Andalini

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CODE OF ETHICS AND CONDUCT

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PURPOSE AND SCOPE

The Code includes the set of values that the Company recognises, accepts and shares and the responsibilities that it assumes within and outside its organisation. Such values must inspire the conduct, acts and behaviour of all those who work on behalf or in the interest of or have business relationships with Pastificio Andalini S.p.a.

In implementing the Organisation, Management and Control Model adopted by the Company, this document sets out the corporate ethical culture of Pastificio Andalini S.p.a.. This culture guides the Company's strategic thinking and the conduct of its business activities.

Pastificio Andalini S.p.a. intends to ensure that its activities are carried out in full compliance with Italian law and, within the limits of its activities, with the law of any country in which it operates, also in collaboration with other companies.

The stakeholders, Addressees of this Code of Ethics (employees, collaborators, suppliers, customers, etc. listed in paragraph "Addressees and application of the Code"), are required to comply with this regulation, the protocols and procedures and/or the internal protocols connected to it.

The adoption of this Code of Ethics represents a code of conduct whose observance by all company representatives, top managers and employees is crucial for the good functioning, reliability and reputation of the Company.

In line with the Code objective of preventing unlawful acts and other improper conduct, Pastificio Andalini S.p.a. monitors compliance with the established rules. The Company provides appropriate training and information on the contents of the Code and the Organisation, Management and Control Model.

ETHICAL REFERENCE PRINCIPLES

In order to achieve its objectives, projects, actions and investments, the Company is inspired by the following principles:

• Legality: compliance with all national laws and regulations applicable to the Company;

• Integrity: the Addressees shall perform their duties in accordance with the principles of fairness, honesty, loyalty and mutual respect. Rejection of illegal or otherwise improper behaviours and of any form of corruption in order to achieve personal or business objectives.

• Equality: equal dignity and impartiality of treatment of all those involved in the activities; no form of discrimination is allowed;

• Quality: maintaining product quality over time is integral to achieving virtuous and sustainable growth. This is realised by ensuring the quality of the business system and, consequently, the quality of work and services. This is improved through the optimisation of human resources and a focus on the customer – a key partner in achieving the ultimate goal of fully satisfying consumer expectations. These have always been, and remain, the cornerstones of our competitive strength.

• Valuing People: ensuring equal opportunities for professional development and protecting people from any situation that may be perceived as harmful or discriminatory;

• Health and safety: respect for physical integrity, rights and dignity of workers in the workplaces;

• Transparency and professionalism: the company carries out its activities in a transparent manner, both in the internal management of the company activities and in the assignment of roles and responsibilities, and in

relations with customers, suppliers and external collaborators, in such a way that the company's interest is made unequivocal and that, consequently, collaborators and counterparts are in a position to make informed decisions

• Competition: compliance with the rules and principles set out to protect competition and promote fair competition in the market and for the market;

• Confidentiality: The Company guarantees the confidentiality of the information and personal data subject to processing and the protection of the information acquired in relation to the work performed, in compliance with the provisions on confidentiality of personal data set out in EU Regulation 679/16 (GDPR) and Italian Legislative Decree 196/2003 and the relevant implementing legislation. The Addressees of this Code of Ethics are required to strictly comply with the obligation of confidentiality with regard to information concerning the company's business learned in the performance of their duties or collaboration.

• Protection of the environment and respect for the Communities in which the Company operates. The Company, in its top managers and employees, undertakes to comply with environmental legislation and to implement preventive measures to avoid or at least minimise the environmental impact.

ADDRESSEES AND APPLICATION OF THE CODE

The Addressees of this Code of Ethics are:

- the members of the Board of Directors and the Board of Statutory Auditors;

- the managers;

- the employees, contractors and agents;

- all those who act in the name and on behalf of the Company, or who have business dealings with it (customers, consultants, suppliers and business partners).

The Addressees are requested to adapt their actions and conduct to the principles set out in this Code. Furthermore, the Addressees commit themselves, within the limits of their role, to disseminate this document to anyone who establishes a relationship with Pastificio Andalini S.p.a.

All activities, decisions and behaviour must comply with the Code. Should there be any doubts about the Code on the part of the Addressees, Pastificio Andalini S.p.a. undertakes to clarify any uncertainties.

Pastificio Andalini S.p.a. ensures an adequate information and training programme on the content of the Code of Ethics, with annual review of the same, without prejudice to what is subsequently provided for in case of reports.

It is compulsory to contact the organisational or contractual contact persons of Pastificio Andalini S.p.a. in order to make the application of the Code of Ethics effective.

RULES OF CONDUCT

General Obligation

All those to whom this Code applies must refrain from any conduct that may directly or indirectly violate the principles set out in this Code of Ethics.

Conflict of Interest

Any possible conflict of interest must be avoided, with particular reference to personal or family interests or those related to other organisations of any kind, which could influence the independence of conduct and judgement or interfere with their ability to make impartial decisions according to the position, role or task entrusted by Pastificio Andalini S.p.a.

By way of example, and without limitation, the following situations may give rise to a conflict of interest:

- existing economic or financial interests, including through family members, with suppliers or competitors;
- exploiting one's position to achieving interests that are in conflict with those of Pastificio Andalini;
- concluding, finalising or initiating negotiations and/or contracts in one's own interest, in the name and/or on behalf of Pastificio Andalini, in cases where the counterparty is a family member or partner, or a legal entity owned by that person or in which they have a financial interest;
- taking personal advantage of confidential information or business opportunities of which one has become aware in the course of performing one's duties at Pastificio Andalini.

Should an Addressee become aware of an actual or potential conflict of interest involving Pastificio Andalini, he/she must immediately report it to the Supervisory Body and refrain from any activity relating to the conflict.

No one is allowed to use their position or knowledge of confidential information to pursue personal interests or those of third parties.

Gifts, favours, improper advantages and other forms of benefits

Pastificio Andalini S.p.a. prohibits involved parties from accepting money, favours or benefits from persons, public and/or private organisations that are or intend to enter into a relationship with Pastificio Andalini S.p.a.

No gifts is allowed, except for modest-value gifts that cannot reasonably be interpreted as exceeding standard commercial or courtesy practices. Furthermore, such gifts should not be intended to secure favourable treatment in the conduct of Pastificio Andalini's business activities. This provision applies to both promised or offered gifts to employees or their family members, as well as those received by them. The term "gift" encompasses any kind of benefit. Any employee who receives gifts or favourable treatment for themselves or their family members that cannot be regarded as normal courtesies and that exceed the modest value limit specified above must inform the Supervisory Body and refuse or return what they have received. This rule, which applies to both promised or offered and received gifts, also applies in countries where offering gifts of high value is customary.

It should be noted that both the contractor and the proposer will be held liable, and that both will be subject to the sanctioning regime.

Staff Duties

Every employee of the Company must act loyally and in good faith, respecting the obligations entered into by signing the employment contract, ensuring the required services and bringing his/her personal contribution of ideas, proactivity and enthusiasm, which are the essential elements for the harmonious and lasting development of the company. He/She must also know and observe the rules of ethics contained in this Code, and base his/her conduct on mutual respect and cooperation.

The assets (e.g. premises, equipment) and information owned by Pastificio Andalini S.p.a. must be used exclusively for the performance of the corporate business. It is the staff responsibility to protect the assets and/or information entrusted to them from theft, damage or misuse. It is mandatory to undertake to process the information managed and/or the company assets in accordance with the Company Regulations. Furthermore, it is forbidden to make available to third parties (both external and within the company) information or data that such parties have no reason to know and/or manage. In case of uncertainty and/or doubts about the possibility of providing data and/or information to third parties, the authorisation of the manager concerned shall be requested.
It is forbidden to use information systems in such a way as to interfere with your own or others' productivity or to access non-work related websites. By way of example, it is forbidden to operate on the computer or IT system, altering data, information or programmes. In addition, employees undertake to comply with copyright laws that protect intellectual property rights. Software and databases protected by copyright and used by employees for the Company activities cannot be reproduced, with the exception of copies made for back-up purposes, nor may they be reproduced for the employee's personal use.
It is forbidden to use unauthorised software or databases, i.e. for which licences have not been regularly acquired.

Duties of the HR manager.

Those who have management functions and/or responsibilities towards staff subject to their supervision and direction must avoid any abuse of their position.
In particular, those who have management and/or responsibility functions must comply with the following principles:
- impartiality, without indulging in preferential treatment;
- decision-making with maximum transparency
- not to determine, nor contribute to determining, situations of privilege;
- not to misuse their decision-making and management powers in order to achieve benefits for themselves or others.

FAIR AND TRANSPARENT COMPETITION IN MARKET CONDUCT

Pastificio Andalini S.p.a. refuses acts or methods used to obtain information illegally and conclude business in breach of the legal provisions.

Pastificio Andalini S.p.a. carries out its marketing activities in a transparent and truthful way, clearly specifying the information, the affiliated companies and partners and the services offered.

Relations with information bodies are characterised by correctness and respect for the right to information. These reports are the sole responsibility of the departments expressly delegated to them.

Should journalists or other media approach any employee, they are not permitted to make statements or issue communications concerning Pastificio Andalini S.p.a. (or other associated companies), its customers or its suppliers, unless prior authorisation has been granted.

In collaboration and partnership relations, each Addressee of the Code of Ethics, in relation to their functions, will take care to propose and choose people and companies that enjoy adequate reputation and credibility, based on criteria linked to the quality and objective competitiveness of the services and products offered.

It is forbidden to enter into pacts or agreements contrary to the law.

RELATIONS WITH SHAREHOLDERS: EFFICIENCY, TRANSPARENCY

As part of the initiatives aimed at maximising value for shareholders and ensuring transparency in the

management operations, the Company defines and implements a system of rules of conduct suitable for its internal organisational structure, taking into account both relations with shareholders and relations with third parties, in the knowledge that the company's ability to give itself efficient and effective operating rules is an essential tool for strengthening its reputation in terms of reliability and transparency and the trust of its Stakeholders.

Pastificio Andalini S.p.a. believes it is necessary for shareholders to be able to participate in the decisions for which they are responsible and to make informed choices, and therefore ensures maximum transparency and timeliness of the information communicated to them.

It is forbidden to perform any act, simulated or fraudulent, aimed at unlawfully influencing the will of the members of the shareholders' meeting to obtain the irregular formation of a majority and/or a resolution other than the one that would otherwise have been taken.

PROTECTION OF CORPORATE ASSETS

All patents, trademarks, studies, ideas, inventions, intangible assets consisting of intellectual activities carried out by individual employees or groups of employees are the exclusive property of Pastificio Andalini S.p.a. It is the obligation of the employees:

- Not to use company property and equipment for purposes not strictly related to work;
- take all precautions to prevent and avoid unauthorised persons from using the assets and equipment made available to them by the Company;
- transmit reports to the Human Resources Manager on any use by unauthorised persons of the company's property and equipment, if they witness such use.

RELATIONS WITH CUSTOMERS

Business development activities are carried out in full compliance with correct economic principles, in the regular market context, and in fair competition with competitors, in constant compliance with applicable laws and regulations.

Relations with customers are based:

- on the principle of transparency and fairness;
- on compliance with the applicable provisions, particularly those concerning anti-money laundering, usury, transparency, privacy and compliance with restrictive measures imposed by the European Union;
- on independence from all forms of conditioning, both internal and external.

The Addressees of the Code, in their relations with customers, comply with the following fundamental principles: professionalism, expertise, availability, fairness and courtesy.

The Company selects its employees and collaborators taking care to verify that they meet the requirements of integrity and professionalism required for the exercise of its activity.

RELATIONS WITH CONSUMERS

Pastificio Andalini S.p.a. complies with the regulations on the provision of food information to the consumers (EU Regulation no. 1169/20117, as amended, specifically dedicated to the "labelling" of food products; Regulation (EU) no. 775/2018, as amended, introduces the obligation to include the indication of the country of origin or place of provenance on the label, Italian Ministerial Decree no.6793 of 18/07/2018 "Provisions for

the implementation of EC Regulations no.834/07 and no.889/08" and their subsequent amendments and additions, relating to organic production and labelling of organic products.)

The wording of the label follows the principles of clarity, precision and easy comprehensibility

RELATIONS WITH SUPPLIERS

Pastificio Andalini S.p.a. chooses its suppliers by assessing their honesty, fairness and loyalty in the conduct of business, on the basis of objective assessments focused on competitiveness, utility, price, integrity, ability to ensure effective and continuous assistance. Pastificio Andalini S.p.a. is committed to refraining from conducting business with entities or countries subject to EU restrictive measures.

RELATIONS WITH INSTITUTIONS, SUPERVISORY AUTHORITIES, ACCREDITATION BODIES AND PUBLIC ADMINISTRATION IN GENERAL. FIGHT AGAINST CORRUPTION

In the relationships that the Addressees of the Code, also through third parties, have with the Public Administration, the principles of the Code of Ethics must be respected and acts, behaviours or statements that, in order to benefit the Company or pursue an interest of the same, are such as to integrate illicit cases of violations must always be avoided. No false declarations can be made to national or Community public bodies in order to obtain public funds, contributions or financing or concessions, authorisations, licences or other administrative acts.

It is not permitted to offer or simply promise to a public official or a person in charge of a public service, money or other benefits (e.g. improper staff hiring, i.e. that goes against the requirements and the selection process provided for by company procedures), in order to induce him/her to perform an act aiming to procure direct or indirect advantages for the Company. Furthermore, it is not permitted to pay or accept money, exercise other forms of corruption or give gifts or favours to third parties or accept gifts or favours from third parties in order to procure direct or indirect advantages for the Company.

Any attitude or behaviour aimed at creating an obstacle to the exercise of the Supervisory Authorities, Judicial Authorities and Accreditation Bodies is forbidden. It is forbidden to induce directors, officers, employees and anyone else who represents or works in the name of and on behalf of the Public Administration to perform acts contrary to their official duties.

ANTI-MONEY LAUNDERING

Pastificio Andalini S.p.a. shall in no way and under no circumstances be involved in events relating to money laundering from illegal or criminal activities. The Company undertakes to comply with all national and international rules and regulations on money laundering. Before establishing relationships or entering into contracts with third parties, the Addressees of this Code are required to make sure of the reputation of the counterpart, in accordance with the relevant internal provisions.

OCCUPATIONAL HEALTH AND SAFETY

Pastificio Andalini S.p.a. ensures respect for the physical, cultural and moral integrity of the person.

Pastificio Andalini S.p.a. guarantees fair conditions to all employees and collaborators without any discrimination.

Pastificio Andalini S.p.a. undertakes to respect all civil rights, human rights and labour laws, to offer equal employment opportunities, and to maintain a working environment free from discrimination, harassment,

intimidation or retaliation.

Pastificio Andalini S.p.a. is committed to ensuring satisfactory working conditions for its employees, in accordance with the provisions of the relevant National Collective Labour Agreements, and to refraining from any unlawful labour intermediation or conduct that could lead to the exploitation of its workforce.

It is forbidden to exert pressure, of any kind, on the person called to make statements before the Judicial Authority, in order to induce him/her not to make statements or to make false statements.

It is absolutely forbidden to acquire pornographic and child pornographic material in the working environment, to distribute, disseminate or advertise it, to possess it at the premises and in the equipment available at Pastificio Andalini S.p.a., or in any other device attributable to Pastificio Andalini S.p.a..

The fees and/or sums paid to employees in any case in the performance of their duties must always be agreed and specified in the contract, must be paid in a timely and reasonable manner, and must be proportionate to the activity to be performed.

Health and safety at work is guaranteed by a management system that assesses risks, in order to avoid them at source, with the adaptation of collective and individual protection measures and adequate training, information and instructions on the work of employees and collaborators, and a monitoring system that ensures compliance with these principles.

The Company carries out its activities under technical, organisational and economic conditions such as to ensure adequate accident prevention and a healthy and safe working environment.

The Company is committed to:

- avoid risks, assess risks that cannot be avoided, eliminate risks at source;

- take into account the degree of technical development;

- replace what is dangerous with what is not or is less dangerous.

The Company is committed to spreading and consolidating a culture of safety among all its collaborators, developing risk awareness and promoting responsible behaviour by all collaborators, also through appropriate instructions.

The Addressees of this Code undertake to comply with the prevention and safety measures put in place and contribute to the process of risk prevention and health and safety protection for themselves, their colleagues and third parties, without prejudice to their individual responsibilities under the applicable provisions of the law.

The Addressees must also maintain a climate of mutual respect for each other's dignity, honour and reputation while also respecting the existing organisation within the company.

Within the scope of company activities, there is a general ban on the use of alcohol or drugs and a ban on smoking in the workplace- in compliance with the law- and in any case in any circumstance in which smoking may cause danger to company facilities and property or to the health or safety of colleagues and third parties.

Furthermore, Pastificio Andalini S.p.a. has a comprehensive compliance framework in place, encompassing a range of preventive and infection-control measures. These measures are designed to be implemented expeditiously in the event of a future pandemic emergency.

RESPECT FOR THE PERSON

The Company protects and promotes the value of human resources (an indispensable element for the existence and development of the company) in order to increase the wealth of skills of each employee, and promotes respect for the physical, moral and cultural integrity of the person.

In this regard Pastificio Andalini S.p.a. is committed to:
- adopt criteria of merit and expertise, and in any case strictly professional criteria, for any decision concerning an employee, starting from the selection phase, and to ensure a working environment in which individual characteristics cannot give rise to discrimination of any kind;
- actively involve its employees in the corporate project, including decision-making, in order to allow the expression of personal skills and professional fulfilment;
- prevent employees from suffering illicit conditioning and discomfort in the context of their work activity, intervening to prevent offensive and defamatory behaviours;
- protect the moral integrity of its staff, guaranteeing the right to working conditions that respect the dignity and potential of the person. For this reason, the Company undertakes to protect workers from acts of psychological violence or mobbing and to counteract any attitude or behaviour that is discriminatory or detrimental to the person, his/her beliefs and inclinations;
- guarantee working conditions respectful of individual dignity and safe working environments, in full compliance with current legislation and regulations. Pastificio Andalini S.p.a. prohibits any form of psychological, physical, sexual harassment of managers, employees, collaborators, suppliers, customers or visitors, where harassment means any form of intimidation or threat that is an obstacle to the smooth running of one's duties, or the abuse by the hierarchical superior of his/her position of authority. Any act of retaliation against an employee who refuses, complains or reports such regrettable facts is prohibited.

ENVIRONMENT

The Company undertakes to comply with environmental legislation and to implement preventive measures to avoid or at least minimise the environmental impact.

Collaborators and employees involved in operational processes that may have environmental impacts must carry out their work conscientiously and in compliance with current laws and regulations.

FOOD HYGIENE AND SAFETY

Food safety and policies to ensure it are a core value of the company.

Pastificio Andalini S.p.a. complies with the requirements of national, European and international food hygiene legislation, where applicable.

All personnel involved in the operational processes of preservation, preparation, packaging, transport and storage of food, as well as in the processes of food control, strictly comply with the provisions of current company regulations and binding and voluntary regulations on the subject, in order to ensure health and safety in the food sector.

In particular, the company complies with the regulations relating to:

- compliance with standards on the provision of information on food;

- activities of verification of the contents of advertising communications in order to ensure their consistency with the characteristics of the product;

- supervision activities with reference to traceability, i.e. the possibility to reconstruct and follow the path of a food product through all stages of production, processing and distribution;

- control activities on food products, aimed at guaranteeing the quality, safety and integrity of the products and their packaging at all stages of the supply chain;

- procedures for the withdrawal or recall of foodstuffs, whether produced, transformed, processed or distributed, which do not comply with food safety requirements;

- risk assessment and risk management activities, making appropriate prevention and control choices;

- periodic checks on the effectiveness and adequacy of the model.

All Operating Units apply their own HACCP self-control plan adapted to the particular characteristics of each Unit.

All staff are trained on these issues, through the preparation of periodic update plans.

The management structure, at each level, each for its own duties, applies all the procedures and supervises their correct application.

Pastificio Andalini is certified to the standard ISO 22000 to identify and manage the risks inherent in the food chain.

The company is also certified to the standards BRC - related to food safety, recognized by the Global Food Safety Initiative (GFSI), an international initiative, whose main purpose is to strengthen and promote food safety throughout the supply chain - and IFS (International Food Standard) which aims to promote the effective selection of food suppliers branded by the large-scale retail trade, based on their ability to provide safe products that comply with contractual specifications and legal requirements.

PROCESSING OF INFORMATION AND CONFIDENTIALITY

Pastificio Andalini S.p.a. recognises the ever-increasing importance of digital intangible assets. The Company considers information security, together with compliance with the relevant principles of data confidentiality, integrity and availability, as an integral part of its operations; Pastificio Andalini S.p.a. is committed to act in accordance with the applicable legislation governing the collection, security, storage, protection, processing and disclosure of data and information, including personal data, irrespective of the format in which it is received, whether in paper or electronic format.

Pastificio Andalini S.p.a., after evaluation, assumes any commitment of confidentiality deriving from contractual relationships.

It is forbidden to alter the functioning of a computer or IT system or manipulate data contained therein in order to obtain an illicit interest or advantage, especially when this may cause damage to Pastificio Andalini S.p.a.

In the conduct of any activity, it is forbidden to request and obtain confidential information that may compromise the integrity or reputation of Pastificio Andalini S.p.a. and/or of one of its potential or actual customer/supplier.

The misuse of information collected during the performance of activities related to the provision of specific services is also prohibited.

With regard to the protection of personal data, all staff are required to know and respect the rules of conduct described below:

- process data lawfully and fairly;
- collect data and record them for the purposes of the activity carried out;
- verify, where possible, that the data are accurate and, if necessary, update them;
- verify that the data are relevant, complete and not excessive for the purposes for which they were collected or subsequently processed;
- maintain the utmost confidentiality on the data processed;

- do not use, disclose or disseminate any of the above data unless previously authorised by the Data Controller;
- take the necessary precautions to ensure the secrecy of the confidential part of the credential and the diligent safekeeping of the devices in the exclusive possession and use of the person in charge;
- promptly inform the Data Controller if, in their opinion, an instruction violates Regulation 679/2016 or other national or EU provisions on data protection or if an event of possible data breach occurs;
- in the event of leaving the workplace, even temporarily, the person in charge must check that it is not possible for third parties to access personal data for which any type of processing is in progress, in both printed and electronic format.

Confidential or proprietary information is defined as any information that is not in the public domain (e.g. business strategies, research and development projects and sales data) and relates to the organisational and production activities of Pastificio Andalini S.p.a., and which may have economic or strategic value.

Disclosing this information to third parties, could result in potentially significant financial, reputational or privacy-related harm to employees of Pastificio Andalini S.p.a., the Company itself or its business partners.

Consequently, Pastificio Andalini S.p.a. prohibits the unauthorised disclosure of such information, whether internally or externally, verbally or in writing, through any means, including social media and online platforms, regardless of whether the information was provided by the Company itself.

This obligation shall remain in force even after the termination of the employment relationship or working arrangement with the Company, where required by and in accordance with the applicable legislation.

Should any employee of Pastificio Andalini S.p.a. become aware of, or even suspect, a breach of confidentiality or a data breach, he/she must report it immediately to their line manager or through the reporting channels made available by the Company.

TRANSPARENCY AND CORRECTNESS OF INFORMATION

The administrators of the Company, the Board of Directors, Managers, Collaborators and Employees of the Company are obliged to guarantee the truthfulness, authenticity and originality of the documentation and information provided in the performance of their duties.
Pastificio Andalini S.p.a. condemns any behaviour aimed at altering the correctness and truthfulness of the data and information contained in the financial statements, reports or other corporate communications required by law and addressed to the shareholders and the auditing company.
All persons called upon to draw up the aforesaid documents are required to verify, with due diligence, the correctness of the data and information that will then be incorporated in the drafting of the aforesaid documents. They must also avoid situations of conflict of interest, even if only potential, in the performance of the tasks delegated to them. The bodies and persons delegated to maintain relations with the auditing company are required to report promptly to their hierarchical superior any falsehoods, errors or omissions in the reports drawn up by the auditors in the performance of their tasks.
Every operation and/or transaction, in the broadest sense of the term, must be legitimate, authorised, consistent, appropriate, documented, recorded and at all times verifiable, in accordance with corporate procedures.
Furthermore:
- it must always be possible to carry out checks on the characteristics of the operations carried out, the reasons for them, the authorisations to carry them out, their execution;

-any person who carries out operations and/or transactions involving sums of money, goods or other economically quantifiable utilities belonging to Pastificio Andalini S.p.a. must act on specific authorisation and provide on request any valid evidence for its verification at any time. Employees of Pastificio Andalini S.p.a. who become aware of omissions, falsifications or negligence in accounting records or supporting documents are required to promptly report them through the procedure provided for in this Code of Ethics.

COOPERATION WITH SUPERVISORY BODIES

The Company's employees are required to ensure maximum cooperation and transparency in the relationships that they may be called upon to maintain with the Board of Statutory Auditors, the auditing company and the shareholders, with regard to the control activities carried out by them. Each manager of the role involved in sending data or information to one of the above mentioned Bodies is required to guarantee, within the documentation produced by his/her role, the completeness, relevancy and correctness of the same. The Addressees of this Code of Ethics and, in particular, the Directors are prohibited from preventing or hindering, through concealment or other suitable expedients, the performance of the control or auditing activities legally attributed to shareholders and other Corporate Bodies.
The Addressees of this Code of Ethics and, in particular, the Directors are forbidden to:
- return, also through simulated documents, the contributions to the shareholders or release them from the obligation to pay them, except in cases of legitimate reduction of the share capital;
- distribute profits or advances on profits not actually earned or allocated, by law, to reserves and distribute reserves, even if not made up of profits, which cannot be distributed by law;
- purchase or subscribe shares or quotas that cause damage to the integrity of the share capital or reserves that cannot be distributed by law, except in the cases permitted by the law;
- fictitiously form or increase, even in part, the Company's capital by allocating shares or quotas for an amount lower than their nominal value, reciprocal subscription of shares or quotas, significant overvaluation of assets in kind or receivables or assets in the event of transformation.

BOOKS OF ACCOUNT AND CORPORATE RECORDS

Pastificio Andalini S.p.a. accurately and completely records all company activities and operations, in order to implement maximum accounting transparency towards shareholders and external bodies in charge and to avoid the appearance of false, misleading or deceptive items. Administrative and accounting activities are carried out using up-to-date IT tools and procedures that optimise their efficiency, correctness, completeness and correspondence to the accounting principles, as well as facilitate the necessary controls and checks on the legitimacy, consistency and appropriateness of the decision, authorisation and performance process of the Company actions and operations.

Pastificio Andalini S.p.a. believes that the correctness and transparency of the company financial statements are important values and lends its utmost cooperation at all levels, providing correct and truthful information about corporate activities, assets and operations, as well as any reasonable request received from the competent Bodies. The information that flows into periodic reports and accounting, both general and analytical, must comply with the principles of transparency, correctness, completeness and accuracy.

In this regard, each Addressee is required to cooperate in the correct representation of the corporate activities. Addressees who become aware of omissions, falsifications or neglect of information and documentation are required to report such situations to the bodies in charge of the verification through their own manager of the establishment, if an employee, or their company contact, if a third party.

WHISTELBLOWING AND CONTROL MODES

To encourage anyone who becomes aware of possible breaches of the Code to report them, the Company has established and made available appropriate channels for submitting reports of such breaches to the Supervisory Body.

The Supervisory Body is responsible for:

• monitoring compliance with the Company's Organisation, Management and Control Model and the Code, examining reports of possible breaches and initiating any checks deemed necessary;

• proposing the adoption of operational procedures, as well as additions to and amendments of existing procedures, with the aim of reducing the risk of breaches of the Company's Organisation, Management and Control Model and the Code;

• propose to the Management any amendments aimed at updating the Code of Ethics.

Pastificio Andalini S.p.a. guarantees the confidentiality of whistleblowers and, to this end, provides the following channels for reporting unlawful conduct or breaches of the Company's Organisation, Management and Control Model and Code of Ethics:

- via a digital platform (Globaleaks software) implemented by the Company and accessible through its website at (https://segnalazioni.andalini.it);
- by email to odv@andalini.it;

It is also possible to request a face-to-face meeting with the Supervisory Body to submit a report in person, or to submit a written report on paper, addressed to the Supervisory Body c/o Pastificio Andalini S.p.a., Piazzale Arrigo Andalini 1, Cento (FE) Italy.

When using the paper-based reporting channel, whistleblowers are advised to expressly state that they wish to benefit from the protections afforded under the Whistleblowing legislation.

In accordance with the law, the Supervisory Body will act in such a way as to guarantee the reporters against any form of retaliation, discrimination or penalisation, also ensuring the confidentiality of the reporter's identity, without prejudice to legal obligations and the protection of the rights of the company or persons wrongly accused and/or accused in ***mala fides***.

CORRECTIVE PLAN

Should a report result in the confirmation of a breach of the Company's Organisation, Management and Control Model or Code of Ethics, the Supervisory Body shall verify:

1) the nature and reasons for the violation;

2) indicate the measures to remedy the violation and to mitigate its possible negative effects.

The Supervisory Body shall document any conduct constituting a breach of the Company's Organisation, Management and Control Model or this Code of Ethics.

APPLICATION OF SANCTIONS

The sanctions and disciplinary system set out in the Company's Organisation, Management and Control Model provides for possible sanctions against any Addressee, taking into account the different types and nature of their relationships with the Company, including in cases of breach of this disciplinary system. In fact, the system is addressed to Top Management, all Employees, collaborators and third parties that work on behalf of Pastificio Andalini S.p.a., providing for adequate disciplinary sanctions in some cases and contractual/

negotiation sanctions in the other cases.

In the event of breach of the Company's Organisation, Management and Control Model or Code of Ethics, sanctions shall be imposed on the involved individuals in accordance with the contractual and/or legal provisions governing the relationship between the person subject to the sanction and the Company in each specific case.

For the self-employed worker, supplier or other individual having contractual relations with the company, a sanction may be envisaged until the termination of the contract, with the inclusion of expressed clauses in the contracts with reference to compliance with the provisions of the Code of Ethics. Employees will be subject to the sanctions provided for under Italian Law 300/1970 art. 7, and in the special regulations contained in the National Collective Bargaining Agreement (CCNL) of Unionalimentari Confapi Piccola e Media Industria Alimentare; partners and all other Addressees will be subject to agreed sanctions based on the contractually relevant commitment to the values expressed in the Company's Organisation, Management and Control Model and Code of Ethics.

The Penalty Code set out in the General Section of Pastificio Andalini S.p.a.'s Organisation, Management and Control Model shall apply.

ADVERTISING AND ENTRY INTO FORCE

The Company widely disseminates this Code of Conduct by publishing it on its institutional ***website*** and by delivering this document to all its employees.

In particular, the Company, at the same time as signing the employment contract or, in the absence thereof, at the time of conferring the assignment, delivers and has new employees, with relationships however described, sign a copy of the Code of Conduct.

This Code of Ethics will be communicated to customers and suppliers so that they understand and respect the fundamental values of the company.

The Company also informs the holders of consultancy or collaboration contracts on whatever basis, including professional ones, to the holders of bodies and assignments in the offices of direct collaboration of the political top management of the administration as well as to the collaborators on whatever basis, including professional ones, of companies providing services to the Company.

In the event that the contractual relationship is not formalised in writing, the Company shall bind the aforesaid parties by means of autonomous communication of adherence to its ethical principles, attaching this document.

This Code of Conduct shall enter into force on the date of its approval by the Administrative Body of the Company.

Cento, 09/06/2026

Rev. 1/2020
Rev. 2/2026

The Sole Director of Pastificio Andalini S.p.a.