



SANTAGATA

1907

CODE OF ETHICS

Santagata 1907 S.p.a.
2024

Introduction

The Code of Ethics is the fundamental charter of moral rights and duties that defines the ethical-social responsibility of each member of the company organisation of 'SANTAGATA 1907 S.p.A' (hereinafter referred to as the company or corporation).

It proposes to constitute an effective means of preventing irresponsible, or possibly unlawful, behaviour by those who operate in the name of and on behalf of the company by introducing a clear and explicit definition of the responsibilities of each company operator towards those who are involved directly, or indirectly, in the company's activities such as customers, suppliers, employees, collaborators, public institutions and anyone else affected by the company's activities. Its addressees are called upon to strictly comply with the values and principles proposed and contained therein and are required to protect and preserve, through their conduct, the respectability and image of the Company, as well as the integrity of its economic, social and human assets.

The Code of Ethics does not, however, replace existing laws and does not override the existing National Collective Labour Agreement.

Through the Code of Ethics, the company intends, in particular:

- define and make explicit the values and general ethical principles that support its business activities and relations with customers, suppliers, partners, employees, collaborators, administrators, public institutions and any other party involved in the company's activities;
- formalise the commitment to behave on the basis of the ethical principles of moral legitimacy, fairness and equality, protection of the person, diligence, transparency, honesty, confidentiality, impartiality, and protection of health;
- indicate to its employees, collaborators and directors the principles of conduct, values and responsibilities respected in the course of their work;
- define implementation tools and methodology.

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Santagata 1907 S.p.a. has been active in the edible oil sector for more than a century. The company, dedicated to the selection of high-quality olive oils and extra virgin olive oils, which are then distributed in Italy and around the world, was founded by Giovanni Battista Santagata in 1907 in Camogli, a small fishing village on the Ligurian Riviera. Today, five generations later, after being listed in the Italian Historical Companies Register (2012), the Santagata family continues to operate with the same passion, dedication and professionalism shown by the founder.

Attention and respect for all those who come into contact with the Company have led Santagata to develop a particular sensitivity regarding its social responsibility, prompting it to adopt reference standards for the market sector in which it operates, capable of measuring its performance and evaluating it in the light of the ethical principles expressed thus far.

The company has obtained the GFSI (Global Food Safety Initiative), both IFS (International Featured Standards) and BRC (British Retail Consortium) certifications, based on an evaluation method shared throughout the world to qualify and select food suppliers that respect parameters of excellence in relation to food quality and safety. It has also obtained organic product conformity (ICEA), Kosher approval, registration by the US Food and Drug Administration and, finally, Halal certification (World Halal Authority).

With this Code of Ethics, the company wanted to clearly express the values, faithfully followed over time, that have inspired the Santagata family's entrepreneurial choices for over 100 years.

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This Code of Ethics is an integral part of the Organisational and Control Model adopted by Santagata. It is intended to crystallise procedures and conduct inspired by the required principles of fairness and diligence, which have always governed the actions of every member of the organisation, and disseminate externally the rules of ethical conduct that have made it a respected company in its sector and in the national economic panorama, with the aim of clarifying its own *modus operandi* and making its suppliers aware of the need to align themselves with these principles.

The Company's design is to ensure that the principles, values and rules set out in the Code inspire future generations and, today, all those who operate, internally or externally, in Santagata's sphere of action: its stakeholders. In particular, the addressees of the rules identified in the Code of Ethics are all members of the Board of Directors, employees and professionals who collaborate with the Company.

Everyone is required to observe the principles contained in the Code of Ethics and, at the same time, to ensure that they are observed by anyone operating with Santagata. The Company's commitment to ensure that this happens, as has always been the case, takes shape in its willingness to disseminate the Code, making it available to all, as a useful tool for everyone to understand how the claim to act in the interest of the company can never justify the adoption of conduct in contrast with the principles herein.

Santagata hopes that the dissemination of the principles addressed here will reach its employees, such as suppliers and professionals engaged by the Company, who are required not only to observe the Code of Ethics but to bring it to life in every manifestation of their will as in the exercise of their duties.

The principles listed below are considered fundamental, so the company undertakes to respect them in relation to everyone. On the other hand, the Company expects these principles to be respected by all persons internally and externally involved with it.

Compliance with laws and regulations	The company operates in strict compliance with the law and endeavours to ensure that all personnel act accordingly: people must behave in accordance with the law, whatever the context and whatever their activities. This commitment must also apply to consultants, suppliers, customers and anyone who has relations with the company.
Integrity of behaviour	The Company is committed to providing quality services and to competing on the market according to principles of fair and free competition and transparency, maintaining fair relations with public, governmental and administrative institutions, citizens and third party companies.
Repudiation of all discrimination	In the decisions affecting relations with its stakeholders (choice of customers, personnel management and work organisation, selection and management of suppliers, relations with the surrounding community and with the institutions representing it), the Company avoids any discrimination on the basis of age, gender, sexuality, state of health, race, nationality, political opinions and religious beliefs of its interlocutors. The same criterion is adopted in the choice of recruitment or relations with personnel. Any criteria for choosing suppliers or customers, based on objective parameters, may instead be considered and will not affect the rules of this code.
Enhancement of human resources	Human resources management is based on respect for the personality and professionalism of each person, guaranteeing their physical and moral integrity: personnel must always behave respectfully towards the people they come into contact with, treating everyone fairly and with dignity. The Company rejects all forms of forced labour, or labour performed by minors, and does not tolerate violations of human rights.
Fairness of authority	In the management of contractual relationships involving the establishment of hierarchical relations, the Company undertakes to ensure that authority is exercised fairly and correctly and that any form of abuse is avoided. In any case, these values must also be safeguarded in choices concerning the organisation of work.
Health, safety and environmental protection	The company intends to conduct its business in a socially responsible and environmentally sustainable manner. It also takes care to disseminate correct and truthful information concerning its activities.
Unethical behaviour	The behaviour of anyone, whether an individual or an organisation, who seeks to appropriate the benefits of the collaboration of others, by exploiting positions of strength, is considered unethical and encourages hostile attitudes towards the Company.
Fairness in contractual matters	Contracts and work assignments must be performed as consciously agreed by the parties: the Company undertakes not to exploit conditions of ignorance or incapacity of its counterparties.

Protection of competition	The Company intends to protect the value of fair competition, refraining from collusive, predatory and abusive behaviours. Therefore, all the subjects who in various capacities operate with the Company will not be able to participate in agreements that conflict with the rules that govern free competition between companies, without prejudice to what is specified in relation to agreements, conventions or similar based on objective criteria.
Enhancement of the Company's investment	The company endeavours to ensure that the results, including economic/financial results, are such as to enhance, as far as possible, the company's capital investment and taking into account the specific activity carried out and the relative context.
Transparency and completeness of information	In the formulation of any contracts or in any case of rules governing relations with third parties, the Company shall take care to specify the relevant clauses in a clear and comprehensible manner.
Personal data protection	As the Company collects and processes personal data of customers, collaborators, employees and other individuals, both natural and legal persons, in May 2018, it adopted the 'Data Protection Policy', a document useful for the processing of such data. Such data consist of any information that serves to identify, directly or indirectly, a person and may include sensitive data, such as those revealing ethnic or racial origin, and/or state of health. The Company undertakes to process such data within the limits of and in accordance with the provisions of current privacy legislation, with specific reference to Legislative Decree 196/2003 ('Privacy Code') and its annexes, as well as the requirements of the Garante for the protection of personal data and the Regulation of the European Parliament and the EU Council of 27th April 2016 no. 2016/679. The personnel of the Company who find themselves, in the course of their work, processing data, whether sensitive or not, must always proceed in compliance with the aforementioned regulations and the procedures identified in the 'Data Protection Policy'. The Company promotes the knowledge of this matter among its staff.
Information processing	Information on counterparties is treated by the organisation with respect for the confidentiality of the persons concerned. In particular: - an organisation is defined for handling information that ensures the proper separation of roles and responsibilities - classifies information according to increasing levels of criticality and adopts appropriate countermeasures at each stage of processing - third parties involved in the processing of information are required to sign confidentiality agreements, if necessary.

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The company's growth over the years has seen virtuous progression sustained by product and work quality, the enhancement of human resources and care for customers and suppliers. The personnel, in their behaviour towards the company, must observe the following principles.

Professionalism	Each person performs his or her work and services with diligence, efficiency and fairness, using the tools and time at his or her disposal to the best of his or her ability, and assuming the responsibilities associated with performance.
Loyalty	People are expected to be loyal to the company.

Honesty	Within the scope of their work, persons are required to know and diligently comply with the organisational model and the laws in force. Under no circumstances may the pursuit of the Company's interest justify conduct that is not honest or respectful of the law.
Fairness	The persons shall not use for personal purposes - except within the authorised limits - information, goods and equipment, which they possess in the performance of their assigned function or task. Nobody shall accept, nor make, for him/herself or for others, pressure, recommendations or reports, which may be prejudicial to the Company or bring undue advantages to him/herself, to the Company or to third parties; each person shall reject, and not make, promises of undue offers of money or other benefits.
Confidentiality	The persons ensure the utmost confidentiality, with regard to news and information constituting the company's assets or inherent to the company's activity, in compliance with the provisions of the law, current regulations and internal procedures. Moreover, Ente's persons are bound not to use confidential information for purposes not connected with the exercise of their activity.
Conflict of Interest Resolution	Employees shall inform their superiors or contacts without delay of situations or activities in which there might be an interest in conflict with that of the Company, on the part of the persons themselves or of their close relatives, and in any other case in which there are relevant reasons of convenience. Persons shall respect the decisions taken by the Company in this regard.

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Since 2018, the company has provided a plan whereby all employees are covered by an insurance (FASA Fund) that covers certain diagnostic visits, a maternity package and routine and preventive examinations.

From 2025, there are plans to set up a space that can accommodate the children of employees who need it, to improve the family/work relationship.

This provides a concrete and tangible benefit to employees, increasing their purchasing power.

Santagata guarantees **equality of opportunity** to all employees, protecting their rights and favouring their personal fulfilment through work and family commitment, avoiding compression of free time and resorting to overtime work only in cases of extreme necessity for the company. The Company, aware of the importance of promoting and protecting employment, aims to maintain the **company climate of tolerance** and respect for employees' professionalism that has been created over years of harmonious collaboration. The Company urges its employees, by supporting them, to report situations that are incompatible with the principles expressed herein in order to avoid the occurrence of cases of discrimination, episodes of harassment or personal offence.

Below is a list of the criteria for conduct in relations with employees and collaborators.

Personnel Selection	The assessment of staff to be recruited is carried out on the basis of the correspondence of the candidates' profiles with those expected and with the company's needs, in compliance with equal opportunities for all those concerned, and in compliance with the regulations in force. The information requested is strictly related to the verification of the aspects envisaged by the professional and psycho-aptitude profile, respecting the candidate's privacy and opinions. The Company adopts, in its selection activities, appropriate measures to avoid favouritism and facilitation.
Constitution of the employment relationship	Staff are employed under regular employment contracts or legally permissible contracts; no irregular employment is tolerated. When the employment relationship is established, the person receives detailed information on: - characteristics of the function and tasks to be performed - regulatory and salary elements - rules and procedures to be adopted in order to avoid possible health risks associated with the work activity.
Personnel Management	The Company is committed to protecting the moral integrity of people, guaranteeing the right to working conditions that respect their dignity. Everyone must be treated with the same respect and dignity and have the right to the same opportunities for professional and career development. The Company avoids any form of discrimination against its personnel. Within the framework of personnel management and development processes, as well as in the selection phase, decisions are based on the correspondence between the expected profiles and the profiles possessed by the persons (e.g. in the case of promotion or transfer). Access to roles and positions is based on skills and abilities; moreover, compatibly with general work efficiency, forms of flexibility in work organisation facilitating people on maternity leave and children care are favoured. The assessment of persons is carried out in a broad manner, involving managers, the personnel function and, as far as possible, those who have come into contact with the person examined.
Integrity and protection of the person	The Company safeguards workers from acts of violence, including psychological violence, and opposes any discriminatory attitude or behaviour. The achievement of individual objectives must be fairly evaluated, establishing clearly stated criteria to be used to assess people's abilities and their contribution; the results achieved must be adequately recognised. In particular, the company considers any act or behaviour constituting harassment or violence in the workplace to be unacceptable, and undertakes to take appropriate measures against the person(s) who perpetrated it. Harassment or violence is outlined in the definitions set out in the Agreement and below: 'Harassment occurs when one or more individuals are repeatedly and deliberately subjected to abuse, threats and/or humiliation in a work context.

	Violence occurs when one or more individuals are assaulted in a work context. Harassment and violence may be exercised by one or more superiors, or by one or more workers, with the purpose or effect of violating the dignity of the person, harming health and/or creating a hostile working environment. It also recognises the principle that the dignity of individuals cannot be violated by acts or behaviour that constitute harassment or violence and that harassing behaviour or violence suffered in the workplace must be reported. In the company, everyone has the duty to collaborate in maintaining a working environment in which everyone's dignity is respected and interpersonal relations are favoured, based on principles of equality and mutual fairness. All persons, in the context of their activities and relations, are required to respect these principles and to cooperate with the company for their protection. Any discriminatory acts must be reported immediately to the managers or contacts, without fear of any kind of retaliation. Persons who believe they have been subjected to harassment, or discriminated against on grounds of age, sexuality, race, health, nationality, political opinions, religious beliefs, or the like, may report the incident not only to their contact persons, but also to the Management. Disparities are not considered discrimination if justified, or justifiable, on the basis of objective criteria. Different pay or level in relation to similar tasks shall not be considered discrimination.
Diffusion of personnel policies	Personnel management and business organisation policies are made available to all persons, through company tools (e.g. e-mail, organisational documents and communications edited by managers).
Enhancement and training of resources	Managers make full use of and enhance all the professional skills present in the structure, by activating the available levers to foster people's development and growth: e.g. shadowing by experienced personnel, experiences aimed at covering positions of greater responsibility, training courses. Training is assigned to groups or individuals, based on specific professional development needs. For distance learning (delivered via the Internet, Intranet or CD), which is not directly assigned by the company, each person can take advantage of it, based on their own interests, outside normal working hours.
Management of people's working time	Each manager is required to make the most of people's working time, requesting performance consistent with the performance of their duties and with the work organisation plans. It constitutes an abuse of the position of authority to request, as an act owed to the superior, services, personal favours or any behaviour that constitutes a violation of this code of ethics.
Interventions on work organisation	In the event of work reorganisation, the value of human resources is safeguarded by providing training and/or retraining where necessary. The company shall therefore adhere to the following criteria: - the burdens of work reorganisation shall be distributed as evenly as possible among all persons, consistent with the effective and efficient performance of the activity in the event of new or unforeseen events, which must in any case be made explicit, the person may be assigned to different tasks from those previously carried out, taking care to safeguard his or her professional skills, if possible.
People involvement	The company, as far as possible, tends towards the involvement of personnel in the performance of their work, also by providing for moments of participation in discussions and decisions functional to the realisation of company objectives.

Safety and health	The Company is committed to providing a working environment that protects the health and safety of its personnel. The Company is committed to spreading and consolidating a safety culture, developing risk awareness and promoting responsible behaviour by all persons; the Company also works to preserve, especially through preventive actions, the health and safety of workers, collaborators and third parties. All persons must comply with the internal rules and procedures on risk prevention and health and safety protection, and promptly report any shortcomings or non-compliance with the applicable rules. In particular, the Company provides the following guiding criteria with regard to the conduct to be adopted in terms of health and safety at work: - avoid risks; - assess risks that cannot be avoided; - combat risks at source; - adapt the work to man, particularly with regard to the design of workplaces and the choice of work equipment and working and production methods, in particular to alleviate monotonous and repetitive work and to reduce the effects of such work on health; - take into account the degree of technical development; - replace what is dangerous with what is not dangerous or is less dangerous; - plan prevention, aiming at a coherent whole integrating in it technique, organisation of work, working conditions, social relations and the influence of factors in the working environment; - give collective protective measures priority over individual protective measures; - give appropriate instructions to workers. These principles are used by the company to take the necessary measures to protect the health and safety of its personnel, including occupational risk prevention, information and training, as well as the provision of the necessary organisation and means. Particular attention is paid to training and information on occupational health and safety risks and implementation measures. In pursuit of these objectives, Santagata commissioned an external professional to assess the health and safety of the work environment and, at the same time, prepared an Organisation and Control Model that, in tune with the RAD (Risk Assessment Document), avoids possible opportunities for accidents at work, while continuing to analyse the risk and any criticalities of the work processes.
Protection of privacy	Santagata aims to create a work environment inspired by the protection of the freedom, dignity and inviolability of the person and their data: in 2018 it equipped itself with the "Data Protection Policy" in line with the current needs for processing personal data capable of respecting the confidentiality not only of its employees but also of customers and suppliers. In processing the personal data of its staff, the Company complies with the provisions contained in Legislative Decree 196/2003 and the aforementioned EU Regulation no. 2016/679, if applicable. People are given a personal data protection information notice that identifies: purposes and methods of processing, any subjects to whom the data is communicated, as well as information necessary to exercise the right of access pursuant to Article 13 of Legislative Decree 196/2003. In cases where the law requires it, people are asked for consent to the processing of their personal data. Any investigation into the ideas, preferences, personal tastes and, in general, the private life of employees and collaborators is excluded. Control tools on the use of company means and tools may be adopted, in compliance with current legislation.
Whistleblowing	Following the issuance of Legislative Decree no. 24/2023, the Company has complied with the legislation on Whistleblowing, both by informing employees about the rights and guarantees reserved for them and by establishing a channel dedicated to communicating violations of the code of ethics, corporate

	procedures or those provided for by the Organizational Model and, more generally, violations of current laws. More specifically, employees were provided with an ad hoc information notice, drafted with criteria useful for verifying their actual reading and relative knowledge of the content; an alternative channel to the external one, managed by the National Anti-Corruption Authority, was also identified: reports may in fact be sent to a double email address, ordinary and certified, managed by the company's Supervisory Body, which will guarantee their confidentiality.
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The duties of the staff are listed below:

General principles	People must act loyally, in order to respect the obligations signed in the employment contract and what is provided for in the code of ethics, ensuring the required performances.
Information Management	People must know and implement the provisions of company policies, in terms of information security, to guarantee its integrity, confidentiality and availability. They are required to prepare their documents using clear, objective and exhaustive language, allowing for any checks by colleagues, managers or external parties authorised to request them.
Confidentiality of business information	Company information and know-how must be protected with the utmost confidentiality. Persons not expressly authorized to answer questions or provide materials requested by internal or external interlocutors of the Company will be required to consult with the contacts and comply with the instructions given in this regard. In the event that it is necessary to discuss relevant, confidential or economic topics, care will be taken to adopt the necessary measures to safeguard confidentiality, according to the nature of the elements discussed. Both during and after the termination of the employment relationship with the Company, people may use the confidential data in their possession exclusively in the interest of the Company and never for their own benefit or that of third parties.
Confidential information about third parties	The Company's personnel shall refrain from using illicit means to acquire confidential information on third-party companies and entities. Those who, in the context of a contractual relationship, become aware of confidential information on other subjects shall be required to use it exclusively for the purposes envisaged in the existing relationship.
Conflict of interest	All Company personnel are required to avoid situations in which conflicts of interest may arise and to refrain from taking personal advantage of business opportunities that they become aware of in the course of carrying out their duties. In the event that even the appearance of a conflict of interest arises, the person is required to notify their contact person or the Management.
Illicit compensation, gifts, entertainment expenses	Company personnel are prohibited from accepting or receiving any gift, bonus or other gift that may influence the actions to be taken in the performance of their work duties. The above cannot be circumvented by resorting to third parties. Gifts of modest value remain permitted (for example, Christmas gifts). Persons of the Company who receive gifts or benefits other than those that fall within the permitted categories are required to notify their contacts, in order to take the necessary actions, including with regard to communications to third parties on company policy.

Use of company assets	Each person is required to act diligently to protect company assets, through responsible behaviour and in line with the operating procedures established to regulate their use, accurately documenting their use. In particular, each person must: – use the assets entrusted to them with care – avoid improper use of company assets, which may cause damage or a reduction in efficiency, or in any case in conflict with the interests of the Company – adequately safeguard the resources entrusted to them and promptly inform the relevant units of any threats or events harmful to the Company – follow the instructions provided by the Company in this regard With regard to IT applications, each person is required to: – adopt the provisions of the company security policies, in order not to compromise the functionality and protection of the IT systems – refrain from sending threatening or abusive emails, or from using low-level language, or from expressing inappropriate comments that may offend people and/or damage the company image – refrain from browsing Internet sites with indecent and offensive content, and in any case not related to professional activities – use company tools according to the instructions provided by the Company and generally for non-personal purposes. The Company reserves the right to prevent distorted uses of its assets and infrastructures, through the use of control systems and risk analysis and prevention, without prejudice to compliance with the provisions of the laws in force.
Participation in antisocial and criminal activities	The Company rejects antisocial and criminal processes and activities and declares its firm intention to have no part in such phenomena. The Company's personnel are prohibited from maintaining relationships of any kind with organizations and elements involved in antisocial and criminal activities, which threaten society or the lives of citizens. In the face of extortionate demands from antisocial and criminal individuals, people will refuse any compromise and will refrain from paying out money or other services. The Company also rejects any action in the field of illicit activities concerning pornography or, even more so, child pornography. In all cases where activities or requests relating to the above occur, the personnel will immediately inform their contacts, for the necessary consultations, the top management of the Company.

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The Code of Ethics also regulates relationships with customers and suppliers; Santagata pursues the objective of obtaining, in purchase and supply contracts for goods and/or services, the maximum competitive advantage, always respecting both the high-quality standards and the desire to grant each supplier the chance to compete fairly on the impartial "field" of comparison offered by the company.

Santagata's behaviour towards its customers is based on respect, legality and professionalism. Contracts with customers and all communications with them must be clear, simple, compliant with current regulations, without resorting to evasive or

unfair practices: no element useful for the customer's decision can be overlooked. Santagata undertakes to examine and promptly accept customer complaints, acting diligently in responding to them as soon as possible.

Avoiding conflicts of interest, preferring mediation that satisfies the interests of the parties, is the objective of the company's activities. Listening, to understand the needs of the customer, as well as the counterparty, is what the Company wishes to continue to happen. The impartiality of each person is the tool with which Santagata aims to consolidate its position in the market, strong in its products and autonomous in its choices. Employees and collaborators are not allowed to have economic or financial interests with suppliers or competitors and to conclude these agreements whenever their activities are attributable to family members of the Santagata employee.

The evaluation criteria of commercial proposals must be transparent and objective, as well as the company's need to meet its customers' expectations both on the quality of the products and on the application of certified procedures and, finally, on delivery times. In this perspective, Santagata intends to always verify the **economic solidity of the counterpart** as well as **the adequacy of its organization** to contract "freely", to respect the principles of correctness and good faith and, last but not least, the deadlines imposed by market needs, while always operating in compliance with the rules and customs as well as the legislation protecting workplace safety.

These are the principles on which customer relationships are based:

Impartiality	The company undertakes not to arbitrarily discriminate against its customers. The evaluation with reference to some previously identified criteria, in particular the association with the Confindustria system or other similar criteria, which may instead constitute a preferential criterion of choice or in the verification of offers, does not constitute a discriminatory activity.
Contracts and customer communications	The contracts and communications to the Company's customers must be: - compliant with current regulations, so as not to constitute evasive or otherwise incorrect practices; - complete, so as not to overlook any element relevant to the customer's decision. The company will make available to the customer all the documentation requested during the inspections, but will not be able to release internal documentation considered sensitive (e.g. supplier technical sheets, processing sheets or recipes, etc.).
Staff behaviour style towards customers	The behavioural style of the Company's people towards customers must be characterized by availability, respect and courtesy, with a view to a collaborative and highly professional relationship, at all levels.
Privacy and confidentiality protection	The parties are required to maintain confidentiality of the information they become aware of during the relationship. The processing of personal data must take place in compliance with current legislation.

These, instead, are the principles on which relationships with suppliers are based:

Supplier selection	The purchasing processes are based on the search for the best advantage for the Company, the granting of equal opportunities to suppliers, loyalty and impartiality: the selection of suppliers and the determination of the purchasing conditions are based on an objective evaluation of the quality and price of the goods or services, as well as the guarantees of assistance and timeliness, without prejudice to any previously identified privileged evaluation criteria. In any case, the Company reserves the right to request suppliers to certify the following requirements: - appropriately documented availability of means, including financial, organizational structures, design capabilities and resources, know-how, etc. - existence and effective implementation, in cases where the Entity specifications require it, of adequate company quality systems - any certifications required by law or regulations. - any additional certifications or demonstrations necessary or appropriate in managing the relationship.
Integrity and independence in relationships	Relations with suppliers, including those concerning financial and consultancy contracts, are subject to constant monitoring by the Company. Documents exchanged with suppliers must be appropriately archived: in particular, those of an accounting and/or fiscal nature must be retained for the periods established by current legislation.
Protection of ethical aspects in supplies	In order to conform the procurement activity to the adopted ethical principles, the Company may introduce, for particular supplies and if deemed necessary, social requirements. To this end, contractual clauses may be included in contracts with suppliers that provide for: - a self-certification by the supplier, regarding compliance with specific social obligations: for example, the adoption of measures that guarantee workers respect for fundamental rights, the principles of equal treatment and non-discrimination, the protection of child labor. - the possibility for the company to carry out control actions, at the production units or operational headquarters of the supplier company, in order to verify the satisfaction of these requirements.
Dominant position	The company undertakes not to abuse, outside of normal commercial relations, any dominant positions.
Protection of personal data	The company also undertakes to protect its suppliers' personal data, using them within the limits set by current legislation.

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The assumption of commitments and the management of relationships, of any kind, with the Public Administration, are reserved exclusively to the corporate functions assigned to this purpose and to the authorized personnel according to the system of delegations, job descriptions, communications and corporate policies.

The term Public Administration refers to any person, entity, interlocutor who can be classified as a public official or person in charge of a public service, who operates on

behalf of the Public Administration, central or peripheral, or of public supervisory authorities, independent authorities, community institutions, as well as private entities concessionaires of a public service.

Relations with Public Administration personnel must be focused on compliance with the provisions of the Law and applicable regulations, as well as company procedures, without compromising the integrity and reputation of the Company in any way.

Fairness and loyalty	The company intends to conduct relationships with the Public Administration with maximum transparency and ethical behaviour: such relationships, which must take place in compliance with current legislation, are informed by the general principles of correctness and loyalty, so as not to compromise the integrity of both parties. The staff must refrain from any behaviour that may undermine the impartiality and autonomy of judgment of the Public Administration. Special precautions must be observed in operations relating to any tender procedures, contracts, authorizations, concessions, licenses, requests for funding from public sources (state or community). In the event that the Company needs to avail itself of the professional services of employees of the Public Administration, in the capacity of consultants, the current legislation must be respected.
Gifts, giveaways and benefits	No person of the Company may give money, or offer economic advantages or other types of benefits to members of the Public Administration, for the purpose of obtaining positions or other advantages, personal or for the Company. No form of gift is permitted that could be interpreted as exceeding normal commercial or courtesy practices, or in any case aimed at obtaining preferential treatment in the conduct of any activity connected to the Company: in particular, any form of gift to public officials, or their family members, that could influence their independence of judgment for the purpose of obtaining more favourable treatment or undue benefits or advantages of any kind is prohibited. The above cannot be circumvented by resorting to third parties. Gifts offered must be adequately documented to allow verification and authorization by the function manager or contact persons. A copy of the relevant documentation (for example, the transport document) must be retained. If a person in the Company receives, from a member of the Public Administration, explicit or implicit requests for benefits, except in the case of commercial gifts of modest value, he/she shall immediately inform his/her superior or the person to whom he/she is required to report, in order to take appropriate initiatives.
Initiatives towards the Public Administration	The Company, if it deems it appropriate, may support programs of public bodies aimed at achieving utilities and benefits for the community, as well as the activities of foundations and associations, always in compliance with current regulations and the principles of this code.

It is necessary to collect and archive the documentation that summarizes the procedure through which Santagata came into contact with the Public Administration, both in terms of documentation delivered and documentation received.

To this end, it is absolutely forbidden to offer, directly or through intermediaries, sums of money or other means of payment to public officials or public service representatives, with the aim of influencing their activity or the performance of their duties. These provisions cannot be evaded by resorting to different forms of contributions that, under the guise of sponsorships, assignments and consultancies, advertising, etc., have the same purposes prohibited above.

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The Code of Ethics also regulates relationships with the community according to the following principles:

Economic relations with parties, trade unions and associations	The Company does not finance political parties, whether in Italy or abroad, their representatives or candidates, nor does it sponsor conferences or parties that have the sole purpose of political propaganda. The Company refrains from subjecting itself to any pressure, direct or indirect, from political representatives: for example, it does not accept recommendations for hiring, nor does it enter into consultancy contracts with similar purposes. The Company does not provide contributions to organizations with which a conflict of interest may arise (for example, trade unions). However, it is possible to cooperate, including financially, with such organizations for specific projects, in compliance with the following conditions: - clear and documented destination of resources. - express authorization by the relevant functions.
Contributions and Sponsorships	The company may accept requests for contributions limited to proposals from declared non-profit organizations and associations, with regular statutes and articles of association, which are of high cultural or charitable value or which involve a large number of citizens. Sponsorship activities, which may concern social, environmental, sports, entertainment and art issues, are intended only for events that offer guarantees of quality or for which the Company can collaborate in the planning, in order to guarantee their originality and effectiveness. In choosing the proposals to accept, the company pays particular attention to any possible conflict of interest of a personal or corporate nature: for example, family relationships with the interested parties or links with organizations that may, due to the tasks they perform, in some way favour the Company's activity.

The dissemination of information is then regulated:

External communication	The Company's communication towards the above-mentioned stakeholders is based on respect for the right to information; under no circumstances is it permitted to disclose false or biased news or comments. All communication activities comply with the laws, rules, and practices of professional conduct and are carried out with clarity, transparency and timeliness. Any form of pressure or acquisition of favourable attitudes by the media is prohibited. To ensure completeness and coherence of information, the Company's relations with the mass media are reserved exclusively to the designated functions.
Control and confidential information	Particular caution is taken in externally communicating documents, data or information concerning company facts that are not in the public domain and that, if made public, could influence the company's activity. The communication of such information must be previously authorised by the Management. In no case, in the management of information, should behaviours be implemented that could favour phenomena that could impoverish the company's assets or bring undue personal advantages or those of third parties.

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It is company policy to disseminate at all levels not only the existence and importance of controls but also a mentality oriented towards their exercise.

With the internal control system, the company intends to pursue the general objectives of effectiveness and efficiency of its operations, protection of company assets and resources, compliance with laws, regulations and internal procedures and reliability of accounting and financial data.

Each employee therefore has, within the scope of his/her own activity, the specific responsibility of creating, maintaining and monitoring the correct functioning and effectiveness of the internal control system.

Every operation and transaction must be properly recorded, authorized, verifiable, legitimate, consistent and congruent. All actions and operations must have adequate recording and the decision-making, authorization and execution process must be verifiable.

Accounting transparency is based on the accuracy, completeness and authorization of the basic information for the related accounting records. Each employee is required to collaborate so that the management issues are represented correctly and promptly in the accounting.

For each operation, adequate supporting documentation of the activity carried out is kept in order to allow easy accounting registration, identification of the different levels of responsibility and the accurate reconstruction of the operation,

also to reduce the probability of interpretative errors. Each registration must reflect exactly what is shown in the supporting documentation.

All documentation must be promptly and systematically archived so that the relevant accounting framework can be reconstructed at any time: in addition to archiving in the appropriate paper binders, if required, documents must also be stored on electronic media from which they can be quickly traced and viewed with appropriate document software.

In any case, it is the responsibility of each employee to ensure that the documentation relating to their activity is easily traceable and arranged according to logical criteria. In any case, company payments to be made must be exclusively commensurate with the performance and methods indicated in the contract and cannot be made to a person other than the contractual counterpart.

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It is with these values that Santagata operates, has operated and will continue to operate in the edible oil sector, with the goal of maintaining the prestigious position in the national and international market, achieved through years of dedicated and passionate, respected and respectful, conservative and innovative work.