

ETHICAL



CODE

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From the Sole Director

*Giulio Casaburi*

## 1. INTRODUZIONE

### 1.1 THE MEANING OF «ETHICS».

"Ethics" represent the set of rules and principles that the community, in its wisdom and experience, has deemed positive and has chosen to follow in its daily life for the progress and well-being of all associates.

### 1.2 THE IMPORTANCE OF ETHICS IN THE COMPANY

È nostro convincimento, quindi, che valori e regole di comportamento sono il nostro credo, che valori e regole di condotta devono essere stati e seguiti anche all'interno di una società come la nostra, in modo da garantire il suo corretto funzionamento e l'affidabilità nel mercato odierno.

Ethics, in fact, constitutes an indispensable asset for Alfaterna which uniquely inspires, guides and orients company choices both in internal relations and in external relations with Customers, Suppliers and Institutions.

Alfaterna believes that, especially nowadays, an ethical vision must be valued and clearly expressed, respect for which allows the Company to grow in a balanced regime and to be qualitatively competitive on the national and international market.

### 1.3 THE VALUE OF THE CODE OF ETHICS

This Code represents the set of our principles, the values in which we believe and our way of working, setting the primary objective of transmitting them to anyone who will have relations with our Company, in the future and for any reason.

Despite the rapid and exponential growth of our company, the values on which it is based remain the same as always, **focusing on the centrality of the customer and the quality of our products**. Sharing our values and ethical principles can only reinforce a common vision and feeling.

The Code is therefore the means by which we clearly state and make common the values in which we recognize ourselves in such a way that anyone, whenever called to act and interact with our Company, can be inspired by them.

### 1.4 THE RECIPIENTS OF THE CODE OF ETHICS

This Code is **addressed to all Company Representatives, such as Directors, Managers, Employees, Consultants, External Collaborators, Suppliers, without any exceptions.**

Anyone who collaborates and establishes relations with our Company for various reasons, directly or indirectly, permanently or temporarily, must comply with the principles and provisions of the Code in addition to the sector legislation.

We believe that conduct in line with the values and principles set forth herein is of particular importance for pursuing an ethically responsible production model and preserving Alfaterna's respectability and reliability on the market.

## 2. Our commitment and the values that inspire us

Alfaterna undertakes to guarantee its customers products of excellence in respect of the dignity of people and the protection of the environment.

A corporate group like ours, in fact, not only carries out a role of commercial distribution of high quality products, but also believes it can qualify as an ethically responsible structure, pursuing production and distribution models that respect Nature and Human Rights .

With this in mind, Alfaterna **pursues continuous research towards improvement and innovation**, the main sources of competitive advantage and excellence. The Company has always acted in the belief that, only by respecting ethical values, the company could achieve success.

### 2.1 RISPETTO DELLE LEGGI VIGENTI APPLICABLE LAWS

Respect for legality is a fundamental principle for Alfaterna, the observance of which is mandatory and essential for carrying out its business. **The Company acts in full compliance with the laws and regulations in force in the Italian Republic and with the rules of the European Union as well as with the foreign territories, countries and states with which it maintains professional relationships, in any capacity.**

### 2.2 HONESTY, LOYALTY AND TRANSPARENCY

We believe in the importance of establishing authentic and loyal relationships. For this reason, we are committed to disseminating clear and complete information, both inside and outside the Company, allowing each of our interlocutors to make autonomous and informed decisions. Alfaterna does not exploit the weak position of its competitors and protects the value of fair competition, refraining from collusive behaviour. **Our actions, operations and trading do**

**are based on the utmost honesty and transparency and we ask everyone, in carrying out their professional activities, to behave in good faith.**

### 2.3 MORAL PENALTY

Alfaterna agisce in modo integro ed in conformità alla legislazione nazionale e comunitaria, ponendo in essere ogni sforzo per scongiurare un comportamento illecito o anche indirettamente collegato al compimento di un reato. **Tutte le azioni, operazioni e negoziazioni compiute sono ispirate alla massima correttezza e serietà nei confronti dei propri “interlocutori”.** In tale ottica è richiesto ai destinatari del presente Codice di tenere un comportamento sobrio e rispettoso.

### 2.4 RESPECT FOR WORK

Alfaterna considera le risorse umane patrimonio fondamentale per lo sviluppo ed il conseguimento degli obiettivi dell'Azienda. Per questo motivo, Alfaterna garantisce un ambiente di lavoro sereno in cui ciascuno possa collaborare esprimendo la propria attitudine professionale. **L'Azienda valorizza le competenze, le potenzialità e l'impegno e per questo offre pari opportunità di lavoro a tutti i Dipendenti, senza alcuna discriminazione.** Selezioniamo, assumiamo e gestiamo i Dipendenti ed i Collaboratori esclusivamente in base a criteri di competenza e di merito.

**Eguaglianza ed equità sono i nostri principi guida e qualsiasi forma di favoritismo viene condannata e vietata.**

Alfaterna richiede ai Destinatari del presente Codice di agire responsabilmente e di farsi carico delle conseguenze delle proprie azioni con serietà, trasparenza e rettitudine, senza tradire il rapporto di fiducia accordato.

### 2.5 VOCATION FOR RESEARCH AND INNOVATION

The cornerstone of Alfaterna's corporate policy is undoubtedly innovation, a fundamental element for the success of the products and the growth of the business, so as to maintain high customer and consumer satisfaction.

**The Company encourages its collaborators to apply the culture of innovation every day and at all company levels, developing new products, new processes and new solutions, in order to improve in all areas of interest, in a constant tension in search of new and more effective solutions.**

## 3. Our commitment to consumers

For Alfaterna, the quality, authenticity and food safety of the products are the starting point and the point of arrival.

The disciplinary we have given ourselves and we follow in the cultivation of the raw material are very high, the production process in the factory is strictly controlled, the final product is recognized by consumers precisely for its qualitative characteristics. In short, **quality is the "driver" of our business**, from the field to the point of sale and is constantly supervised through continuous and substantial investments to obtain maximum customer satisfaction.

### 3.1 QUALITY AND FOOD SAFETY OF THE PRODUCT

#### 3.1.1 THE SELECTION OF SUPPLIERS

Alfaterna qualifies its Suppliers according to the type of product/service to be procured.

**The qualification/approval of Suppliers is carried out in order to ensure that the procured products and the related supply service always comply with the requirements specified in the Management System, so that customer satisfaction is obtained and improved over time.**

The qualification/approval of Suppliers also takes into account their environmental performance and any certifications.

#### 3.1.2 OUR INFRASTRUCTURE

The buildings, work spaces and related services are suitable for pursuing quality objectives. In particular, the technical equipment of the building, in the rooms intended for this purpose, is set up for food production and guarantees, in a controlled way, the maintenance of the production chain.

Furthermore, the cleaning, cleansing and sanitizing of the rooms themselves, as well as the disinfestation, are planned and carried out in a controlled manner.

The company is constantly striving to improve control accessories and safety parameters in working environments. The building structures and plants of the production and logistic platforms are controlled following a punctual planning by the internal and external bodies in charge.

#### 3.1.3 MIGLIORAMENTO DEL NOSTRO SISTEMA PRODUTTIVO

Alfaterna promotes the continuous improvement of the **Integrated Quality Management System, the Supply Chain Traceability System and the Product Certification System**, in compliance with the reference standards for their certification, and in compliance with the Hygiene-Sanitary Self-Control Plan .

**Improving the effectiveness of the organization is in fact one of the Company's objectives**, which it intends to pursue through "dynamic" management, always attentive to identifying points for improvement and updating itself, in order to constantly comply with regulations and changes organizational structures, Alfaterna pursues continuous research towards improvement and innovation, the main sources of competitive advantage and excellence.

**We constantly and consistently invest in technologies at the service of our production**, we have a team of experts dedicated to research and development, we conduct continuous sensory research and seriously monitor market needs.

Innovation is the overcoming of consolidated schemes, not only at an aesthetic level and within the product, but also in the previous phase, i.e. that of the raw material.

### 3.2 OUR PRODUCTS

The quality and safety requirements of Alfaterna products are constantly pursued by:

- a timely assessment of raw material and packaging suppliers by detecting and recording the traceability parameters of the supplies;
- achievement and application of Certifications that are constantly updated and reviewed by external Bodies.

Timely updating of collaborators on **food hygiene, quality and safety procedures** and compliance with the application of procedures supervised by the organizational structure at various levels of responsibility are guaranteed;

- a continuous innovation activity that passes from research & development through actions to improve industrial processes, as well as the introduction of innovative natural fragrances.

The entire supply chain is involved and all collaborators participate proactively in improvement and innovation activities.

### 3.3 INFORMATION ABOUT OUR PRODUCTS

Proper nutrition is a value we believe in and which constantly inspires us in the production of our products. In order to encourage more informed and correct food choices, while also guaranteeing protection of the health of our consumers, Alfaterna complies with the legislative provisions - national and community - which govern the nutritional and health indications to be affixed on food labels and/or on packaging.

**We therefore undertake to report on our products all the information on the composition and characteristics of the food product, on its correct use, consumption and shelf life.**

In compliance with the above, we ask the recipients of the Code not to mislead the consumer about the characteristics of the food product and not to attribute to the product effects or properties that it does not possess

### 3.4 COMMERCIAL COMMUNICATION

Transparency and clarity of information are the basis of our commercial communication, so that anyone who purchases our products is able to make a conscious and informed choice on the characteristics of the products.

In our marketing activities, we are committed to using sincere, sober and understandable language for the customer and the average final consumer.

Aware of influencing the food choices of the consumers we address, **we ask the Recipients of this Code to refrain from using ambiguous and misleading messages that encourage excessive consumption.**

## 4. Our values towards our people

Alfaterna has always believed in the creation of a collaborative community, in which people are encouraged to apply their talent in the realization of group projects that express the "contribution ethic", aiming responsibly at the collective result and rejecting individualism for the common good, which is the good of the Company.

Our employment strategy therefore aims to combine the growth of the company with the protection of the worker and the increase in employment, promoting meritocracy, the quality of work and the personal dignity of the individual worker. Alfaterna ensures workers' right to collective bargaining and freedom of association.

### 4.1 PROTECTION OF FUNDAMENTAL RIGHTS

**We do not tolerate, in any way, forced or compulsory labour, or child labour!**

We are against any discrimination based on age, gender, sexuality, state of health, race, nationality, political opinions and religious beliefs.

**At the same time, we are committed to valuing diversity.**

The foundations on which Alfaterna stands are the protection of equal opportunities, total and unconditional respect for human rights and the strenuous defense of respect for equality. We have always encouraged policies of loyalty and correctness in interpersonal relationships, guaranteeing the cohesion of collaborators and a serene and better work environment.

### 4.2 A WORKING ENVIRONMENT TO SUPPORT GROWTH

The Company undertakes to consolidate and encourage a positive work environment which is inspired by the protection of mutual respect, the inviolability and freedom of the person, and meritocracy.

**Alfaterna hopes that the recipients of this Code of Ethics work together to maintain a climate of mutual respect, tolerance and collaboration.**

In this perspective, we promote the right to interact and associate with others inside and outside the working environment.

**The Company does not tolerate hostile, abusive, discriminatory or defamatory behavior aimed at creating difficulties and obstacles to the professional prospects of others.**

Work organization is an essential aspect to guarantee an adequate work environment to support the professional growth of each collaborator.

Therefore, Alfaterna assigns responsibilities and tasks in line with the roles, defining the tasks of each member of the organization, in order to allow the decisions that are their responsibility to be taken in the interest of the Company.

### 4.3 PERSONNEL MANAGEMENT

#### 4.3.1 RECRUITMENT

Alfaterna recognizes that personnel play a central role within the Company, selecting them on the basis of the correspondence of candidate profiles to company needs.

The hiring of personnel, collaborators and employees, takes place in compliance with equal opportunities for all interested parties, on the basis of objective criteria of merit and competence. As part of the employee appraisal and development processes, decisions are made taking into account the skills, work skills and attitudes to fill open positions and according to an assessment of skills and potential.

**Forms of favoritism and discrimination are prohibited.**

The selections take place according to transparency, in compliance with existing company procedures and involving the sector managers.

#### 4.3.2 TRAINING

Alfaterna is also attentive to the professional aspect, to the enhancement of human resources and to the motivation of its personnel, promoting refresher and training activities,

of professional improvement necessary for the performance of the related activities.

Our Company constantly invests in the use of the best technologies in the production activity in order to avoid risk situations for its workers.

#### **4.4 WORKPLACE HEALTH AND SAFETY**

We have created and continue to guarantee healthy and safe work environments, ensuring respect for the individual dignity and physical integrity of our Collaborators and Employees.

**Alfaterna promotes the culture of safety and accident prevention, adopting preventive actions and a Risk and Safety Management System.**

Alfaterna requires all those who work in its name and on its behalf to behave responsibly and to contribute to safeguarding their own safety and that of others. Company regulations, procedures, instructions, prevention rules in general must be respected by everyone.

In this perspective, the use of alcoholic substances or drugs, or substances that cause similar affection and which in any case have an impact on work performance, are not tolerated

and which may disturb the normal course of the same. Any situation of danger to one's own safety and that of third parties, of criticality during the performance of one's work activity, must be promptly reported to one's manager.

#### **4.5 PROTECTION OF PERSONAL AND SENSITIVE DATA**

Alfaterna undertakes to treat all personal information of its Collaborators and Employees with the utmost confidentiality.

The personal data that it receives for any reason, with the consent of the interested party, will be collected and stored with the utmost diligence, in accordance with the provisions of the Privacy Guarantor, the regulations and professional conduct practices in force.

Likewise, Alfaterna requests its Employees and Collaborators not to use or communicate to others confidential or internal information of the Company itself, without justified reason and/or indication from the Company.

## 5. The selection of raw materials

Fragrance and quality are characteristics that make our products unique. It is therefore essential for us to select only Suppliers capable of procuring healthy, genuine raw materials and which respect the health of the final Consumers.

**Ours is an organized and integrated supply chain, a choice that allows us an in-depth and certified control of all the production phases: from the selection of raw materials, to the transformation, passing through the packaging up to the distribution.**

### 5.1 SELECTION AND CONTROL OF RAW MATERIALS

Alfaterna has established a selection/qualification process for direct or subcontracted (platform) raw material Suppliers, with defined activities (operating, information and control, assessment and decision-making) carried out on the Supplier itself.

Our direct or platform Suppliers, once selected/qualified, are constantly monitored in order to guarantee product requirements and compliance with supply chain requirements.

Alfaterna undertakes to guarantee the identification and traceability of the product both within the Company, as well as the origin of its components. Alfaterna has also established in the Product Recall Procedure from the market, the methods and responsibilities for its implementation.

## 6. The expected behaviors in the Company

Alfaterna requires all Recipients of the Code of Ethics to collaborate in order to pursue the general objectives and interests of the Company, protecting its prestige and respectability on the market.

Therefore, each Recipient of the Code is required to provide adequate professional contributions to the responsibilities assigned, as well as to carry out their duties with commitment and rigour, respecting our principles and values.

### 6.1 PROTECTION OF THE COMPANY INTEREST. CONFLICT OF INTEREST

To ensure that the company choices and decisions are made in the pursuit of the Company's objectives, any situation, occasion or relationship that could constitute, even if only potentially, a conflict between the interests of the Company and its own must be avoided. personal or family.

A conflict of interest certainly constitutes, by way of example but not limited to, the fact of a person who exploits his position to pursue for himself or for third parties a different and/or competing objective with that of Alfaterna, or the fact of a person who attempts to initiate or conclude their own negotiations and/or contracts - in the name or on behalf of Alfaterna who have as counterpart their family members or partners or legal entities of which they are the owner or have an interest in them.

Those who believe they are in such a conflict situation will not be able to participate directly or indirectly in the management of the Company, and will be required to refrain from making decisions, performing acts connected or relating to this situation.

**Alfaterna asks its Company Representatives and Collaborators who find themselves in a situation of conflict to notify their Manager immediately.** In any case, the rules on conflicts of interest envisaged by the civil code remain unaffected.

### 6.2 PROTECTION OF COMPANY ASSETS

Alfaterna's assets consist of tangible assets - such as buildings, infrastructures, plants, equipment, software, as well as raw materials and intangible assets such as, for example, confidential information, know-how, including intellectual and industrial property.

**The recipients of this Code are required to safeguard the corporate assets.** Therefore, they are responsible for the resources entrusted to them and it is expressly forbidden to allow unauthorized third parties to use them.

**Everyone is required to use company assets exclusively for carrying out company activities, in compliance with internal rules and sector regulations.**

The goods must be used in accordance with their normal destination, avoiding improper use that could cause damage or reduce their efficiency. In no case is the use of corporate assets for purposes unrelated to those of the Company or contrary to mandatory provisions of the law, public order or morality, tolerated.

### 6.3 PROTECTION OF COMPANY INFORMATION

Alfaterna requires confidentiality and secrecy from the recipients of this Code and from anyone who relates to the Company. News and information relating to the Company constitute a corporate asset and as such must be protected and preserved.

Therefore, the recipients of the Code must refrain from disclosing, both inside and outside the Company and from using for private purposes and/or in conflict with those of the Company, the information, data, confidential knowledge learned in the performance of their duties.

In fact, corporate information must always be used in accordance with current regulations and internal procedures, as well as in compliance with current legal provisions.

#### **6.4 PROTECTION OF THE COMPANY IMAGE**

Credibility, reliability, respectability are essential characteristics of Alfaterna.

Therefore, each addressee of this Code is required to act and direct their behavior in order to preserve the Company's reputation on the market.

The recipients of the Code must act correctly, with decorum and in compliance with company standards and the principles of this Code.

The corporate image must be protected by anyone who collaborates with and on behalf of Alfaterna.

#### **6.5 GIFTS AND GIFTS**

Alfaterna, in order to preserve its integrity and avoid behaviors that may influence corporate decisions in favor of any person with whom it maintains commercial relations, prohibits the Recipients of this Code, even on holidays, from offering, donating, asking, accepting, also through intermediaries, gifts, favors, freebies, or other utilities for various reasons that are not of modest value.

In compliance with the principle of transparency on which Alfaterna inspires its actions, if the Recipients of this Code accept or offer any gift, even if of a purely symbolic nature, they must inform their contact person who, together with the body responsible for this, will verify the legitimacy of what has been received or donated, and will adopt the appropriate measures.

The Directors, Managers, Employees, and anyone acting on behalf and in the interest of the Company must refrain from engaging in activities not permitted by law, by commercial practices or by any Code of Ethics of the companies or entities with which they have relations.

## 7. Relations with Stakeholders and with the market

Alfaterna undertakes to maintain integrity, fair and correct relationships with all Stakeholders, aimed at guaranteeing their well-being and increasing their trust and loyalty to the Company over time.

**The term "Stakeholder" means all those directly or indirectly involved in the activity of our Company and have an interest in the initiatives, actions and decisions taken by the Company both nationally and internationally.**

By way of example, Customers, Consumers, Suppliers, Consultants, Competitors, financial and/or commercial Partners.

Correctness in dealings with these subjects is an essential objective of our Company.

**To ensure consistency and continuity of our values, we ask our Stakeholders to be bearers of lawful interests and behave in line with the principles of the Code.**

Alfaterna will maintain relations only with those who present requisites of seriousness, personal and commercial reliability, refusing any relationship with those involved in illicit or criminal activities.

### 7.1 RELATIONS WITH CUSTOMERS

Customer satisfaction, i.e. anyone who uses our products for any reason, is at the center of our attention. **We are committed to respecting the right of our customers not to receive products that are harmful to their health and physical integrity.**

Our Company bases its relations with customers on correctness, professionalism, availability and courtesy, in order to create long-lasting and consolidated relationships over time.

**With this in mind, we prefer the use of clear and simple forms of communication, providing truthful, accurate and exhaustive information in order to allow the Customer to make an informed decision.**

**Anyone who collaborates with Alfaterna is therefore required to refrain from providing false or misleading statements in the sale or marketing of our products.**

### 7.2 RELATIONS WITH SUPPLIERS

Alfaterna develops partnerships with Suppliers who are able to satisfy the needs of their Customers, operating in a manner compatible with respect for people and the environment.

We therefore always look for Suppliers and external collaborators who meet the requirements of integrity, technical and professional suitability and who can guarantee high quality standards.

The selection of Suppliers and the formulation of contracts must take place according to impartiality and fairness, in compliance with the internal company procedures specially prepared for the management of relations with Suppliers and external Collaborators. The selection processes must take place in a transparent manner, according to objective and predetermined criteria which take into consideration only the Supplier's professionalism, competence, reliability and cost-effectiveness, in relation to the nature of the good or service to be purchased.

**Alfaterna maintain relationships with Suppliers or external Consultants who engage in illegal activities** and who do not respect fundamental rights, including the protection of child labour, principles of equal treatment and non-discrimination. In any case, Alfaterna requires Suppliers to comply with the principles contained in this Code, as well as with the legislation on the pertinent matter, with the company standards and policies, requesting appropriate documentation, if necessary.

### 7.3 RELATIONS WITH COMPETITORS

Alfaterna supplies its customers with quality products at competitive conditions, in compliance with the regulations aimed at protecting competition.

Our Company recognizes the fundamental importance of a free and competitive market and, therefore, anyone who operates

in the name and on behalf of Alfaterna it must act loyally, following the principles and rules of national and community competition.

Alfaterna respects its competitors as they constitute a point of comparison and a stimulus for the development and progress of the Company which aims to offer increasingly competitive products on the market.

The Company does not tolerate and forbids its people to use negative comments and judgments towards its competitors. Its Managers, Employees or Collaborators must in no case take part in unfair commercial practices, or in agreements or discussions with competitors regarding prices or discounts, sales territories or markets which have as their ultimate aim the alteration of the principle of free competition.

We therefore condemn any form of participation in any initiative contrary to current legislation on free competition, antitrust and monopoly, believing that every economic operator must be able to access the market and compete with equal opportunities.

Alfaterna is aware of the importance of intellectual property and for this reason it respects and protects the content of all forms of intellectual property, both its own and that of others, whether it be copyrights, patents, trademarks, trade secrets or other similar intangible assets.

We disapprove of any conduct aimed at disseminating non-genuine or low quality products with counterfeited or altered trademarks or other distinctive signs and in any case such as to deceive as to the origin of the product.

#### **7.4 PREVENTIVE ILLEGAL BUSIENSS ACTIVITIES**

Alfaterna implements all the necessary measures to prevent and avoid illegal commercial phenomena, such as, by way of example but not limited to, corruption, extortion and laundering of money deriving from illicit activities or

criminals. Commercial operations and transactions must be authorized and correctly recorded in the company accounts, according to the criteria indicated by sector legislation and internal regulations.

The Recipients of the Code are required to collaborate so that each activity can be traced and verified and management facts are represented correctly and promptly in the annual financial statements on the basis of truthful, accurate, complete and verifiable information.

#### **7.5 RELATIONS WITH PUBLIC INSTITUTIONS**

Each Director, Employee, whatever the function or position covered in the Company, as well as each collaborator or consultant, must maintain collaborative relationships in compliance with current legislation and on the basis of the general principles of correctness and loyalty with the national, community and international public institutions, public officials or persons in charge of a public service, or bodies, representatives, as well as persons in charge of public functions or services, of public institutions, public administrations, public entities, including economic entities, entities or companies public affairs of a local, national or international nature.

## 8. The methods of implementation and control of the Code of Ethics

### 8.1 COOPERATION OBLIGATIONS

Alfaterna requires the Recipients of this Code to collaborate so that the principles set forth herein are observed and respected by all and does not tolerate behavior - whether committed or omissive - on the part of anyone that is in contrast with one's own values even if carried out with the conviction of act for the benefit or in the interest of the Company.

The members of the Administrative Body of the Company must be inspired by the principles of the Code of Ethics in setting the company objectives. The members of the Supervisory Bodies ensure respect for and observance of the contents of the Code in the exercise of their functions. The management of Alfaterna in proposing and realizing the Company's projects, actions and investments is required to observe the Code, giving substance to the principles and contents set forth therein.

Those who occupy positions of responsibility in Alfaterna are required to be an example for their Employees and to ensure that they observe the Code.

**Compliance with the provisions of the Code is an essential part of the contractual obligations for all Employees pursuant to art. 2104 c. c.**

Therefore, these must conform their actions and behavior to the principles and commitments set forth in this Code.

The Company Representatives are required to collaborate with the structures in charge of verifying the violations, not to hide the existence of the Code from the counterparties and are required to contact the hierarchical superior in charge to request clarifications or file complaints of incorrect conduct.

### 8.1 METHODS FOR DISSEMINATING THE CODE OF ETHICS

In order to guarantee the respect and concrete implementation of its values, Alfaterna ensures the maximum dissemination and awareness of the Code through specific communication activities deemed more appropriate from time to time.

Alfaterna promotes continuous and effective actions within the Company to allow the

knowledge of its values and makes this Code available to anyone.

In business relationships, the counterparties must be informed of the existence of rules of conduct and must respect them.

For this purpose, the provision of clauses and/or declarations is envisaged in the assignment of tasks and in the contractual agreements entered into with third parties both to formalize the commitment to comply with the Code and to regulate the sanctions in the event of violation of such commitment.

### 8.2 CONTROL OF THE CODE OF ETHICS AND DISCIPLINARY/SANCTIONING SYSTEMS

Alfaterna undertakes to enforce the principles and rules of conduct of this Code. To this end, it has provided for internal disciplinary and sanctioning procedures that will be applied in the event of a violation.

**In the event of violation of the principles contained in this Code, the Company bodies in charge will evaluate any initiatives to be taken and the measures, also of a disciplinary and sanctioning nature, to be taken against persons who have engaged in unlawful conduct. compliant with this Code.**

Any sanctions, to which further claims for compensation for damages possibly suffered by the Company may be added, may be applied:

- a) towards Employees in compliance with the provisions of labor law and also in relation to the worker's duties of diligence in the context of the services owed by him;
- b) with regard to Executives, within the limits of what is expressly provided in this regard in labor law;
- c) against the Directors, by way of suspension or revocation of office;

with regard to external Collaborators and third parties, also in terms of termination of the related contractual relationships.

In the event of implementation of disciplinary and/or sanctioning procedures, the confidentiality of the information and indications must in any case be guaranteed, subject to provisions of the law and/or specific provisions to the contrary made on the basis of the law in force.

### **8.3 APPROVAL OF THE CODE OF ETHICS AND POSSIBLE AMENDMENTS**

**This Code has been approved by the Sole Director and by the Quality and R&D team**

Alfaterna undertakes to study and constantly update its Code of Ethics, in order to adapt it to the evolution of the regulations relevant to the Code itself.

Any changes and/or updates of the same will be approved by the same body and communicated to the Recipients



**ALFATERNA S.R.L.**

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