



INDUSTRIA AGROALIMENTARE

ETHICAL CODE
concerning the ORGANIZATION,
MANAGEMENT AND CONTROL MODEL Farris
S.r.l.
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1. INTRODUCTION

1.1 FARRIS S.R.L.'S ETHICAL CODE

The code of ethics (hereinafter "**Code of Ethics**" or even just "**Code**") is one of the fundamental protocols for the implementation of a valid Organization, Management and Control Model (hereinafter also "Model") pursuant to Legislative Decree n. 231/2001 (hereinafter also "**Decree**"), suitable for preventing the offenses indicated by the same Decree.

Farris Srl has therefore endowed itself with its own Code of Ethics, with the aim of guaranteeing the highest standard of ethicality possible in the performance of social activity.

The Code is an integral part of the Model adopted by the Company and identifies, among other things:

- ▶ the general ethical principles to which the Company recognizes positive ethical value;
- ▶ the specific rules of conduct dictated in relation to the subjects required to comply with the Code and to whom these subjects must comply;
- ▶ the communication, training and monitoring mechanism of the Code of Ethics.

1.2. RECIPIENTS

The Management and all employees (hereinafter, also referred to as "**Personnel**"), without any exception and regardless of the type of contractual relationship, are the main recipients of this Code of Ethics ("Recipients"). Therefore they must abide by the principles and rules of conduct set forth therein, inspiring daily corporate behavior and decisions. In fact, the Code of Ethics is a guarantee and reliability tool for protecting Farris's heritage and reputation.

Even all those who in various capacities (partners, suppliers, service providers, consultants, network contract companies, etc.) collaborate with Farris Srl are required to comply with the provisions of this Code of Ethics in their applicable parts as "**Third Party Recipients**").

All Recipients will be required to observe and, for what they are responsible, have the Code of Ethics observed.

In particular, compliance with the provisions of the Code is to be considered an essential part of the contractual obligations of the Company's personnel, pursuant to and for the purposes of articles 2104 and following of the Italian Civil Code.

Any violation of the principles and rules of conduct referred to in this Code of Ethics prejudices the relationship of trust with the Company that can promote the most appropriate disciplinary actions and the request for compensation for damages, without prejudice, for employees, the compliance with the procedures pursuant to art. 7 of the law of 20 May 1970 n. 300 (c.d. Statuto dei Lavoratori), of the applicable collective labor agreements and of any company regulations adopted by the Company.

SECTION I. THE COMPANY AND THE BASIC ETHICAL PRINCIPLES OF REFERENCE

Farris s.r.l. (hereinafter "**Farris s.r.l.**" or "**the company**") produces dehydrated, semidry and dry freeze vegetables and vegetables for food, human and / or animal industry.

The awareness of operating in an important and delicate sector such as food and the opportunity offered by legislative decree n. 231 of 2001 on the subject of "*administrative responsibility*" of legal persons, has meant that in the ownership of Farris s.r.l. the will to define and make known the policies and ethical principles of conduct to which the company is inspired and to which all employees and external collaborators (consultants, agents, representatives and service providers) will have to abide in carrying out the tasks and functions entrusted to them.

We also want to communicate and make the external subjects with whom the company relates (customers, suppliers, banks, Public Administration) understood, the ethics and sense of responsibility with which their business is carried out.

Compliance with the rules of this Code must be considered an essential part of the contractual obligations of the employees and collaborators of the company pursuant to and for the purposes of the law.

La Farris s.r.l. is a young and dynamic company, with a production site located in Puglia, in the province of Foggia, a territory that is at the European top for the production of fresh vegetables and vegetables. The proximity to places of agricultural production guarantees Farris s.r.l. top quality products, thanks also to a Quality Assurance and Control service that

is not limited to internal production phases, but extends to all the steps of the entire production chain, from planting the crops to packaging the finished product .

The innovative production process used allows preserving the color, flavor and functionality of the vegetables: the control of the microbial load is carried out by using process temperatures above 100 ° C and the absence of direct contact of the steam with the food; these peculiarities also allow enzymatic inactivation and a significant reduction in the presence of pathogenic germs.

La Farris s.r.l. is currently able to supply products from **organic farming, integrated pest management, and GLOBAL GAP certificates**; has the **HACCP** program updated to production requirements and is certified **UNI EN ISO 9001: 2015, BRC** and **KOSHER food certification**.

I.1. Compliance with laws and regulations

FARRIS SRL has as its essential principle the respect of the laws, regulations and all the current legal provisions and undertakes to ensure that all employees, managers, administrators, collaborators, suppliers and customers of the company - as well as the staff and officials of other companies with which activities were to be carried out in common or in coordination with each other, even temporarily (as envisaged in the network contract) - observe constant compliance with the laws and regulations in force in all the countries in which the Company operates.

The lack of knowledge of the laws and regulations cannot in any case constitute an exemption from liability.

I.2. Respect for the dignity of the person and impartiality

The Company considers respect for the human person a priority. We do not allow behaviors that have a discriminatory content based on political and union opinions, religion, race, nationality, age, sex, sexual orientation, health status, economic conditions and, in general, any personal feature.

I.3. Integrity

The Company requires compliance with the highest standards of individual and corporate integrity.

The Company neither approves nor justifies any action of violence or threat aimed at obtaining behavior contrary to the current legislation and / or the Code of Ethics.

I.4. Honesty

Recipients of the Code must be aware of the ethical meaning of their actions and must not pursue personal or corporate profits in violation of the laws in force or in violation of this Code.

I.5. Fair play

In respect of the rights of all the subjects involved in the Company's activity, the Recipients must act correctly in order to avoid situations of conflict of interest, meaning by this, generically, all the situations in which the pursuit of one's own interest is in contrast with the interests of the Company. In addition, situations must be avoided whereby Recipients can derive an advantage and / or a profit unduly from known opportunities during and due to the performance of their activity.

I.6. Transparency and verifiability of operations

The principle of transparency is based on the truthfulness, accuracy and completeness of the information, both outside and inside the Company.

In compliance with the principle of transparency, every operation and transaction must be correctly recorded, authorized, verifiable, legitimate, coherent and congruous. In particular, it must be possible to verify the decision-making, authorization and execution process.

For each operation there must be adequate documentary support in order to be able to proceed, at any time, to carry out controls that certify the characteristics and reasons for the operation and identify who authorized, performed, recorded and verified the operation itself .

I.7. Efficiency and excellence

The Company is committed to the constant improvement of its processes and the services it offers.

In every working activity, in compliance with the most advanced quality standards, the economic management and use of company resources must be pursued.

I.8. Competition. Fair competition

The Company believes in free and fair competition and informs its actions of obtaining competitive results that reward capacity, experience and efficiency. The Company recognizes the value of competition when based on the principles of fairness and transparency towards the operators present on the market and acts with honesty and in accordance with the laws and regulations on fair competition.

I.9. Protection of confidentiality and privacy

The Company undertakes to protect the privacy of the Addressees and of the other subjects of which the Company arranges the data, acquiring, processing and maintaining information and personal data in compliance with the regulations in force, so as to prevent the use and / or dissemination not authorized of the same.

I.10. Value of human resources

Human resources are recognized as a fundamental and indispensable factor for the development of the Company.

The Company protects growth and professional development in order to increase the wealth of skills possessed, in compliance with the regulations in force concerning the rights of the individual, with particular regard to the moral and physical integrity of Personnel, promoting an environment that encourages the spirit of innovation, creativity and achievement of results through teamwork.

The Company also undertakes to create and maintain a positive working environment, free of behavior that may even appear degrading, intimidating or offensive to the individual.

FARRIS SRL does not favor in any way forms of patronage and nepotism, undertaking to adopt policies aimed at promoting interaction and open and effective communication between human resources, full participation and career advancement.

I.11. Correct accounting management

The Company respects the principles of transparency, accuracy, truthfulness and correctness of accounting information in compliance with current legislation and endeavors to have a reliable administrative and accounting system in correctly representing management facts and in providing the tools to identify, prevent and manage,

as far as possible, risks of a financial and operational nature, including through appropriate training activities for the corporate subjects involved, in any capacity, in accounting operations.

The accounting records and documents must be based on precise, exhaustive information, must reflect the nature of the transaction to which they refer in compliance with the external constraints (legal provisions, accounting principles), as well as the company procedures prepared to oversee the accounting activities; in addition, they must be accompanied by the relative supporting documentation, which can always be traced and consulted, necessary to allow objective analysis and verification.

I.12. Environmental Protection

The Company recognizes the primary importance of the environment and carries out its activity with the utmost respect for the environment and the applicable laws and regulations.

When promoting, designing or entrusting the design of works, the Company carries out or ensures that, among other things, all the investigations required to verify the possible environmental risks deriving from the intervention and prevent damage are carried out. The employees, each within the scope of their duties, take part in the process of identifying and preventing risks, safeguarding the environment against themselves, colleagues and third parties.

The Company is committed to spreading and consolidating a culture of environmental protection and pollution prevention among all its collaborators and subcontractors, developing risk awareness and promoting responsible behavior by all employees.

The company has a particular concern for the environment. For this reason, it sets its activity on the correct use of resources and on the investment in structures that reduce as much as possible the environmental impact of the company activity (photovoltaic systems and system for reusing raw water washing). All personnel, in the context of their duties, undertake to comply with the current legislation on environmental protection and safeguarding.

I.13. Relationships with local authorities and public institutions

Relationship with the Public Administration (local authorities and public institutions, including the Supervisory Authorities) and in any case with institutional partners, both Italian and foreign, are managed with the utmost clarity, integrity and fairness.

Relations with institutional interlocutors are held exclusively by the subjects expressly appointed for this purpose.

If a consultant or a third party is to represent the Company in its relations with the Public Administration, the latter will be required to comply with the directives valid for the Recipients.

In any case, if there are conflicts of interest, even potential, the Company must not be represented, in relations with the Public Administration, by a consultant or by a "third" party.

All relations with subjects that qualify as Public Officials or Public Service Officers must be conducted in full compliance with the laws and regulations in force, as well as with the Model and the Code of Ethics, in order to ensure the absolute legitimacy of the Company's actions.

I.14. Relationship with associations, trade unions and political parties

The Company does not make contributions, direct or indirect for the financing of political parties, movements, committees and political and trade union organizations, nor of their representatives or candidates, it does not finance associations or carry out sponsorships of events or congresses that have political propaganda as a goal, except in exceptional cases that must be duly authorized based on company procedures.

The Company can recognize contributions and donations in favor of subjects with social, moral, scientific and cultural purposes, subject to scrupulous verification of the seriousness of the requesting body and in compliance with company procedures.

I.15. Salute e sicurezza sul lavoro

The Company pursues with the utmost commitment the objective of guaranteeing health and safety in the workplace and is committed to complying with current legislation.

The company also undertakes to take all preventive measures aimed at protecting safety and health in the workplace.

The Company carries out its activities under technical, organizational and economic conditions that allow adequate accident prevention and a healthy and safe working environment.

The Company is committed to spreading and consolidating a culture of safety among all its collaborators, developing risk awareness and promoting responsible behavior on the part of all.

With regard to health and safety at work, the Company also undertakes to operate according to the following principles and criteria:

- Avoid risks;
- Assess the risks that cannot be avoided;
- Combat risks at source;
- Take into account the degree of technical evolution;
- Replace what is dangerous with what is not dangerous or that is less dangerous;
- Adequately plan prevention, aiming at a coherent complex that takes into account and integrates work organization, working conditions, social relations and the influence of work environment factors;
- Give priority to collective protection measures over individual protection measures;
- Give adequate instructions to the Personnel.

These principles are used by the Company for the purpose of identifying and adopting the necessary measures for the protection of the safety and health of workers, including the activities of prevention of professional risks, information and training, as well as the preparation of an organization and the necessary means.

I.16. Correct use of computer systems

The Company pursues the objective of the correct use of IT or electronic services.

To this end, to protect the interests of the Company and third parties, with particular reference to public Authorities and Institutions, it adopts suitable measures to guarantee the integrity and genuineness of the data processed, to ensure that access to telematic and IT data takes place in the absolute respect of the regulations in force and of the privacy of the subjects involved as well as the confidentiality of the information and to ensure that their treatment is carried out by subjects expressly authorized to do so, preventing undue interference.

In particular, the Company prohibits:

- ▶ unauthorized introduction into computer or telecommunications systems protected by security measures;
- ▶ the destruction, deterioration, cancellation or alteration of information, data or computer programs of others, of the State or of another public body;
- ▶ the production of false IT documents, both private and public, having evidential value;
- ▶ the installation of equipment designed to intercept, prevent or interrupt communications relating to an IT or telematic system or between multiple systems;
- ▶ theft, reproduction, dissemination or unauthorized delivery of codes, keywords or other means suitable for access to a computer or telecommunications system protected by security measures.

I.17. Protection of transparency in commercial and financial transactions

The Company has as its principle that of the maximum transparency in commercial transactions and prepares the most appropriate instruments in order to contrast the phenomena of money laundering and handling stolen goods. Compliance with the principles of correctness, transparency and good faith in relations with all contractual counterparties must be guaranteed.

The same principles and criteria guide the Company in all commercial relations and in financial transactions with foreign subjects and operators.

I.18. Protection of the individual personality

FARRIS SRL guarantees the need to protect individual freedom in all its forms and condemns any activity that may involve the exploitation or reduction in a state of subjection of any individual as well as any phenomenon of prostitution and / or child pornography. The Company also recognizes the primary importance of the protection of minors and the repression of any form of exploitation of child labor (also through the use of computer or telematic networks) and not.

I.19. Repudiation of terrorism

The Company repudiates all forms of terrorism and undertakes not to establish any working or commercial relationship with individuals, be they natural or legal persons,

involved in acts of terrorism, as well as not to finance or otherwise facilitate any activity of these.

I.20. Repudiation of criminal organizations

The Company condemns all forms of national and transnational or international criminal organization. Consequently, it adopts the appropriate measures to prevent the danger of its own involvement or of its employees in relations and activities carried out in any capacity and by any means, even in the form of mere assistance and assistance, with these organizations.

To this end, the Company does not establish any relationship of a work, collaboration or commercial nature with individuals, be they natural or legal persons, directly or indirectly involved in criminal organizations or, in any case, linked by family ties and / or affinity with exponents of known criminal organizations, as well as not financing or, in any case, facilitating any activity referable to such organizations.

I.21. Protection of industrial and intellectual property rights

The Company, in compliance with the legislation on the protection of trademarks, patents and other distinctive signs and on the subject of copyright does not allow the use, for any reason and for any purpose, of products with trademarks, counterfeit signs and manufacturing or marketing or, in any case, any activity concerning products already patented by third parties.

It is also forbidden to reproduce computer programs and the contents of databases, as well as the appropriation and dissemination, in any form, of protected intellectual works, even by revealing the relative content before it is made public.

I.22. Protection of industry and commerce, competition and the free market

The Company recognizes as fundamental the protection of competition in the free market and the respect of the principles of honesty and fairness in the commercial activity; therefore undertakes to carry out its business activities by not disturbing the freedom of industry, commerce and the market in any jurisdiction and in any way and also undertakes to collaborate with market regulatory authorities.

To this end, the Company prohibits conduct that is contrary to professional correctness, collusive, predatory, implemented with threat or violence or abuse of a dominant position and any other conduct aimed at altering the loyalty and competitive balance of the market, as well as directing it to draw in deceiving the consumer on the origin, origin and quality of the products.

I.23. Collaboration with the Authority in case of investigations

The Company has as its fundamental value the integrity and correctness in its relations with the competent Authorities. To this end, it prohibits any behavior aimed at or capable of interfering with the investigations or investigations carried out by the competent Authorities and, in particular, any conduct aimed at obstructing the search for truth, also through the induction of persons called by the Judicial Authority to don't make statements or make them mendacious.

I.24. Relationship with private individuals and repudiation of corruption

FARRIS SRL considers a fundamental and essential value that relations with private individuals (suppliers, competitors, customers, consultants, business partners, etc.) are based on maximum loyalty, integrity, fairness and good faith.

I.25. Protection of privileged information

FARRIS SRL considers fundamental the correct management of privileged information as well as knowledge and compliance with company procedures with reference to market abuse.

SECTION II. RULES OF CONDUCT

I.1. Rules of conduct

The Management is required to comply with the provisions of the Model and the Code of Ethics which is part of it.

In particular, it must:

- behave according to the principles of autonomy, independence and fairness both in relations with public institutions and with private parties;

- behave in a manner inspired by integrity, loyalty and a sense of responsibility towards the Company;
- refrain from performing acts in situations of conflict of interest;
- facilitate the activities of control and / or review by the shareholders, of the other corporate bodies, including the Supervisory Body (hereinafter, in brief, also "SB" or "Body");
- make a confidential use of the information of which they become aware for reasons of office, avoiding using their position to obtain personal advantages;
- comply, for matters within its competence and within the limits of their responsibilities, with the rules of conduct dictated for the Personnel by the following par. II.2.

II.2. Rules of conduct for staff

In addition to the aforementioned provisions, the employees of the Company (hereinafter, for brevity, even only "Personnel"), must also comply with the rules of conduct indicated below.

II.2.1. Conflict of interest

The Personnel, in accordance with the general ethical principles of the Company, must avoid engaging in or even facilitating operations in conflict of interest with the Company as well as activities that may interfere with the ability to make, in an impartial manner, decisions in the best interests of the Company and in full compliance with the provisions of this Code.

If in a situation of conflict of interest, even only potential, the Personnel must communicate this circumstance to the competent corporate functions on the basis of internal procedures, refraining from carrying out any operation.

II.2.2. Relations with Public Officials and Public Service Officers

The Company Personnel who maintains, in the exercise of their functions, relations with institutional interlocutors, and therefore with the subjects qualifying as Public Officials or Public Service Officers, must adopt behaviors that are respectful both of the legislative

dispositions in force and of this Code, in order to to preserve the legitimacy of the Company's work and its image.

In any negotiation or relationship with the Public Administration, it is expressly forbidden for all personnel to accept, offer or promise, even indirectly, money, gifts, goods, services, services or favors (also in terms of employment opportunities or through activities - even commercial - directly or indirectly attributable to the employee) in relation to relationships with Public Officials or Public Service Officers, to influence decisions, in view of more favorable treatments or undue performance or for any other purpose, including the completion of records of their office.

If connected to the aforementioned relationships, any requests or offers of money, gifts (with the exception of those of modest value, meaning those of use in relation to the circumstances, in accordance with the customs in force in the particular legislative and social context and applicable laws) and as long as they cannot be interpreted as aimed at seeking favors), favors of any kind, forwarded or received by the Personnel and by the subjects that carry out the activities in the interest of the Company, must be promptly brought to the attention of their hierarchical superior and of the Supervisory Body.

Gifts and courtesy to Public Officials, Public Service Officers or, in any case, public employees are permitted only when, being of modest value, they do not in any way compromise the integrity and independence of the parties and cannot be interpreted as a tool to get advantages improperly.

In any case, during a negotiation or any other relationship with the Public Administration, the Personnel and the subjects that carry out the activities in the interest of the Company must refrain from undertaking, directly or indirectly, actions aimed at:

- proposing employment or commercial opportunities from which advantages may be derived, for themselves or others, from employees of the Public Administration or their relatives or similar;
- solicit or obtain confidential information that could compromise the integrity or reputation of one or both parties.

In the case of investigations, inspections or requests of the Public Authority, the Personnel and the subjects who carry out the activities in the interest of the Company are required to ensure the due collaboration.

In the event that the activity involving contact with the exponent of the Public Administration is carried out to a subject external to the Company, the employee who relates to the same must ensure, as far as his authority permits, compliance with the ethical principles indicated above.

II.2.3. Relationship with suppliers

The Company uses suppliers that operate in compliance with current legislation and the rules set out in this Code.

Personnel who have contact for reasons of office with suppliers in relation to orders must base their conduct on maximum transparency and correctness.

In particular, under no circumstances may favoritism be carried out and the principles contained in the specific procedures must be respected.

Personnel are prohibited from receiving donations, acknowledgments, acceptance of benefits (even in the form of a promise), gifts, acts of courtesy and hospitality, unless they are of irrelevant entity / value (eg company gadgets).

The selection of suppliers and the determination of the conditions of purchase must be made by the function managers on the basis:

- of internal procedures existing in the company,
- an objective and transparent evaluation concerning the quality, the price, the traceability of the products and the ability to supply and guarantee services of a level adequate to the business needs.

The supplier must also be selected in consideration of the ability to guarantee:

- compliance with the Code of Ethics;
- compliance with company policies (including anti-corruption);
- the implementation of adequate quality systems, where required;
- the availability of suitable means and organizational structures;

- compliance with labor legislation, including for what concerns child labor and women, health and safety of workers, trade union rights or in any case association and representation rights;
- compliance with the law against illegal employment with specific reference to suppliers of raw materials for Farris
- compliance with environmental protection legislation.

Specific procedures are provided for the documentation of the overall selection and purchase process, with a view to guaranteeing maximum transparency in the assessment operations and choice of the supplier.

The behavioral rules indicated above are valid, also in relation to relations with international operators.

II.2.4. Relationship with customers

The Company bases its business on the quality criterion, intended as the goal of full customer satisfaction.

Relations with customers must be continuously strengthened through the efficiency and quality of the services offered, the level of technological development and the reliability of the products.

The personnel of:

- encourage, in compliance with internal procedures, maximum customer satisfaction by providing comprehensive, truthful and accurate information on the products sold, so that the customer can make informed decisions, paying particular attention to their requests and any complaints and reports coming from the themselves.

II.2.5. Diligence in the use of resources and assets of the Company

Personnel must protect and safeguard the values and assets of the Company entrusted to it, avoiding situations that could adversely affect the integrity and security of the Company's assets.

The abuse of personnel resources or company property for purposes not related to company activities is prohibited.

The company is committed to ensuring high quality standards in its production. The company is also aware of the fact that customer loyalty and trust is implemented through a relationship based on criteria of loyalty, availability, transparency and professionalism.

II.2.6. Data confidentiality

Personnel are prohibited from disclosing confidential information or industrial secrets (such as financial data, company strategies, planned operations) to unauthorized third parties, even after the termination of the respective employment contract.

It is also forbidden to use directly or indirectly company information reserved for one's own benefit or for the benefit of third parties, or at the expense of the Company, even after the termination of the respective employment contract.

Personnel must ensure that any access to confidential information is prohibited to third parties (protection against industrial espionage).

Great importance in the context of the principle of confidentiality, assumes the protection of personal data protected according to current legislation.

II.2.7. Management of IT systems and use of computer data

Personnel, within the limits of their duties / duties, are responsible for the security of the IT systems used and are required to comply with the regulations in force and the terms of the license agreements.

To this end, Personnel are prohibited from uploading to the company systems borrowed or unauthorized software, just as it is forbidden to make unauthorized copies of programs, granted under license, for personal, corporate or third party use.

Except as provided for by civil and criminal laws, Personnel is also required not to send threatening and abusive e-mail messages, not to use linguistic expressions that do not conform to the style of the Company, or in any case to a low-level language.

Likewise, information traffic must not be activated within the corporate data network in order to significantly reduce its efficiency with negative impacts on the relational and productive capacity of the Company.

You will not be able to browse Internet sites with indecent and offensive contents, you will have to scrupulously adopt the provisions of company security policies, in order not to compromise the functionality and protection of information systems.

The Personnel is required to provide the necessary commitment in order to prevent the possible commission of crimes through the use of computer systems.

II.2.8. Occupational health and safety

With regards to health and safety at work, Company personnel must, in particular:

- a) take care of your health and safety and that of other people present at the workplace;
- b) contribute to the fulfillment of the obligations established for the protection of health and safety in the workplace;
- c) observe the provisions and instructions given by the employer, managers and supervisors, for the purposes of collective and individual protection;
- d) correctly use work equipment, dangerous substances and preparations, means of transport, as well as safety devices;
- e) appropriately use the protection devices made available to it;
- f) immediately report to the employer, the manager or the person in charge the deficiencies of the means and devices referred to in letters. d) and e), as well as any eventual dangerous condition of which it becomes aware, making direct use, in case of urgency, within the framework of its own competences and possibilities and without prejudice to the obligation set forth in the following letter. g) to eliminate or reduce situations of serious and imminent danger, giving notice to the workers' safety representative;
- g) not to remove or modify safety, signaling and control devices without authorization;
- h) take care of the personal protective equipment made available to him, without making any changes on his own initiative and reporting any defects or inconveniences to the employer or the manager or person in charge;
- i) not carry out operations or maneuvers on its own initiative which are not within its competence or which may compromise their own safety or that of other workers;
- l) participate in training and training programs organized by the employer;
- m) undergo the health checks required by current legislation or in any case ordered by the competent doctor.

II.2.9. Relationship with the community and environmental protection

FARRIS SRL recognizes that environmental protection is of fundamental importance in ensuring a consistent and balanced growth path.

Consequently, the Company is committed to safeguarding the environment and contributing to the sustainable development of the territory, also through the use of the best available technologies and the constant monitoring of company processes, as well as the identification of industrial solutions of minor environmental impact.

All the Company's activities must be carried out in compliance with the current legislation on environmental protection.

II.2.10. Anti-money laundering and receiving stolen goods

Personnel and persons working on behalf of the Company adopt all the appropriate tools and precautions to ensure transparency and fairness in dealings and commercial transactions.

In particular, it is mandatory that:

- the tasks assigned to any service companies and / or natural persons who look after the economic / financial interests of the Company are drafted in writing, with indication of the contents and the agreed economic conditions;
- the competent functions ensure the control of the regularity of the payments towards all the counterparties, also by verifying the coincidence between the subject to whom the order is made and the person who collects the relative sums;
- the provisions of the anti-money laundering law (Legislative Decree 231/2007 and subsequent amendments and additions) regarding the limitation of the use of cash are complied with;
- the minimum requirements established and required for the selection of the offerers of the goods and / or services that the Company intends to acquire are scrupulously respected;
- the criteria for evaluating the bids are established;

- with reference to the commercial / professional reliability of suppliers and partners, all necessary information is requested and obtained;
- in the event of conclusion of agreements / joint ventures aimed at making investments, maximum transparency is guaranteed.

II.2.11. Compliance with accounting records

Personnel must pay particular attention to the preparation of the financial statements and other corporate documents.

In this regard, it will be necessary to guarantee:

- adequate collaboration with the company departments responsible for drafting corporate documents;
- the completeness, clarity and accuracy of the data and information provided
- compliance with the accounting document compilation principles.

II.2.12. Private bribery

Recipients are strictly prohibited from any form of instigation, promise, giving, offer, money or other benefit, direct or indirect, of any kind to a private individual (suppliers, customers, agencies, business partners, consultants, etc.) for completion (or even the omission) of an act of one's office, in violation of one's professional and loyalty obligations, with the aim of receiving an advantage of any kind for the company and / or for oneself and / or for third parties, regardless by the fact that this act is then carried out.

Similarly, it is forbidden to accept money or other benefits, both economic and of any other nature, for the company and / or for themselves and / or third parties, if this is intended to influence the performance of an act of their office .

Gifts of modest value can be given / accepted in compliance with company procedures and if not aimed at influencing the recipient.

II.2.13. Privileged information

Inside information as well as all confidential information must be considered confidential and consequently must not be acquired, used or communicated except by authorized persons.

Any information, data or document that the staff becomes aware of during work is the exclusive property of Farris srl, so every idea, formula, technique, invention, program, business plan, marketing and sales plan and similar information are confidential information. and exclusive property of the company.

It is therefore forbidden to disclose similar information externally without express authorization and to use it for personal advantage.

II.3. Rules of conduct for Third-Party Recipients

The Third-Party Recipients, if they have not adopted their own Code of Ethics, must formally undertake to comply with the principles of the Code of Ethics (as well as the Model) and, in the absence of the express commitment, the Company will not conclude and / or do not no relationship will continue.

In the contracts and in the letters of appointment with the Third-Party Recipients, the introduction of clauses and / or the signing of declarations aimed at both formalizing the commitment to comply with the Model and the Code of Ethics and to regulate contractual sanctions, for the hypothesis of violation of this commitment.

SECTION III. COMMUNICATION, TRAINING AND IMPLEMENTATION OF THE CODE OF ETHICS. MONITORING AND CONTROL

III.1. The communication of the Code of Ethics

The Company undertakes to guarantee timely internal and external dissemination of the Code of Ethics by:

- distribution to all personnel;
- posting in a place accessible to all and publication on the company intranet;
- made available to Third Party Recipients and any other interlocutor.

III.2. Training

The Company promotes and monitors the implementation of periodic training initiatives on the Code of Ethics, planned also in consideration of the need to differentiate activities based on the role and responsibility of the resources involved, or through the provision of more intense and in-depth training for persons qualifying as 'top managers' in the same

way as the Decree, as well as for those operating in areas classified as "at risk", pursuant to the Model.

III.3. Monitoring and control

The implementation and compliance with the Code of Ethics must be continuously monitored by the Supervisory Body which, in particular, must:

- ▶ verify compliance with the Code of Ethics by the Recipients;
- ▶ make its own observations on the ethical issues that may arise in the context of company decisions;
- ▶ provide, to interested parties who request it, clarifications and explanations regarding the interpretation of the Code or the legitimacy of their own behavior or that of others;
- ▶ stimulate and coordinate the updating of the Code of Ethics, also through its own proposals for adaptation or updating;
- ▶ promote and monitor the development of communication and training activities on the Model and, in particular, on the Code of Ethics, determined by the Company.

III.4. Reporting violations

If a person required to comply with the Model and this Code of Ethics becomes aware of a fact that has reason to believe it constitutes a violation, even a potential one, of the same must promptly report it to the OdV.

Communications can be made through the following channels: a specific e-mail address segnalazioni@farrisnet.it where you can send any reports regarding the failure to comply with the Model or this Code; in addition, in writing to the address Farris S.r.l., Sp.P. 109 Loc. Borgo Giardinetto, 71027 Orsara di Puglia (FG), ITALY.

In any case, the SB makes every effort to ensure that those who made the reports are not subjected to retaliation, discrimination or, in any case, penalties, thus ensuring the adequate confidentiality of these subjects.

III.5. Violations and related sanctions

As regards the typing of violations of the Code of Ethics, as well as applicable sanctions as well as the procedure for notifying violations and imposing sanctions, the Company, in

compliance with the requirements of the Decree, has prepared a specific Disciplinary System, approved together with the Template.