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|  | Code of Ethics  | <b>ETI</b>                               |
|   | <b>CODE OF ETHICS &amp; STANDARDS OF PROFESSIONAL CONDUCT</b> | Rev. no. 1 of 19/09/2018<br>Page 0 of 19 |

# **CODE OF ETHICAL BEHAVIOR OF THE COMPANIES BELONGING TO LEVONI GROUP**

| Rev | Date | Paragraph          | Change Description                            | Editing | Sharing | Approval   |
|-----|------|--------------------|---|---------|---------|------------|
| 0   |      | All                | Issue   |         |         | 20/12/2017 |
| 1   |      | Pag. 6 e Pag<br>16 | Change requested by San Daniele's Trade union |         |         | 19/09/2018 |
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## **Foreword**

The Levoni Group consists of the companies Levoni S.p.A. and Mec Carni S.p.A. and of Levoni America Corporation based in the U.S.A.

Levoni SpA - producer of deli meats and cured meats - at the headquarters in Castelluccio and of prosciutto at the headquarters of Lesignano de 'Bagni and San Daniele del Friuli, brings with it over one hundred years of history based on the absolute value of the high quality of their products. The remarkable acknowledgment at the international exhibition "Modern Arts and Industry" in London in 1913 still symbolizes the firm will to pursue the excellence in the production of their own deli meats with humility.

The company totally controls Mec Carni S.p.A ..

Mec Carni S.p.A. is authorized to process the Gran Suino Padano PDO meat and it is one of the most modern slaughterhouses acknowledged worldwide specialized in the slaughtering and cutting of pork.

The companies of the Group - rooted in their historical values - are still active in the objective of maintaining quality craftsmanship levels even in the progressive increase of the production volume, working in the absolute conviction that ethics in the conduct of business is a key condition for the success and the safeguard of one's own image.

For these reasons the Levoni Group has decided to adopt this Code of Ethical Behavior (hereinafter also "Code" only). It contains and expresses the values and principles with which the Levoni families have been conducting their business for over a hundred years: integrity, objectivity, transparency and competence, constantly guiding the conduct of those who work and work in the Company and for the Company. It therefore codifies the ethical and professional responsibilities of the shareholders, directors, managers, employees and collaborators of Levoni S.p.A. and of the subsidiary Mec Carni S.p.A., allowing preventing irresponsible and/or illicit conduct by them and guaranteeing, at the same time, the correct and effective management of the production activities.

This Code is an integral part of the Management and Control Organizational Model (hereinafter also only "Model") of the Levoni Group, defined pursuant to Legislative Decree 231/2001 and it expresses the company *policy*.

## **Mission**

For the companies of the Levoni Group the high quality of the products offered lies at the heart of their business, and it is the constant, essential objective to pursue in order to preserve the productive excellence.

Careful in the inspection of the supply chain and in the selection of the breeds, the commitment which the Group is aimed at is to combining the guarantees and safety standards of industrial systems with the accuracy and attention to the typical product of the artisan process.

The high reputation of the Companies is a pivotal intangible resource, favoring the investments of the shareholders, the loyalty of the customers, the attraction of the best human resources, the serenity of the suppliers, the reliability towards the creditors.

The Levoni Group wants to pursue its objectives by maintaining a solid relationship of trust with its main *stakeholders*, namely: shareholders, employees, collaborators, customers, suppliers, commercial partners, credit institutions, public administration and supervisory authorities, and customers in general. The ability to effectively pursue this *mission* is closely related to the relationships built with them and to the reputation established over time.

The extended Code is a guideline for the maintenance and consolidation of the ethical and legal standards that protect Levoni's professional and social assets with their interlocutors.

Within the Management System 231 (therefore the Organizational Model and related management and control procedures), it attributes and recognizes legal relevance and mandatory effectiveness to the ethical principles and behavioral standards described below, with a view to preventing corporate criminal offenses.

Therefore, the violation of the principles established by the Code compromises the relationship of trust between the Company and the offender and it is pursued with firmness, timeliness and incisively through appropriate disciplinary procedures and proportionate sanctions, regardless of the possible criminal relevance of the behavior assumed and / or from the establishment of a criminal proceeding where a crime occurs, or a related judicial action of any other nature.

## **Recipients and force**

All professionals working with and for the companies of the Levoni Group do so in compliance with the quality standards required by the profession.

Recipients of the Code are:

- shareholders
- members of the Board of Directors (hereinafter also the "BoD");
- corporate control bodies;
- employees with any type of work contract;
- external collaborators including suppliers of goods and services, including professional ones, that carry out activities in the name and on behalf of the Company or under the control thereof;
- any other third parties with whom the companies of the Levoni Group enter into contractual relations for the achievement of the company objectives, which involve work services (even temporary), or carrying out activities in the name and on behalf of the Group Companies, such as to establish a fiduciary relationship with the latter.

All recipients of the Code shall be obliged to observe and respect its principles and to comply with its behavioral rules. To this end, Levoni S.p.A. undertakes to disclose this Code, the principles from which it draws inspiration and all related information to their employees. With reference to external collaborators and third parties, the Code of Ethics is disclosed by publication in the company website and, where possible, transmitted to them.

Members of the Board of Directors, those of the corporate control bodies and employees (all), in case of violation of the provisions of the Code, are subject to disciplinary sanctions. The implementation, in violation of the Code, of behaviors of significant seriousness may lead to the termination of the employment relationship, without prejudice to the claim for damages in accordance with the applicable legislation.

### **General principles**

**Legality** – The companies of the Levoni Group operate in compliance with the laws and regulations in force in the areas in which they perform their work, with this Code of Ethical Behavior and with the internal corporate regulations.

**Honesty and fairness** - The companies of the Levoni Group set up relations with stakeholders in compliance with the rules of fairness, loyalty, collaboration and mutual respect. Under no circumstances can the pursuit of the interests of the companies justify a non-honest behavior. The recipients of the Code shall not accept gifts, presents and/or benefits or be influenced by any kind of pressure that addresses their conduct towards external interests.

**Confidentiality** – The recipients of the Code undertake to treat any information acquired in the performance of their work as confidential and, therefore, not to disseminate it - if not within the limits of the use necessary for the execution of the activity. In any case, the information obtained cannot be used for one's own interests in order to derive undue advantage in ways that are contrary to the law or ways that cause damages to the rights, assets and objectives of the Companies of the Group.

**Transparency** - The recipients of the Code are required to provide transparent, accurate, complete and comprehensible information in such a way that, in setting up relations with Group companies, stakeholders are able to make independent decisions that are aware of the interests involved, alternatives and significant consequences. In particular, in the preparation of any contracts, Levoni S.p.A. and the subsidiary Mec Carni S.p.A. take care to specify to the contractor the behaviors to be kept in all the circumstances provided for in a clear and comprehensible manner.

**Respect for the dignity of people and equal opportunities. Child labor** – The Levoni Group respects the fundamental rights of people, protecting their moral integrity and guaranteeing equal opportunities.

In internal and external relationships, behaviors that have a discriminatory content based on race, religious belief, age, health status, political opinions and sexual orientation, as well as any personal characteristics of the person are not allowed.

The Companies of the Group also ensure working conditions that respect the behavioral rules of good manners. They act so that no intimidation, mobbing or stalking occurs in the work environment. The companies Levoni S.p.A. and Mec Carni S.p.A. do not employ or support the use of child labor, that is, children under the age of 15, even if a lower age is provided for making an exception to the regulations in force.

The Companies of the Group undertake to respect the right of all personnel to join the trade unions of their choice and the right to collective bargaining. In addition, the Company undertakes to ensure that workers' representatives (RSA/RSU – Company Trade Union Representatives/Unitary Union Representative Body and OOSS – Trade Unions) are not subject to discrimination, and that these representatives can communicate with their members and supporters in workplaces in the manner provided by law and the current Collective Labour Agreement.

Levoni S.p.A. and Mec Carni S.p.A. companies ensure that the salary paid to their employees is compliant with the laws and the current Collective Labour Agreement (Collective Labour Agreement of Food Industry).

**Safety, health protection and working conditions** – The Levoni Group undertakes to act scrupulously in compliance with the current regulations on safety and hygiene at work, and to ensure their implementation within companies.

To this end, the Levoni S.p.A. and Mec Carni S.p.A. are committed to spreading and consolidating a culture of safety, developing greater awareness of risks and promoting responsible behavior by all employees.

The Companies of the Group carry out a constant control of the premises and related facilities that they own or rent or which they have available in any capacity, even beyond the regulatory obligations and the prevention of risks deemed to be imminent, in order to ensure higher levels of safety and hygiene in the workplace.

The Directors, employees and collaborators of the Companies of the Group ensure maximum collaboration and availability towards the Health & Safety Manager (RSPP) and to anyone who carries out inspections and controls on behalf of any competent public body qualified in the matter. If employees or collaborators find anomalies or irregularities in this matter, they shall immediately inform the Directors or the delegate pursuant to art. 16 of Legislative Decree no. 81 of 2008, as well as the Health & Safety Manager.

**Commitment to sustainable development and environmental protection** – The Group undertakes to act in compliance with the current regulations, applying the best available technologies, to encourage and plan development of its activities aimed at optimizing the use of natural resources, preserving the environment also for future generations, as well as supporting initiatives for widespread environmental protection.

Consistent with its line of attention to environmental and territorial issues, the Group commits itself to complying with the legislation aimed at protecting the environment, to adopting certified environmental and quality management systems, constant, technological updating of the plants in order to guarantee the reduction of the polluting factors, to minimize the direct and indirect environmental plants caused by the activity of the production plants, to adopting eco-efficient technologies.

**Partnership** – The work must be based on relationships of trust and collaboration, in compliance with company directives and relations between colleagues and in the formal respect of the roles provided by the organization chart and the tools for the management of functional relationships, tasks, responsibilities and of the authorities implemented by the individual companies. Group work must be promoted and stimulated. Personal interests must not be placed before corporate objectives.

**Corporate social responsibility** – Levoni S.p.A. and Mec Carni S.p.A., as well as the Levoni America Corporation, are engaged in socially responsible procurement practices on the basis not only of what is provided for by the regulations, but also on the basis of the behavior that is ethically lawful to expect.

## **Behavioral Criteria**

### **Corporate Governance**

The Levoni Group considers an essential and effective control system as a fundamental element of its organization, understood as a complex of tools, processes and bodies necessary and useful for guiding, managing and verifying business operations with a view to operating an efficient and ethical business.

#### *Shareholders*

Members of Levoni S.p.A., Mec Carni S.p.A. and of the Levoni America Corporation are the first recipients of the Code, and they all undertake to respect it by promoting their sharing and knowledge.

### *Directors*

The Managing Directors - aware of their role and responsibilities and the leadership function of those working within the Company - perform their functions with professionalism, autonomy and independence. They shall refrain from any collateral activity that may harm the interests of the Group, or of the Company, or from pursuing their own interests or those of third parties even if only potentially conflicting and/or prejudicial to the same Companies.

The Directors shall not prevent or hinder the control activity by the supervisors.

Anyone, within the scope of their skills, must participate and facilitate the operation of the company control system, thereby making the staff aware of this.

### **Human resources and personnel policy**

Group companies devote significant attention to the recruitment of personnel, ensuring the respect of fundamental rights, as well as the values of equal opportunities and equality in line with international standards, as well as with the relevant legal provisions and the requirements deriving from collective bargaining at national level.

In the selection, recruitment and career advancement phases of the personnel, the Delegate Function carries out an evaluation exclusively on the basis of the correspondence between the expected and requested profiles and on transparent and verifiable merit considerations.

Each assumption is given with a regular employment contract, containing all the key elements of the relationship established. At the time of recruitment and during the first period of placement in the company, each employee receives an accurate training and information on their duties, safety and hygiene at work, environmental protection, principles and values to the rules of conduct provided for by the Code and the Organizational Model of Management and Control.

Working relationships are based on principles of mutual respect, fair treatment and meritocracy.

### **Privacy protection**

The companies of the Group undertake to protect the information relating to their employees, collaborators and third parties generated or acquired within and in business relationships, and to avoid any misuse of this information.

Notably, they - in respect of the subjective right of data subjects to the protection of personal data, whether employees, collaborators, customers or suppliers - provide them with complete, updated information written with a simple and clear language, with precise indication of the period of the retention of personal data, the right to lodge a complaint with a supervisory authority, as well as the intention of the holder to transfer personal data to a third country.

The data Controller adopts and implements technical and organizational measures, from the moment of design, as well as in the execution of the processing, which protect the principles of data

protection. For the processing of data - both ordinary and possibly sensitive - acquired or that will be acquired and/or processed during the course of the activity, it is required to issue informed consent whenever necessary. Except where specifically indicated to the interested parties, such data cannot be communicated, disclosed or used for other purposes, both inside and outside the Company.

The subjects operating in the Company - both in top management and subordinate positions - are forbidden to alter the functioning of the IT and telecommunications system in any way, or to intervene in any way on data, information and programs installed to procure directly and/or indirectly advantages or usefulness to the business activity.

The Group guarantees to the interested parties that the processing of their personal data is carried out with the appropriate minimum security measures in accordance with the applicable regulations in force, at its headquarters and always by authorized personnel.

For the activities and/or professional services conferred to third parties that involve the processing of personal and sensitive data, the Group Companies impose a direct assumption of responsibility on them for the correct implementation of the relevant legislation by contract.

The information management of data is centralized, that is Levoni S.p.A. guarantees the management of all the information also of the subsidiaries, equally providing the adoption of all the tools necessary to guarantee the binding regulatory commitments.

### **Intellectual property**

The Group's policy includes the protection of intellectual property, patents, trademarks, copyrights, trade secrets, confidential software, creation rights, know-how and show-how.

The companies of the group condemn any behavior in place for the purpose of illegally taking possession of trade secrets, supplier lists and other information relating to the economic activity of third parties. Therefore, the Group respects the intellectual property rights of its customers, avoiding their violation. Employees must immediately inform the Directors of any notice or denunciation of violation of the intellectual property rights of third parties.

The Group considers the protection of the good functioning of the market as a key principle of its activity and condemns all behaviors that prevent or disturb the free exercise and the normal course of industry and commerce, discouraging unfair competition. Therefore the Companies of the Group inspire their conduct toward the competitors to the principles of loyalty and fairness and, consequently, stigmatize and disapprove any behavior that may constitute impediment or disturbance to the exercise of a business or trade or that can be in any case directed to the commission of crimes against industry and commerce.

### **Accounting and financial management**

The Companies provide a clear, correct and truthful representation of their registrations carried out in compliance with the Italian Civil Code or other applicable national provisions, accounting principles

and in compliance with current and applicable tax regulations, so as to ensure transparency and promptness of verification.

Each operation and transaction is correctly registered, authorized and is verifiable, legitimate, consistent and appropriate.

All actions and operations of the (also *infra*) Group have an adequate registration and the decision-making, authorization and execution process is verifiable. For each operation there is documental support suitable to allow, at any time, carrying out checks that certify the characteristics and motivations of the operation and identify who authorized, carried out, registered and verified the operation itself.

Group companies also prevent the creation of false, incomplete or misleading registrations, and they ensure that no extra-budget, secret, unregistered or personal funds are set up, or that invoices or registered invoices are issued for totally or partially non-existent transactions. In fact, the administrative bodies must not represent false financial statements, corporate books and direct communications to shareholders and/or third parties, material facts that do not correspond to the truth, or they must not omit information due on the economic, patrimonial and financial situation of the Company, in in order to mislead recipients, to cause damage to shareholders and to social creditors. Not even adopt fraudulent behavior of the applicable tax legislation.

Any action or omission capable of preventing, obstructing or falsifying the control activities reserved for members or attributed to intra and extra social control bodies is prohibited.

It is expressly forbidden for anyone to use the social funds without authorization and to set up, hold and manage foreign funds not resulting from official accounts. Any violation of the precepts of this article must be promptly reported by anyone who is aware of it to the Supervisory Body.

Corporate communications must be clear, truthful, correct, transparent and exhaustive. They must comply with the principles, criteria and formalities provided for by the Italian Civil Code or by the other applicable national provisions, by accounting principles, and they must comply with the provisions of the tax legislation, as well as special laws and enforceable regulations.

The financial statements, the prospectuses, the corporate books and, in general, the reports or communications on the economic, equity and financial situation required by law, the corporate accounting records and corporate books are documents prepared according to the principles of transparency and correctness.

Personnel are made aware in order to prevent operations that can substantiate, even by way of competition, recycling or self-laundering.

The Companies of the Group can grant contributions and sponsorships to individuals and public and non-profit organizations, aimed at social, cultural and solidarity purposes, in compliance with the provisions of the accounting, civil law and tax regulations.

## **Protection of health, safety and environment**

In general, all Group activities are conducted in accordance with national and international agreements and standards.

The companies of the Levoni Group, engaged in the promotion and maintenance of an adequate internal control and risk management system, shall adopt and implement all the tools necessary to manage and verify the business activities with the aim of ensuring compliance with laws and company procedures.

Notably, the Group operates for:

- eliminating risks, where this is not possible, minimizing them in relation to the knowledge acquired on the basis of technological progress;
- assessing all risks that cannot be eliminated;
- respecting ergonomic and health principles in workplaces in the organization of work, in the design of workplaces and the choice of work equipment, in the definition of working methods and production, in particular in order to reduce the effects on the health of monotonous and repetitive work;
- planning measures deemed appropriate to guarantee the improvement of safety levels over time, also through the adoption of codes of conduct and good practices;
- giving adequate instructions to workers.

These principles and tools are used by the company to take the necessary measures to protect the safety and health of workers, including activities to prevent occupational risks, information and training, as well as setting up a required organization and resources.

In relation to activities with a likely environmental impact, the Directors and senior management shall commit themselves to complying with environmental legislation and to implementing preventive measures to avoid or at least minimize the environmental impact.

The sharing of these values is also extended to other subjects unrelated to the company structure, linked to the company by negotiation relationships, through specific contractual clauses.

Notably, the Group is committed to:

- adopting measures to limit and - if possible - cancelling the negative impact of economic activity on the environment, in a preventive manner, not only when the risk of harmful or dangerous events is demonstrated, but also, as a precautionary measure, when it is not certain whether and to what extent business activity exposes the environment to risks;
- fostering the adoption of measures aimed at preventing possible damage to the environment, rather than waiting for the moment of the repair of a damage already done;
- planning an accurate and constant monitoring of scientific progress and of the legislative evolution in environmental matters;
  - promoting the values of training and the sharing of the principles of the code among all the subjects operating in the enterprise, top managers or subordinates, so that they adhere to

the established ethical principles, in particular when decisions are to be made and, later, when the same must be implemented.

### **Conflicts of interest**

A basic principle of ethical conduct requires that each employee of the Companies of the Group positively supports both the workplace and the outside of the Company's commercial activities.

An important way to fulfill this commitment is to make sure that business negotiations are never influenced - not even in appearance - by personal interests.

In particular, and only by way of example, during the period of employment at Levoni S.p.A. and Mec Carni S.p.A. employees must never, directly or indirectly:

- work for, be associated with, provide services or materials of any kind to, or receive compensation from any competitor of the Company.
- have financial interests in any of the Company's customers, potential customers, competitors, suppliers or sellers.

This Policy does not prevent anyone from socializing with customers, competitors, suppliers, but employees must not in this way violate any of the foregoing prohibitions. Employees must also be careful and avoid conflicts of interest arising.

To understand whether a particular job or an external activity may give rise to a conflict of interest and/or interfere with the responsibilities toward the Group, the employee is invited to contact the Directors and verify the situation together with them.

### **Relations with institutions**

#### *Relations with the public institutions*

The Group's commitment is entirely aimed at achieving the highest standards of integrity: this means doing business in an ethical manner and in compliance with all the laws and regulations in force in the countries in which it operates.

The Group maintains ethical conduct and complies with the law, in particular as regards relations with public institutions in the countries in which it operates, as described below.

Employees, collaborators and, in general, all those who are similar to the staff of the Group must understand that any illegal activity could damage the reputation of the same and cause serious negative consequences both for the companies and for the individuals involved.

Notably, all employees, collaborators and those working in the name and on behalf of the Companies of the Group are prohibited from:

- giving, offering or promising values of any kind to state officials in order to influence or reward an official act;
- giving or offering values of any kind to government officials with the intent of obtaining a contract with the public institution which the official belongs to or a favorable treatment;

- bestowing, trying to bestow, offering and demanding, accepting or trying to accept any kind of "gratuities" or bribe. It is considered a gift, or a bribe, anything of value that is bestowed for the purpose of obtaining or rewarding unlawful treatment of favor;
- putting in place any conduct - active or omissive - which takes the form of artifice and deception, implemented by any means, by one of its members, and aimed at unjustifiably obtaining funding, subsidies or provisions provided by national public entities and/or Europeans, or to misappropriate their binding use.
- In countries where it is customary to offer gifts to customers or others, you can accept gifts provided they are of an appropriate nature and of modest value, but always in compliance with the laws.

#### *Relations with the Judicial Authorities*

In case of involvement of the Group in judicial proceedings (administrative, civil and/or criminal), the Companies Levoni S.p.A. and Mec Carni S.p.A. shall act in compliance with the law and with the rules of this Code of Ethics.

Notably, it is forbidden for corporate bodies and employees with a proxy to represent companies in court, to promise or give money or other benefits, to magistrates, judges, clerks and witnesses in order to condition the outcome of the process in sense favorable to companies. Making, inducing or favoring false declarations to the Judicial Authority is forbidden as well.

The companies of the Group consider public order as a fundamental interest of the company in which they operate and therefore condemn the establishment of any relationship with subjects whose behavior is not based on principles of verified legality and ethics. To this end, the Companies activate all the preventive and subsequent control procedures necessary for the purpose of preventing the establishment of such relationships.

### **Business relations**

#### *Customers*

Companies aim to increase the degree of satisfaction and appreciation of their services or products, making themselves aware to the needs of customers, even prospective ones, and providing exhaustive information.

These relationships are managed according to criteria of collaboration, availability, professionalism and transparency, in the commitment to guarantee the high quality of the products offered, in order to build solid and lasting relationships, characterized by mutual reliance.

#### *Suppliers*

The choice of suppliers is based on a careful technical and economic evaluation in consideration of the following parameters: product quality, estimate of the offer and economic convenience, technical and professional suitability, competence and reliability.

Sharing this Code is a prerequisite for the establishment and maintenance of supply relationships. The products and/or services provided are compliant and justified by concrete business needs, within the limits of the available budget.

In the continuity of the continuous relationships of supplying goods and services, as well as with any potential supplier, the Companies of the Group maintain relationships based on the principles of good faith, fairness, transparency and respect for the values of fairness, impartiality, loyalty and equal opportunities.

Relationships with external consultants, collaborators and any outsourcers are based on the same principles and selective criteria.

#### *Business partners*

The Group is responsible for relations with its commercial partners and companies that are in compliance with the strict observance of applicable laws, market rules and the principles that inspire fair competition, countering any form of unlawful or collusive agreement or conduct.

The commercial relationships are established with suitably selected subjects according to objective evaluation criteria of quality, competence and professionalism.

### **Methods of implementation of the Code**

#### ***Contractual value of the Code***

This Code of Ethical Behavior - considered in its entirety and together with all the specific implementation procedures approved by the Companies of the Group - must be considered an integral part of the subordinated employment contracts and to be stipulated, pursuant to art. 2104 Civil Code.

The violation of these provisions will therefore include an offense of a disciplinary nature and, as such, may be prosecuted and sanctioned by the Companies pursuant to and for the purposes of art. 7 of Law 300/1970; this unlawful act will entail, among other things, compensation for damages caused to Group companies.

With regard to collaborators, consultants, contractors and other third parties, signing or, in any case, adhering to the provisions and principles established by the extended Code represent a *conditio sine qua non* of the stipulation of contracts of any nature between the Levoni SpA companies and Mec Carni S.p.A. and these subjects. Therefore, the provisions approved, made known and accepted constitute an integral part of the contracts themselves. In view of the foregoing, any violations by third parties of specific provisions of the Code legitimize the interruption by the aforementioned companies of the contractual relationships with said parties and may also be identified ex ante as causes for the express resolution of the contract to pursuant to art. 1456 Civil Code.

#### ***Operating principles***

The implementation of the extensive Code of Ethical Behavior sets its foundations on the operating principles that characterize the Group Companies since their establishment:

- actions in line with company values and customer needs, in particular, and above all, fairness in contractual relations;
- constructive, transparent, direct, honest and timely communication;
- participation in group work and evaluation of mutual errors;
- progressive, constant improvement of roles.

### ***Communal commitments***

Compliance with the laws and regulations applicable in the operating sector is a doctrine for the Group. No action that violates laws and regulations must be undertaken by the Companies. Each subject recipient of the Code must incorporate the legal and ethical principles that apply to the company's activities and, in case of doubt regarding the adequacy of the proposed conduct, is in contact with the Supervisory Body in order to obtain an opinion on the compliance of the just act on the rules set out in the extensive Code.

The Group is committed to acting with moral and professional integrity and to managing its activities in line with the highest ethical models. Everyone must commit to interact correctly with customers, suppliers, competitors and work colleagues. We must not tend to achieve positions of supremacy in labor relations, through the manipulation, concealment or abuse of privileged information, or at least with the misrepresentation of material facts. Everyone's attitude must be fair to everyone.

This Code contains the rules regarding both personal and professional conduct, therefore the adherence to the Code does not in any way integrate the stipulation of an employment contract or the guarantee of an indefinite commitment.

### ***The rules of conduct of Directors and Company Top Managers***

The members of the Boards of Directors, the Functional Managers of the Companies, as well as the statutory auditors are required to comply with this Code and to standardize their conduct to values of honesty, loyalty, correctness and integrity, consciously sharing the mission of the Companies.

It is the duty of the members of the Boards of Directors to give concrete effect to the principles contained in this Code, strengthening the trust and cohesion underlying the company's operations.

To this end, the Board of Directors is inspired, even in the determination of business objectives, to the values expressed by the code. The Boards of Directors of the Companies act in full awareness of accurately interpreting the principles expressed in this Code of Ethics.

### ***Duties of the Functional Managers***

Each company functional manager shall:

- represent with their behavior an example for their subordinates;

- make sure they follow the code;
- ensure that employees understand that compliance with the provisions contained in the Code constitutes a substantial part of their work performance;
- select employees and collaborators who guarantee compliance with the principles contained in the Code;
- promptly report to the Supervisory Board any reports of violations or requests for clarifications made by employees;
- prevent any form of retaliation within their functions, to the detriment of workers or collaborators who have collaborated in the observance or practical implementation of the Code.

### ***Duties of employees***

Each employee is required to have knowledge of the provisions contained in the Code and of the laws of reference that regulate the activity carried out within the scope of their role.

Employees have the duty to act loyally in order to comply with the obligations entered into by their employment contract and by the provisions of this code of ethics, ensuring the services required.

Inform their own supervisors and the Supervisory Body regarding any violation of the Code of Ethics and the Organizational Model of which they become aware.

The Company will investigate, deal with and respond to the problems raised by employees and parties concerned regarding compliance or non-compliance of company policies with the Code of Ethics adopted.

The Company will refrain from taking disciplinary measures, dismiss or otherwise discriminate against any employee who provides information regarding non-compliance with the rules contained in this Code.

### **Final provisions**

#### ***Article of association, laws and regulations***

The content of this Code must be coordinated with the provisions of the Articles of Association, with the provisions in civil and criminal matters applicable, as well as with the provisions of law on labor law and with those arising from collective bargaining, as well as any other enforceable law or regulation.

#### ***Organizational Model of Management and Control***

This Code coordinates and integrates the pre-requisite content of the Model adopted by the Company pursuant to Legislative Decree 231/2001, synergically to which it identifies the behavioral standards which the parties operating in the areas/functions assessed and registered as risk-offense must comply with. Therefore, the Code is to be considered an integral part of the Organization,

Management and Control Model adopted by Levoni S.p.A. and by the subsidiary Mec Carni S.p.A. and is implemented in coordination with the Model's behavioral requirements.

### ***Supervisory Body***

As part of the system of prevention of offenses in which the Group company is located, the Supervisory Body (SB) is the corporate subject appointed to control, update and adapt the Model and the Code of Ethics. It is composed of subjects with the necessary requisites of integrity, professionalism and independence, as well as competence and experience in matters of interest.

In exercising its powers, the Supervisory Body shall notably:

- interpret, apply and check compliance with this Code of Ethics;
- supervise the observance, operation, updating and optimization of the Organizational Model and the Code;
- carry out inspections, monitoring and coordination with other in-house/outside corporate bodies;
- detect and report any violators to the governing bodies, activating the disciplinary procedure.

### ***Supervisory activities, violations and sanctions***

Compliance with the principles and rules of the Code of Ethics and their consistent dissemination and operational application within the assigned responsibilities are an essential part integral to the contractual obligations of each employee.

The Supervisory Board, through any source of knowledge, detects any violations of the Code and reports them to the Administrative Body which formally challenges them to the offenders.

Notably, it avails itself of the collaboration of the Administrative Body for the necessary preliminary activities and for the reporting and treatment of the violations which are its task to define.

The Supervisory Board is also entitled to directly collect any indicative element of violations of the Code and the Model.

In any case, it acts in such a way as to ensure a general correctness of the assessment procedure, in order to avoid any notable reports, not supported by facts or totally unfounded, in order to adopt determinations only with reference to significant violations.

The SB is a reference point for the interpretation of the Code and the Model, makes use of structures, also external, for the periodic verification and updating of the same, also ensuring effective communication, training and involvement processes, coordinating initiatives for their dissemination and understanding.

With regard to the sanctions that can be imposed on employees, reference should be made to the sanctions established by the disciplinary system, depending on the type of offender, and according to a degree of the sanction commensurate with the seriousness of the fact and subject to the

necessary coordination with the corporate bodies and, eventually, the organizations union. Always in full respect of the contradictory with the offender.

[\*] In negotiation reports, depending on the seriousness of the violation, the signed contract can be resolved for non-fulfillment, imputable and important.

In cases of an organic relationship, the detected and contested violation by a member of the management and / or control bodies is assessed according to its severity and may entail the revocation for a just cause of the assignment, resolved by the Shareholders' Meeting.

In the event that the offender is a member, the SB assesses, in coordination with the competent corporate bodies, the seriousness of the violation committed for the purpose of the imposition of the penalty.