

Rev.  
00

# Fine Foods Group Supplier Code of Conduct



## LIST OF REVISIONS

REV.	DATE	CHANGES	APPROVAL
00	19 July 2022	New issue	ESG Committee

## Our Commitment

*"Fine Foods promotes and shares its values throughout the supply chain and works towards an environmentally and socially responsible supply chain, focusing on respect for human rights."*

*Giorgio Ferraris  
Chief Executive Officer*



### 1 Introduction

Supply chain relationships are indispensable to ensure business model sustainability.

Fine Foods believes that involving its strategic suppliers makes it possible to significantly improve the environmental and social impact of the products it markets. By directing their purchasing decisions, companies can promote a virtuous cycle where sustainability commitments resonate throughout the supply chain, fostering systemic and lasting improvements.

Adopting a supplier evaluation and engagement strategy is necessary to achieve two main objectives throughout the value chain: respect for human rights and fighting against deforestation and pollution.

This Code of Conduct is consistent with Fine Foods Group<sup>2</sup> Code of Ethics' values. It refers to the primary internationally recognised standards such as the United Nations (UN) Universal Declaration of Human Rights, International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, UN Global Compact, Pharmaceutical Supply Chain Initiative (PSCI), Sustainable Development Goals of the UN 2030 Agenda (SDGs), Paris Agreement of the COP21 (Conference of the Parties) and European Green Deal.

### 2 Scope

This Supplier Code of Conduct applies to and must be followed by Fine Foods Group companies' suppliers.

Direct suppliers must communicate this Code of Conduct to their employees and suppliers, requesting compliance with its principles, values and requirements.

<sup>1</sup> Icons of Sustainable Development Goals no. 7, 12 and 13 of the United Nations 2030 Agenda.

<sup>2</sup> [https://www.finefoods.it/wp-content/uploads/2022/05/Fine-Foods-Group-Code-of-Ethics\\_13.05.2022\\_Rev.03.pdf](https://www.finefoods.it/wp-content/uploads/2022/05/Fine-Foods-Group-Code-of-Ethics_13.05.2022_Rev.03.pdf)

### **3 Rules of conduct**

#### **3.1 Basic Requirements**

##### **3.1.1 Regulatory compliance**

Compliance with the law and regulations is an essential principle of Fine Foods' business. Pursuing the Company's interest cannot justify dishonest conduct that does not comply with regulations.

Suppliers must strictly follow the law in the same way as this Code.

##### **3.1.2 Product safety and conformity**

Suppliers' goods and services must comply with national and international laws and regulations on quality and safety, and meet industry quality and safety standards inspired by internationally recognised best practices and reference standards.

To meet quality requirements, Suppliers must carefully select raw materials and semi-finished products and provide requested supply chain information necessary to verify their safety and quality and assess their environmental and social impact.

#### **3.2 Ethics**

##### **3.2.1 Fighting corruption and bribery**

All forms of corruption, bribery, extortion and embezzlement are prohibited. Suppliers must not pay or accept bribes or participate in other illegal incentives in business or government relations (the use of intermediaries is excluded).

Suppliers shall not give, offer or promise Fine Foods employees direct or indirect monetary or non-monetary payment to obtain or retain assignments or any other benefit to gain an improper advantage over other potential Suppliers.

Suppliers must ensure that they have adequate systems to prevent corruption and comply with applicable laws.

##### **3.2.2 Conflict of Interest**

Suppliers must avoid situations and activities where conflict of interest with the Company may potentially or practically arise or may interfere with their ability to impartially make decisions in the Company's best interests and under the Code of Ethics. Suppliers will inform Fine Foods of situations or activities in which they (or their close relatives) may have interests conflicting with those of Fine Foods and cases where there are other conflicts of interest. Suppliers will comply with the decisions taken by the Company on this topic.

##### **3.2.3 Fair Competition**

Suppliers must conduct their business under fair competition and applicable antitrust laws and adopt acceptable business practices, such as using accurate and truthful advertising.

### **3.3 Human rights and labour**

Suppliers must treat workers with dignity and respect and defend their human and labour rights. Labour aspects include:

#### **3.3.1 Prevention of forced labour**

Suppliers shall not use forced or prison labour. No worker shall be required to pay for work, nor shall they be denied freedom of movement.

#### **3.3.2 Child labour and young workers**

Child labour is any activity that harms a child's growth, impairs their health or prevents them from attending compulsory schooling (ILO). Suppliers shall not employ workers below the minimum age for employment as stipulated in the Core Conventions of the International Labour Organisation's Declaration and under the local, social and legal labour framework, when it prescribes a higher minimum age. If local laws permit the employment of young workers, Suppliers shall protect young people with the minimum age for employment, up to 18 years, by ensuring that they are protected by law. This includes measures to avoid dangerous situations and night work that could compromise their health, safety or moral integrity. Employment of those under the age of 18 should only be for non-hazardous work and if that is above the legal age for the country and the age set for completing compulsory education.

#### **3.3.3 Non-discriminatory treatment**

Suppliers shall ensure a working environment free from discrimination. There shall be no discrimination based on race, colour, age, pregnancy status, gender identity, sexual orientation, ethnicity, disability, religion, political affiliation, union membership or marital status.

#### **3.3.4 Fair treatment**

Suppliers shall treat their employees and workers fairly, respectfully, and with dignity, ensuring equal opportunities. Suppliers shall ensure that the working environment is free of harassment, inhuman treatment (this includes sexual harassment and abuse, corporal punishment, mental or physical coercion, verbal assault of workers) and threats of such treatment.

#### **3.3.5 Remuneration, benefits and working hours**

Suppliers shall pay workers under applicable wage laws, including those concerning minimum wages, overtime and mandatory benefits.

They must inform the worker about their wage principles, any need to work overtime, and the related remuneration. Overtime work must comply with applicable national and international standards.

#### **3.3.6 Freedom of association**

Under local laws, suppliers shall respect the rights to associate freely, join trade unions, be represented and join committees. Workers must communicate openly

with management to report working conditions without fear of retaliation, intimidation or harassment.

Open communication and direct employee engagement to resolve workplace and pay issues is encouraged.

### 3.3.7 Privacy

Suppliers shall act under applicable privacy and data protection laws to protect the confidentiality of their workers and their data rights.

### 3.3.8 Health and safety

Suppliers shall provide a safe and healthy working environment, including in any company accommodation. Health and safety measures at supplier sites must be applied to contractors and subcontractors.

Suppliers shall adopt procedures to identify and assess work-related risks.

Suppliers shall protect workers from exposure to all risks by providing personal protective equipment free of charge, safe and compliant equipment, facilities and workplaces, scheduling checks, and establishing safe working procedures.

Suppliers shall provide workers with adequate safety training and information to protect them from risks.

Construction and maintenance of work facilities shall be carried out under applicable standards, regulations and laws. Suppliers must ensure that their premises are clean and have access to drinking water, suitable lighting, and adequate temperature conditions.

Suppliers shall identify and assess the workplace and company-provided accommodation emergencies and minimise their impact by implementing emergency plans and response procedures.

Suppliers must pay regular social security contributions for each worker; if there is no public social security system for workers, Suppliers are required to provide health services or remuneration during occupational injury or illness.

## 3.4 Environment

### 3.4.1 Environmental Impact

Suppliers must be ecologically responsible and efficient to minimise negative environmental impact. Production processes and material selection criteria shall be modified to impact the climate and the environment as little as possible, mainly by reducing greenhouse gas emissions.

Suppliers are encouraged to conserve natural resources, use hazardous materials only where necessary, and engage in reuse and recycling.

### 3.4.2 Environmental authorisations and reporting

Suppliers must comply with applicable environmental regulations. It is essential to obtain the necessary environmental authorisations, licences, information



records and restrictions and follow the relevant operational and reporting requirements.

#### 3.4.3 Environmental protection and pollution prevention

Suppliers must have systems to ensure the safe handling, movement, storage, disposal, recycling, reuse or management of waste, air emissions and wastewater discharges. Any waste, wastewater or emissions that may harm human or environmental health and biodiversity must be adequately managed, controlled and treated before releasing into the environment.

Suppliers must have systems to prevent and contain accidental spills and leaks into the environment and adverse effects on the local community.

#### 3.4.4 Resources and eco-friendly innovation

Suppliers shall take measures to improve efficiency and reduce resource exploitation. Suppliers shall establish production processes that reduce the waste of natural resources, including water and energy and promote recycling and reuse.

#### 3.4.5 Biodiversity

Fine Foods wishes to positively contribute to sustaining ecosystems by protecting biodiversity, combating deforestation and managing land use. Suppliers are encouraged to contribute positively to biodiversity in their products and services.

#### 3.4.6 Sustainable supplying and traceability

Suppliers must apply due diligence on the source of raw materials to ensure legal and sustainable supply.

### **3.5 Management and control systems**

#### 3.5.1 Management and organisation systems

Suppliers should have certified management systems, or at least an organisation inspired by the leading national and international standards, to ensure business continuity, and facilitate continuous improvement and compliance with this Code of Conduct.

#### 3.5.2 Monitoring

Suppliers shall monitor and document their compliance with this Code of Conduct and keep any necessary documentation to certify they comply with its provisions, standards, and applicable regulations.

#### 3.5.3 Liability and penalty system for Code of Conduct non-compliance

If Suppliers fail to comply with this Code of Conduct, Fine Foods may require them to plan and implement the necessary corrective actions. If an end-customer mediates between the Supplier and Fine Foods, corrective actions will be shared with them.





Fine Foods may terminate any contract without prejudice to any legal rights consequent and related to such termination if there is a failure to implement corrective measures within the deadline agreed between the parties or a severe breach of the following chapters of this Code:

Section 3.1: Basic Requirements

Section 3.3: Human rights and labour

Preferential criteria will be adopted for Suppliers that can demonstrate their compliance with this Code and those that are seriously committed to improving their performance.

#### **4 Conclusions**

The Fine Foods ESG Committee approved this Code of Conduct which applies to all Group companies.

*Giorgio Ferraris*  
*Chief Executive Officer*