li> </ul>

REFUSAL AND CONDEMNATION OF MOLESTATION IN THE WORKPLACE	We reject any conduct or action that can create an intimidating, offensive work environment or promotes or incites hatred, discrimination, hostility, humiliation or violence. We are particularly committed to maintaining a workplace in which there are no cases of verbal harassment, physical, psychological or abuse of authority that generate fear or hostility in the work environment. You are not authorized to participate, encourage or tolerate behavior or insinuations of sexual nature, neither insults, mineral or physical threatening attitudes of a racial nature, gender, ideological, religious or linked to orientation or sexual identity, to a disease, a A physical or psychological disability.
GOOD COMUNICATION AND TEAM WORKING	We are convinced that collaboration favors a better decision-making process and aids in achieving goals. For this reason, CONSERVE MANFUSO wants to do team work a daily practice, as well as promoting an environment that promotes a clear and appropriate communication, committing to periodically inform all the collaborators about the general lines of the strategic plan and the evolution of the agency. > Different points of view help to get a better result

### **Corporate resources commitment**

We all have the responsibility to guarantee the correct use and protection of corporate resources.

RESPONSIBLE USE OF CORPORATE RESOURCES	The resources of CONERVE MANFUSO must be used in a lawful, adequate and efficient way; It follows that it is not possible to appreciate or use it for itself or its own purposes or to commit acts that can damage the image and reputation. Equipment, systems (including Internet), electronic devices, systems, transportation, business credit cards and company supplies They must be used solely by collaborators or persons specifically authorized, to carry out entrepreneurial activities or for the purposes authorized by the Management, according to the procedures established at any time. All the work tools necessary for carrying out your professional work will be provided. The products and information of CONSERVE MANFUSO must be stored and treated with these instruments; Furthermore, it is not allowed to use, storage or archiving with instruments, devices or installations unauthorized by the organization. You are not authorized to install, distribute or make unauthorized copies of the software or to execute programs or actions that could delete, alter, damage or make inaccessible data, computer programs, electronic docyments or can interrupt the operation of systems and applications of CONSERVE MANFUSO or third parties. The information contained in the technological and computer resources made available by CONSERVE MANFUSO are considered professional and never personal or private. You are not authorized to pronounce or disseminate defamatory comments, to use languages, images or files that are offensive or inducing any form of discrimination.
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COMMUNICATIONS WITH MEDIA AND GOOD USE OF THE SOCIAL NETWORK	Communication with the mass media on behalf and representing the preserved manfuso is exclusively responsible for the spokespersons designated by the Directorate and the legal representatives of the managers of the companies belonging to the Group. Any use of social networks and means of communication must be by way personal and never representing the company, unless expressly authorized by the company.
INTELLECTUAL AND INDUSTRIAL PROPERTY	The property rights of ownership over the whole know-how developed in the work context belong to the company, which reserves the right to exploit them in the way and at the moment considered more appropriate, in accordance with the current legislation, without prejudice to respect for the rights of the 'Inventor or author in accordance with the related legislation. The ownership of intellectual property concerns logos and any other distinctive sign, computer programs, patents, models, systems, industrial processes, methodologies, recipes of products, designs and any other processed that can be subject to industrial or intellectual property in accordance with the laws in force . Similarly, CONSERVE MANFUSO and its collaborators will constantly respect intellectual and industrial property rights to third parties.

### Commitment to corporate relationships with the external

We have the duty to carry out our activities responsibly, promoting communication with interest groups and in accordance with current legislation.

ANTI- CORRUPTION POLICY IN THE PRIVATE SECTOR	Simultaneously with professional performance at CONSERVE MANFUSO, you cannot offer, request or accept, directly or account for third parties, gifts, payments, commissions or any other benefit or unjustified advantage, to improperly promote your person, CONSERVE MANFUSO or a third party, respect to others, in commercial relations.
CONFLICTS OF INTEREST	A conflict of interest occurs when your personal interests or interests of a third party are competing with those of CONSERVE MANFUSO in the event that a conflict of interest occurs or if you were in a situation that can imply or give Application to a conflict of interest, promptly communicate to your direct superior and the Ethics Committee, in order to resolve the situation fairly and transparently. Personal relationships in the workplace must not affect your action capacity in the most interesting interest and should not affect any professional relationship. Work decisions must always be based on qualifications, performance, skills and experience.
AUITORITHY RELATIONSHIPS	Relationships with authorities and administrations will be managed in full compliance with the principle of collaboration and transparency, always maintaining the highest level of integrity and not interference.
RIGOR OF THE INFORMATIONS	The economic-financial information of CONSERVE MANFUSO must faithfully reflect the economic, financial and asset reality, according to the generally accepted accounting principles. You will never be authorized to intentionally provide incorrect, misleading or inaccurate information. The transmission of information must take place clearly, exhaustive and truthfully. The information must be transparent and accurate, ie they will not be able to give rise to errors by the recipient.

The CONSERVE MANFUSO policy provides for the respect of trade secrets or other exclusive property information of third parties, unless expressed consent of the interested parties, cases of legal obligation or compliance with judicial or administrative judgments.
In relations with the communities in which it operates, CONSERVE MANFUSO undertakes to act in accordance with the laws, uses and habits of these communities and contributing as much as possible to the responsible and sustainable development of them, offering job opportunities and social participation . Whenever you participate in community activities, you are required to do it responsibly and in accordance with the ethical and image principles of the group. Through good tax practices, the company contributes to the sustainability of public expenses.
the landscape, ecological, scientific, historical, artistic or cultural nature.
We care about carrying out the activities respecting the environment, the rules, regulations and commitments taken voluntarily. We act in such a way that the environmental impact of our professional activity is as low as possible; At the same time, we work to improve our efficiency as a company. Aware of the fact that good management and proper use of natural resources strengthens the future of our business, CONSERVE MANFUSO wants to publicly show its desire to promote measures that contribute to improving the environmental context in which it operates and from which its products depend on Food.
Our goal depends on the satisfaction and trust of consumers; For this reason, we focus our efforts on them. The preserved manfuso is firmly committed to guaranteeing the highest quality of its products. In the event that consumers are dissatisfied with the products offered, they can send suggestions or complaints through the channels in charge of CONSERVE MANFUSO

CONSERVE MANFUSO CODICE ETICO AZIENDALE	
RELATIONSHIPS WITH THE CUSTOMERS	Customers are the fundamental partners of the business, because through them we reach consumers. The utmost professionalism and impartial will constantly guide your relationships with customers. In contractual relationships with customers, we will promote transparency and inform about the various existing alternatives, in particular with regard to services, products and rates. At the same time, Conserve Manfuso company expects from its customers an impartial treatment and compliant with the rules of a healthy and fair competition.
RELATIONSHIPS WITH THE SUPPLIERS	We will demand the total fulfillment of their legal and contractual obligations from our suppliers, including the protection commitments to human rights, work, ethical and sustainability assumed with the subscription of the Code of Conduct. In the event that you are a direct knowledge of any behavior of a supplier who may violate the laws or code, you must inform your manager or the Ethics Board through the reported channels.
RELATIONSHIPS WITH THE OTHER COMPETITORS	CONSERVE MANFUSO believes that maintaining good relations with competitors is the key to the success of their business. We are committed to absolutely respect free competition, not to carry out practices that involve unfair competition and to demand loyal behavior by competition. CONSERVE MANFUSO expressly prohibits price agreements, the use of threats, the offer or request for advantages in exchange for non-participation in competitions or auctions, in both public and private sector.

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# Code of Conduct Board

#### Ethic Board

Its main functions are:

- monitor the application of this Code of Ethics and establish its interpretative criteria; guarantee the disclosure of the code;
- promote training on the contents of the Code for the collaborators of the Conserve Manfuso;
- guarantee the development of policies and procedures necessary for the appropriate implementation of the principles and commitments contemplated within the Code;
- monitor the correct investigation of the investigations of possible irregularities, evaluate its conclusions and decide about any disciplinary measures or legal actions to be undertaken;
- monitor compliance with the disciplinary regime;
- propose to the Committee for Compliance and the Board of Directors the periodical review of the Code, based on the annual activity of the department for the conformity and suggestions proposed by the recipients;
- periodically inform the conformity committee about the level of conformity to the code;

For the purpose of the assigned functions, the Committee for Compliance and the Ethics Committee will be supported by the Directorate for Corporate Social Responsibility and by the Manager for Compliance.

#### Direction for corporate social responsibility

Being the proprietary body owner of the document containing the Corporate Code of Ethics, in addition to the general responsibilities relating to the management, will be responsible for:

• disseminate the values of the Code of Ethics between collaborators and other interest groups;

• facilitate understanding and forming the collaborators of the Conserve Manfuso on the relevant conformity; collaborate in the resolution of doubts or interpretative criteria that may arise;

• Propose the revisions and updates of the Code to the Compliance Committee.

#### Management

All members of the Steering Committee of Conserve Manfuso will be responsible for:

- Spreading the code between the various teams and promote compliance by giving a good example;
- Make sure that people under their responsibility include the requirements of the code and have the necessary resources to be able to respect it;
- establishing the mechanisms that guarantee compliance with the code in the respective liability areas and correcting any identified devies;
- Pay your cooperation to those reporting doubts or concerns.



22/06/2021

Conserve Manfuso s.r.l. L'Amministratore Unico (Ennice Manfuso) hink