

De Cecco

— Mugnai dal 1831 —



Code *of* ETHICS

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1. *Code* of ETHICS

This Code of Ethics (hereinafter also referred to as the "Code"), adopted by F.lli De Cecco di Filippo Fara S. Martino S.p.A. (hereinafter also referred to as the "Company"), contains the behavioural principles and rules which the Company adopts, defining the business ethics to which all those who operate in the name and on behalf of the Company are subject. De Cecco requires compliance with the Code of Ethics in the context of their respective functions and responsibilities in pursuing the company's objectives and in the various work situations. Therefore, the addressees of this Code are obliged to observe its provisions both in their direct relations with the Company and in their reciprocal relations and under no circumstances may the intention of acting in the interests and/or to the advantage of De Cecco justify actions, omissions or conduct that runs contrary to the principles and values enshrined in the Code.

The Company believes that ethics in the conduct of business facilitates the success of business activities, by enhancing the reliability, integrity and transparency of the activities carried out in pursuit of the company's aims. The adoption of this Code is aimed at disseminating and reinforcing the values and principles for which De Cecco is recognised and at combating behaviour in breach of such principles and regulations.

This Code of Ethics may be amended and supplemented by its administrative body also on the basis of any suggestions, indications and proposals made by the Supervisory Board appointed pursuant to Italian Legislative Decree no. 231/2001.

2. *Addressees* and DISSEMINATION *of the Code*

The addressees of this Code are, as far as appropriate, the shareholders, directors of all Group companies, along with their managers, employees, consultants and anyone (individuals, entities or third-party companies) who, for any reason, directly or indirectly, permanently or temporarily, establish a cooperation or partnership relation with them, including in the form of brand/trading name licence.

The addressees of the rules of the Code are obliged to observe the prescriptions contained herein and to adapt their conduct and actions to the principles expressed.

The Group Companies undertake to call for compliance with the provisions of this Code in all their economic and contractual relations and to disseminate it as widely as possible.

To this end, the Code is published on the company website and made available to any Group stakeholder.

3. History

The history of De Cecco, a quality leader in Italy and worldwide in the Premium Food segment and today the third largest pasta producer in the world, began in Fara San Martino, a small village in Abruzzo. Two centuries of unique and timeless experience in the hills of the Maiella National Park, a UNESCO Geopark (Fig. 1).

A history of quality, created by men and their passion which, since the early nineteenth century, has evolved from previous, similar professions to that of 'pasta makers since 1886': firstly bakers, and then 'Millers since 1831'.

This expertise in craft baking has taken root and developed continuously since the firm's foundation by Nicola De Cecco in 1831. Nicola's son, Filippo

Giovanni, inherited this passion for baking from his father and expanded it to pasta production in 1886.

In 1889 he had an epoch-making brainwave: he designed and built the first hot-air system for the artificial drying of pasta, an invention that made history and became a national treasure, as witnessed by the Treccani Encyclopaedia under the heading 'Pasta' (Fig. 2). This invention forever transformed the pasta-making process. Until then, pasta had been sun-dried and was therefore subject to weather conditions and less protected from a health and hygiene perspective. This new process allowed the production of high-quality pasta and even its export overseas, while keeping the flavour, colour and aroma of durum-wheat semolina intact.

Our first major recognition took place at the 1893 Chicago World's Fair where De Cecco pasta was exhibited and awarded a diploma and gold medal "for superior workmanship, colour and toughness after cooking" (Fig. 3).

All the secrets of the fine quality of De Cecco pasta lie in the 'De Cecco Method', accompanied by a constant search for quality at every step of the process. It all starts in the fields, where the best durum wheats are selected in the Italian and foreign supply chains according to quality protocols that require compliance with strict quality/quantity parameters assessed at accredited laboratories, in addition to the in-house laboratory, to guarantee conformity and wholesomeness.

If compliant, the wheat is sent for milling in the mill owned by the company in Fara San Martino, where state-of-the-art technology, applied to ancient and

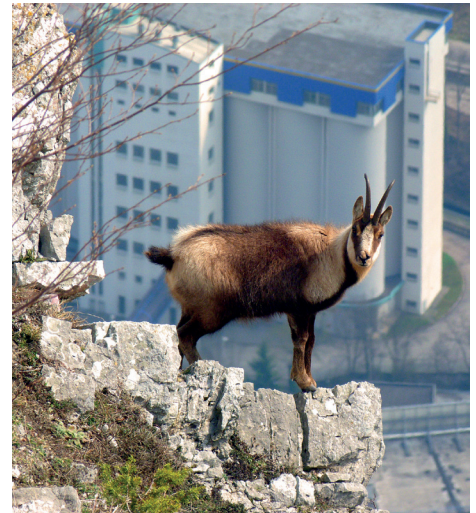


Fig. 1 Unesco Geopark

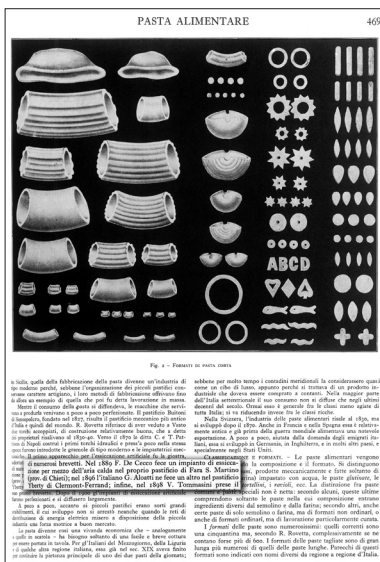


Fig. 2 Treccani Encyclopaedia

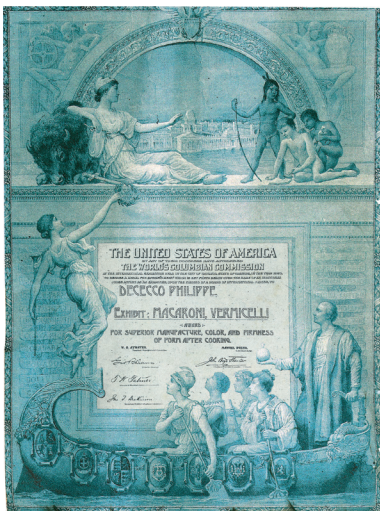


Fig. 3 1893 Chicago Expo Diploma

skilful milling tradition, is turned into high-quality semolina, i.e. coarse grain, obtained with low extraction yields and taken only from the finest part of the wheat, the heart of the grain.

The semolina is mixed with spring water, at a temperature below 15°C.

Coarse-grained semolina and cold water temperature are key parameters for the development of a hardy gluten that will give the pasta the right consistency and perfect hold during cooking. This rough process gives each format the ideal porosity to capture any sauce. Lastly comes the drying phase – slow and at low temperature, according to the technology that De Cecco has always employed and even preserved when high-temperature technology conquered the pasta industry during the 1960s. Low-temperature technology, in fact, preserves the nutritional and organoleptic characteristics of the raw material because it protects it from 'heat damage', preserves all the fragrance of the flavours and aromas, and the natural colour of the grain.

Almost two hundred years have passed since 1831: this artistic approach has become a culture of quality excellence that De Cecco, with a presence in 110 countries around the world, exports through its historic brand, a pioneer of 'Made in Italy' craftsmanship, recognised everywhere as an emblem of quality.



To be a leading company in its sector also means ensuring activities adhere to ethical values during the conducting of business, respecting the environment and protecting and safeguarding employees and professional partners.

These values can be summarised as compliance with the law, professionalism, honesty, integrity, fairness and good faith, transparency, diligence, respect for competition rules, confidentiality, personal dignity and environmental protection. They are aimed at:

- safeguarding the interests of all those directly or indirectly involved in De Cecco's business and who have an interest in relation to decisions, strategic initiatives and possible actions;
- ensuring an efficient, reliable and correct working method, marked by compliance with legal rules and ethical principles deemed adequate, necessary and essential for operating on the market, with regard to both the activities carried out within Italy and those performed in other countries and the consequent relations with national and international operators, companies and institutions.

Attention and respect for all those who come into contact with the company, together with the needs and new expectations of society and the global market, have over time led De Cecco to develop a particular sensitivity to the ever-evolving themes of corporate social responsibility and sustainable development, which are the subject of a number of reference standards, adopted on a voluntary basis, aimed at measuring performance. A long list of certifications ensures, today as in the past, the quality and reliability of De Cecco's work and products, as shown in the table below (Fig. 4).

De Cecco certificates news:

CERTIFICATES *and* RECORDS

No.	CERTIFICATE	DATE OF 1ST ISSUE
1	 KOSHER	1 May 1996
2	 HACCP	1 April 2003
3	 ISO 9001	7 May 2003
 4	 PC FOOD	29 June 2004
 5	 SA8000	25 February 2005
6	 BRC	3 August 2005
7	 IFS Pastificio	3 August 2005
8	 Linea BIO	31 August 2006
9	 ISO 14001	2 October 2007
10	 A.E.O.	29 April 2009
11	 Statement PAY PER PAGE GREEN	13 May 2011
12	 Assurance Statement ISO26000	15 June 2011
13	 UNI 11381	24 June 2011
14	 E.P.D.	5 August 2011
15	 ISO 45001 (OHSAS 18001)	24 July 2013
16	 HALAL	15 July 2015
17	 GMP+	5 December 2017
18	 NO OGM (U.S.A.)	10 April 2019
 19	 Statement MY CARE for COVID protection	29 July 2020
20	 PARITÀ DI GENERE (Pdr 125:2002)	29 December 2022

Fig. 4

4. *Dissemination* and IMPLEMENTATION of the CODE of ETHICS

De Cecco is committed to the dissemination of this Code to all interested parties, to the correct interpretation of its contents and to the provision of tools to facilitate its application, by also putting in place the necessary measures to enable verification and monitoring of its application.

The Addressee undertakes, for the entire duration of the relationship with De Cecco, to comply with this Code and behave in a manner inspired by the principles of loyalty, impartiality, integrity and honesty. He/she also undertakes to avoid any act or conduct that violates or may be deemed to violate the provisions of the law or regulations or those contained in the Code.

Relations between the Company and the Addressees are characterised by mutual trust and cooperation.

Compliance with the rules of the Code must be considered an essential part of the contractual obligations of the Personnel and all outsourcers working on behalf of De Cecco.

Therefore, application of this Code is the personal responsibility of each Addressee. The latter, once informed, may not invoke lack of knowledge of the Code or having received instructions to the contrary from any other company representative as justification for non-compliance. To this end, the Code of Ethics is published on the corporate website and made accessible to all stakeholders and interested third parties. The effective enforcement and updating of the Code of Ethics is ensured by the Supervisory Body referred to in para. 14 below.

5. *General* ETHICAL PRINCIPLES

The general ethical principles adopted by the company are those of:

- **Legality:** The Company, in carrying out its activities, undertakes to comply with all national and international laws and directives. All Addressees of the Code of Ethics are obliged to be aware of and comply with the rules of law applicable to the performance of their activities, bearing in mind that the pursuit of a corporate interest in violation of the rules of law and of the others listed above shall not be tolerated under any circumstances.
- **Confidentiality:** all addressees are forbidden from divulging company secrets and are obliged to keep news and information of which they become aware during their duties confidential, unless they are subject to transparency in accordance with the law and regulations. In particular, confidential information includes information on strategies, economic/financial results, business strategies, contracts or partnerships or on inspection or investigation activities underway at the company .

It is forbidden to share information pertaining to specific acts such as salary, contractual or economic conditions, prior to its disclosure to the parties concerned.

Addressees shall only consult the documents they are authorised to access and use them in accordance with their duties, granting access to those entitled and authorised by the Company.

Addressees shall observe the duty of confidentiality even after the termination of their relationship with De Cecco.

- **Fairness:** Addressees must always ensure their conduct complies with the company's provisions and procedures in accordance with the rules laid down by law and by the contracts in force with the company. The behaviour of senior persons (directors, auditors, managers, etc.) must always be characterised by fairness and equity, as they are role models for all and ensure that relations with colleagues are inspired by harmony and avoid acts or behaviour characterised by animosity or conflict.

- **Integrity:** Addressees shall not use the Company to pursue private and personal ends or benefits, shall not use their position in the Company to obtain benefits or advantages in external relations, including those of a private nature, and shall not use information not available to the public or not made public, obtained (even if confidentially) in the course of company business, to make profits or private interests. The Addressees shall avoid receiving benefits of any kind, even during trips, seminars and conventions, which may or appear to influence their independence of judgement and impartiality; moreover, they shall neither solicit nor accept, for themselves or for others, any gifts or other benefits from persons in any way concerned by the Company's activities or who intend to enter into relations with it, with the exception of gifts of modest value.

In the event that they are subject to unlawful pressure or are offered gifts, benefits or other advantages exceeding a modest value, they are required to promptly notify the company management and the Human Resources department.

- **Honesty in Business:** Addressees have a duty to behave in a fair and honest manner, in both internal and external relations, avoiding the pursuit of illicit or illegitimate aims, or the establishment of situations of conflict of interest, with a view to an undue advantage, either their own or that of third parties. Under no circumstances may the interest or advantage of the company justify dishonest conduct. In preparing contracts, both with customers and suppliers, the Company undertakes to include transparent and clear conditions and clauses, respecting the 'equal partnership' principle. Addressees shall endeavour to prevent situations of conflict of interest with the Company, and shall inform the SB of any interests, including those of an economic nature, that their spouse, relatives up to the fourth degree of kinship or cohabiting persons may have in the activities or decisions within their remit.

- **Competition:** De Cecco respects the value of competition, operating according to principles of fairness, fair competition and transparency with respect to all operators and competitors in the market, recognising as a primary need, in this sense, the protection of its own and third parties' industrial and intellectual property rights.

- **Prevention of money laundering:** De Cecco requires the utmost transparency in business operations and in relations with its business partners, in full compliance with anti-money laundering regulations, and rejects any conduct aimed at using, replacing, transferring or in any case concealing sums of money known or suspected to be of unlawful origin, whether internal or external to the Company.

- **Transparency in institutional communications:** De Cecco undertakes to provide the due information, both outside and inside the Company, in a clear and complete manner, adopting verbal or written communication that

is easy and immediate to understand and subject to verification of the requirements of truthfulness, clarity and completeness of such information.

In the information provided to customers, as well as in the formulation of contracts, De Cecco communicates clearly and comprehensibly, while always ensuring that equal conditions are maintained.

- **Responsibilities:** Each Addressee has a duty to provide professional input appropriate to the responsibilities assigned and to act in such a way as to protect the reputation and good name of the Company.

- **Impartiality:** De Cecco, in its relations with its stakeholders, guarantees equal treatment of the companies that come into contact with it, refraining from any arbitrary acts that could have negative effects on companies as well as any preferential treatment.

- **Conflicts of interest:** all decisions made on behalf of the Company must be made in the best interests of the Company and in accordance with applicable laws and regulations. Therefore, Directors, Managers, Employees and other addressees of the Code must avoid any possible conflict of interest, with particular reference to personal, financial or family interests that could influence the independence of decision-makers. Situations in breach of this rule must be reported immediately to the Supervisory Board.

- **Confidentiality and privacy protection:** De Cecco ensures the confidentiality of the information in its possession and refrains from carrying out any investigation into the ideas, preferences, personal tastes and private life in general of employees.

The Company complies with the provisions on the protection of personal data contained in EU Regulation no. 2016/679 (General Data Protection Regulation) and in Italian Legislative Decree no. 196/2003 containing the 'Personal Data Protection Code'.

- **Solidarity:** Addressees must interact with each other with solidarity and mutual respect, cooperating in the work/professional activity of each, in order to guarantee a service of high social value and usefulness to the community, free from arbitrary discrimination.

- **Dignity and professional development of employees:** human resources constitute added value for the development and growth of the company's activities and, on this basis, De Cecco protects in all ways the respect of workers' rights and promotes their professional growth in order to increase the wealth of skills possessed and acquired.

- **Occupational health and safety protection:** De Cecco promotes an organisational and management structure of safety at work suitable for preventing any accident, in compliance with the relevant regulations, developing risk awareness and promoting responsible behaviour by all personnel. It also ensures that any assignment in the field of safety and hygiene at work, to third parties, be they external consultants or companies, is assigned exclusively on the basis of proven and adequate skills and experience in the field.

- **Environmental protection:** De Cecco recognises the importance of respecting the environment and requires Addressees to assess the environmental impact of their decisions in order to minimise any negative effects. It plans its activities by seeking the best possible balance between economic initiatives and environmental needs.

6. *Principles of* CONDUCT *for and towards employees*

De Cecco recognises that human capital is a fundamental factor for healthy company growth and is committed to management aimed at ensuring respect for the ethical and social principles enshrined by the United Nations in the Universal Declaration of Human Rights and the Declaration of the Rights of the Child, by the conventions of the ILO (International Labour Organisation) and by national legislation.

In compliance with the laws protecting the physical and moral integrity of workers, De Cecco undertakes to:

- ensure decent working conditions for staff, in safe and healthy working environments;
- maintain conduct geared towards safeguarding the dignity, freedom and equality of employees, protecting labour and trade union freedoms, and the health and safety of its human resources;
- ensure a working environment in which personal characteristics and orientations cannot give rise to discrimination of any kind.

De Cecco does not tolerate any form of illegal or undeclared work, repudiates child, forced and compulsory labour and respects the applicable laws and standards on working hours, holidays and holidays. The company asks its suppliers to respect the same principles for its employees.

All staff are employed under a regular employment contract and the company guarantees their right to a decent salary, handling their pension, welfare and insurance treatment as provided for by the regulations and employment contracts in force.

The Company neither implements nor tolerates any form of discrimination in hiring, remuneration, access to training, promotion, dismissal or retirement, nor interferes with the exercising of the rights of personnel to follow principles or practices, or to meet needs, on the basis of: religion, disability, gender and sexual orientation, trade union membership, political opinion, age or any other condition that could give rise to discrimination.

Likewise, the Company does not permit behaviour, including gestures, language or physical contact, that is coercive, threatening, abusive or exploitative.

De Cecco guarantees freedom of association and the right to collective bargaining and does not discriminate and/or retaliate against workers' representatives, union members and those involved in union activities.

The company also promotes and develops a system of continuous training and upgrading, which is not only professional but also ethical.

In the context of the employment relationship established in any capacity with the Company, each worker shall perform his or her duties in accordance with laws, internal or external regulations and the guidelines of this Code on the basis of a personal commitment to honesty and loyalty to the Company.

7. *Relations* with THIRD PARTIES

7.1 Customer relations

De Cecco is committed to satisfying its customers in compliance with the obligations set out in the applicable legislation, contracts and quality standards.

It also undertakes not to discriminate against its customers, to establish a relationship with them characterised by a high degree of professionalism, oriented towards helpfulness, respect, courtesy and the search for and offer of maximum cooperation.

7.1.1 Quality, food safety and customer satisfaction

De Cecco is committed to ensuring the achievement of the required quality and safety standards and to periodically monitoring the quality of products or services provided to customers.

In particular, the Code aims to ensure the ethical values inspiring the company's work are in line with the requirements of the certified management systems adopted by the Company.

7.2 Relations with Suppliers

De Cecco establishes its relations with suppliers according to principles of loyalty, integrity, confidentiality and diligence, ensuring in the procurement process the observance of all relevant corporate provisions, procedures and practices. In choosing suppliers, De Cecco adopts objective and transparent selection criteria, taking account of suppliers' ability to guarantee the implementation of quality systems in the food chain, the availability of means and organisational structures and the ability to meet the obligations of confidentiality and protection of any personal data processed on behalf of the Company.

All employees, in their relations with suppliers, must observe, at all times and everywhere, the principle of impartiality and independence of relations, so as not to harm the Company's image and may not ask for or accept, for themselves or for others, gifts and other benefits offered by suppliers, consultants, contractors or companies competing with or in any way involved in supplying De Cecco, with the exception of courtesy gifts linked to holidays¹.

All suppliers of goods and services and partners are asked to share and respect the Code of Ethics and, in the event of non-compliance, shall be subject to the relevant penalty system.

7.3 Relations with Political Organisations and Trade Unions

De Cecco does not in any way make contributions to political parties, movements, committees and organisations that have political and/or trade union aims, to their representatives and/or candidates, which are not permitted under current legislation.

7.4 Relations with the Public Administration

De Cecco has always been careful to ensure that its employees, collaborators and any third party acting in its name and on

¹ as a reference value: €50 (fifty Euros).

its behalf, when dealing with the Public Administration, adopt behaviour characterised by fairness, loyalty, transparency and traceability. Employees, collaborators and any third party acting in the name and on behalf of the Company, in any capacity involved in the management of relations with the Public Administration, are required to comply with the existing legal provisions on the subject, the provisions contained in the Code of Ethics and in the Organisation, Management and Control Model pursuant to Italian Legislative Decree no. 231/2001 adopted by De Cecco.

De Cecco requires its stakeholders to strictly refrain from conduct likely to influence the good performance and impartiality of the Public Administration, especially if aimed at obtaining any undue advantage for themselves, for the Company to which they belong or for its Shareholders.

It is forbidden for anyone in any capacity representing the interests of the company to give, promise or offer money, any gift, gratuity or hospitality to public officials, employees of public institutions, for themselves or their relatives and family members.

It is strictly forbidden to unfairly obtain, to the detriment of the Italian Public Administration and/or the country in which the company operates, including the European Union, contributions, financing or disbursements of the same nature granted or disbursed on the basis of false or misleading documents or the omission of due information. Properly obtained contributions, grants or financing may not be used for purposes other than those for which they were granted.

7.5 Media Relations

Every communication activity respects the laws, rules, and practices of professional conduct, and is carried out with clarity, transparency and timeliness, taking care to guarantee the company's image and reputation.

Under no circumstances will the Company tolerate the dissemination of false or misleading news or comments.

8. *Contributions,* **SPONSORSHIPS** *and donations*

The Company may agree to requests for contributions and donations limited to proposals from organisations and associations that are declared non-profit and have regular articles of association and memoranda of association, that are of high cultural, moral, sporting or charitable value and that involve a significant number of citizens.

This form of solidarity can also take the form of donating products to deserving organisations and redistributing basic necessities.

Sponsorship activities, which may relate to social, environmental, sports, entertainment and art issues, are only intended for events that offer a guarantee of quality.

In any case, when choosing proposals to endorse, De Cecco pays particular attention to any possible conflict of interest of a personal or corporate nature.

9. *Free gifts* *and* SERVICES OFFERED *to and by individuals*

The offering of gifts or services free of charge by De Cecco's internal resources to private persons is permitted to the extent that it does not exceed the normal expressions of courtesy permitted by business practice or on the occasion of Christmas or Easter holidays.

In line with this principle, it is not permitted to request or accept, directly, indirectly or through an intermediary, money or gifts or favours of any kind, offered by third parties in a relationship of interest with the Company, except in the case of gifts or utilities of modest value², linked to business practices or the aforementioned recurring holidays.

Any form of gift or gratuity that exceeds this limit must be refused by the addressees, as it may potentially constitute a consideration for a service in some way connected to the employment relationship with De Cecco.

If it is de facto impossible to refuse or return the gift, the recipient thereof shall promptly inform his or her direct superior and the Supervisory Body referred to in para. 14 below.

10. *Health* *and* SAFETY

De Cecco's primary objective is to guarantee organisation and management of health and safety suitable for preventing all accidents and illnesses in compliance with the relevant regulations, developing risk awareness and promoting responsible behaviour by all personnel.

De Cecco also strives for the continuous improvement of the efficiency of company structures and processes that contribute to the continuity of prevention and protection services for workers, through:

- continuous analysis of risk, criticality of processes and resources to be protected;
- adoption of the best technologies aimed at preventing injuries and illnesses;
- the verification and updating of working methods;
- the contribution of training and communication interventions.

The Company also ensures that any assignment in the field of safety and hygiene at work, to third parties, be they external consultants or companies, is assigned exclusively on the basis of proven and adequate skills and experience in the field.

All workers are required to actively contribute to the maintenance of an optimal standard of health and safety by refraining from unlawful or otherwise dangerous behaviour and by reporting activities carried out to the detriment of company property or human resources.

² as a reference value: €50 (fifty Euros).

11. *Environmental* POLICY

De Cecco, aware of the strategic role of the environment as an instrument of corporate enhancement, promotes – **with dedication and seriousness** – the principle of sustainability, pursuing environmental protection in all corporate choices.

Environmental awareness is an early corporate sensitivity that goes back a long way, to the De Cecco Hydroelectric Power Stations (Fig. 5) commissioned during the first two decades of the 20th century and still in operation today and capable of satisfying, through self-production of clean renewable energy, 14% of the electricity needs of the current Fara San Martino production unit: a truly groundbreaking energy revolution applied to the economy of the time and to the De Cecco production model, from the use of energy obtained through the combustion of fossil fuels for commercial and production uses, to energy produced from renewable sources.

Since then, and with the latest tools and means, the company has continued to engage in programmes of continuous improvement of its work processes with the aim of preventing and minimising environmental risks, reducing atmospheric and electromagnetic emissions, containing waste in the electricity distribution network, minimising



Fig. 5 Current photo of the De Cecco hydroelectric power plant located in Fara San Martino (CH) at Viscardi



Fig. 6 Photovoltaic plant



Fig. 7 Fara San Martino Production Unit (CH)

the visual and acoustic impact caused by the company's plants, and optimising the capture, distribution and purification of water resources.

Furthermore, with a view to waste reduction and rational use of energy consumption, a virtuous paper, cardboard and plastic recycling system has been implemented and a photovoltaic system was installed on the roof of the C grain silo (Fig. 6) in the Fara San Martino production unit in 2022 (Fig. 7).

12. *Information* SYSTEMS

Every employee and agent, when using company equipment and computer systems, has a duty to adopt responsible behaviour in line with the principles set out in this Code.

Every employee and agent also has a duty to comply with the rules of conduct set out in the Company Policy for the correct use of company computer equipment, adopted by De Cecco, refraining from visiting websites with unseemly or offensive content, hacking into or damaging the computer systems of others.

De Cecco is committed to ensuring that the digital preservation and archiving of data and business documents takes account of digital obsolescence and strives to ensure that digitally archived material is not lost with the advent of new technologies that do not 'recognise' previous media.

13. *Accounting* *and* TAX COMPLIANCE

13.1 Financial statements

When preparing financial statements or other similar documents, the company ensures accounting transparency by guaranteeing the truth, accuracy and completeness of the basic information for the relevant accounting records.

Each employee is required to cooperate to ensure that management facts are correctly and promptly represented in the accounts.

Adequate supporting documentation of the activity performed is kept on file for each transaction, to enable the accurate reconstruction of the operation and also to reduce the likelihood of errors of interpretation.

13.2 Tax and fiscal obligations

De Cecco undertakes to fulfil, in a comprehensive and transparent manner, all tax and fiscal fulfilments foreseen for it by the regulations in force and to cooperate, where envisaged, with the financial administration.

Tax declarations and tax payments are not only mandatory by law, but also unavoidable in the context of the company's social responsibility.

Therefore, any criminal violation of tax and fiscal law is absolutely contrary to the company's interest.

14. *Supervisory* BODY

The Company, in accordance with Article 6(1)(b) of Italian Legislative Decree no. 231/2001, has established an internal body responsible for supervising the operation of and compliance with the Code of Ethics and the entire crime prevention system, entitled the Supervisory Board, whose characteristics are described in the Organisation, Management and Control Model. This Body is independent of the administrative body, distinct from all other corporate bodies and functions and endowed with autonomous powers of initiative and control, also for the purpose of implementing the Code of Ethics.

In the exercising of its functions, the Supervisory Board is assigned the following tasks:

- monitoring the application of and compliance with this Code and promoting the continuous improvement of ethics within De Cecco;
- providing support to the Addressees in the interpretation and implementation of the Code;
- setting up training programmes for the addressees aimed at improving their knowledge of the objectives and contents of the Code of Ethics and the consequences of any violations thereof;
- receiving and analysing reports of violations of the Code, promoting the most appropriate checks;
- ascertaining violations of the Code;
- proposing to the administrative body any amendments and additions to be made to the Code.

15. *Whistleblowing* POLICY

The Company, in compliance with the regulations in force, has adopted a whistleblowing system that guarantees employees, associates, managers, directors, auditors, customers, etc. the possibility of reporting unlawful conduct based on precise and consistent factual elements, or infringements of the organisation and management model adopted by the Company that may harm the organisation, users, shareholders or other stakeholders.

The system allows a report to be sent, also anonymously, to the Supervisory Body, which will assess its content and arrange for any necessary investigations.

In addition to the traditional channels of communication, the Company also makes a 'Whistleblowing Portal' available to all recipients. It can be accessed by Whistleblowers at the following dedicated web address

https://www.dececco.com/it_it/whistleblowing/

The Company ensures whistleblowers are protected from any act of retaliation or discrimination by protecting their personal identity.

16. *Violations* of the **CODE of ETHICS** *related to Italian Legislative* *Decree no. 231/2001*

The principles and rules of conduct set out in this Code constitute a basic reference framework to which the Addressees must adhere in their relations with their interlocutors (public and private) and their violation may be sanctioned on the basis of the disciplinary system suitable for sanctioning non-compliance with the measures indicated in the Model (including this Code of Ethics) pursuant to Article 7(4)(b) of Italian Legislative Decree 231/2001.

All Addressees, both internal and external to the Company, are required to report in writing any breach of the Code committed by other Addressees to the Supervisory Board, in accordance with the reporting procedures adopted by De Cecco. De Cecco ensures that whistleblowers are protected against any retaliation they may face. The Supervisory Board also guarantees the confidentiality of the whistleblower's identity, except where specifically required by law.

Reports that turn out to be manifestly unfounded and malicious are subject to the sanctions laid down in the disciplinary system adopted by the Company pursuant to Article 7(4)(b) of Italian Legislative Decree no. 231/2001.

The Company has set up dedicated communication channels through the 'Whistleblowing Portal', from which any reports can be submitted; in addition, you can always contact the Supervisory Board at the following e-mail address **organismodivigilanza@dececco.it**.

17. *Sanctions*

Violation of the principles contained in this Code, where also constituting a disciplinary offence, shall give rise to disciplinary proceedings, irrespective of any criminal proceedings in cases where the offending conduct also constitutes a criminal offence.

In the context of contracts for the supply of goods or services and professional collaboration, express termination clauses pursuant to Article 1456 of the Italian Civil Code shall be included with respect to conduct that is found to be contrary to the principles of this Code.

18. *Final referral* CLAUSE

This Code is implemented in coordination with the provisions of the Organisation, Management and Control Model, adopted by De Cecco for the purpose of preventing offences.

The Code automatically incorporates every company rule and directive, present and future, aimed at complying with the laws and regulations in force, with particular reference to the prevention and repression of corporate offences, constituting a valid legal safeguard for De Cecco's operations.

19. *Approval* *of the* CODE *of* ETHICS *and its amendments*

This Code of Ethics has been approved by the Board of Directors of F.lli De Cecco di Filippo Fara San Martino S.p.A. and circulated to all Group companies. As a result of this dissemination within the Group, the Code of Ethics applies to all subsidiaries. Any amendments and/or updates to the same shall be approved by the same body and communicated to the Addressees.

22 March 2024



The Chair of the Board of Directors
Cav. Filippo Antonio De Cecco

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