



CODE OF ETHICS



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Mission, Vision and Projects

The present time is characterised by great changes, due to the globalisation of the economic and financial systems, as well as, due to socio-political situations characterised by social mobility and cultural, linguistic and religious pluralism.

We are also in the presence of an information system that uploads onto the web, in real-time, with an imposing mass of information, in which it is increasingly more difficult to unravel what might be useful as true and reliable, from what might be useless or even harmful.

Business systems face unprecedented and global challenges, which put a strain on the capacity for innovation and the adaptation of organisational structures.

Amongst these, the human factor is distinguished by its centrality, but also by elements of fragility.

The working dimension then becomes a terrain on which to measure the ability of individuals and businesses themselves to "stay in the global competition", maintaining an efficient and productive corporate identity, inspired by the deep-rooted values of cooperation and solidarity amongst all.



Roncadin SpA

In this complex and challenging context, Roncadin SpA is a young and dynamic recently formed company with whirlwind expansion that is likely to operate in national and international contexts in continuous and rapid evolution characterised by fierce competition and great challenges.

The mission of Roncadin SpA is the production and marketing of high end frozen pizzas, produced with raw materials of the highest quality selected from the best producers in the world, in order to maximise the well-being and satisfaction of customers and consumers, together with the well-being and satisfaction of its employees. The ethical vision shared and advocated by Roncadin SpA is based on the conjugation of purposes, which contribute in a harmonious way to the improvement of life, both the customers' and the employees'.

The ethics in question are respectful of all parties co-involved in corporate business, without prevarication and privileges of any kind. All of Roncadin SpA's activities must, therefore, be carried out in compliance with the law, within a framework of fair commercial competition, based on honesty, integrity, fairness and good faith, respecting the legitimate interests of customers, employees, business and financial partners and the communities in which Roncadin SpA is present with its activities. All those who work there, without distinction or exception, are committed to observe and ensure compliance with these principles as part of their duties and responsibilities. In no way can the belief of acting for the benefit of Roncadin SpA justify the adoption of behaviour that conflicts with these principles.

For this reason, the present "Code of Ethics" was drawn up, as well as being pursuant to, and for the purposes of, the provisions of Legislative Decree No. 231/2001, which includes a set of principles and standards with which compliance by recipients is crucial for the proper functioning, reliability and reputation of Roncadin SpA.

A Code of Ethics is not just a collection of guidelines to ensure proper conduct inspired by a correct view of action of the people in the Company, but also a strong reminder of the principles which should govern human conduct in general. Like any other order, the Code of Ethics cannot, not be, inspired by explicit and clear foundations that put the individual, who works with colleagues in an articulate and complex work group, at the centre of a joint project aimed at a benefit corresponding to the intrinsic logic of the profitability of the business. This project should be a collective value to share and protect by all those who work for the Company. The Code of Ethics, therefore, proposes to imprint on the values of correctness, fairness, integrity, loyalty, and professional rigour, operations, conduct and way of working, both internally at Roncadin SpA, and in relation with external subjects, placing at the centre of attention compliance with the laws and regulations of the countries in which the Company operates, as well as compliance with company procedures.

Adapting to the most advanced standards of Corporate Governance, the Board of Directors of Roncadin SpA adopts the present Code of Ethics in order to ratify the aforesaid principles of ethics and transparency, and in order to reconcile the pursuit of competitiveness with the requirements of fair competition. Roncadin SpA will closely check compliance with the Code of Ethics, by providing an adequate means of information, prevention and control, and ensuring the transparency of operations and conduct adopted, and intervening, if appropriate, through the check list provided in the Organisational Model of Legislative Decree No. 231/2001, with corrective actions.

In order to give the widest possible dissemination of the contents of this Code of Ethics, it has also been posted on the company website at www.roncadin.it

The Code of Ethics also constitutes the first safeguard on which is founded the Organisational Model adopted by the Company in accordance with the provisions of Legislative Decree No. 231/2001 (administrative and criminal liability of companies and organisations for the acts constituting the offence), of which it is an integral part. The violation of the principles and regulations contained in it may, therefore, lead to serious consequences for the Company, pursuant to that legislation.

1. General Principles

1.1 Recipients

The parties to whom the provisions of this Code of Ethics have been applied, are, hereinafter, referred to as "Recipients". They have been identified as the directors and members of the corporate bodies of Roncadin SpA, as all the employees of the company Roncadin SpA, and as all those who, directly or indirectly, permanently or temporarily, establish dealings and relations with Roncadin SpA, or at least work towards the goals and objectives anywhere Roncadin SpA operates. The activities carried out by Roncadin SpA are based on the principles of correctness and transparency. To this end, the transactions between the various corporate



entities, including transactions with related companies, comply with criteria of substantial and procedural correctness, according to the pre-established principles of conduct for their implementation, adequately brought to the knowledge of the market.

In setting corporate objectives, the members of the Board of Directors are inspired by the principles contained in the Code. It is then up to the managers to satisfy the values and principles contained in this Code, by assuming responsibilities both inwardly and outwardly, and strengthening the trust, cohesion, sense of belonging and Roncadin SpA's spirit of enterprise.

As part of the due respect for the law and regulations, Roncadin SpA's employees adapt their actions and conduct to the principles, objectives and commitments

envisaged by the Code. All actions, transactions and negotiations carried out and, in general, the conduct adopted by Roncadin SpA's employees in their work are inspired by the utmost of correctness from the point of view of management, completeness and transparency of information, the legitimacy in both form and substance, and clarity and truthfulness in accounting records, in accordance with the applicable laws and internal procedures. Each employee must provide appropriate business contributions to their assigned responsibilities and to the recognised professionalism, and must act in such a way as to protect the reputation and image of Roncadin SpA.

Each Recipient is required to know the Code of Ethics, to contribute actively to its implementation and report any deficiencies to the appropriate reference function (Management, Human Resources and Supervisory Board).

To achieve full compliance with the Code of Ethics, each of the employees, should they become aware of situations which, actually or potentially, represent a significant breach of the Code, must promptly report to their immediate supervisor and/or any of the Reference bodies referred to in paragraph 1.6.

1.2 Roncadin SpA's Commitments

Through the designation of specific functions ("Reference bodies"), Roncadin SpA ensures:

- 1) the maximum dissemination of the Code to the Recipients;
- 2) the updating of the Code in order to adapt it to evolving civil sensitivity and to make changes in the standards concerning the Code itself;
- 3) the carrying out of checks on any notice of violation of the provisions of the Code;
- 4) the assessment of the facts and the subsequent implementation, in case the violation is verified, of appropriate sanctions;
- 5) that no one may suffer reprisals of any kind for providing information on possible violations of the Code or of the reference standards.

1.3 Obligations for All Employees

All employees are expected to know the provisions of the Code and standards that regulate the activity carried out as part of its function. Roncadin SpA's employees have the obligation to:

- 1) refrain from any conduct contrary to these standards;
- 2) contact their superiors or the Human Resources Department in case of a need for clarification on how to apply these standards;
- 3) report promptly to their superior or the Human Resources Department any information, direct or reported by others, regarding possible violations of these, as well as any and every request addressed to them to violate them;
- 4) in cases of alleged violations of particular seriousness, it is the obligation of the employee to direct the report directly to Management.

1.4 Further Obligations for the Heads of Corporate Functions

Every Head of Corporate function has the obligation to:

- 1) set, through their own conduct, an example for their employees and to direct their employees to comply with the Code and reference procedures;
- 2) work to ensure that employees understand that compliance with the Code, as well as the procedures and safety standards is an essential part of the quality of their work and the employment relationship in its ethical dimension;
- 3) carefully select, to the extent of their competence, internal and external partners in order to avoid assignments being given to people who cannot be relied upon to commit to comply with the provisions of the Code and the procedures;
- 4) adopt immediate corrective action when required by the situation.

1.5 Valence of the Code with Respect to Third Parties

All employees of Roncadin SpA, by reason of their skills in liaising with external parties, with regard to these, must:

- 1) be properly informed regarding the commitments and obligations imposed by the Code;
- 2) require compliance with the obligations that directly affect their activities;
- 3) adopt appropriate internal and, if authorised, external initiatives, in the event of non-performance by third parties to the obligation to comply with the provisions of the Code.

1.6 Bodies of Reference

Bodies of reference for the implementation of the Code are:

The Management and the Human Resources Department, with the task of promoting awareness of the Code within Roncadin SpA, providing the necessary explanations and education and taking the appropriate disciplinary measures in the event of violation of the Code, as well as, investigating reports of possible violations, to promote investigation and proper inquiry procedures.

1.7 Contractual Valence of the Code

The Code is an integral part of the standards of the employment relationship. Compliance with the provisions of the Code is an essential part of the obligations of Roncadin SpA's employees.

The violation of the provisions of the Code may constitute a breach of the primary obligations of the work relationship or disciplinary offence, with all the legal consequences, including the preservation of the employment relationship, and may lead to actions for damages caused by that same violation. For Recipients who are not employees, compliance with the Code is an essential prerequisite for the continuation of the professional/collaborative relationship with Roncadin SpA.



2. Conduct in Business Management



2.1 Business Management in General

In business relations Roncadin SpA is inspired by the principles of loyalty, correctness, transparency, efficiency and openness to the market. Employees of Roncadin SpA and external collaborators who act for, or on behalf of, Roncadin SpA are required to keep an ethically founded and law-abiding conduct, in Roncadin SpA's business interests and in rapports with the Public Administration. This conduct is marked by an explicit and binding prohibition of unlawful favouritism, transparency, clarity, correctness and efficiency in rapports and commercial and promotional relations. Recipients are also bound to a conduct aligned with Roncadin SpA's corporate policies, which can never be expressed, even if aimed at pursuing the corporate purpose, in acts contrary to law, current legislation, that is, the corporate procedures adopted with reference to the individual functions.

2.2 Gifts, Presents and Other Benefits

In relations with customers, suppliers and third parties in general, no offers of money, gifts or benefits of any undue advantage of any kind are permitted (e.g. promises of economic benefits, favours, recommendations, promises of job offers, etc.). In any case, the acts of courtesy trade are permitted provided that they are modest in value and, in any event, such as not to compromise the integrity and reputation, and do not influence the independence of the Recipient's judgement. The Recipient who receives gifts of any nature and consistency of value, must inform his direct superior or one of the Bodies of reference referred to in paragraph 1.6.

2.3 Conflicts of Interest

Recipients must avoid situations and/or activities that may lead to conflicts of interest with those of Roncadin SpA or that could interfere with their ability to make impartial decisions, safeguarding the best interests of the Company.

Should the Recipient encounter an objective situation of conflict with the interests of Roncadin SpA, it is necessary that the Recipient notifies his superior and one of the bodies of reference immediately, and refrains from any activity related to the source of conflict.

In relations between Roncadin SpA and third parties, the Recipients shall act in accordance with ethically founded standards according to the principles contained in the Code, and legally, with the explicit prohibition of resorting to illegitimate favouritism, collusion, corruption or solicitation of personal advantage for himself or for others. It is compulsory to report immediately to one's superior and/or to one of the bodies of reference any information that might suggest or predict a situation of potential conflict of interest with Roncadin SpA. By way of example and not exhaustive, the following situations can determine conflicts of interest:

- 1) having economic and financial interests (significant share ownership, professional positions, etc.) even through family members, with customers, suppliers or competitors;
- 2) performing work, even by family members, for customers, suppliers or competitors;
- 3) accepting money, gifts or favours of any kind from persons, companies or entities that are or intend to enter into business relationships with Roncadin SpA;
- 4) using their position in the Company or information acquired in their work, to create a conflict between their own interests and those of company.

2.4 Relations with Shareholders

Roncadin SpA pursues the creation of value for the generality of its shareholders, protecting the interests of the Company itself and the shareholders' in their entirety, without any preference.



2.5 Relations with Suppliers

The selection of suppliers and the formulation of the conditions of purchase of goods and services for the Company are dictated by the values and parameters of competition, objectivity, correctness, impartiality, fairness in price, quality of goods and/or services, careful assessment of the service guarantees and the range of offers in general.

Procurement processes must be based on the search for maximum competitive advantage for Roncadin SpA and on loyalty and impartiality towards every supplier in possession of the requirements. The collaboration of suppliers in consistently meeting the needs of Roncadin SpA's customers in terms of quality and delivery times, should also be pursued. The stipulation of a contract with a supplier must always be based on relations of extreme clarity, avoiding, where possible, the assumption of contractual obligations that involve forms of dependence on the contracting supplier.

The need to pursue the maximum competitive advantage for Roncadin SpA however must necessarily ensure that the Company and its suppliers adopt practical solutions in line with current legislation and, more generally, with the principles of the protection of all persons involved, the products, health and safety and the environment.

2.6 Relations with Customers

Roncadin SpA pursues its success on the markets and in the countries where it operates by offering products and services of high quality, competitive conditions and in compliance with the regulations for the protection of competition. Each Recipient, in the relationship with customers and in compliance with internal procedures, must aim for maximum customer satisfaction by providing complete and accurate information on the products and services provided, in order to facilitate informed choices.

2.7 Proper use of Business Assets

Each Recipient is responsible for protecting the resources entrusted to him and has the duty to report promptly to the appropriate bodies of any threats or harmful events for Roncadin SpA. In particular, each recipient must:

- work diligently to protect corporate assets by acting responsibly and in line with the operating procedures established to regulate the use of the same;
- avoid improper use of corporate assets that may cause damage or reduced efficiency, or otherwise be contrary to the interest of the Company;
- obtain the necessary authorisations in the event of use of the asset outside the Company.

The increasing dependence on information technology requires the assurance of availability, security, integrity, and maximum efficiency of this particular category of capital goods. Each recipient is required to:

- not send threatening and insulting e-mail messages, not resort to inadequate language of low quality or style, not make inappropriate or undesirable comments, which may cause offence to the individual and/or damage the corporate image;
- avoid spamming and "chain letters", which can generate traffic in data/information/processes within the company computer network, such as to significantly reduce the efficiency of the network with negative impacts on productivity;
- not surf websites whose contents are improper and offensive;
- comply scrupulously with the provisions of the corporate security policies, in order not to compromise the functionality and security of the information systems;
- avoid loading borrowed or unauthorised software on corporate systems, and never make unauthorised copies of licensed programmes for personal, corporate or third party use.

Roncadin SpA prohibits, in particular, every use of computer systems that may constitute violation of applicable laws, as well as, any offence against freedom, integrity and dignity of persons, especially children.

The use, even involuntary, of these assets for any purpose outside of business can cause serious damage (economic, of image, competitiveness, etc.) to Roncadin SpA, and what is worse, is that improper use may result in potential penal or administrative sanctions for any wrongdoing, and configure the need to take disciplinary action against the Recipients.

3. Relations with External Entities



3.1 Relations with Public Institutions

Relations with Local Authorities and the Public Bodies, necessary for the development of Roncadin SpA's business programmes, are reserved exclusively for business functions entrusted with these. The relations shall be based on maximum transparency, clarity, correctness, and such as not to induce interpretations that are partial, distorted, ambiguous or misleading on the part of public institutions with whom relations are kept in various ways.

Gifts and acts of courtesy and hospitality extended to representatives such as public officers or public service delegates are permitted, if they are of limited value and cannot be interpreted by a third party as aimed at obtaining undue advantages. In any case, this type of expenditure must be authorised and documented in an appropriate manner. In particular, in dealing with Public Entities for access to subsidised funds, Roncadin SpA:

- rejects any conduct aimed to attain the contribution unduly, through deceit or omission of required information;
- forbids the allocation of the grant received for purposes other than those for which it was provided.

3.2 Relations with the Media

The relations between Roncadin SpA and the media are incumbent to the designated company function and must be carried out consistently with the policy and communication tools defined. Any employee of Roncadin SpA who receives a request for interview/release of statements regarding Roncadin SpA on the part of any component of the press or communication, is obliged to notify Management in advance and agree upon the desirability and content of the interview itself.

4. Personnel Policies

4.1. Management and Development of Human Resources

Human resources are a key factor and essential for the existence of the Company. The dedication and professionalism of the employees are determining values and conditions for the achievement of Roncadin SpA's objectives.

The Company is committed to developing the abilities and skills of each employee, so that the energy and creativity of people find full expression in the implementation and achievement of the objectives contained in the corporate purpose.

Roncadin SpA offers all employees the same opportunities for professional growth so that everyone can enjoy equal treatment based on merit, without discrimination.

The competent functions must:

- 1) adopt strictly professional criteria of merit, competence and, in any case, for any decision relating to an employee;
- 2) select, hire, train, compensate and manage employees without discrimination of any kind;
- 3) create a working environment in which individual features cannot give rise to discrimination, and in no way, to the so-called phenomena of bullying.

To this end, implement all the initiatives to monitor the corporate climate, enhancing the indicators acquired for the purpose of working for continuous improvement.

Each Recipient must work actively to maintain a climate of mutual respect for identity, dignity and reputation.

Recipients are also required to give personal data of which they become aware during their work, the most appropriate treatment in order to protect confidentiality, the image and dignity of people. Roncadin SpA is committed to promoting and consolidating a culture of safety in the workplace, developing sensitivity to the acquisition of a full awareness of risks, promoting responsible behaviour by all employees, and working to preserve, especially through preventive measures, the health and the safety of workers.

Roncadin SpA's activities must be conducted in full compliance with current legislation in the field of prevention and protection. The operational management should refer to advanced criteria for environmental protection and energy efficiency, pursuing the improvement of health and safety at work. Roncadin SpA is committed to ensuring the protection of working conditions through the protection of the mental and physical health of its workers, with respect for their moral personality, preventing the latter from suffering undue influence or undue discomfort. The Company, therefore, opposes any behaviour or attitude which is discriminatory or harmful to the individual, their beliefs and preferences (for example, in the case of insults, threats, isolation or excessive intrusiveness, professional limitations).

Roncadin SpA endeavours to ensure that, in the context of its activities, the conditions laid down by the Universal Declaration of Human Rights are guaranteed in all operating areas of the Company. Roncadin SpA, in any country in which it operates, rejects the exploitation of child labour. In addition to full compliance with the regulations laid out in individual countries, Roncadin SpA promotes the protection of workers' rights, freedom with regard to trade unions and rights of association.

Any violation of the provisions of this article shall be immediately submitted to the Human Resources Department.

4.2 Respect for Peers

Roncadin SpA does not allow any kind of harassment towards a colleague, including sexual harassment, this meaning, the subordination of salary or career prospects to the acceptance of sexual favours; Roncadin SpA also does not allow overtures of private interpersonal relations, proposed with insistence, despite an expressed or clear distaste of the person involved, which are perceived as disturbances or, in any case, elements of disturbance.

4.3 Alcoholic Substances, Drugs and Other Illegalities

Roncadin SpA considers it essential that each employee personally contribute to maintaining the work environment respectful of moral principles and the sensitivities of colleagues. The following will, therefore, be considered a conscious taking of the risk of breach of these environmental and behavioural connotations:

- a) working whilst under the effects of the use of alcohol, drugs or similar substances;
- b) consuming or offering for whatever reason alcohol or drugs during the performance of work wherever and however exercised;
- c) smuggling and facilitation of illegal immigration.

Such conduct will be properly reported and punished.

4.4 Smoking

Roncadin SpA, in consideration of the existing legislation and the desire to create for its employees and visitors a healthy and comfortable environment, has provided a complete ban on smoking in the workplace, with the exception of the area devoted to it explicitly.



5. Transparency of Accounting Information and Internal Controls



5.1 Accounting Information

All activities and actions undertaken and carried out by Recipients as part of their work must be verifiable. Accounting transparency is based on the truthfulness, accuracy, completeness and reliability of the documentation of the proceedings of management and the related accounting records.

Each Recipient is required to collaborate so that the proceedings of management are properly and timely represented in the accounting.

Adequate supporting documentation of the activity is stored and archived for each transaction, in order to allow the easy accounting entry, the identification of the different levels of responsibility, and accurate reconstruction of the transaction. Each record should reflect precisely what results from the supporting documentation. Recipients who become aware of any omissions, forgery, alteration or negligence of the information and supporting documentation, are required to report the facts to their superior or to one of the bodies of reference set out in paragraph 1.6.

5.2 Internal Controls

It is Roncadin SpA's wish to spread to all levels of its organisation a culture aware of the importance of an adequate system of internal control. In particular, the system of internal control must facilitate the achievement of corporate objectives and must, therefore, be directed at improving the efficiency and effectiveness of production and management processes. All Recipients, in their respective functions, are responsible for the proper functioning of the control system. Each employee shall be custodian of the corporate assets, whether they are tangible or intangible that are needed for their activity.

5.3 Anti-money Laundering and Counter-terrorism

Roncadin SpA, in compliance with current legislation, seeks to prevent the use of its economic - financial system for purposes of money laundering or financing of terrorism (or any other criminal activity) by its customers, suppliers, employees and counterparties with which it interacts in the course of its activities. Roncadin SpA shall, therefore, check with the utmost care available information on business partners, suppliers, partners and consultants, in order to ascertain their respectability and the legitimacy of their business, before establishing a business relationship with them. Roncadin SpA will also ensure that the operations of which it is part do not present, even potentially, the risk of encouraging the receipt or replacement or the use of money or assets derived from criminal activities.



6. Adoption, Effectiveness and Changes

This Code of Ethics may be subject to periodic study, updating, amendment or revision by the Board of Directors, including any proposal brought forth by the Board of Statutory Auditors.



7. Whistleblowing

Whistleblowing is an Anglo-Saxon derived tool through which employees of an organization, whether public or private, report to specific individuals or entities a potential violation, crime, misconduct, or any irregular conduct committed by other individuals within the organization.

The purpose of whistleblowing is to enable organizations to address the reported issue as soon as possible, making situations of risk or harm known and contributing to the prevention and combating of any wrongdoing.

The Procedure for the submission and management of reports - Whistleblowing (hereinafter the "Policy") prepared by Roncadin SPA SB aims to protect those who report crimes or irregularities of which they have become aware for work-related reasons and to promote a culture of ethics and legality in the workplace, as well as to create an atmosphere of transparency and a sense of participation and belonging, generated by overcoming employees' fear of retaliation from social bodies or colleagues, or the risk of their report being ignored.

The Policy plays a fundamental role in discovering and preventing various violations. It also enables appropriate action to be taken with the parties involved and protects employees who raise genuine concerns about legal or ethical violations. Furthermore, it aims to preserve the reputation and assets of Roncadin SPA SB.

The reporting tools are:

- the reporting platform (website) accessible at the following addresses: <https://roncadin.integrityline.com> and www.roncadin.it in the "Whistleblowing" section (with the option to also make a report);
- reporting in person subject to the requirements specified in section 3.1 of the Policy available on the website.

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8. Confidentiality

8.a Protection of company secrecy

Roncadin Spa's activities constantly require the acquisition, storage, processing, communication and dissemination of news, documents and other data relating to negotiations, administrative proceedings, financial transactions, know-how (contracts, deeds, reports, notes, studies, designs, photographs, software, etc.) that, by contractual agreements, may not be made known externally or whose inappropriate or untimely disclosure may produce damages to the company interests. Without prejudice to the transparency of the activities implemented and the reporting obligations imposed by existing provisions, Roncadin Spa's people are required to guarantee the confidentiality required by the circumstances for any news of which they become aware based upon their working role.

The information, knowledge and data acquired or processed during their work or through their duties belong to Roncadin Spa and may not be used, communicated or disclosed without specific authorisation from their superior in the Roncadin organisation, in respect of specific procedures.

8.b Privacy Protection

Roncadin Spa undertakes to protect the information relating to its people and to third parties, generated or acquired within business relationships, and to avoid any improper use of that information.

Roncadin Spa intends to guarantee that the processing of personal data performed within its structures occurs in respect of the rights, fundamental freedoms and dignity of the data subjects, as required by existing regulatory provisions. The processing of personal data must occur in a lawful and correct manner and, in any case, only data necessary for certain, explicit and legitimate purposes are collected and registered. Data will be stored for a period of time not exceeding that necessary for the purposes of their collection.

Roncadin Spa also undertakes to adopt suitable and preventive security measures for all databases in which the personal data are collected and stored, in order to avoid risks of destruction and loss or unauthorised accesses or unlawful processing.

Roncadin Spa's people must:

- acquire and process only data necessary and opportune for the purposes in direct connection with the functions and responsibilities covered;
- acquire and process those data only as part of specific procedures and retain and archive those data in a manner that prevents other unauthorised parties from becoming aware of them;
- represent and order those data using methods that ensure that anybody authorised to access them may easily draw the most precise, comprehensive and truthful picture possible from them;
- communicate those data as part of specific procedures or on express authorisation of superior positions and in any case only after having checked that those data may be disclosed in the specific case also with reference to absolute or relative restrictions regarding third parties connected to Roncadin Spa by a relationship of any nature and, if necessary, have obtained their consent.