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IL CIOCCOLATO DAL 1946

# ETHICAL CODE

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## INTRODUCED OUR HISTORY

Laica S.p.A. (hereinafter "Laica" or the "Company") considered it appropriate to collect all those values and principles that have always characterized its activities, relations with employees, collaborators, commercial partners, suppliers and Public Authorities, that is, all those with whom business relations are maintained.

Laica is determined to ensure the utmost fairness in the conduct of her business and related business activities, also to protect her image and reputation, has chosen to comply with the provisions of Legislative Decree 8 June 2001, n. 231 (hereinafter also the "Decree"), which introduced the administrative liability of entities into the Italian legal system

Furthermore, Laica is aware that the adoption of a Code of Ethics (hereinafter alternatively the "Code"), which sets out in a clear and transparent way the set of values to which it is inspired in achieving business objectives, is of central importance for the correct performance of the respective activities. The Code also constitutes a supporting element of the Organization, Management and Control Model which the Company is called upon to adopt, pursuant to and for the purposes of the Decree, for the prevention of the offenses provided for in the Decree itself.

All employees are encouraged to avoid risks to people and the environment. The purpose is, as far as possible, to go beyond mere compliance with all applicable local laws, regulations and standards.

Given the above, this document, adopted by the Board of Directors, sets out the principles and ethical values to which Laica adheres in carrying out its activities, and of which it claims the most rigorous observance by all the subjects present in the Company and, more in general, of all those who cooperate and collaborate with it to pursue its corporate mission.

All employees and those who cooperate in carrying out the Company's activities are required to know the Code of Ethics, contributing, as far as it is for each of them, to its observance. To this end, the Company, within the scope of its competence, undertakes to guarantee the maximum diffusion of the Code of Ethics, ensuring an adequate training and awareness program regarding its contents.

The Company, also through the supervisory body (hereinafter the "Supervisory Body") established pursuant to the Decree, supervises compliance with the rules of conduct contained in this Code.

## OUR HISTORY

Laica, with its registered office in Novara, is a company specialized in the production of pralines and other chocolate products for national and international consumption.

The Company was founded by Lino Saini in 1946, with the name of Sant'Alberto. Two years later the company took on its current name, becoming a joint-stock company. In less than twenty years, from the first modest headquarters in Via 2 June, Laica has grown to its current location in Via Vittorio Veneto, a building designed to give space to new production lines, warehouses and the offices of a company in strong expansion, which had accompanied the production of pralines with historical products like coins, Santa Claus had joined the production of pralines.

The new headquarters was inaugurated in May 1963, in the presence of the Minister of Foreign Trade and municipal and regional authorities, testifying to the importance that Laica had assumed in Arona and national productive fabric.

Today, the Company is constantly expanding in the national and international confectionery market. The increased economic productivity has not, however, affected the profound ethical sense of the Property, which remains the same: to continue to affirm its products, in Italy and in the world, respecting rules and people.

### 1 Scope of application and Addressees

This Code of Ethics originates from the ethical principles adopted by the Company, and contains the guiding principles of the Company which all Recipients are bound to comply with.

This Code also contains the ethical and behavioral principles relevant to the prevention of crimes and compliance with the provisions of Legislative Decree No. 231/2001 and its subsequent amendments and / or additions.

Recipients must know the provisions of this Code of Ethics and employees are also required to actively contribute to its scrupulous observance.

The following subjects are "Recipients" of this Code of Ethics:

- the Directors;
- Executives and middle managers;
- employees without exception;
- collaborators (including, for example, consultants, agents, intermediaries, etc.);
- anyone who has business relations with the Company.

In particular, the Directors are required to be guided by the principles of the Code of Ethics, in setting the objectives of the company, in proposing investments and carrying out projects, and in any decision or action relating to the management of the Company. Likewise, the Executives and function managers

corporate, in giving concrete effect to the activity of management of the Company, they must be inspired by the same principles, both internally, thus strengthening the cohesion and the spirit of mutual collaboration, and towards the third parties with whom the Company enters into relationship.

Each manager or each people in general anyone who holds a position of hierarchical superior within the company, must be an example for all employees and must commit to creating a positive climate within the company by proposing a consistent leadership and guidance to the principles contained in the Code. It must also ensure that employees are aware that compliance with the Code is a fundamental aspect of their work and that the achievement of objectives and results must never be separated from compliance with applicable laws and the Code.

## **2. Obligation of employees and collaborators**

The Company's employees perform their functions in accordance with the principles of honesty, fairness, commitment and professional rigor, and operate, in carrying out the activities entrusted to them, in compliance with the laws in force.

Every action, operation, negotiation and, more generally, any activity carried out by the employees of the Company, must comply with the rules of correctness of management, transparency, completeness and truthfulness of the information, as well as the company procedures.

The principles of collaboration, loyalty and mutual respect must shape the relationships between employees of any level, and between these and third parties with whom they come into contact due to the work activities carried out.

In particular, employees are required to:

- diligently observe the provisions of the Ethics Code, refraining from any behavior contrary to them;
- reporting to the Supervisory Body any news relating to alleged violations of this Code of Ethics that occurred within the company;
- offer maximum collaboration in ascertaining the possible and / or alleged violations of this Code of Ethics;
- inform third parties who enter into a relationship with the Company about the provisions of the Code of Ethics and request compliance.

Company collaborators (including, for example, consultants, agents, intermediaries, etc.) and anyone who has business relations with the Company are also required to comply with the principles contained in the Code of Ethics. To this end, this document will also be brought to the attention of these subjects. Laica is therefore committed to ensuring the maximum dissemination of this Code of Ethics, also through the use of appropriate cognitive tools, training and awareness regarding its contents.

### **3. General provisions**

Laica S.p.A. has decided to publish these Business Principles exposed within the document to emphasize issues such as:

- the dissemination of the culture of respect for hygiene and safety conditions for workers and the environment, as a management tool;
- the importance of communications with which information is transmitted to the final consumer;
- the importance of the fight against corruption and other crimes potentially committed in the course of their commercial activities.

#### **3.1 Ethical Principles**

The Company complies with the following principles in the achievement of its objectives and in order to prevent crimes and to comply with the provisions of Legislative Decree no. 231/2001 and its subsequent amendments and / or additions (hereinafter also principles"):

- Compliance with laws
- equality and impartiality;
- transparency and reliability;
- honesty, fairness and good faith;
- diligence and professionalism;
- confidentiality;
- mutual trust;
- social commitment;
- fair competition.

##### **3.1.1 Compliance with laws**

The behaviors of the Recipients, in the activities carried out in the interest of the Company, are based on strict compliance with the laws in the countries where the Company carries out its activities and places its products, regulations and national, EU and international conventions (for example, Convention for the protection of human rights and fundamental freedoms).

Laica recognises that increasing globalisation implies the development of more and more international recommendations. Although These recommendations are generally addressed to Governments, they have an unavoidable impact on trade procedures.

### **3.1.2 Equality and impartiality.**

In the management of the various social activities and in all relevant decisions (including, but not limited to, the choice of business partners, the management of staff and the organisation of work, the selection and management of suppliers, the relationships With the community and the Institutions that represent it, i.e.), Recipients must work impartially in the best interests of the Company by taking decisions with professional rigour and impartiality, according to objective and neutral evaluation criteria.

### **3.1.3 Transparency and reliability**

In the course of working or professional activities, actions, operations, negotiations and, more generally, the behaviours of the Recipients are inspired by the utmost transparency and reliability.

In the management of social activities, Recipients are required to provide transparent, truthful, complete and accurate information.

Laica promotes and disseminates, at every level of the company, the culture of control, sensitizing its employees to the relevance of the system of internal controls and respect, in carrying out the work activities, the regulations in force and the Business procedures.

The Company through the company referents to this, collaborates with the supervisory bodies and the Board of Statutory auditors regarding the carrying out of the relevant assignments.

### **3.1.4 Honesty, fairness and good faith**

The Recipients, within the most different relationships established with the Company, will have to refrain from carrying out activities that are contrary to the interest thereof, aware that the pursuit of the interest of the Company will not justify in any Conduct contrary to the principles of the Ethics Code.

In the conduct of the activities must absolutely be avoided situations where the subjects involved in the transactions are or may be in conflict of interest, intending for conflict of interest the situation in which the Recipient pursues an interest different from that of Society or activities that may, however, interfere with its ability to take decisions in the exclusive interest of the company, or personally benefit from the Company's business opportunities.

In the event of a conflict of interest, the Recipients will have to inform their manager or business representative without delay, conforming to the decisions to be taken by the Company.

The Company aware that a healthy and correct system of competition contributes to the best development of its company mission, scrupulously observes the current rules on competition and refrains from putting in place and/or encouraging behaviours that can integrate forms of unfair competition.

### **3.1.5 Diligence and professionalism**

All the activities of the Company must be carried out with the utmost commitment, diligence and professionalism in a spirit of mutual respect and collaboration.

The Recipients are called to carry out the activities of their responsibility with a commitment appropriate to the responsibilities entrusted to them, protecting the image and the reputation of the Company.

### **3.1.6 Confidentiality**

Laica ensures the confidentiality of the information in its possession and refrains from using confidential data, except in the case of Express and aware authorisation and, however, always in the strictest observance of the legislation in force regarding Protection of personal data.

In the communication to third parties of confidential information, which is only permitted for office or professional reasons, the confidential nature of the information is expressly stated and the obligation of confidentiality to the third party is requested.

No employee or collaborator may take advantage of any kind, whether direct or indirect, personal or patrimonial, from the use of confidential information, or communicate such information to others or recommend or induce others to use them.

The disclosure to third parties of the information must be made exclusively by authorized persons and in any case in accordance with the company's provisions.

The Company constantly applies and updates policies and procedures for the protection of information. The confidentiality is also ensured through appropriate measures to protect the company data stored on computer support.

### **3.1.7 Mutual Trust**

The Companies help, both inside and outside, the development of relationships based on a deep mutual trust and encourage staff to propose their ideas for the improvement of business processes in a long-term perspective.



### **3.1.8 Social Commitment**

The Companies want to actively contribute to the well-being of the community in which it operates, with the commitment to actively work to establish good neighbourly relations and to promote the educational and training processes of the young resources.

### **3.1.9 Fair Competition**

Laica supports the principle of the market economy and for this reason undertakes to exercise fair competition and recognises to other companies the same right.

In this context, the Company, aware that a healthy and correct system of competition contributes to the best development of its company mission, scrupulously observes the current rules on competition and refrains from putting in place and/or from encouraging behaviours that can complement forms of unfair competition.

In particular, Laica:

- Establishes its own commercial policy independently and does not fix any price in agreement or collusion with competitors;
- Does not allocate customers, territories or markets in agreement or collusion with competitors;
- Establishes equitable relations with its customers and suppliers in accordance with the Laws regulating competition.
- believes that mergers and acquisitions are means to improve efficiency, not to restrict competition;
- believes that commercial payments are based on the efficiency of customers and the services provided.

## **3.2 Correctness and transparency of corporate information**

Any action, operation or transaction must be correctly recorded in the company accounting system according to the criteria indicated by the applicable law and accounting standards, and shall also be duly authorised, verifiable, lawful, Coherent and congruous.

Each employee and collaborator operates, as far as he or she is responsible, so that any fact relating to the management of the Company is correctly and promptly registered in accountancy.

Each accounting record must reflect exactly the results of the supporting documentation. Therefore, it will be up to each employee and contributor to this member to make sure that the supporting documentation is readily available and sorted according to logical criteria.

Employees and collaborators shall also be responsible for their competence:

- To cooperate actively in the correct and effective functioning of the internal control system;

- To responsibly guard the company's assets, whether tangible or intangible, instrumental to the activity carried out and not to misuse it.

### **3.3 Safeguarding The quality and safety of food products**

The Company considers the protection of the quality and safety of its products to be of paramount importance. For this reason, the process of direct procurement by producers of food raw materials (mainly milk, coffee, cocoa, cereals, fruit, sugar and spices) becomes of paramount importance. The benefits that Laica obtains from the process of direct procurement by the producers of food raw materials are as follows:

- Greater understanding of Laica needs in terms of quality and safety;
- Objective and transparent evaluation of the quality of raw materials;
- Utmost attention to the alleged qualitative expectations of consumers;

In this context Laica:

- Supports mechanisms that help to ensure a more stable income for farmers;
- Supports the adoption of new technologies and the advances acquired by agricultural science, including the opportunities offered by biotechnology, once their positive effect on food safety, the environment, agricultural practices and On production efficiency is scientifically confirmed and accepted by consumers;
- Recognises the importance of biodiversity as a base for future developments in the agricultural sector and in the science of life and supports its preservation as a public good.

### **3.4 Respect and protection of the environment**

The Company considers the protection of the environment and the sustainable development of the territory in which it operates, in view of the rights of the community and of future generations, of paramount importance.

It Is therefore committed to consider in the field of operational management and business initiatives, the essential needs to minimize the negative impact that their business activities have on the environment.

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It Is therefore committed to consider in the field of operational management and business initiatives, the essential needs to minimize the negative impact that their business activities have on the environment.

To this end, the Company, in full compliance with current environmental regulations, pays particular attention to the following point like:

- Realization of initiatives aimed at promoting as much as possible a greater responsibility towards the environment, with a view to continuous improvement and through the use of advanced criteria and technologies in the field of environmental safeguard, Energy efficiency and sustainable use of resources with the aim of minimizing environmental impact and waste;
- Centrality of the precautionary approach in environmental matters;

- Checking the progress, monitoring of results and definition of future actions to be undertaken;
- Collaboration with “stakeholders”, internal (i.e. employees) and external (i.e. Institutions), to optimize the management of environmental issues.

These aspects, guarantee the continuous improvement of the environmental performances throughout the supply chain, from the production and purchase of raw materials, to the production processes, to the packaging, to the distribution, to the consumption.

In Addition, the Company recognises the absolute need to create a responsible management of water resources and for this reason is committed to achieving optimum performance in carrying out its productive activities:

- Without compromising the safety and quality of its products, reducing as much as possible the use of fresh water and, where possible, reusing and recycling water;
- reuse the water already used to particular treatments in order to return it to the environment, in conformity with local legislation, where existing and, if not, applying Laica standards.

Lastly, this document dictates the following principles, which all employees must follow in environmental matters. In particular, employees must:

- Respect scrupulously the environmental regulations;
- Assess potential risks and develop appropriate prevention programmes to protect the environment;
- Establish and update emergency procedures in order to minimize the effects of environmental impacts generated under emergency conditions;
- Carry out the fulfilments and the preparation of the relative documentation in respect of the Public Administration Bodies in control of the environmental regulations, in compliance with the regulations in force, national and/or community, with the maximum Diligence and professionalism in order to provide clear, accurate, complete, faithful and truthful information, avoiding and in any case signalling, in the form and in the appropriate way, situation of conflict of interest;
- Disseminate the principles of this document at every level of the organisation and make it aware of its suppliers to ensure products and services in line with these principles.

### **3.5 Protection of industrial and intellectual property**

Laica assures, in implementation of the principle of observance of the laws, the observance of the internal, community and international norms for the protection of the industrial and intellectual property.

The Addressee shall promote the correct use, for any purpose and in any form, of trademarks, distinctive signs and all works of ingenuity, including computer programs and databases, to protect the property and moral rights of the author.

For this purpose, it is prohibited to carry out any conduct aimed, in general, at counterfeiting, alteration, duplication, reproduction, in any form and without the right of the other's work.

### **3.6 Compliance with Anti-money laundering legislation**

The Recipients undertake to comply with all the rules and regulations, both national and international, in the subject of anti-money laundering.

Before establishing relationships or concluding contracts with non-occasional suppliers and other partners in business relations, the Company and its employees and/or collaborators will have to make sure about the reliability, moral integrity, reputation and good name of the opposing party.

The Recipients, within the various relationships established with the Company, undertake to counter events related to money laundering from criminal activities or to the accommodation of goods or other utilities of illicit origin.

## **4. Internal Relations**

### **4.1 Human Resources and Working conditions**

With reference to what is defined in the context of corporate ethics, the Company considers its staff as the most valuable asset in the conviction that the most important factor of success of any company is guaranteed by the professional contribution of the people who work there, in an environment of loyalty and mutual trust. Human resources represent for Laica an indispensable and precious value for its own existence and future development.

The Company recognizes as essential principles of its company philosophy, respect for the work, the professional contribution and the commitment of each one, the respect of the different opinions, regardless of seniority and experience, and the strength of ideas.

In this respect, the Company ensures equal opportunities at any level of the organisation, in accordance with merit criteria and without any discrimination. Even in the recruitment and selection phase, the Company rejects all forms of discrimination and harassment based on racial and ethnic origin, religion and ideology, disability, sex, sexual identity and age.

Employees and collaborators are, on the other hand, required to commit themselves and to act loyally, ensuring the due performance and commitments made towards the Company.

Aware, moreover, that professionalism is a value that is acquired with practice and experience and a specific training, the Company recognizes the decisive contribution that this process receives from professionals with

greater seniority and It promotes the transfer of their knowledge and their professional attitude to the youngest staff. The professional skills of employees are used and enhanced through training and continuous updating.

The Company pursues the enhancement of professionalism, promotes the aspirations of individuals, expectations of learning, professional and personal growth of each.

The Company's policy on the management of human resources is based on the following principles:

- Establish professional relationships based on trust, loyalty and honesty;
- Maintaining respect for fundamental human values, attitudes and behaviours.
- Respect the privacy of employees;
- Observe the regulations in force on the protection of personal data and adopt the Laica standards in those Countries where there is not yet specific legislation;
- Promote a spirit of loyalty among all collaborators and apply a certain number of common rules;
- To offer merit-based career opportunities, irrespective of race, age, nationality, religion, gender, disability, seniority, service or belonging to the protected classes in accordance with current legislation. The fundamental criteria for the promotion are the professional competences, the experience, the capacity and the willingness to apply the Principles of management and Leadership in Laica.
- Offer wages and competitive benefits. Working hours, wages and overtime payment are in conformity with current and competitive laws compared to those offered by other similar companies;
- Treat each employee with respect and dignity and do not tolerate any form of bullying, harassment or abuse

## **4.2 Human Rights**

Laica respects human rights and fundamental freedoms recognised internationally in accordance with the principles dictated by International Organisations, and, in particular, as provided for in the Universal Declaration of Human Rights adopted in 1948 by the United Nations Organisation.

In this context, Laica supports and respects the protection of internationally guaranteed human rights within its sphere of influence, and ensures that its structures are not complicit in human rights abuses.

## 4.3 Child Labour

Laica is opposed to any form of exploitation of child labour.

Laica believes that the development of any policy relating to this issue should take into account the social and legal status of individual Countries. All actions aimed at eliminating child labour must be guided by respect for the interests of the child, because reckless commercial policies or measures may worsen its conditions.

In this context, Laica:

- It is against any form of exploitation of children. The Company does not give work to the children before they have completed their compulsory training process, as established by the authorities in charge.
- Laica expects from its industrial suppliers and business partners the application of policies that have the same standards as their own Company Principles and reserves the right to verify compliance.

Finally, Laica defends the principle of eliminating all forms of forced and coercive work.

## 4.4 Discrimination and harassment

The Society protects and promotes the supreme value of the human person who should not be discriminated against by age, gender, sexual orientation, race, language, nationality, political and trade union opinions, religious beliefs.

The Company also undertakes to ensure that the authority is exercised with fairness and correctness, avoiding any abuse. In particular, the authority must never become the exercise of the power detrimental to the dignity and autonomy of employees and collaborators in a broad sense. The choices of organization of the work will have to safeguard the value of employees and collaborators.

There are in no way tolerated demands or threats aimed at inducing people to act against the law and the Code of Ethics, or to adopt behaviours detrimental to each other's convictions and moral and personal preferences.

The Company does not tolerate any discriminatory conduct on recruitment and employment, nor any form of harassment and/or personal or sexual offence and undertakes, therefore, to provide a working environment that excludes all forms of discrimination and Harassment of race, sex, religion, nationality, age, sexual orientation, disability or other personal characteristics not related to work.

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## **4.5 Safety and health in the workplace**

Laica guarantees working conditions respectful of individual dignity and ensures safe and healthy working environments, in compliance with the rules of accident prevention and health and hygiene at work in force.

It strongly Promotes the dissemination of a culture of safety and awareness of the risks associated with the work carried out, requiring all, at every level, responsible and respectful of the security system prepared and all The company procedures that form an integral part of it.

From this point of view, every employee, collaborator and any other person who, in various ways, provides work at the offices and the Company's establishment is called to contribute personally to the maintenance of safety and quality of the working environment in which it operates, adhering scrupulously to the security system prepared and to all the company procedures that are part of it.

Laica undertakes:

- To guarantee the training and information of all those who work in the offices and in the establishment of the Company, on the risks related to the safety they are exposed to from time to time, assuring them the means and Personal Protective Equipment required by the regulations in force in relation to the type of activity carried out;
- Periodically review and monitor continuously the performance and efficiency of its system, which is in the presence of safety-related risks, to maintain safe workplaces to protect the integrity of its staff, and to Achieve the objectives of continuous improvement established by the Company in the field of safety, health and the environment.

## **4.6 Protection of assets and corporate resources**

The assets and resources to which all employees, at each level, have access or are in their custody must be used efficiently and in an appropriate way to protect their value and exclusively in order to achieve the objectives and purposes Company. In Addition, all employees are responsible for protecting such goods and resources against loss, theft and unauthorized use or disposal. Any use of such goods and resources which may be contrary to the interests of the Company or which may be dictated by professional reasons unrelated to the employment relationship Shall be prohibited.

## **5. Dealings with third parties**

Laica is particular careful to develop a relationship of trust with all possible interlocutors, i.e. individuals, groups or Institutions whose contribution is necessary to pursue their corporate mission, as well as with

collaborators, partners Trade, suppliers, Public Institutions, the market, political, trade unions and social organizations whose interests can be directly or indirectly influenced by the activities of the Company.

In carrying out its activities, the Company conforms to the principles of fairness and faithfulness, requiring all those who work on their behalf to conduct honest, transparent and conform to the laws in any relationship they incur, not tolerating Corruptive and/or collusive conduct, nor favouritism not due.

It is absolutely forbidden to employees and collaborators to give, offer, accept or receive free gifts, benefits and/or any other utility, personal or not, in the context of the activities carried out for the company, without prejudice to the granting of gifts of modest value in Occasion of events (i.e. on the occasion of visits in the company of schools), of the Christmas or Easter holidays, or of other initiatives carried out by the Company in its commercial, marketing and communication strategy.

The management of the tributes by the employees of the Company must be limited to the cases envisaged and must in no way generate even the suspicion of having acted in the interest and on behalf of the Company.

## **5.1 Relations with consumers**

Satisfying the needs of Consumers: The goal of Laica is to create value in a sustainable way in the long term, meeting the expectations of consumers in the area of nutrition, wellbeing and a reliable quality.

Laica is a company aimed at the consumer, and it tailor its products according to the tastes and desires "local" of all the Countries in which it is present. The Company is committed to listening to consumers, and interacts every year with hundreds of thousands of buyers through toll-green numbers, websites and other means of communication. In Addition, Laica undertakes to meet consumer preferences, and carries out extensive product testing with consumers, in order to ensure that they prefer their products to those of competition.

Laica is aware of its role and responsibility in communicating to consumers, especially when it can influence the choice of a healthy diet and lifestyle. The Company is particularly sensitive to the need to help children develop healthy eating habits.

Laica Communication to consumers is based on The following Basic Principles:

- The Company shows moderation in food consumption and does not encourage excessive feeding. This is particularly important when children are involved.
- Where possible, the Company should show children in healthy and energetic activities and avoid the representation of a passive lifestyle in compared with unhealthy food models.



- Advertising should not suggest replacement of meals with gratifying foods or snacks, nor encourage excessive intake of snacks.
- Laica is committed to advertising children in a way that does not compromise the authority, responsibility or judgement of parents or guardians. It should not encourage the children's ability to insist with parents to persuade them to buy products.
- Laica advertising for children should not portray them in dangerous situations or encourage them to accept invitations from strangers.
- Laica must communicate the benefits of health care products that must have a solid nutritional basis.
- Communications must not show or encourage the consumption of its products in a way that can be considered hazardous.
- As regards the placement of advertising, it is against Laica principles to sponsor television and radio programmes or magazines whose strategy to attract spectators or readers is based on the exploitation of violence, sex, or encourage a Offensive behaviour towards others.
- Laica in its communication messages to the consumer must not portray the products of the competition in an inaccurate or derogatory manner.

## **5.2 Relationships with business partners**

In line with the fundamental values of which it is the bearer and aware of the fact that each trading partner has different needs and expectations and that each represents, however, an opportunity for growth, the Company prints the relationships with all the partners Principles of integrity, honesty, loyalty, fairness, respect and mutual trust, as well as professionalism, independence and equity.

In all the international commercial transactions carried out by the Company we follow the international norms in order to prevent, in the performance of its commercial activities, the crimes of extortion and corruption. The Company also undertakes to comply with the Recommendations of the Organisation for Economic Cooperation and Development (CSE) and the OCSE Convention in order to prevent corruption offences.

## 5.3 Relations with suppliers

Similarly, the Company manages the relationships with suppliers pursuing the principles of loyalty, fairness, professionalism, encouraging ongoing collaborations and solid and lasting trust relationships.

The total commitment to customer satisfaction and to the continuous improvement of quality is shared by Laica with all its suppliers. The intent of the Company is to buy from reliable suppliers who are willing to adopt the quality standards of it. In particular, the main suppliers with whom Laica has a report are subject to periodic audits in order to ensure that they conform to the Laica's Business Principles, or that they are actively working to comply with them.

In Addition, the Company intends to buy from suppliers who consistently meet delivery times, value, quality of service and aptitude for prevention.

The selection of suppliers and the determination of the conditions for the purchase of goods and services are based on objective and impartial evaluations based on the quality of the raw materials provided, on the price and on the guarantees provided.

The Company, in its dealings with its suppliers, observes the following principles:

- The Company does not practise or approve any form of "reciprocity" with the suppliers: the goods/services that Laica research, are chosen and purchased exclusively on the basis of their value in terms of price and quality;
- Any negotiation with a supplier, current or potential, must concern only the goods and services traded with the supplier.
- The personnel in need of the purchase of goods and services, must not comply with any form of pressure, by the suppliers, for the donation of materials, products and/or sums of money in favour of associations of charity/solidarity or similar.

The assumption of commitments and the management of relations with suppliers, current and potential, must be carried out in accordance with the Company's directives on conflict of interest and business management.

## 5.4 Relations with Public Institutions

Relations with public, national, community and/or international Institutions, as well as public officials or public servants, or bodies, representatives, agents, exponents, members, employees, consultants, public servants, Functions, of Public Institutions must be governed by the strictest compliance with the laws in force; These reports are only put back to the subjects authorized according to the current proxies and powers conferred by the administrative body of the Company. The Company imprints Its relations

with the Judicial Authority and the Public Authorities in general to the principles of correctness, completeness and truthfulness.

## **5.5 Relations with the Public Administration**

Relations with public officials and public and/or private entities providing public services (hereinafter generically the Public Administration) and, in any case, any report of an advertising nature, must always be inspired by the strictest Compliance with applicable legal provisions, the principles of transparency, honesty and correctness, and in no way affect the integrity and reputation of the Company.

The Management of relations with the Public Administration or relations with a publicity character, are reserved exclusively to the company functions that are responsible and authorized.

In relations with the Public Administration, the Company must not improperly affect the decisions of the Administrations concerned, in particular the officials who treat or decide on their behalf.

During a negotiation or a business relationship, also commercial, with the Public Administration, in Italy or in other Countries, the Company refrains from the conduct contrary to the above principles, including, but not limited to:

- Offer or grant business opportunities and/or commercial benefits to Public Administration personnel involved in the negotiation or relationship, or their family members;
- Offer or receive gifts or other utilities, except in the case of acts of commercial courtesy of modest value;
- Provide untruthful information or omit to communicate relevant facts, where required by the Public Administration.

In relations with the Public Administration, in Italy and abroad, the representatives and/or employees of the Company are not allowed to correspond or offer, directly or through third parties, sums of money or other utilities of any kind and entity, whether Public officials, government representatives, public servants or individuals, to compensate or repay them for an act of their office, or to obtain or delay the execution of an act contrary to the duties of their office.

## **5.6 Management of relations with Independent Administrative Authorities**

Laica undertakes to scrupulously observe the rules dictated by the Public Supervisory Authorities (i.e. Guarantor for the Protection of Personal Data, etc.) To comply with the legislation in force in the fields connected with its own business.

Recipients undertake to comply with any request from Independent Administrative Authorities in the exercise of their duties and to provide full cooperation in the course of the investigative procedures.

To ensure maximum transparency, the Company undertakes not to be with officials/employees of Independent Administrative Authorities or their family members in conflict of interest situations.

In dealings with these authorities, no form of gifts is permitted which, however, is intended to acquire favour treatments in the conduct of each of the activities in any way connectable to the Company. This rule concerns both the gifts promised or offered and those received, intending to gift any kind of benefit.

## **5.7 Relations with trade unions and social organizations**

Laica contributes to the economic wellbeing and growth of the community in which it operates. To this end, it is in the performance of its activities to respect the local and national communities, favouring the dialogue with the unions or other associations.

The Company promotes and supports social initiatives (such as initiatives with local schools), possibly through the provision of contributions to foundations, institutions, organizations or bodies dedicated to the performance of activities Social, cultural and, more generally, geared towards improving living conditions and spreading a culture of peace and solidarity. The process of disbursement of such contributions must be carried out in compliance with the regulations in force and be correctly and adequately documented.

The Company neither promotes nor maintains any kind of relationship with organizations, associations or movements that pursue, directly or indirectly, criminally unlawful purposes or, however, prohibited by law.

The Company sentence, moreover, any form of participation of the Recipients in associations whose purposes are prohibited by law and contrary to public order and repudiation any direct behaviour even to facilitate the activity or the programme of Organizations to the commission of offences, even if such facilitation pipelines are necessary to achieve a utility.

In Accordance with local laws, each employee is free to be represented by a trade union or other representative organization.

## **5.8 Managing relationships with other interlocutors**

The Company's relations with private and public bodies, such as non-profit organizations and other non profit entities, the local communities, the competent authorities, must be guided by the strictest observance of the applicable legal provisions and cannot in any way compromise The integrity and reputation of Laica.

The assumption of commitments and the management of the relations, of any kind, with the private bodies, are reserved exclusively to the company functions and to the personnel authorized by it.

## **5.9 Communications Outside**

Any communication outside of documents and information concerning the Company or other persons with whom the same relates must be made in compliance with the laws, regulations and practices of professional conduct in force. Is, in any case, prohibited:

- The disclosure, also through its web site, of false or tendentious news related to the Company or to other subjects with which Laica relates in the performance of its activities;
- Any form of pressure aimed at acquiring attitudes of favour from the communication/information bodies to the public.

The contents of the information relating to the products must always be documented or documentable. Exaggerated claims, universal and hyperbolic assertions, and non-demonstrable comparisons without a clear objective basis are Not allowed.

## **6. Final Provisions**

### **6.1 Compliance with anti-corruption standards**

Laica promotes and requires the recipients of this code of ethics to respect the principles and standards of anti-corruption.

Corruption in all its forms is prohibited and full respect for the principles of integrity, correctness, impartiality and legality is promoted.

In particular, the company requires the addressees of this Code of ethics to actively participate in the fight against any form of corruption and to refrain from carrying out activities or adopting behaviours incompatible with the obligations related to Relationship with the company for which they operate

It is also prohibited to offer, promise, give, pay, authorize someone to give or pay, directly or indirectly, an economic advantage or other utility to a third party (private or public) with the objective of:

- Induce the third party to perform any function or act in an improper or contrary manner to the duties of his or her office (or to compensate him for turning);
- Unduly secure or maintain a business or unfair advantage in relation to business activities, in breach of applicable laws.

### **6.2 Dissemination of the ethics Code**

The Company undertakes, also through exposure in bulletin boards accessible to all personnel and publication on all other channels of communication and disposition of the company, the maximum diffusion of the Code of Ethics and to foresee and impose, consistently, Impartiality and uniformity, penalties

proportionate to the infringements that should occur, and in any case conform to the existing provisions on regulating employment relations.

## **6.3 Violations and sanctioning consequences**

All employees and collaborators, if they become aware of alleged violations of this code of ethics or conduct that do not conform to the rules of conduct adopted, must inform the company contact person and/or the relevant bodies without delay Specially set up in accordance with current regulations. These bodies will, in fact, proceed to verify the merits of the alleged violations, hearing, where appropriate, the person who made the report and/or the alleged author.

Compliance with the provisions of this code of ethics must be considered as an essential part of the contractual obligations of employees under and for the effects of art. 2104 Cod.

Any breach of the provisions of the Code of Ethics may constitute breach of the obligations of the employment relationship and/or illicit disciplinary, in accordance with the procedures laid down in art. 7. The Statute of workers and collective bargaining applicable, with every consequence of the law, including with regard to the preservation of the employment relationship, and may result in compensation for damages arising from the same.

## **6.4 Approval of the Code of Ethics and related modifications**

This code of ethics has been approved by the company's board of directors.

Any modifications and/or updates thereof shall be approved by the same body and promptly communicated to the addressees.

*Board of Directors, 30/05/18*