

Code of Ethics

January 26, 2022
Ed.00

ORGANISATION, MANAGEMENT AND CONTROL SYSTEM
Code of Ethics

Legislative Decree
231/2001

1. PREAMBLE.....	1
2. RECIPIENTS AND SCOPE OF APPLICATION.....	2
3. VALUES.....	2
3.3 INTEGRITY.....	3
3.4 FOCUS ON THE INDIVIDUAL.....	3
4. RULES OF CONDUCT.....	5
5. RELATIONSHIPS WITH THIRD PARTIES.....	9
6. METHOD SOF IMPLEMENTATION AND CONTROL.....	16
6.1 <i>REPORTS TO THE SB.....</i>	<i>17</i>
6.2 <i>DISSEMINATION OF THE CODE OF ETHICS.....</i>	<i>18</i>
6.3 <i>EFFECTIVENESS OF THE CODE OF ETHICS AND SANCTIONS.....</i>	<i>18</i>
6.4 <i>FINAL PROVISIONS.....</i>	<i>19</i>

1. Preamble

This Code of Ethics (hereinafter referred to as "Code") constitutes the set of principles of conduct that the Longino & Cardenal Group (hereinafter also referred to as "Group", "Longino & Cardenal" or "Company") considers essential to comply with in carrying out the activities required for the pursuit of its own purposes, both internally within the company structure and when dealing with external parties.

The set of ethical principles and values described in the Code shall drive the activities of all those working in and for the Company, taking into account the importance of their roles, the complexity of their functions and the responsibilities entrusted to them for the pursuit of the Company's aims.

The orientation to ethics is a fundamental approach for the reliability of the Company's behavior towards stakeholders and, more generally, towards the entire civil and economic context in which it operates. The adoption of some specific principles of conduct, to be observed when dealing with the Public Administration, with customers and with third parties, is an expression of the Company's commitment also towards the prevention of the crimes referred to in Legislative Decree 8 June 2001 n. 231 and subsequent amendments and additions.

For these reasons, it is paramount to clearly define the set of values that the Company acknowledges, accepts and shares. These needs are met by the drafting of this Code of Ethics, which constitutes a code of conduct whose observance by all company representatives is of fundamental importance for the proper operation, reliability and reputation of the Company. In line with the purpose of preventing the aforementioned offenses, Longino & Cardenal and, in particular, the Supervisory Body (hereinafter referred to as "SB") monitor compliance with the rules contained therein, providing adequate tools for training and information, ensuring constant effectiveness in controlling the methods of carrying out one's activities and intervening, when necessary, with corrective actions.

2. RECIPIENTS AND SCOPE OF APPLICATION

The Code of Ethics applies to all Group companies, in any country and at any level of the organization. In the event of a misalignment between the principles expressed in the Code of Ethics and local regulations, the most restrictive provisions are applied, whether they are those expressed in the Code of Ethics or provided for by Law.

Employees, Executives, Directors and Members of the Board of Statutory Auditors are the main recipients of this Code of Ethics. Therefore, they must strictly adhere to the principles and standards of conduct indicated therein, inspiring the daily corporate conduct. The principles expressed in the Code of Ethics form the common value base of the People of Longino & Cardenal and represent the minimum binding values that must guide everyone's behavior.

The Code of Ethics is an integral part of the employment relationship, therefore, compliance with the rules of the Code must be considered an essential part of the obligations of the Employees of Longino & Cardenal, and it constitutes an essential prerequisite for establishing and / or continuing the professional and collaborative relationship.

Under no circumstances, the assumption of acting for the benefit of the Group can justify a conduct contrary to the laws in force and the rules of this Code, which is actually designed as an instrument of guarantee and reliability, to protect the assets and reputation of the Company.

Furthermore, all those who, for various reasons (eg Partners, Suppliers, Customers, Service Providers, Consultants, External Collaborators, etc ...), directly or indirectly, permanently or temporarily, work for the Company, are required to comply with the regulations of this Code of Ethics that apply to them.

3. VALUES

3.1 General Principles

The Company adopts as essential principles

- **Excellence,**
- **Integrity,**
- **Focus on the individual**

and, in general, full compliance with the laws and regulations in force in the area in which it operates. Consequently, each recipient of the Code must undertake to respect these elements.

3.2 Excellence

Longino & Cardenal boasts a leadership position in the sale of high quality food products achieved through a scouting activity aimed at excellence.

The same value of excellence must drive the daily actions of people both inside and outside the Company, in dealing with colleagues and in external relations with third parties.

The Group believes in the strength of collaboration between People in the belief that only by combining the personal talents of the resources involved the outcome will be excellent.

To this end, it is essential that everyone strives to create a serene work environment, where respect for the dignity and reputation of the individual is essential, creating the perfect environment that allows everyone to express their professional skills.

The same working approach will have to be adopted in relationships with Customers, Suppliers and third parties. It is by showing them our reliability that we will strengthen their trust and build an effective and productive relationship.

3.3 Integrity

The principles of moral integrity, honesty and transparency must always drive the work carried out daily by the individual, who is required to act by expressing a professional ethics based on respect for company rules and values.

The pursuit of the Company's interest can never justify conduct contrary to the principles of correctness, honesty, loyalty and mutual respect: said conduct will therefore always be condemned by Longino & Cardenal, whatever the positive outcome obtained.

The Company, in line with the values of honesty and transparency, undertakes to implement all the measures necessary to prevent and avoid corruption and conflict of interest, that is the condition where the representatives of customers, suppliers or public institutions act contrary to the fiduciary duties linked to their position.

The Company recognizes that competition is a fundamental element for development, therefore, it guarantees compliance with the regulatory rules of the market, avoiding unfair practices that distort

regular commercial competition or damage the intellectual property rights of third parties.

3.4 Focus on the individual

Longino & Cardenal is committed to taking care of its resources, promoting their professional development, creating initiatives to increase their skills and expertise.

All Employees must be given equal opportunities for training and professional growth, in line with objective merit criteria and the results achieved. Each recipient is required to foster respect for the work of others, through collaboration and inclusion. The evaluation of individual performance takes into account not only the goal achieved, but also the ways it was achieved, rewarding integrity, passion, proactive attitude and innovative ideas.

Working at Longino & Cardenal is meant as an opportunity that allows you to fulfill your professional needs and aspirations. It is up to the organization to guarantee an engaging, motivating work environment characterized by a spirit of sharing and collaboration where each Collaborator can fully express their talent and skills.

Longino & Cardenal welcomes and respects diversity by ensuring the same opportunities for employment and professional growth for all, removing any possibility of direct or indirect discrimination due to individual characteristics, such as gender, different ability, age, marital status, ethnic or social origin, faith, sexual or political orientation.

The health and safety of Employees and Collaborators are fundamental values that inspire the choices and decisions of the Company. Safe and healthy working conditions are guaranteed to employees and collaborators also through information, continuous training and the direct responsibility of everyone in the application of safety procedures and vigilant preventive action.

Sustainable development: the importance of harmonizing economic growth, social inclusion and environmental protection.

Longino & Cardenal is interested in the action program signed in September 2015 by the UN member countries in which 17 Sustainable Development Goals have been drawn up; the Company believes it is of paramount importance to implement business processes that aim at a development that satisfies the needs of the present without compromising the ability of future generations to satisfy their own needs. The Group is therefore aware of the importance of harmonizing economic growth, social inclusion and environmental protection.

The value of excellence towards which Longino & Cardenal strives, as well as the quality of the product, a fundamental requirement of what is intended for sale, are goals that can also be reached by taking care of the environmental and social contexts in which the Company operates and to the attention paid towards these themes by the Supplier chosen by Longino & Cardenal.

In selecting its Supplier, Longino & Cardenal adopts ethical-environmental criteria, also requesting specific social / environmental certifications, if any, an element of extreme importance and often decisive in the choice of the Supplier.

The Group is strongly committed to spread key messages concerning the environmental protection, to strengthen the support of the whole company to a culture of sustainability.

In fact, Employees and Collaborators are required to contribute to reducing the environmental impact of the entire organization, starting with small daily actions, including but not limited to: separate waste collection with the specific signs inside the Company; energy consumption reduction policies (the workers

present in the Company are required to turn off the lighting in each office and the electrical equipment at the end of the work session); the use of electrically powered forklifts.

Longino & Cardenal is attentive to the social problems present in its operating context; to this end, it has ongoing contacts with the non-profit organization Nonsolopane based in Varese, where all the goods close to their expiry are sent, thus avoiding their destruction and therefore the waste of resources that are still of excellent quality. In particular, such goods are sent or collected directly from the Company by the non-profit organization and distributed costless to charitable organizations and affiliated families who can benefit from them for daily consumption free of charge. It is outlined that the Company shows a strong interest in the activity carried out by the Silvabella Social Cooperative, which founded the "Il Pezzettino" communities for minors in Milan, also active in Varese. The Company always makes sure to contribute with a substantial amount of food to this organization in order to keep the Community projects running.

Longino & Cardenal actively participates in the life of the communities where it operates, it undertakes to promote activities that are in line with the Group's mission or in any case with the principles of its Code of Ethics, thus choosing to be involved in sponsorship and partnership initiatives.

To implement these principles, the Company supported "abc la sapienza in tavola", a non-profit social cooperative of cooks, waiters and members inside and outside the Bollate prison house, organizing fundraising events at the restaurant InGalera, the first and only restaurant in Italy located inside a prison and open to the public, allocating to them all their revenue. The proximity of Longino & Cardenal to the Cooperative's projects is still alive today, and the Group has actively been involved in implementing the project of social and occupational reintegration of the participants.

4. RULES OF CONDUCT

4.1 GUIDELINES

Fight against corruption and conflicts of interest

The Company, in line with the values of honesty and transparency, undertakes to implement any measure necessary to prevent and avoid phenomena of corruption and conflicts of interest. It is therefore not permitted to offer or simply promise to a Public Official or a Public Service Representative money or other benefits to induce them to perform an act aimed at procuring direct or indirect benefits to the Company, nor to offer money, benefits or other to private subjects employed by other companies to induce them to harm the interests or to cause any damage to the company they work for.

Furthermore, it is forbidden to pay or accept any sum of money, to carry any other act of corruption or to make or accept gifts or favors to or from third parties aimed at procuring direct or indirect advantages to the Company.

With regard to the onset of possible conflicts of interest, Directors and Managers are required to avoid any situation in which conflicts of interest may arise and to refrain from personally taking advantage of business opportunities they become aware of while performing their duties. In the event that even the appearance of a conflict of interest arises, the Director or the Manager is required to notify the Supervisory Body in accordance with paragraph 5.1 "Information to the Supervisory Body" and with paragraph 4.4.1 of the Organization and Management Model (OMM).

Competition:

The Company recognizes that competition is a key element for development. The Company therefore guarantees compliance with the regulatory rules of the market, avoiding unfair practices that distort regular commercial competition or damage the intellectual property rights of third parties.

It is forbidden to enter into any agreement, even of an informal nature, or to take part in commercial practices which, in any way, are aimed at undermining the principle of free market competition and which are, therefore, in violation of national and European competition law. The Company does not deny, hide or delay any information requested by the antitrust authorities and other regulatory bodies in their inspection functions, and it actively collaborates in the course of the preliminary procedures.

Environment, Health and Safety

Longino & Cardenal ensures that all the security measures required by technological evolution are adopted and makes every effort to ensure the physical integrity and moral personality of the providers. Furthermore, in addition to the law requirements, the Company establishes rules and procedures to safeguard the safety and health of the workplace, in order to minimize the risk of accidents. Safe and healthy working conditions are guaranteed also through information, continuous training and the direct responsibility of everyone in the application of safety procedures and vigilant preventive action.

The management structure at each level, each according to their own skills, is in charge of applying all company procedures and monitor their correct implementation.

Staff and Collaborators are forbidden to:

- possess, consume, offer or sell drugs, alcohol or substances having a similar effect, while at work or in the workplace;
- consume drugs before starting work and during daily work.

Longino & Cardenal shows an outstanding attention to the sustainability in the choice of its products for sale, it complies with the law requirements on environmental protection, adopting all the necessary measures, either with reference to the verification of the origin of the products purchased, in particular regarding the due diligence on protected species subject to traceability, or to the management of waste and its environmental footprint.

During the scouting activities, careful checks are carried out on the production methods implemented by different suppliers, since the outstanding quality of products required by LONGINO & CARDENAL spa can only be achieved through the commitment of the supplier towards environmental issues along the entire production chain, therefore, only breeding practices which respect the animals are allowed and production techniques with minimal environmental impact are chosen.

Confidentiality

Longino & Cardenal guarantees the confidentiality of the information and personal data being processed and the protection of the information acquired in relation to the work performed, complying with:

- the provisions on confidentiality in the processing of personal data pursuant to Reg. EU 679/16, of Legislative Decree n. 196/03 and Legislative Decree 101/18 - **Longino & Cardenal REGULATION ON THE PROCESSING OF PERSONAL DATA;**
- the requirements regarding compliance with the provisions of the Law and Regulations in force aimed at ensuring the enforcement of the utmost confidentiality of Privileged Information - **PROCEDURE FOR THE MANAGEMENT, PROCESSING AND DISCLOSURE OF Longino & Cardenal PRIVILEGED INFORMATION.**

Longino & Cardenal undertakes to maintain totally confidential any privileged information on its Customers, both in terms of strategic information and personal data.

The main rules of conduct are listed below, divided by reference counterpart and relative area of business management.

4.2 SENIOR MANAGEMENT

Anyone within the Group holding a top position must:

- set an example and foster a positive environment among employees, promoting a constructive exchange of ideas; Senior management is responsible for embodying the values of this Code of Ethics, encouraging, with their behavior, the awareness that acting according to the principles of the Code of Ethics is an essential element of the Longino world.
- comply with the confidentiality obligations and non-competition agreements, carrying out their duties with full loyalty to Longino;
- operate with complete transparency in order to allow the traceability of all the transactions carried out.

4.3 EMPLOYEES

Longino & Cardenal protects and promotes the value of Human Resources, an essential element for the existence and development of the company, in order to increase the set of skills of each employee and to promote respect for the physical, moral and cultural integrity of the person.

To this end, the Company undertakes:

- to adopt a personal performance evaluation system based on objective evaluation criteria, disclosed and discussed with each collaborator when defining the annual objectives, where applicable;
- to actively involve their collaborators in the company project, including decision-making, in order to allow them to express their personal skills and to achieve their professional fulfillment;
- to avoid any discomfort to employees in their work environment, preventing abusive, defamatory, discriminatory attitudes, promoting - also through top management, a policy of inclusion and integration between Employees;
- to protect the moral integrity of its staff, guaranteeing the right to working conditions that respect the dignity and the potential of the person;
- to guarantee working conditions that respect individual dignity and safe working environments.

In full compliance with the Laws and Regulations in force, Longino & Cardenal prohibits any form of psychological, physical or sexual harassment against Managers, Employees, Collaborators, Suppliers, Customers or Visitors. By “harassment” we indicate any form of intimidation or threat preventing the peaceful performance of anyone’s job, or the abuse by any supervisor in charge.

Any act of retaliation against employees who have refused, complained of or reported such behavior is prohibited.

4.4 DUTIES OF STAFF

Diligence and good faith

Each Employee of the Company must act loyally and in good faith, respecting the obligations of the employment contract, ensuring the required performance and bringing their own personal contribution with ideas, proactivity and enthusiasm, fundamental and necessary elements for the sustainable development of Longino & Cardenal . They must also know and observe the ethical rules contained in this Code, basing their conduct on mutual respect and cooperation.

All Employees are required to use company resources and brands - or belonging to it - within the limits allowed by their duties, avoiding any abuse, neither for extraneous purposes, nor outside working hours; finally, they are required to comply with all the requirements of their Collective Agreement, as well as with the Regulations on Safety at Work.

Protecting the company's assets

Each company employee must diligently and respectfully use the company assets made available as work tools in order to perform their duties in the best possible way. In particular, each collaborator shall: • use with care the assets entrusted to them; • avoid improper use of company assets that may cause inefficiency or damage to the company's interest.

The software and databases protected by copyright and used by staff in carrying out their job cannot be reproduced or duplicated, neither for business purposes nor for personal use. It is forbidden to install and / or use unauthorized software or databases on the company's computers.

the documents relating to the Group's activities, the work tools and any other property, tangible or intangible, owned by the Group itself must be used exclusively for corporate purposes, they cannot be transferred or made available, even temporarily, to third parties.

Use of IT systems and privacy protection

It is expressly forbidden to use any company IT systems that could represent a violation of the laws in force, or that could lead to undue intrusions or damage to the IT systems of third parties. Each employee must therefore bear in mind that:

- the use of telephone, e-mail and Internet at the Company must take place for legitimate professional purposes
- all information entered into the computer system belongs to the Company
- it is forbidden to tamper with the computer or telematic system, altering its data, information or programs.

In general, all staff members are required to be familiar with and comply with the rules of conduct set out in the **Personal Data Processing Regulations** and the **Information Systems Regulations** in force with regard to the correct processing of personal data and the use of corporate processing and communication tools.

Anti-money laundering

L&C spa undertakes to prevent the use of its economic-financial system for money laundering purposes, respecting all national and international rules and provisions on the matter; the Group also performs the due diligence on all third parties in order to ascertain their respectability and legitimacy before establishing any business relationship. The Longino&Cardenal Group also expressly refuses to establish

relationships of any kind with partners believed of being involved in criminal activities of any kind, with particular reference to money laundering.

L&C spa employees are required to:

- make payments for the goods and services provided to the Company only to the partner involved and through the methods of money transfer specifically approved and documented by internal procedures;
- not to make payments to persons or entities in countries other than their country of residence or work or where the goods or services have been delivered;
- not to ship goods to customers in any way inconsistent with standard procedures.

Donations, gifts and promotions of initiatives

In relations with Customers, Suppliers and third parties in general, it is forbidden to offer/accept money, gifts or benefits, including in a personal capacity, in order to obtain undue advantages of any kind. All acts aimed at corrupt practices of any kind against third parties, both private and public, are expressly prohibited, as they are absolutely contrary to the Group's policies. The use of the corporate credit card must be limited to expenses incurred on behalf of or in the interest of the Group.

Supervising staff's obligations

In addition to the obligations of the staff members referred to in the previous paragraph, supervising managers must avoid any abuse of position. In particular, senior and supervising managers must:

- be impartial and not indulge in lenient treatment;
- take decisions with the utmost transparency and be able to explain them at all times;
- reject undue pressure;
- not create, or contribute to create, situations of privilege;
- not unduly use their decision-making and management power in order to achieve benefits for themselves or for others.

5. RELATIONSHIPS WITH THIRD PARTIES

5.1 RELATIONS WITH THE PUBLIC ADMINISTRATION

Public Administration means all the subjects, private and public, performing a "*public function*" or a "*public service*". By "Public function" we mean the activities, governed by the rules of public law, relating to legislative, administrative and judicial roles.

By "public service" we mean the activities of production of goods and services of general interest and subject to the supervision of a Public Authority, in addition to activities aimed at guaranteeing the right of everyone to life, health, freedom of communication, even by way of concession and/or agreement, or in any case the activities subject to the rules of the public function, even without its ordinary powers.

Relations with the Public Administration (e.g.: Supervisory Authorities, Local, institutional or public bodies) must be inspired by the strictest compliance with the provisions of the Law and the applicable

Regulations, as well as the general principles of fairness and loyalty and company procedures.

Legal and fair relationship with the Public Administration

Longino & Cardenal inspires and adapts its conduct to respect the fairness and the good performance of the Public Administration.

Conflicts of Interest

Longino & Cardenal cannot be represented in dealing with the Public Administration by third parties or internal staff when an actual or potential conflict of interest arises. Third parties or internal staff operating on behalf of the Company are required to refrain from having relations with the Public Administration whenever it is strongly advisable not to. In the event of a conflict of interest, even if only potential, it is mandatory to promptly inform your supervisor and the SB.

Gifts and Benefits

Longino & Cardenal doesn't allow promising or offering, directly or indirectly, money or other benefits to Representatives of the Public Administration or their relatives or similar, in order to obtain an actual or even potential interest or benefit for the Company. The aforementioned behaviors are considered acts of corruption, whether held by the Corporate Bodies or by the Employees, or if carried out through persons acting on behalf of Longino & Cardenal, such as, for example, Consultants or Collaborators or third parties linked to Longino & Cardenal by similar or equivalent relationships.

Contributions, grants, permits

The Company condemns any conduct aimed at obtaining, from a Supervisory Authority or other Public Body, any kind of contribution, financing or other disbursement, permission or authorization to carry out its business (e.g.: SCIA - certified notice of commencement of business) by means of altered or falsified declarations and/or documents, or by means of omitted information or, more generally, by means of artifices or deceptions, including those made with a computer or information system, aimed at misleading the issuing Entity/Entity in charge of the authorization. It is also forbidden to distract or allocate with timing and/or for purposes other than those for which they were granted, contributions, grants or funding obtained from the Supervisory Authority or other Public Body (e.g.: training contributions, contributions for extraordinary transactions, etc.), even if of modest value and/or amount.

5.2 RELATIONS WITH SUPPLIERS AND CONTRACTORS

The selection of Suppliers and the formulation of the conditions of purchase of goods and services must be lead by criteria of competition, objectivity, fairness, impartiality, fairness in price and quality of goods and/or services. The Suppliers of L&C spa, also operating abroad, adopt operational solutions in line with the regulations in force in their respective countries, identify themselves in the values listed in the Code of Ethics of the Company and ensure that these principles are applied. In particular, they show respect for the principles of protection of the health and safety of workers and of the environment and protection of species, and of the Person, rejecting any discrimination in the workplace and refusing to employ child labor.

Longino&Cardenal spa expects its Suppliers to behave correctly, in compliance with the provisions of the

Law, with particular attention to compliance with:

- regulations concerning food safety and traceability systems;
- the requirements regarding the regularity of contributions of the personnel employed in the activities carried out for Longino & Cardenal and at its headquarters (e.g. cooperatives);

Personnel in contact with Suppliers must:

- scrupulously comply with internal procedures relating to the selection and management of relationships with suppliers, obtaining their collaboration in ensuring the satisfaction of requirements in terms of quality, safety and delivery times of goods or services;
- observe the principles of transparency and completeness of information in correspondence with suppliers;
- avoid being subject to any form of influence from third parties outside the Company when making decisions and/or carrying out actions regarding their work.

Longino & Cardenal will not initiate forms of collaboration with suppliers that are not willing to accept these conditions and it will reserve the right to terminate the supply relationship in the event that the Supplier, in carrying out activities in the name and/or on behalf of L&C spa, violates the law and the provisions of this Code of Ethics.

Confidentiality

Longino & Cardenal undertakes to maintain total confidentiality on information concerning its Suppliers and to use the aforementioned information only for strictly professional reasons, as also indicated in the company Privacy Policy, accessible on the Company website. Furthermore, suppliers are also required to ensure confidentiality with regard to information, documents and personal data relating to Longino & Cardenal and its Collaborators. In the event that the Supplier is also an External Data Processor, pursuant to Reg. EU 679/16, the related responsibilities are defined by contract.

Gifts and Benefits

Longino & Cardenal prohibits the receipt/offering of gifts and/or benefits (money, objects, services, favors or other benefits) by potential or actual Suppliers, whenever they represent an unlawful conduct or, in any case, every time they can be interpreted by an impartial observer as aimed at achieving an advantage, even if not of economic nature, except when these gifts are traditionally offered to everyone having the same relationship with that Customer or Supplier. The compensation to be paid to suppliers must be exclusively related to the performance indicated in the contract and payments may not be made to a subject other than the contractual party, nor in a different country. Except as mentioned above, in the event that an Employee receives money or a gift, he/she is required to promptly inform his/her superior and the SB.

4.3 RELATIONS WITH CUSTOMERS

In relations with current or potential customers it is mandatory to strictly observe internal procedures.

The Customer must be adequately informed about the products and services offered and must be allowed to make informed choices based on real and verifiable data.

Any form of misleading or deceptive advertising of the products and services provided by the Company, of information aimed at preventing an evaluation based on objective and open data, in an attempt to be able to win orders/contracts (through untrue information or the structuring of offers that cannot subsequently be fully complied with) is prohibited toward all Customers.

In the drafting and management of advertising documentation (website, brochures, catalogs, etc.) the information regarding the products marketed must be true and correct; Suppliers must adopt all the necessary verification and validation measures.

Correct negotiations and contractual fairness

Longino & Cardenal sets up contractual relationships with its Customers in a fair and transparent way, trying to predict the circumstances that could significantly affect the relationship established. Even where unforeseen events or situations occur, Longino & Cardenal and its collaborators systematically undertake to comply with the expectations of the Customer, respecting the commitments made with fairness and correctness; and therefore ensuring compliance with all the obligations and services provided. Any complaints must be promptly reported to the competent structures and consequently managed for the adoption of the necessary corrective actions, in particular if product recalls must be implemented, as required by the application procedures of the HACCP Self-Control Plan. It is forbidden to modify the contractual conditions or the methods of providing the service in an arbitrary manner and without prior written authorization from the business unit in charge, according to company procedures.

Confidentiality

Longino & Cardenal undertakes to maintain totally confidential any privileged information on its Customers, both in terms of strategic information of the customer company and personal data. In addition, the Company ensures the use of the aforementioned information only for strictly professional reasons, as also indicated in the Company's Privacy Policy, published on the company website. Suppliers are also required to ensure confidentiality with regard to information, documents and personal data relating to Longino & Cardenal and its Staff.

Gifts and Benefits

It is absolutely forbidden to offer/receive, directly or indirectly, to/from customers gifts and/or benefits (money, objects, services, favors or other benefits) that can be interpreted by an impartial observer as aimed at achieving an interest or advantage (eg: award of tenders, contracts, etc...), even if not of economic nature. Acts of commercial courtesy, such as gifts or forms of hospitality, are only permitted if and within the limits defined by company protocols, where applicable.

Conflicts of Interest

Third parties or internal staff operating on behalf of the Company in commercial transactions with Customers where an actual or potential conflict of interest may arise must promptly inform their superior and the SB.

5.4 RELATIONS WITH PARTNER AND OTHER THIRD PARTIES

Longino & Cardenal develops partnership relationships with parties of established reputation and experience, setting up such relationships in compliance with current regulations and the principles of this Code.

Transparency of agreements

Longino & Cardenal promotes transparent and collaborative agreements with partners, enhancing synergies and committing not to exploit situations of dependence or weakness of the partner, expecting the same behavior in return.

Confidentiality

Longino & Cardenal undertakes to maintain totally confidential any privileged information on its partners, both in terms of strategic information and personal data. In addition, the Company ensures the use of the aforementioned information only for strictly professional reasons and, in any case, after written authorization. Partners are also required to ensure confidentiality with regard to information, documents and personal data relating to Longino & Cardenal and its Staff.

Relationships with External collaborators and consultants

The Collaborators in any capacity and the Company's Consultants are required, while implementing the contractual relationships established and the assignments received, to behave with fairness, good faith and loyalty, respecting, to any extent applicable, the provisions of this Code, the company policies and the instructions and prescriptions issued by the Company's Personnel.

The Company requires, in each individual agreement with collaborators and consultants, the observance, of the relevant articles of this Code, ensuring its release to them.

Any behavior contrary to the principles stated herein may be considered by the Company as a serious infringement of the duties of correctness and good faith in the execution of a contract, undermining the relationship of trust and giving rise to the termination of the contract/partnership. The contractual parties must sign declarations of knowledge of the principles of this Code, undertaking not to engage in any conduct that in any way induces the Company or its Managers, Employees or Collaborators to violate its principles.

Relationships with media

The Staff does not have relations with the press or other media relating to the Company's activity, unless such activity is carried out by the Chairman of the Board of Directors or has been expressly authorized according to the internal procedures in force.

Information relating to Longino & Cardenal and directed to the mass media may be disclosed only by the company appointed person (Chairman of the Board), or with their authorization. The external communication of data or information must be truthful and transparent. The Collaborators will refrain from behaviors and statements that may in any way damage the image of Longino & Cardenal.

Ethics in business management

Longino & Cardenal is committed to maintaining a formalized organizational system, with a clear indication of the attribution of responsibilities, lines of hierarchical dependence and the definition of roles. All operations of Longino & Cardenal must be verifiable in their decision-making, authorization and performance process.

The Company establishes clearly and in advance the authorizing and signing powers, in line with the organizational and management responsibilities.

Each direct or indirect Collaborator must be informed of their tasks and, in carrying out the tasks assigned, must comply with the rules established by internal procedures. Should compliance with these rules be prevented, the collaborator must promptly inform his/her supervisor and, if this is not possible for any reason, the SB.

Transparency and correctness of information

Longino & Cardenal condemns any behavior aimed at altering the correctness and truthfulness of the data and information contained in the financial statements, reports or other corporate communications provided for by law and directed to the Shareholders and the auditing Company. The units and persons in charge of entertaining relations with the independent auditors are required to promptly report any falsehoods, errors or omissions to their hierarchical superior in the reports drawn up by the Auditors in the performance of their activities.

Transparency of operations and transactions

Every operation and/or transaction, understood in the widest sense of the term, must be legitimate, authorized, congruent, documented, registered and verifiable at all times, in compliance with company procedures. In addition, it must always be possible to carry out checks on the characteristics of the operations carried out, on their reasons, their authorizations, their execution.

Share Capital Transactions

The recipients of this Code of Ethics and, in particular, the Directors are prohibited from:

- returning, also by means of simulated acts, the contributions to the shareholders or exempt them from their obligation, except in cases of legitimate reduction of the share capital;
- allocating profits or advances on profits not actually achieved, or destined by law to a reserve and allocating reserves, also not constituted with profits, which cannot by law be distributed;
- purchasing or subscribing shares or stocks that cause an injury to the integrity of the share capital or to non-distributable reserves except where permitted by law;
- forming or fictitiously increasing the capital of the Company, by assigning shares or quotas for an amount lower than their nominal value, mutual subscription of shares or quotas, significant overvaluation of the contributions of assets in kind or receivables or the assets of the Company if a transformation is involved.

5.5 RELATIONS WITH COMPETITORS

Those acting on behalf of Longino & Cardenal are required:

- not to make use of names or distinctive signs that are likely to cause confusion with the activity carried out by other companies operating in the same field of operation;
- not to perform any type of act likely to create confusion with the activity carried out by other businesses;
- not to disseminate information or appreciation on the activity of other competitors causing the discredit of Longino & Cardenal;

- not to make direct and/or indirect use of any other means not complying with the principles of professional fairness and likely to harm the business of other competitors;
- to adopt a commercial policy aimed at ensuring competitiveness on the market, operating in compliance with applicable competition laws and regulations and prohibiting the adoption of unfair competition methods or any proposals involving forms of fraudulent cooperation with competitors;
- to prohibit the Personnel, in contacts with competing companies, from discussing issues such as prices or other conditions and terms of offer of the Company, costs, commercial policies or other proprietary or confidential information whose communication is not strictly relevant and necessary for the specific negotiation;
- to raise awareness among employees so that they absolutely avoid, in violation of a specific rule of law, entering into agreements with competing companies with the object or effect of setting prices.

5.6 RELATIONS WITH SHAREHOLDERS AND CORPORATE BODIES

The internal structure of the company and the relationships with the parties involved in the different activities are structured in order to guarantee the reliability of management and a correct balance between the powers of management and the interests of shareholders. Longino & Cardenal is committed to promoting and maintaining an adequate internal control system, and all Employees, within the scope of their roles and activities, are responsible for the implementation, effectiveness, proper functioning of the internal control system, as well as not to hinder the control activity

Longino & Cardenal is committed to ensuring the transparency of accounting records. Each member of the corporate bodies, management or employee is required to collaborate, within the sphere of his / her own competences, so that the management facts are correctly and promptly represented in the accounting records. Each record must reflect exactly what is shown in the supporting documentation. People of Longino who become aware of omissions, falsifications or neglect in the accounting records or in the documents on which the accounting records are based are required to report to their superior or to the Supervisory Body using form 231/2001.

The activity of the Corporate Bodies is based on full compliance with current national, Community and international laws and the provisions of the By-laws.

Members of the Board of Directors and the Board of Statutory Auditors are required:

- to constantly participate in the work of the corporate bodies, making their specific skills available for the benefit of the Company, always giving priority to the interest of the corporate mission over the particular interests of the individual shareholders;
- not to entertain, outside the Corporate Bodies, direct relations with the company's organizational units about the business, initiatives and requests still to be defined and about company facts in general;
- promptly declare situations, even potential, of conflict of interest.

The relations between Longino & Cardenal and the Board of Statutory Auditors are based on criteria of transparency and fairness. In particular, the subjects indicated to maintain relations with the Accounting Control Bodies must not:

- provide false statements;
- hide Information on the Statement of Assets and Liabilities of the Company;
- hinder their activities in any way.

Only the specifically authorized subjects have the right to maintain relations with Shareholders on behalf of the Group.

L&C spa guarantees a constant dialog with the financial community in compliance with current legislation on corporate information. The information is in fact communicated with promptness, correctness, transparency and accuracy and made available in the Investors Relations section of the Group's website www.longinogroup.it. In order to ensure maximum transparency, procedures of Internal Dealing, management, processing and communication of insider information have been adopted.

6. METHOD SOF IMPLEMENTATION AND CONTROL

All those who collaborate with Longino & Cardenal, without distinction or exception, in Italy or abroad, are committed to enforcing the principles of this Code. In no way, acting in the interest or benefit of the Company may justify the adoption of conduct, even carried out with omissions and in possible competition with others, in contrast with the legislation and with these principles. In particular, all employees are required to ensure that the rules of conduct referred to in this Code are properly applied, both within the Company and, in general, by all its partners. Corporate Bodies and Managers also have the duty to provide the first example of consistency between the principles of the Code and daily conduct. The Body responsible for supervising the application of the Code is the Supervisory Body (hereinafter also referred to as SB), created in accordance with the Organizational, Management and Control Model for the prevention of crimes pursuant to Legislative Decree 231/2001 and related standards, which is appropriately coordinated with the bodies and functions responsible for the correct implementation and adequate control of the Principles of the Code of Ethics.

6.1 REPORTS TO THE SB

All employees of the Company, internal or external, are required to report any violation, or suspected violation, of the Code of Ethics to the SB of the Company, which provides an analysis of the report, possibly interviewing the author and the person responsible for this alleged violation. In addition, the same Collaborators, in case of doubt about the lawfulness of a specific behavior, its ethical disregard or the violation of the Code, may contact the SB to obtain the necessary clarifications. The SB is actually responsible, among others, for:

- periodically verifying the implementation and compliance with the Code;
- verifying the content of the Code, in order to report the need for adaptations to the evolution of the Laws and to promote their dissemination;
- suggesting to the Board of Directors amendments and additions to the Code;
- receiving reports of violations of the Code and investigating them;
- reporting to the persons in charge about the outcome of the verification activities carried out in response to reports received.

All the Company's Employees and Collaborators are required to collaborate with the SB, possibly

providing the company documentation necessary to carry out its activities. The correct fulfillment of the information obligation by the employee cannot give rise to the application of disciplinary sanctions. In order to allow timely compliance with the provisions of this paragraph, the appropriate email box **odv@longino.it** dedicated to communication with the Supervisory Body by all the recipients of the Model about detailed reports of unlawful conduct and/or any violations that may be detected or to verify the lawfulness of any doubtful conduct with respect to the principles expressed by this Form is created. Reports may also be made by ordinary mail to the headquarters of the Company for the attention of the Supervisory Body: Via Ambrogio Moroni 8, 20100 Pogliano Milanese (MI).

For all purposes, the Supervisory Body will also be required to evaluate reports received anonymously. Reports of any violations by the Supervisory Body may be addressed to the Board of Directors so that it delegates one of its members to carry out the investigations deemed necessary and/or appropriate.

Also due to the introduction of the so-called whistleblowing within the framework of the Decree (*Law 30 November 2017, no. 179, containing "Provisions for the protection of the authors of reports of crimes or irregularities of which they have become aware in the context of a public or private employment relationship"*), the Company guarantees that:

- 1) on the reports received, the strictest confidentiality is maintained;
- 2) confidentiality is always maintained regarding the identity of the persons who give information to the Body that is helpful in identifying conduct contrary to the prescriptions indicated in the Model, to the procedures adopted to implement it and to the procedures set up by the internal control system, without prejudice to any obligations arising at law and to the protection of the Company's rights or persons wrongly accused and/or in bad faith.
- 3) the whistleblower is protected from any act of retaliation or discrimination for reasons related to the reporting;
- 4) appropriate sanctions are applied against those who violate the aforementioned measures to protect the whistleblower and/or those who submit blatantly unfounded reports.
- 5) all information, notifications, reports, and statements foreseen by the Model are kept on record by the Supervisory Body in a special archive (computerized or on paper) for a period of at least 5 years .

6.2 DISSEMINATION OF THE CODE OF ETHICS

Longino & Cardenal proceeds with the dissemination of the Code and its updates to the recipients, in the manner deemed most appropriate from time to time, such as, for example:

- Forwarding by e-mail and/or fax and/or mail and/or delivery by hand to the Members of the Corporate Bodies, employees and collaborators on an ongoing basis (with a statement of the Code being binding on all employees) and providing, if deemed appropriate, the signing of a document stating their receipt, acknowledgment and acceptance (eg: at the time of hiring, etc...);
- Publication on the Company website;
- Availability on the Company server;
- Posting on the company bulletin board;
- Notice to Occasional Collaborators and Suppliers of the existence and contents of the Code; drafting, on the agreements signed, of a clause aimed at notifying to third parties that they must agree to comply with the Code;

- Set up of a training/information plan, tailored on different company roles, aimed at disseminating the principles and ethical rules on which the entire activity of the Company is based.

6.3 EFFECTIVENESS OF THE CODE OF ETHICS AND SANCTIONS

Compliance with the rules of this Code must be considered an integral and essential part of the obligations incumbent on collaborators by virtue of the existing employment and contractual relationship. Violation of the principles referred to in this Code and the rules referred to in OMM231, entail the application of the disciplinary system.

Once the Supervisory Board has been informed of a misconduct (through notification of the Recipients or of their own motion), it assesses if this can be considered manifestly groundless through appropriate investigations, in compliance with current legislation on labor and trade union law, privacy and human rights.

Having ascertained that the information is not manifestly groundless, the SB has the duty to report the violation in writing to the competent company departments, which will punish the censored behavior in accordance with current legislation, regulations and national collective labor agreements.

The SB also has the duty to monitor the proper and timely issuing of the disciplinary sanctions provided for infringers.

The detailed regulation of the disciplinary process is indicated in a specific section of the OMM231, of which this Code is an integral part.

In any case, the infringement of the principles stated in this Code, in OMM231 and in the procedures provided for by the internal protocols, undermines the fiduciary relationship between Longino & Cardenal and its Directors, Employees, Consultants, Collaborators, Customers, Suppliers, Commercial and Financial Partners, possibly triggering the termination of the relationships.

Such violations, if they constitute a civil or criminal offense, will therefore always be prosecuted in accordance with the Law.

6.4 FINAL PROVISIONS

Any amendment to this Code of Ethics must be approved by the Board of Directors.