

SEDAMYL

Code of conduct





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Foreword

SEDAMYL (hereinafter the “*Company*”) supplies high quality cereal-derived products and services to the food industry, industrial applications and the animal feed industry.

The Company, in order to conduct its own industrial activities combining production efficiency and compliance with the regulations in force, has implemented an Integrated Management System. In this way, the Company has committed to operating in accordance with recognised standards with reference to all company policies: quality, hygiene and food safety, health and safety, workplace safety and respect for the environment.

In confirmation of its commitment, the Company has obtained the most important certifications for its Management System, including the ISO 9001:2008 and FSSC 22000 standards.

The Company aims to achieve the specific objectives of each policy and continuous improvement by involving its staff as well as all suppliers and collaborators.

For the above reasons, the Company has drawn up this Code of Conduct which describes and defines the principles and values to which directors, accounting auditors, managers, all employees and collaborators, including external ones, must align their activities, both in relations with third parties and within the company.

Article 1 – Purpose

- 1.1** The Code of Conduct establishes the basic principles and rules whose observance by the Company’s employees and collaborators is considered to be of fundamental importance for the regular operation, the reliability of the management and its reputation. Its purpose is to spread the values of **fairness, loyalty, integrity and transparency** which must distinguish the actions and conduct of people working for the Company.
- 1.2** The provisions of the Code must be complied with all relations and activities carried out in its name or its interest or, however, in any way relating to it, internally as well as externally.
- 1.3** The provisions of the Code constitute exemplifying specifications of **general obligations of diligence and loyalty** whose fulfilment is required of employees by law (Articles 2104 and 2105 of the Civil Code) and those of **fairness and good faith** required of collaborators in any capacity (Articles 1175 and 1375 of the Civil Code).



Article 2 – Distribution and relative verification

- 2.1** Directors, accounting auditors, managers, all employees and collaborators, including external ones, have been informed about the provisions contained in this Code.
- 2.2** The Company shall ensure the **distribution of the Code** among internal and external stakeholders, as well as:
- a) the interpretation and clarification of its provisions;
 - b) the verification of its effective compliance;
 - c) the adoption of measures related to the removal of breaches of its provisions, which constitute disciplinary offences.

Article 3 – Principles

- 3.1** The pursuit of the Company's interest can never justify conduct contrary to the laws of the Italian State, the provisions of the Code and the clauses of collective labour agreements.
- 3.2** Those acting in pursuit of the Company's objectives shall operate in compliance with the following inspiring principles:
- a) **legality, honesty and fairness:** the Company operates in compliance with the laws in force, professional ethics, internal regulations and the procedures/work instructions of the Integrated Management System;
 - a) **transparency and completeness of information:** the Company is committed to informing its stakeholders in a clear and transparent manner about its situation and performance, without favouring any interest group or single individual.

3.3 The persons referred to in paragraph 1 of Article 2 are directly and personally responsible for the protection and preservation of the Company's assets, which are entrusted to them while carrying out their respective duties, as well as for their use in compliance with the rules established concerning the preservation and protection of assets and other legal provisions.

Article 4 – Use of information

4.1 It is forbidden for anyone to use the information acquired during the performance of their duties for purposes that are unrelated to such performance.

4.2 Information that is legitimately disseminated must be complete, transparent, comprehensible and accurate.

Article 5 – Conflict of interests

5.1 In carrying out each activity, the Company shall operate to **avoid incurring in situations of conflict of interest**, whether real or even only potential, and all the persons referred to in paragraph 1 of Article 2 are obliged to comply with this way of operating.

5.2 Conflicts of interest include cases in which one of the persons referred to in Article 2(1) operates so as to satisfy interests other than those of the Company and the recipients of its work, to gain personal advantage.



Article 6 – Benefits

- 6.1** The persons referred to in paragraph 1 of Article 2 must not promise or pay sums of money or goods in kind of any amount or value, or any other benefit, to public officials in order to promote or favour the Company's interests, even after illicit pressure.
- 6.2** Different forms of aid or contributions which, in the form of sponsorships, advertisements, assignments, consultancies and the like, pursue the same prohibited aims, are prohibited because they are considered to be a circumvention of the provisions of the previous paragraph.
- 6.3** Anyone who expressly or implicitly receives requests for the benefits referred to in the two preceding paragraphs from public officials shall immediately suspend all relations with the applicant and immediately inform their hierarchical superior.
- 6.4** It is forbidden for the persons referred to in paragraph 1 of Article 2 to accept benefits of any kind from suppliers, such as to improperly influence their work or even only to appear to be directed towards them.

Article 7 – Working conditions

- 7.1** The **protection of working conditions** is considered a primary value by the Company which, when carrying out its activities, is obliged to adopt those measures that, according to the particular nature of the work, the experience and technology, are necessary to protect the physical integrity and moral personality of the employees and collaborators,

following an assessment of health and safety risks in accordance with the regulations in force. The aim of this is to eliminate or minimise such risks in relation to the knowledge acquired on the basis of technical progress.

- 7.2** The Company shall guarantee **working conditions that respect the individual's dignity and the principle of fair remuneration.**
- 7.3** All staff in charge of the Company's activities are responsible for supervising the measures referred to in the two preceding paragraphs, within the scope of their respective assignments and abilities.
- 7.4** The Company **shall never use forced or otherwise bonded labour.**
- 7.5** The Company **shall never employ workers younger than the age established by the laws concerning** the employment of children and adolescents.
- 7.6** Staff shall be treated with **respect and dignity**; no employee will be subjected to physical, sexual, psychological, or verbal harassment or abuse.
- 7.7** The Company recognises and respects the **staff's rights** to associate freely and bargain collectively.
- 7.8** Staff shall have a **regular employment contract** as no form of irregular employment or other any forms of employment contracts are tolerated that violate labour, tax and social security laws.



Article 8 – Employees

8.1 Staff are required to fulfil, with diligence and loyalty, the obligations concerning his or her assignment and are also required to **respect and protect the Company’s assets through responsible behaviour** in compliance with the internal regulations, including the disciplinary rules (“General Internal Regulations” at Art 2.11), the Code, the law and collective bargaining.

Article 9 – Contractors

9.1 The Company shall identify by means of special procedures that must be transparent, precise and non-discriminatory, using criteria referring to the competitiveness (usefulness and guarantee of effective ongoing assistance) of the offered services and products as well as their quality.

9.2 Staff working or collaborating with the Company in any capacity must refrain from practising, suggesting, implementing, allowing or tolerating violations of the laws in force, professional ethics and internal regulations in its activities.

9.3 The owners of the legal entities which, as outsourcers, carry out relevant activities, recognise the Code of Conduct as an integral and essential element of the procurement contract, or of any other kind of contract used, and undertake to ensure that staff sent to the Company’s premises are aware of the content of the Code of Conduct and refrain from conduct that is in contrast with its content.

Article 10 – Use of IT equipment

- 10.1** Any Internet connection made available, telephone, fax, e-mail and video recording equipment **shall be used for the time necessary and only for work purposes.**
- 10.2** Staff may not directly install programs on personal computers, nor duplicate or remove installed programs, unless expressly **authorised by management.**
- 10.3** Staff are **prohibited** from using the Company's computers, fax machines, printers and photocopiers **for personal needs.**
- 10.4** Staff granted access to the internal network, Internet or the email system are not allowed:
- a)** to download software or music files or to save files on the internal network that are not strictly related to the performance of their duties;
 - b)** to use e-mail or network services for personal reasons unless expressly authorised in writing;
 - c)** to perform acts aimed at evading controls on the use of e-mail and Internet that the Company may carry out in accordance with the law, including occasionally or collectively and on individual devices and workstations.



Article 11 – Violations

- 11.1** The company shall not allow violations of the provisions contained in the Code.
- 11.2** Any violation of the principles and contained in the Code by persons referred to in paragraph 1 of Article 2 shall be promptly reported by those who become aware of it to their supervisor/superior.
- 11.3** In the event of violation of the Code of Conduct by out-sourcers' staff, the Company shall notify the legal representative of the legal entity to which the service is entrusted of the incident in writing, and the legal representative shall take appropriate corrective action, the non-implementation of which, without justification, shall constitute a breach of contract.
- 11.4** Reports of violations shall be taken into consideration only if they contain sufficient information to identify the terms of the violation and to allow the Company to carry out an appropriate verification.
- 11.5** The Company will not tolerate any kind of retaliation for reports made in good faith.
- 11.6** The persons referred to in paragraph 1 of Article 2 are required to cooperate in internal investigations relating to violations and conduct contrary to the rules set out in the Code.

Article 12 – Sanctions

- 12.1** Any violation by staff is a disciplinary breach and will result in sanctioning consequences which are stipulated in Article 7 of Law no. 300/1970 (Workers' Statute), Articles 2119 and 2106 of the Civil Code, Legislative Decree no. 231/2001, and the collective and regulatory provisions applied.
- 12.2** Any violation by coordinated and continuative collaborators, self-employed workers and external collaborators in general is a source of contractual liability and as such is sanctioned according to the general principles of law and the rules governing the relative contractual relationships.

Article 13 – Relations with the Public Administration

- 13.1** The Company's relations with representatives of public and supervisory institutions are based on criteria of transparency and professionalism in a spirit of maximum cooperation aimed at substantial compliance with the regulations in force.
- 13.2** In relations with employees and officials of public and supervisory institutions, it is absolutely forbidden to offer, directly or indirectly, payments or material benefits of any kind.

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