



Values to Grow By

Granarolo Group Ethical Code





**The Ethical Code belongs to the entire Granarolo Community.
Created by the people to serve the people.
Based on values, to allow everyone to generate and spread value.**





Contents



A new revision Page 7



- A Bet on Our Future *by Gianpiero Calzolari* 8
- 2002-2016 a pact that grows over time 10

Our values Page 13

- Vision 14
- Mission 14
- General Principles 15



Who the Ethical Code is intended for Page 19



Guidelines for our commitment Page 23



Rules for relations Page 27

1. Rules for relations with workers 28
2. Rules for relations with consumers 34
3. Rules for relations with Group Companies 38
4. Rules for relations with suppliers 40
5. Rules for relations with clients 44
6. Rules for relations with the financial community 46
7. Rules for relations with controlling authorities 48
8. Rules for relations with representative bodies, society and the territory 50
9. Rules for relations with the environment 52
10. Rules for actuation of Italian Legislative Decree 231/01 54



Actuation of the Ethical Code Page 57

- The Ethics Committee 58
- Restorative Justice 60
- How to report a violation 61
- Response times 61

- Who to write to



A woman wearing a straw hat, a white cardigan, and denim shorts stands with her back to the camera in a vast field of purple flowers. The sun is setting in the background, creating a warm, golden glow. A large teal circle is overlaid on the top right of the image, containing the text "A new revision".

**A new
revision**

"Reducing uncertainty through values means being equipped with ethical vision"

A bet on our future

Luciano Sita, the Chairman of the Granarolo Group that preceded me and outlined the first Ethical Code, in 2005 wrote:

"This Ethical Code represents a bet on our future. We live in complex times, uncertain situations lie ahead of us.

Uncertainty and complexity run the risk of making us choose the wrong route, either because of fear, or because of anxiety about reaching our objectives.

Uncertainty and complexity are capable of giving us sufficient reasons to explain incorrect behaviour that each of us may have in carrying out our everyday work.

But not a single excuse. At Granarolo, we chose not to hide behind excuses when we decided to base our choices on a set of values.

With this Ethical Code we gave our values the task of reducing our uncertainty, but also the uncertainty of all those who have relations with our organisation.

Reducing uncertainty through a set of values means working on the transparency of behaviour. It means restricting the boundaries of arbitrary behaviour. It means introducing responsibility where only discretionary power exists. In other words, it means acquiring ethical vision.

Ethics may not always be capable of providing us with the best decisions, but they will definitely help us see the ones that have no trace of a future.

We have to remember that businesses - regardless of their economic and market power - live and die by their values.

There is definitely no shortage of examples, in one way and in the other".

Even today - ten years later - these words are fitting. From 2005 onwards, the company looked to the outside world, and today it operates in numerous, diverse, and complex foreign contexts. That is why it has become necessary to update the Ethical Code, the compass guiding the actions of those working within and with our organisation.

The only way to virtuous complexity that can be an opportunity for growth for those working in the company - in order to unleash energy capable of transforming knowledge - resides in frugal organisation.

Ethics help us to make that frugal, inter-generational, cooperative spirit our own, which



is essential for the survival and growth of the company.

Ethics do not leave space to individual speculation or remuneration based on position. Instead, they promote independent, shining and clarifying intelligence, called to work towards objectives.

The central value on which the entire system is based is coherence: behaving towards others the way we would like others to behave towards us. Coherence - as is the case with all values - can spread only by intimately taking responsibility, and is passed on by good examples.

It can be found only by challenging the prerogatives of all those who invest time, work and ideas in the company.

The Ethical Code will not protect us against mistakes: businesses are, by their very nature, imperfect organisms, because they must constantly combine freedom and rules, creativity and responsibility. But a humble company, built on attention and respect, and therefore simple in all its presumed complexity, will know how to deal with its mistakes and improve in order to grow.

Gianpiero Calzolari
Chairman of the Granarolo Group



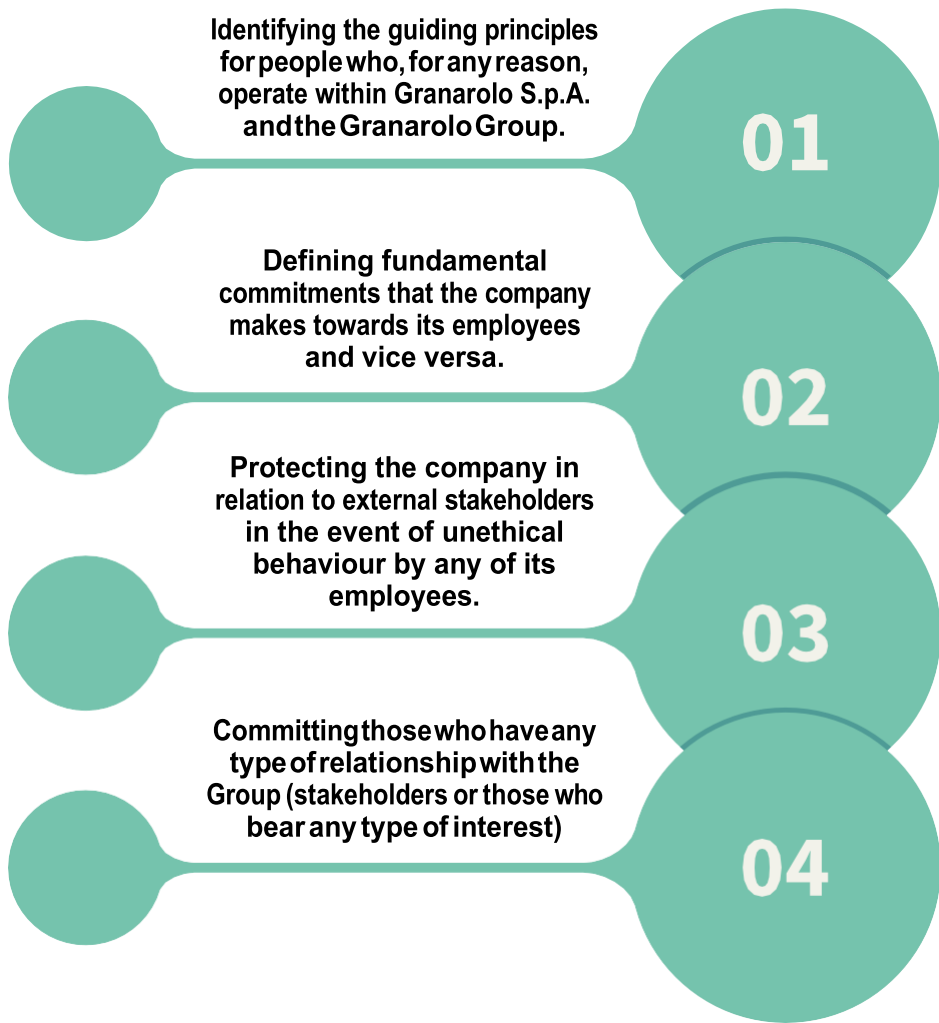


2002-2016 a pact that grows over time

The Granarolo Group Ethical Code is nothing more than a pact. The pact that the company makes with its human resources and with the main external interlocutors. It is a useful guiding instrument in helping the recipients deal with ethical dilemmas.

The first Ethical Code project, initiated by the Board of Directors in June of 2002, was characterised by the central nature it gave to internal relations in the company community.

Functions of the Ethical Code in the Company Community



A code that started at the bottom

The Granarolo Group decided that the process that would lead to the creation of the Code could not be separated from the principles of economic democracy that have accompanied this company since 1998, when its vision, mission, and values were defined for the first time.

This Code is the evolution of that system, and was not written by the Company Management, but by an inter-department work group. The vision and mission were revised in 2012 in light of the many changes in the world, and the new vocation the company is called to. The set of values has remained the same. The Ethical Code was revised and renewed in December 2015, taking on increasing importance as a tool of governance, understood as the active and conscious management of ethical issues in work activities.

The Ethical Code and the institution of the Ethical Committee were approved by the Board of Directors in their meeting on 14 July 2016.

The Ethical Code belongs to the entire Granarolo Community: created by the people to serve the people, based on values, to allow everyone to generate and spread value.







Our
Values



Vision

Producing well-being and Italian pleasure with the best milk. Successfully anticipating global challenges for a sustainable society and economy, promoting the Country System with the Group's growth.

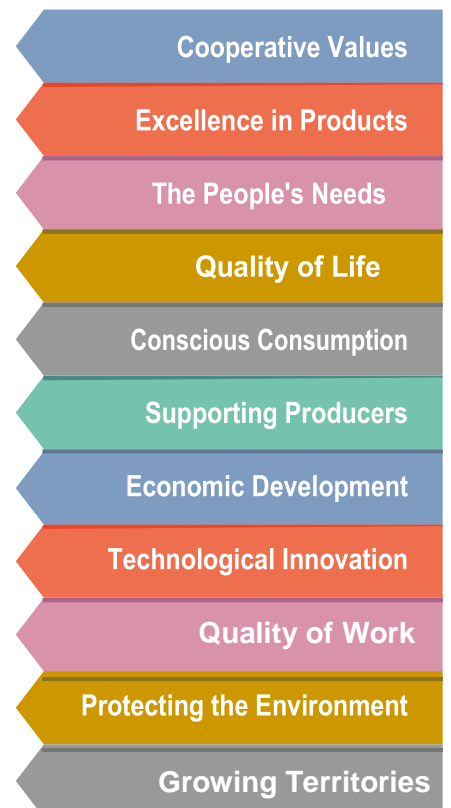
Mission

We are the largest Italian milk and cheese group with a cooperative structure, which offers the best milk and the best dairy products that nature and technological progress can give.

We respond to the needs of people and their taste, we are aware of their health and quality of life. With good, authentic, safe products that respect the environment, we favour healthy eating, positive lifestyles and more informed nutritional choices.

We work alongside shareholders and producers to improve their abilities, their techniques, and their efficiency, and to increase the perceived value of their milk. We increase their ability to stay on Italian and foreign markets, investing in innovation, technology, and research.

We believe in the people who work for us, committed and participating in constantly exploring new developmental horizons. A sense of responsibility, dialogue and courage are the



principles that inspire our work.

General Principles



LEGALITY

The Granarolo Group, in performing its activities, acts in full compliance with current legislation, in addition to company procedures.

Granarolo Group stakeholders are obliged to comply with current national and community laws, internal regulations and/or codes and, where applicable, professional codes of conduct. A lack of knowledge of current laws does not imply a lack of responsibility,

INTEGRITY AND PROPRIETY

Relations with stakeholders, at all levels, must be based on the criteria of integrity and propriety. In particular, the Granarolo Group does not apply behaviour or sign agreements that can have a negative impact on the competitiveness between the various operators in the reference market, or compromise the consumers in general. Instead, our company policy is based on commercial integrity and propriety, preventing and condemning unfair practises of all kinds. Commercial and institutional communications, aimed at the market, will be inspired by the principles of integrity and propriety, and by coherence between what is communicated and what is actually offered to consumers.

HONESTY

Honesty represents the reference principle for all activities initiated by the Granarolo Group. Under no circumstances will unfair or unlawful conduct be justifiable or tolerated in our operators towards the Granarolo Group, its employees, and the public.

FAIRNESS

The Granarolo Group is committed to acting so that authority is exercised fairly, avoiding any type of abuse, guaranteeing that authority does not transform into exercising power that is damaging to the dignity and independence of the collaborator, and so that choices in organising work activities protect the value of our collaborators.

TRANSPARENCY

The Granarolo Group informs all stakeholders in a clear, understandable and transparent manner in relation to its situation and financial and managerial progress, without favouring individual interests. In compliance with current laws, principles, and generally accepted accounting standards the financial statements, public reporting documents and any other public communications form a complete, fair, accurate, prompt and clear presentation of the Granarolo Group's position.

QUALITY/IMPROVEMENT

The Granarolo Group bases its action - and in particular its production intended for consumers - on quality. The Granarolo Group is a promoter of change, and aims all processes at sustainable development and the improvement of its products and market.

In this sense, it cultivates excellence among its human resources, well aware of the value they generate in relations with stakeholders.

IMPARTIALITY

In decisions that influence relations with its interlocutors, the Granarolo Group does not allow any type of discrimination linked with age, gender, sexual orientation, health, race, nationality, political opinions or religious beliefs. In performing its activities, the Granarolo Group forbids any type of action, towards or on behalf of third parties, aimed at promoting or favouring their exclusive interests, gaining an advantage, or anyway capable of damaging its impartiality and independent judgement.

PROFESSIONALISM

Professionalism is a fundamental principle that the Granarolo Group aspires to in fulfilling its activities, in order to achieve efficient and competitive service.

CONFIDENTIALITY

The Granarolo Group treats management of personal information and data with particular confidentiality. The Granarolo Group is committed to protecting information concerning the private life and opinions of each employee, through the ban on interferences and invasive inspections aimed at damaging personal freedom. It is also committed to not using confidential information for purposes not linked with carrying out normal business activities.

HEALTH AND SAFETY

The Granarolo Group protects the physical and moral integrity of all employees and collaborators, ensuring safe and healthy work environments and work conditions that respect individual dignity. The Granarolo Group is committed to achieving, among its suppliers, the same level of respect for all their employees and collaborators, and to this purpose, specific checks are in place.

The Granarolo Group supports and respects human rights and workers' rights in compliance with the Universal Declaration of Human Rights.

ENVIRONMENTAL PROTECTION

The Granarolo Group acknowledges environmental protection as fundamentally important. To this purpose, the Group will never seek advantages that may in any way be linked with violating environmental regulations.

COOPERATION

The Granarolo Group's style is inspired by the principle of collaboration with stakeholders, creating dialogue with them and involving them effectively and proactively in defining development policies.



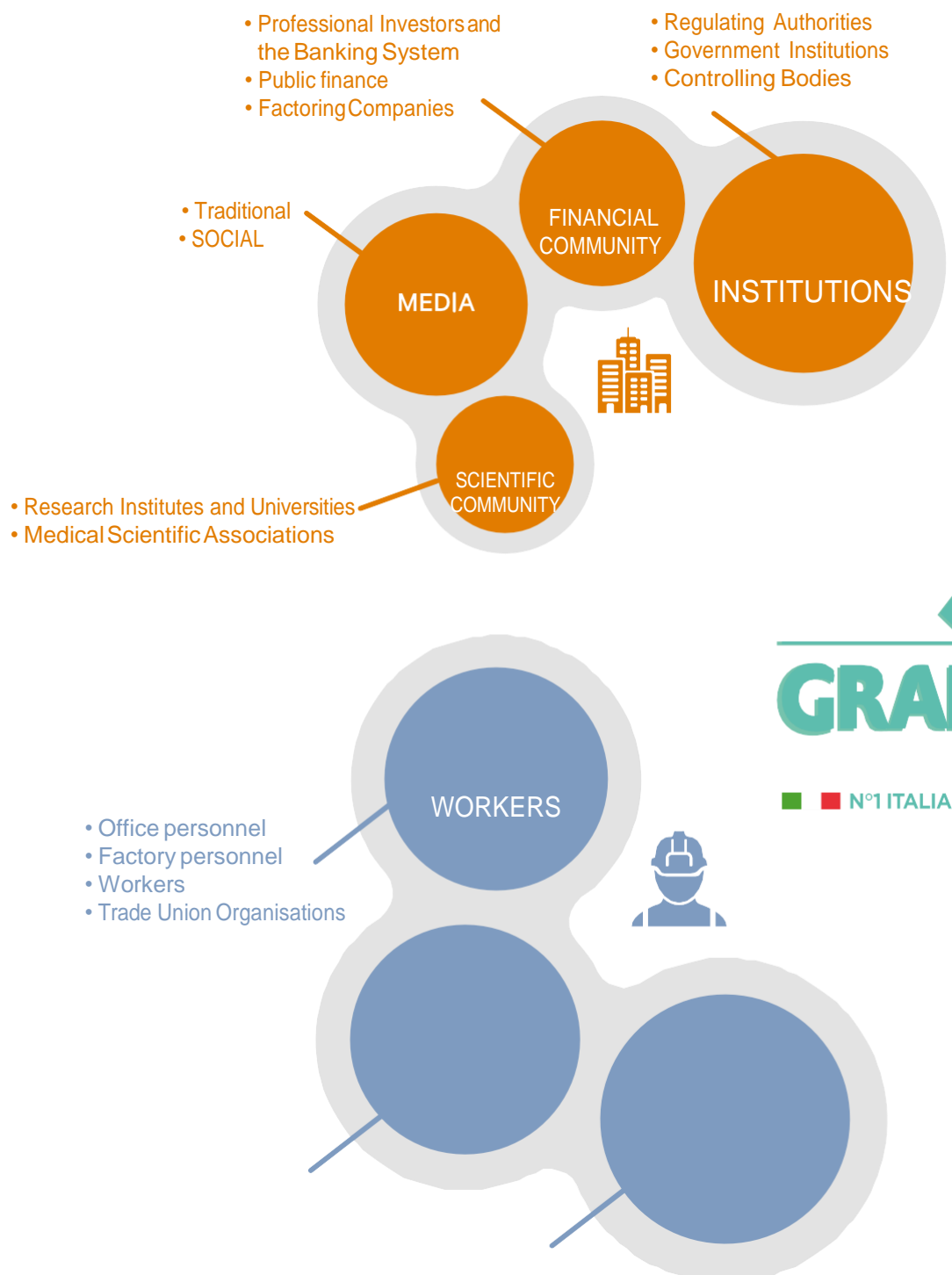


A young girl with long dark hair is wearing a blue bucket hat with white stars and a red band. She is looking down at a red pouch of yogurt and a bowl of food. The background is blurred, showing other people and a bright outdoor setting.

**Who the
Ethical Code
is intended
for**

Recipients of the Code

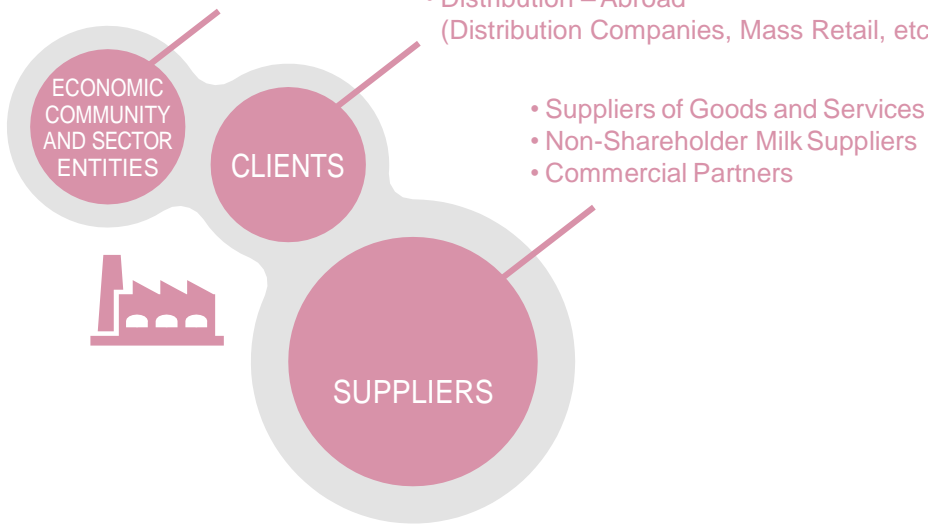
The Code is intended for all those who, for various reasons and at different levels of responsibility, help reach Granarolo's objectives - either directly or indirectly. The Granarolo Group considers the following to be first-level stakeholders:



- Producer cooperatives
- Financial backers

- Milk and Cheese Industry Competitors
- Food Industry Competitors
- Food and Agriculture Associations
- Industrial Associations
- Cooperative Movement
- Associated Distributor Associations

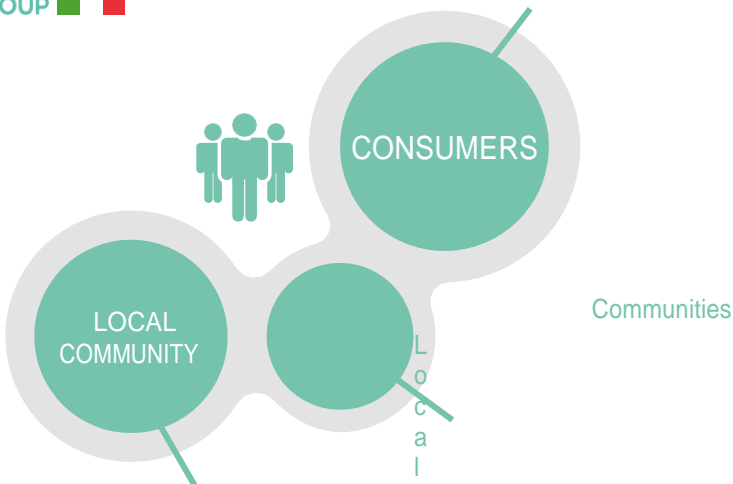
- Mass Retail
- Food Service
- HORECA
- Distribution – Abroad
(Distribution Companies, Mass Retail, etc.)



- Suppliers of Goods and Services
- Non-Shareholder Milk Suppliers
- Commercial Partners



- Families and People
- Consumer Associations
- Consumers - Abroad



Leaders

the Development of CSR

- Non-Profit Associations/NGOs

- Environmental Associations and Associations of Workers

(corresponding Representatives)

- and Associations)
- Organisations with which social projects are developed



A photograph of a woman and a young girl. The woman, on the left, has brown hair tied back, wears black-rimmed glasses, a pearl earring, and a blue denim apron over a dark top. She is smiling broadly. The young girl, on the right, has light brown curly hair and is wearing a grey t-shirt with a colorful butterfly pattern. She is also smiling. The background is a blurred outdoor setting with blue and red tones. A yellow circular graphic is overlaid on the top right, containing the text 'Guidelines for our commitment' in white.

**Guidelines
for our
commit-
ment**



General areas



Compliance with the Ethical Code

Directors, employees and collaborators of the Granarolo Group base their relations on trust and responsibility. Their conduct is inspired by respect for the rules contained in this Code. Every case of conduct that fails to comply with the Ethical Code is considered a violation of this trust agreement and must be detected and reported.

Responsibility and Decision-Making Power

The Granarolo Group interprets the company as a place of responsibility. The responsibility of each individual increases with their level of authority and power to make decisions. As a result, spreading and actuating this Code depends on the commitment of each individual, and particularly of those who hold the most decision-making power, whose conduct is seen as an example.

Commitment to Reporting

The Granarolo Group makes the commitment to responding to its interlocutors in terms of objectives, activities and results, through instruments capable of "broadcasting" the economic, social and environmental impact of company activities.

Commitment to Dialogue

The Granarolo Group creates a dialogue with its interlocutors and their representatives, in relation to mutual interests. Everyone is obliged to respond to requests for dialogue.

Active Participation in Company Life

The Granarolo Group promotes active participation in company life among employees and collaborators.

Confidentiality of Information

All information on the company activities that has not yet been made public and that is in the hands of directors, employees and collaborators of the Granarolo Group in relation to their individual roles, is considered confidential and of the company's exclusive interest.

Potential Conflicts of Interest

Directors, employees and collaborators must avoid situations that can represent conflicts of interest between themselves and the company.

Compliance with the Ethical Code

The Granarolo Group asks all those who - in various roles - collaborate with the company, to comply their conduct with the rules described in this Code.





An aerial, high-angle photograph of a busy pedestrian plaza. The ground is paved with a large-scale checkerboard pattern of light and dark grey tiles. Numerous people of various ages and ethnicities are walking in different directions across the plaza. The scene is brightly lit, suggesting a sunny day. In the upper right quadrant, there is a large, semi-transparent blue circle containing the text "Rules for relations" in a white, sans-serif font.

Rules for relations

1. Rules for Relations with workers





1.1 Respect for diversity

Granarolo Group encourages an inclusive environment, which promotes individual expression, creativity, innovation and realisation, and acknowledges value in the diversity of cultures and talents.

It is therefore opposed to any form of discrimination in terms of age, gender, sexual orientation, race, religion, and political or spiritual beliefs, and guarantees the consolidation of a company environment based on respect for human dignity.

1.2. Promoting and protecting employment

The Granarolo Group promotes an attractive, inspiring and challenging work environment, where employees can grow both professionally and personally.

Company management is therefore committed to applying strategies that combine company growth and profit with protecting and developing employment - both direct and induced - and promoting the quality of work.

1.3. Contracting and representing workers

In Italy and abroad, company management bases its decisions and conduct towards employees on strict compliance with regulations and collective labour agreements, respect for freely elected trade unions and a constructive spirit in industrial relations.

1.4. Selection

1.4.1. The selection process is carried out with respect for equal opportunities and for the individual, in a manner that is structured and clearly explained to the candidate.

1.4.2. Granarolo Group provides the candidate with correct and complete information concerning the organisation and the position for which they will be considered.

1.4.3. The candidate is expected to provide the selecting personnel with all useful information that may make the selection process effective and efficient.

1.5. Placement

1.5.1. The Granarolo Group is committed to putting into practise all those activities that favour the placement of newly employed personnel in a collaborative and open environment, both in Italy and abroad, creating constant opportunities for dialogue.

1.5.2. In return, the newly employed staff member agrees to accept the information they receive and to follow Granarolo's rules.

1.6. Training

1.6.1. In order to increase the professional and personal skills of collaborators in a rapidly evolving context, company management agrees to providing employees with the necessary tools in terms of knowledge, updates, and professional improvement for them to perform their activities.

1.6.2. Furthermore, the Granarolo Group is committed to defining and activating an effective

training activity programme, guaranteeing equal opportunities for all and putting - according

to opportunities and after careful analysis of potential and needs – employees in the condition to access these programmes.

1.6.3. In return, it is the employee's duty to take part in this commitment, both by actively participating in training initiatives and by sharing and applying the knowledge acquired therein.

1.7. Growth

1.7.1. Granarolo Group values the contribution of each individual, guaranteeing equal opportunities for growth, attributing responsibilities in coherence with each role and path, and acknowledging - in terms of organisational independence - acquired skills.

1.7.2. In professional assessment processes, the systems that are applied are fair, transparent, and known to the assessed employees.

1.7.3. The employee agrees to take responsibility for the tasks assigned to them, and to deal with the assessment process in a collaborative and proactive manner.

1.8. Health and Safety

1.8.1. The Granarolo Group constantly shares and consolidates the culture of health and safety in the workplace, at all levels, developing knowledge of risks and promoting responsible behaviour among all collaborators.

1.8.2. The employee must not create dangerous situations for themselves and for colleagues. They must comply with internal regulations and collaborate to improve control and prevention systems.

1.9. Organising work - timetables and shifts

1.9.1. Granarolo respects the private life of its employees and collaborators, identifying ways of paying attention to their needs in difficult situations that prevent them from performing their duty.

1.9.2. In return, the employee is obliged to respect the timetables and shifts assigned to them, and to provide prompt notification of any unforeseen absences.

1.10. Organising work - equipment

1.10.1. Employees are provided with all the suitable equipment to perform their activities, and are asked to use the assigned resources cautiously, diligently, and responsibly.

1.10.2. In return, employees and collaborators are responsible not only for protecting these resources, but also for preventing their fraudulent or improper use, to their own advantage, to the advantage of third parties, or to the advantage of the Group's own companies.

1.11. Organising work - planning activities

1.11.1. The Granarolo Group is oriented towards overall activity planning that provides each individual with the possibility of occupying the most suitable role, maximising usefulness of the organisation, with respect for equal opportunities.

1.11.2. To this purpose company management prepares and publishes the system of responsibility in terms of organisation, skills, and functions performed by current staff.

1.11.3. Staff management policies are transparent and are promptly communicated to employees.

1.11.4. Protecting the dignity of the individual in words, attitude and organisation of work activities is taken as an inspiring principle in all of Granarolo's actions.

1.11.5. The Granarolo Group asks all employees to collaborate to maintain, in the company, an atmosphere of mutual respect for the dignity, reputation and honour of each individual and to intervene to prevent abusive or defamatory interpersonal behaviour.

1.12 Security

1.12.1. Violating the property of any individual and of the company is considered a serious transgression of the rules of living together.

1.12.2. All employees of the Granarolo Group are asked to be careful and collaborative in order to guarantee a safe work environment.



1.13. Confidentiality and processing company information

1.13.1. Information linked with the company activities is considered an intangible asset owned by the company. This asset should receive the same protection as is provided to material assets.

1.13.2. By confidential information, we mean all information that is not public and that is capable of causing damage to the company if not used correctly.

1.14. Privacy

1.14.1. Employee information covered by privacy rights are managed exclusively by specifically authorised personnel, according to current regulations.

1.14.2. It is forbidden to transmit this information outside of specific standards and procedures.

1.15. Conflict of interests

1.15.1. Employees must avoid situations that may generate a conflict of interests. In the same way, they must abstain from taking personal advantage from their position, their information, and the discretion linked with their professional role.

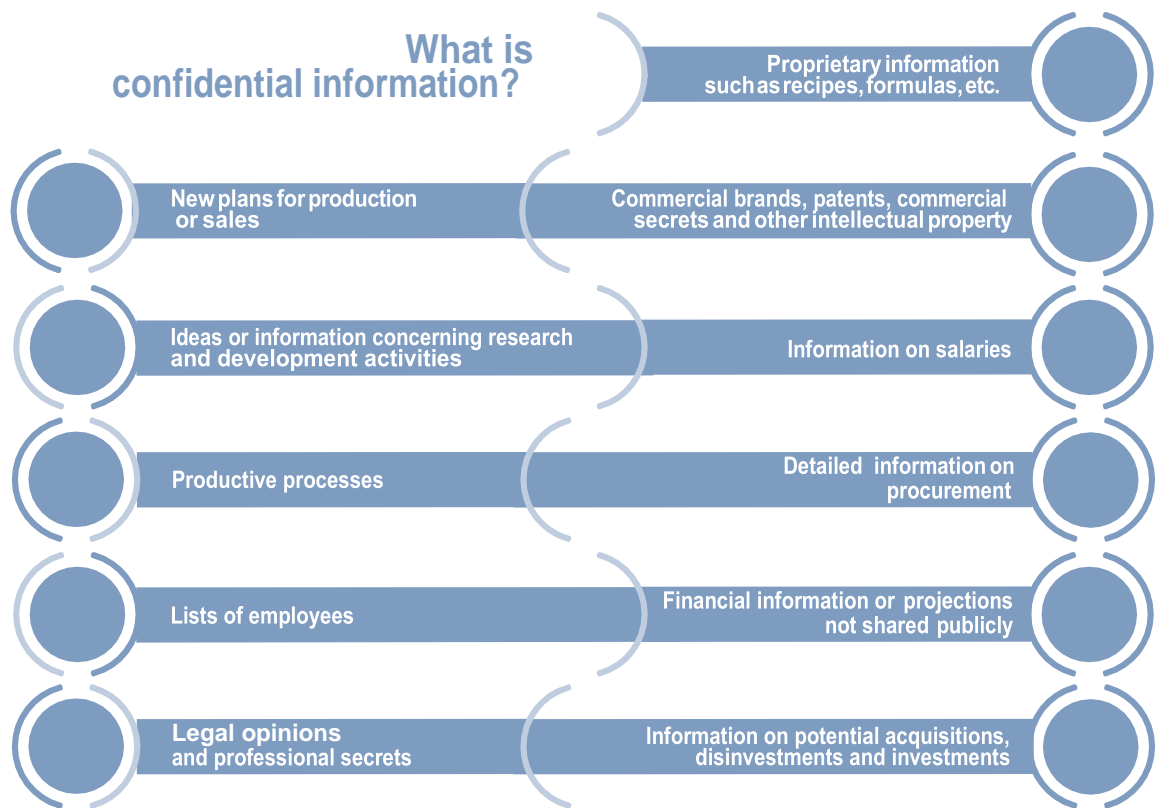
1.15.2. These conflicts, which may concern both internal and external professional relationships, are considered seriously detrimental to Granarolo wherever this action compromises better choices.

1.16. Gifts and professional courtesy

1.16.1. The Granarolo Group accepts only gifts that are considered part of normal professional courtesy - of no significant value to the company and that do not compromise equal treatment of all stakeholders.

1.16.2. The Granarolo Group prefers and favours the donation of all gifts received to charity.

1.16.3. Employees of the Granarolo Group are not allowed to give benefits or gifts to third parties that go beyond normal professional courtesy, and that may therefore be perceived by the recipient as attempts to influence decisions and behaviour. Specifically, it is forbidden to give benefits or gifts other than the goods subject to our business (that is to say objects manufactured or sold by the company) - even indirectly - to individuals who, in any way, represent or are employed by Public Administration.



1.17 The Importance of Communication

The Granarolo Group acknowledges the value of communication as an essential factor in sharing and exchanging competence and in increasing the sense of belonging within the company. Clients, consumers, the media and investors deserve to receive truthful, precise, clear and complete communications from the Group. In order to provide such information, only employees who have received specific training and authorisation may represent the Group in public and in relations with the media. If you happen to receive requests for information, before answering or writing, it is best to ask your supervisor.

1.17.1 Employees and collaborators of the Granarolo Group have a common identity as employees, but each one has individual thoughts, opinions and interest. Whatever you say, write by email, on blogs or in tweets, in a few seconds can reach millions of people. That is why Granarolo's communications can also have an impact on millions of people - either positively or negatively. Everything you say or do has an effect on the Group's reputation. This power implies additional responsibility, especially when communicating on social media.



2. Rules for Relations with Consumers





21 Product quality

21.1. The Granarolo Group aims for excellence in terms of quality - both in Italy and abroad - promoting healthiness, safety and innovation for complete consumer satisfaction. To this purpose - also by collaborating with research institutes and ministries - we work to generate superior quality products, which value the Italian food and agriculture sector. We constantly apply and actuate a system of procedures that make it possible to monitor and control the raw materials, the productive process, and distribution of the finished product, in order to be able to guarantee quality, safety and healthiness, beyond the current regulations and according to Granarolo standards.

21.2. The Granarolo Group works to offer the consumer products that are fruit of the work carried out with a production chain approach and of the responsible choice of the applied technology.

2.1.3 The Granarolo Group works to generate the correct remuneration for all those working throughout the production chain.

2.2. Information to the consumer

22.1. The Granarolo Group provides truthful, understandable and accessible information to all consumers, within the limits of company confidentiality.



truthful information, respectful of the ethical principles expressed in this Code, putting the consumer in the position to be able to make conscious and independent decisions.

223. The Granarolo Group provides, through the labels on its products, simple and clear information, in order to make sure that all consumers receive complete, easy and understandable information.

2.3. Dialogue

231. The Granarolo Group listens in an organic and structured manner to all consumers who contact the company, providing suitable means and procedures for the purpose and facilitating access.

232. The Granarolo Group is committed to offering exhaustive and prompt answers to consumers, using care, courtesy and availability towards them.

2.4. Competitions and promotions

241. The Granarolo Group guarantees the utmost transparency and fairness in organising and communicating competitions and promotions, offering the chance to participate in the initiative to all consumers who are interested in doing so.

242. Management of these activities is carried out in a fair manner, and suitably to make sure the consumer receives increasingly efficient service.

243. All those who participate in the competitions, following the rules, are guaranteed the same treatment.

2.5 Protecting consumer information

Gruppo Granarolo guarantees the protection of consumer information in the following manner:

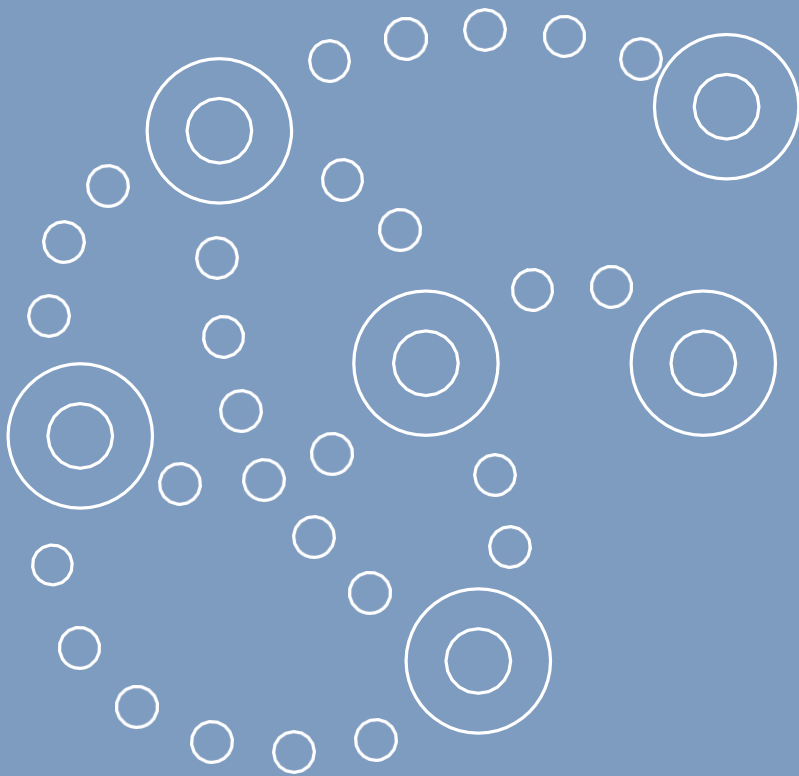
- Always managing personal details responsibly and complying with all applicable laws concerning privacy and policies.
- Never sharing personal information belonging to third parties with anyone else inside Granarolo who is not authorised to receive said information.



“The Granarolo Group aims for excellence in terms of quality - both in Italy and abroad - promoting healthiness, safety and innovation for complete consumer satisfaction”



3. Rules for Relations with Group Companies





"Granarolo is committed to accepting suggestions and contributions to improvement coming from subsidiary companies, who in turn apply and implement centrally decided policies at a local level"

3.1 Access to the Group

3.1.1. In the case of acquisitions, Granarolo is committed to making sure that the activities and organisation of the potential subsidiary are coherent with the values established in the Group vision and mission.

3.1.2. Company management asks the managers of acquired companies to inform their operating structure of the acquisition process.

3.1.3. Management of the acquired company is asked to provide Granarolo with all the information necessary to facilitate integration processes in the Group's organisation structure.

3.2. Information

3.2.1. Granarolo promptly provides subsidiaries with all the information necessary to facilitate their management and integration with the Group's policies.

3.2.2. Subsidiary companies must promptly report situations that have a significant influence on the trends in economic, social and environmental performance levels, or that may put Granarolo's reputation at risk, in terms of its values.

3.3. Managing relations

3.3.1. Company management provides the managerial and operative structure of subsidiaries in the condition to be able to participate in the Group's path to excellence, providing the same training opportunities and defining suitable investment policies.

3.3.2. Granarolo is committed to accepting suggestions and contributions to improvement coming from subsidiary companies, who in turn apply and implement centrally decided policies at a local level,

3.4. Reorganising processes

In line with the principle of ongoing improvement, operations for productive and reallocating reorganisation of departments are carried out by suitably informing people involved of the consequences derived from these operations.

4. Rules for Relations with Suppliers





As a responsible and global business citizen, the Granarolo Group aims to collaborate only with commercial partners who follow the law and operate in a fair and ethical manner at all times.

4.1. Negotiation and selection

4.1.1. The Granarolo Group is committed to providing all necessary information to all individuals participating in negotiations. In return, the potential supplier is required to formulate clear and complete offers, that do not leave room for misunderstandings.

4.1.2. Granarolo Group - during the offer assessment phase - considers the professional know-how contained therein as the potential supplier's intellectual property.

4.1.3. Granarolo Group selects its suppliers according to objective criteria, ensuring equal treatment for all those who participate in the negotiation procedure.

4.1.4. Suppliers are asked to contribute to raising the level of quality of current supplies.

4.2 Stipulating the contract



Therefore, Granarolo asks those who deal with procurement and managing relations with suppliers to follow these guidelines:

01

Treat all suppliers and commercial partners with fairness and integrity, regardless of the value of the transaction or the duration of the contract.

02

In choosing from suppliers competing with each other, select those that best satisfy the needs and objectives of Granarolo Group, maintaining the commitment to diversity in the supplier base.

03

Base the decision on objective criteria such as quality, price, service, reliability, availability, technical excellence and delivery, in addition to ethical commercial practises.

04

Avoid conflicts of interest - even conflicts that are only apparent - which may give rise to questions concerning the company's ability to make independent choices.

05

Do not accept anything from commercial partners except gifts, favours and entertainment of no significant nominal value.

During the contract stipulation phase, the Granarolo Group agrees - and asks suppliers to make the same commitment - to show all the information that can put both parties in the condition to be able to correctly fulfil the commitments they have made, thus avoiding misunderstandings.

4.3. Managing relations

4.3.1. The Granarolo Group manages relations with suppliers by applying the ethical principles expressed in the introduction to this Code, inspired by fairness, coherence and transparency. Granarolo is committed to developing - with typical suppliers - relations based on cooperation and collaboration, which make it possible to exchange knowledge useful for both businesses.

4.3.2. Suppliers chosen by the Granarolo Group are asked to respect the principles and rules in coherence with the management systems that the company applies.

4.3.3. In the presence of particularly serious cases - concerning the behaviour of suppliers in ethical, social and environmental terms - Granarolo reserves the right to interrupt relations.

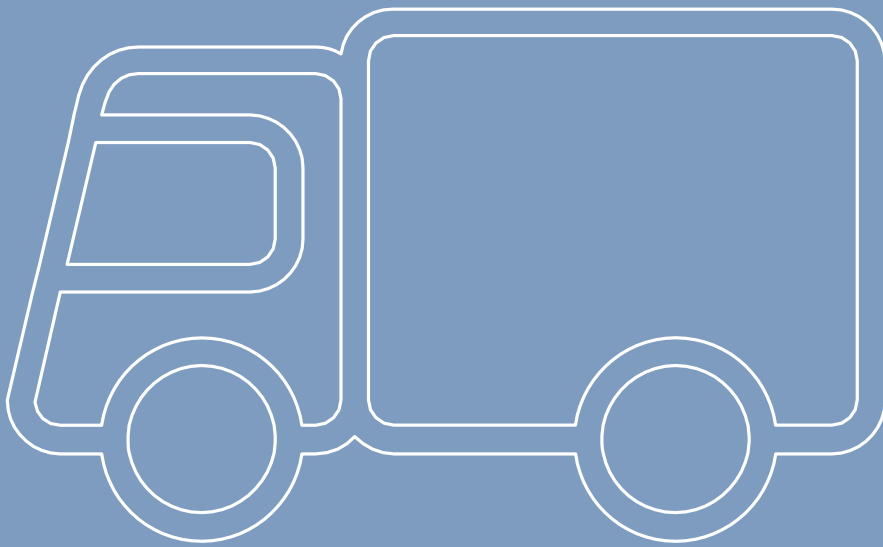
4.3.4. The Granarolo Group is committed - and expects the same commitment from suppliers - to correctly following agreements made up until the last day said agreements are valid.

4.4. Termination of relations

Granarolo Group asks suppliers not to transmit information of a confidential and strategic nature outside of the company, and agrees to do the same. This obligation must be maintained during and after the supply contract, unless otherwise agreed.



5. Rules for Relations with Clients





5.1. Activating relations

5.1.1. During the phase of activation of relations, Granarolo Group is committed - and asks both Italian and foreign clients of any kind to make the same commitment - to agreeing transparently on the object and conditions of trade, incorporating this information in the formalised contract.

5.1.2. The Granarolo Group promptly assesses the feasibility of any extraordinary requests before making a formal agreement.

5.2. Guarantees in managing relations

5.2.1. Granarolo Group guarantees that the deliveries must be made based on the conditions defined in supply specifications, in the applied ISO standards and in current regulations on control and traceability systems in the production chain, in order to make sure that all consumers receive the best conditions of quality and safety in their products.

5.2.2. The Granarolo Group is committed to informing the client with suitable forewarning of the launch of new products and promotional initiatives, in order to allow them to assess the corresponding opportunities.

5.3. Developing relations

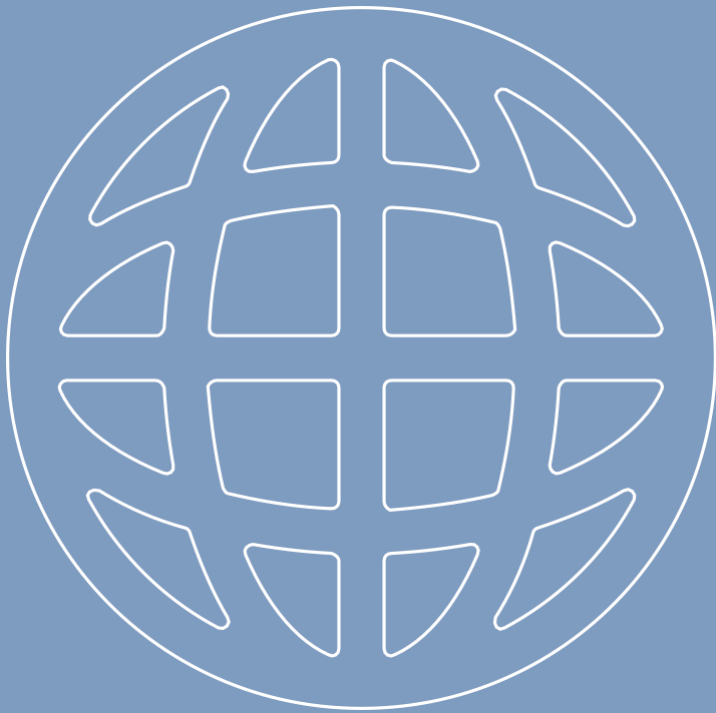
5.3.1. The Granarolo Group is committed to cultivating dialogue and listening, considering these essential levers in the growth and improvement of relations with their clients, in order to consolidate the relationship for the long term.

5.3.2. Granarolo Group adheres to its reference values even in areas of the relationship that have not been formalised, well aware that cooperating with the client contributes to transmitting ethical value to the consumer.

5.3.3. The Granarolo Group shares its market know-how with the client, well aware that a synergic and coordinated approach to expectations and needs of the consumer multiplies advantages for both parties.

"The Granarolo Group is committed to cultivating dialogue and listening, considering these essential levers in the growth and improvement of relations with their clients"

6. Rules for Relations with the financial community





Granarolo supports fair and open stock markets and works to protect the Group's reputation as a reliable company for honest transactions, everywhere.

6.1. Managing relations

6.1.1. Company management is committed to promptly communicating to members of the financial community any information that has an actual or potential effect on the Group's value.

6.1.2. In relations with shareholders, the Granarolo Group ensures the utmost transparency with regard to the mechanisms of governance and protection of mutual interests, in addition to what is required by law.

6.1.3. The Granarolo Group agrees to work to ensure suppliers of financial resources and services respect for commitments they have made, and protection of the confidentiality of professional know-how, and asks in return the same fairness in managing relations.

6.2. Accuracy of accounting records

6.2.1. Every document certifying the assets and liabilities of the company and the economic and financial management trends at Granarolo must be based exclusively on precise, exhaustive and verifiable information. All of Granarolo's accounting documents must be generated exclusively from certain and verifiable management documents. No employee of the Granarolo Group may forgo this principle, not even at the request of their hierarchical superiors.

6.2.2. Each operation and/or transaction carried out by the Granarolo Group must be legitimate, authorised, coherent, congruous, documented, recorded and, at all times, verifiable.



7. Rules for Relations with controlling authorities





*“For the Granarolo Group,
any findings by controlling
authorities are an
opportunity
for improvement”*

7.1. Managing relations

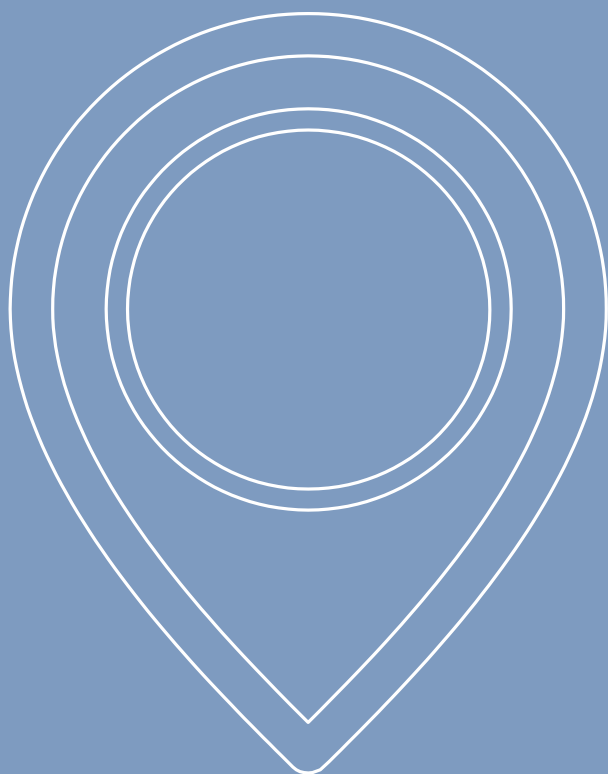
7.1.1. The Granarolo Group agrees to ensure the utmost collaboration with controlling authorities, providing the requested information and guaranteeing, in the case of inspections or audits, the availability of personnel, access to facilities, and the usability of documentation.

7.1.2. Company management assigns to each department the responsibility for truthfulness, authenticity and originality of the documentation and information provided in performing their duties.

7.1.3. For the Granarolo Group, any findings by controlling authorities are an opportunity for improvement to be taken into consideration in defining strategies and policies, in a relationship inspired by the principles of collaboration and mutual trust.



8. Rules for relations with representative bodies, society and the territory





Granarolo Group pursues and reaches its objectives also by giving value to representatives, which it considers an important part of economic democracy. It is therefore committed to generating contributions and actively participating in projects promoted by representative bodies, providing information, data, experience, resources and knowledge.

The Granarolo Group works to support the communities in which its employees live and work.

8.1. Activating relations

8.1.1. The Granarolo Group clearly declares its business policy and the criteria it uses to select the interlocutors with whom to activate partnership projects. These criteria are made public and are easily accessible through the institutional communication channels.

8.1.2. Criteria for the assessment of potential collaborations that the Granarolo Group applies each time refer to the vision, mission, values, and ability to share common strategic objectives.

8.1.3. The Granarolo Group clearly declares its expectations with regard to potential relations, provides the counterpart with all useful information to satisfactorily assess the level of involvement that can be conveniently activated (from simple economic support to strategic alliances) and asks organisations aspiring to partnership to apply the same behaviour in return.

8.1.4. The Granarolo Group takes on the role of interpreter and communicator of food culture in the social context, and is committed to establishing collaborative relations with the scientific world in order to constantly support innovation in food research and in managing the productive activity, in order to offer increasingly safe products, in line with the expectations of the consumer and of society.

8.2. Managing relations

8.2.1. The Granarolo Group is committed to defining its own social intervention programmes.

8.2.2. The Granarolo Group circumscribes to a few limited cases the payment of generic contributions to the management of partner organisations, privileging partnerships linked with the creation of specific projects. The Granarolo Group is committed - and asks partner organisations to make the same commitment - to managing common projects in coherence with the declared purposes, binding the realisation of the project to compliance with a series of previously and mutually identified indicators of efficacy.

In addition, the Granarolo Group is committed - and asks partner organisations to make the same commitment - to constantly monitoring progress in activated projects as well as partnership relations created.

8.2.3. In designing and creating educational projects in the scholastic field, the Granarolo Group acts in the exclusive interest of the students, working to raise their level of knowledge and to develop their critical sense, and avoiding providing informative and training actions with a promotional connotation.

9. Rules for Relations with the environment





The Granarolo Group works to create a more sustainable society, doing its best to reduce to a minimum its environmental footprint and developing solutions to preserve resources and protect the planet.

9.1. Direct impact

9.1.1. The Granarolo Group is committed to using certified management systems to reduce the environmental impact of its activities, in coherence with its declared values.

9.1.2. During the actuation phases of structural and technological changes, the Granarolo Group takes into account the environmental impact these may cause.

9.1.3. Company management works to spread the culture of protecting and valuing the environment among its employees and direct interlocutors.

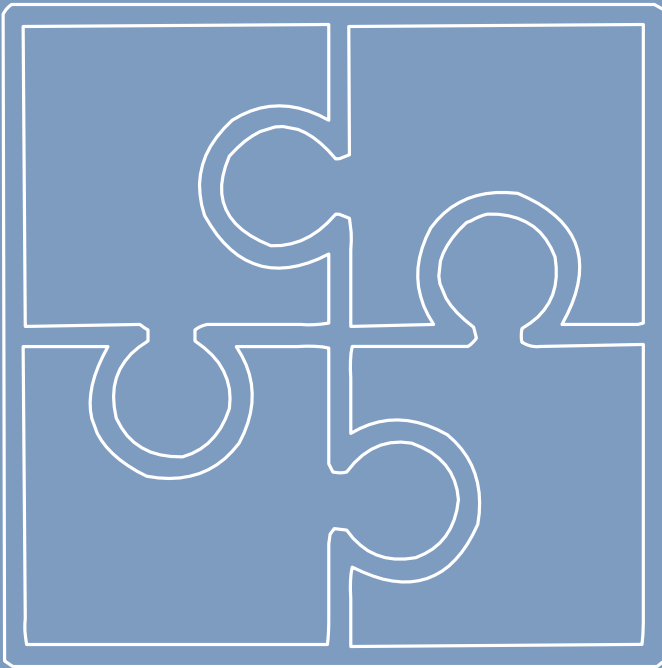
Especially in relation to those operators whose activities have a higher environmental impact.

9.2. Indirect impact

The Granarolo Group is committed to activating - in its own reference context and throughout the supply production chain - tools and practises to increase awareness of the importance of assessing environmental impacts, promoting specific initiatives in partnership with national and international institutions.



10. Rules for actuation of Italian Legislative Decree 231/01





"The Granarolo Group is committed to orienting its conduct in relations with Public Administration to principles of fairness and transparency"

101. Relations with Public Administration

The Granarolo Group is committed to orienting its conduct in relations with Public Administration to principles of fairness and transparency, in order to protect its company interests, but simultaneously favouring better execution of the functions of Public Administration in compliance with current laws.

102. Organisational models

The Granarolo Group is committed to effectively applying and actuating - and overseeing effective compliance - suitable organisation and management models:

- to favour full compliance with current regulations and to prevent committing crimes in the interest and to the advantage of Granarolo by anyone (senior positions, employees and collaborators) who hold relations with Public Administration on Granarolo's behalf.
- to prevent any or all other crimes in the interest and to the advantage of Granarolo Group by senior positions or employees and collaborators of the company.

103. Procedures for exclusion

The Granarolo Group agrees to exclude from its company community anyone (senior positions, employees and collaborators) who has received a sentence that has become res iudicata:

- for crimes against Public Administration, company crimes and crimes of corruption in the private sector committed in the interest or to the advantage of the Granarolo Group.
- for any other crime committed in the interest or to the advantage of the Granarolo Group, in the case of fraud or serious infractions.



A woman with long, dark, curly hair is shown in profile, drinking from a white mug. She is wearing a red and white striped sweater. The background is a kitchen with a countertop, a sink, and various items like a red bowl and a white pitcher. The lighting is warm and natural, suggesting a bright window. A grey circular graphic is overlaid on the right side of the image, containing the text "Actuating the Code".

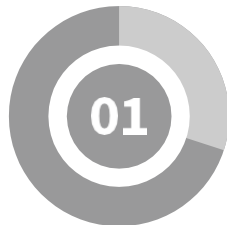
Actuating the Code

The Ethics Committee

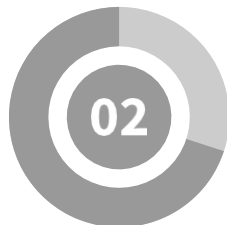
The Ethics Committee, made up of mixed members (internal/external) guarantees concrete compliance with the Code within the organisation, and application of the control system.

Composition

The Ethics Committee is made up of 3 members:



A member appointed by the Board of Directors.



Two external members selected on the basis of an acknowledged moral integrity, together with good knowledge of the operative mechanisms of bodies and organisations.



An external member presides over the Ethics Committee, selected on the basis of an acknowledged moral integrity, together with good knowledge of the operative mechanisms of bodies and organisations. He/She represents the interests of the stakeholders, guaranteeing equal and transparent application of the Code. This figure may coincide with one of the two external members.

Activities

- Supervises Code training and communication activities, in synergy with the Communications & CSR department.
- Researches the cases subjected to the committee through hearings with the involved parties.
- Decides on sanctions to be applied on the basis of instructions written up by the member nominated by the Board of Directors and working on the concept of restorative justice.
- Proposes updates and changes in the Ethical Code to the Board of Directors.

It is not the Committee's duty to express their opinion on the interpretation of laws and regulations or contractual clauses.

Meetings

- The Ethics Committee meets twice a year, except in urgent cases that require the immediate summoning of the member nominated by the Board of Directors.
- Meetings are valid if all members - or their representatives - are present, it being understood that it is possible to delegate this responsibility for only one meeting during the year.



Restorative Justice

Any sanctions will be inspired by the concept of Restorative Justice, defined as a “process through which parties with a stake in a specific offence collectively resolve how to deal with the aftermath of the offence and its implications for the future”. It is therefore a different way to deal with the sanction. We do not focus on the repressive aspect of the sanction, but instead on the assessment of the damage caused to those involved in the unlawful conduct and on the assessment of the personal and organisational reasons that originated this unlawful conduct or made it possible.

Sanctions therefore differ in relation to the severity of the violation, the repetitive nature of the behavioural pattern and on the consequences for all stakeholders as well as for the company itself, in terms of economic and reputational damage.

As far as external stakeholders are concerned, sanctions are applied on the basis of the existing contractual obligations. The Ethics Committee will establish, after having assessed the corresponding investigation and the parties involved.





How to report a violation

Reports of violations may be made to the Committee as a whole or to one of its members. These reports may be made either verbally or in written form. If presented verbally, the petition will be formalised in writing during the Committee's first meeting.

Response times

The person who presents the report has the right to be informed, within 30 days of the report itself, of the Committee's decision to open procedures. The Committee has 60 days to reach a decision on the report.

Who to write to

Granarolo Group Ethics Committee
via Cadriano 27/2
40127 Bologna

comitatoetico@granarolo.it

