



Ethical Code

February 2017

Introduction

Agritalia's success is very much related to its *vision* strongly connected with ethical values fully respecting all people involved with the Company such as employees, customers, packers and investors.

Honesty, transparency, loyalty, correctness and respect are the values in which Agritalia reflects itself in every activity and affair connected to everyday life.

High behavioral standards are a target to achieve day by day.

The values included in this ***ethical code*** are intended to be a guide for everyone reflecting the high quality standards Agritalia is wishing to pursue.

The Company identity and reputation is the key to its employees working achievements and therefore everyone will be responsible for the actions which will contribute to its improvement.

The behavior of every single person will be essential and shall always be directed to the achievement of the common goals and fully reflecting the Company values.



1. **Rules and Code of Behavior**

Honesty, integrity and transparency are the values in which Agritalia reflects itself. These values represent the fundamental principles in performing all Agritalia's activities and affairs constituting an essential part of the Company's management policy. Employees and stakeholders rights are considered of the utmost importance. With the term stakeholder Agritalia means the following categories: investors, employees, customers, suppliers and all people who are connected with the Company during everyday routine.

2. **Compliance with Laws**

The Company considers compliance with national and international law as essential in performing all of its activities. Therefore Agritalia itself and all employees should always conduct in compliance with the law as to prevent crimes and to conform to the principles of general practice. Employees are required to report to their supervisor any violation of laws that may harm the Company.

3. **Employees and Contract Terms**

Agritalia has always been active to promote a working environment based on trust and mutual respect supporting a culture without discrimination and prejudices.

Employees are hired according to meritocratic criteria and to specific competencies reflecting the position to acquire in the Company.

The career advancement reflects the same meritocratic values and Agritalia always promotes the development of knowledge, competencies and abilities to support the Company growth.

Working terms reflect rules on health and safety set in D.Lgs. 81/2008.

A working relation is by all means a proper contract between the parties i.e. Company and employee and to both parties belong rights and duties.

This means that employees are required to comply with the following rules to carry out their tasks and to promote the wellbeing within the Company:

- Comply with the disciplinary rules posted in the offices according to the national contract policy terms;
- Wear an appropriate dress code;
- Speak to colleagues with professionalism and good manners;
- Respect working shifts according to the agreements took upon assignment;
- All employees notwithstanding their position within the Company shall always use their badge to register their ins and out from the office. Any exception such as business trips and/or external visits shall be promptly notified by using the **INAZ** portal;
- Be responsible for the Company's assets provided to carry out their tasks.

HR will check on the respect of such rules and will make sure to unroll disciplinary measures when a violation may be detected.



4. Customers

Goods and services offered to Agritalia's customers always have an excellent quality/price ration and are efficiently advertised on the market.

5. Suppliers & Business Partners

Agritalia cooperates with its suppliers and business partners to maximize mutual benefits.

Commercial relations with suppliers and business partners are always consistent with the general principles of the present code and every interlocutor shall explicitly accept and respect the principles set out therein.

The Company is committed to offer goods and services reflecting excellent standards and it thus requires the same excellence to its suppliers. For this reason all suppliers and business partners are carefully selected and contracted only if fully reflecting the rules established by the Company.

6. Social Responsibility

Agritalia operates in full accordance with the national contract terms applying to its employees wages and employment levels reflecting the rules and only hiring regular workers.

Child labor at any level is strongly condemned by the company which does not for any reason hire juvenile workers.

All suppliers and business partners shall comply with the rules set therein. Agritalia shall not come to business terms with any entity not fully reflecting such values and terms.

7. Ethical Principles

Employees representing Agritalia are forbidden to accept – either openly or indirectly – cash, rewards, business gifts or take financial advantage from outside entities.

Agritalia's personnel shall never accept gift or other personal benefits related to their professional activity within the Company.

In any case employees are offered benefits or gifts from third parties they shall promptly notify their supervisor.

8. Conflict of Interests

Agritalia recognizes and respects the rights of its employees to take part in business, financial or other activities outside their jobs. However, such activities must be lawful and not have any conflict of interest with the employees' responsibilities at Agritalia.

All Company employees must absolutely refrain from using their position to influence Company decisions in a manner that would benefit themselves or work to the advantage of the members of their own family or friends.

A conflict of interest may arise when sharing Company's sensitive information or professional opinions to competitors.

9. Environment & Community

Agritalia is very much committed to the social community and is constantly promoting environmental responsibility and eco-sustainability.

10. Protecting the Company's Assets

Employees are responsible for protecting Agritalia's assets and use them efficiently. Agritalia's assets include physical and intellectual property.



Company's Confidential information (such as business and financial plans, investments) should be protected and not disclosed to anyone outside the Company.

All employees are required to comply with this privacy policy during their relation with Agritalia but also at the time of their assignment.

All sensitive information relating to the employees are for internal use only and the Company has no authorization to disclose them to third parties according to d.Lgs. 196/2003.

11. Social Media Policy

Agritalia respects employees right to use social media **outside working hours** being confident in their common sense and discretion.

These media shall not be used to disclose Company's confidential information (business plans, financial info, images relating to things and persons) that could harm in any way the Company unless an official authorization has been given by the General Management.

Agritalia is confident in its employees common sense however reserves the right to put in place disciplinary measures where a violation harming the Company and its activities has been detected.

12. Financial Integrity

By means of financial management and control systems Agritalia shall always comply with the Law and guarantee accurate and detailed flow charts for all financial movements.

13. Compliance with the Ethical Code & Violations

Employees are required to carefully read, understand and fully comply with this ethical code.

The Company will check on the personnel to make sure that the ethical code will be respected in full and that no violations may occur.

The respect of such code is essential for the Company success.

The Management will be requested to monitor on the respect of the ethical code and to verify any violation to its values and principles.

Any violation can be reported anonymously to the HR office.

Sergio Massa
CEO

A handwritten signature in black ink, appearing to read "Sergio Massa", written over a light grey background.