

SUPPLIER CODE OF CONDUCT

The value of ethics is an indispensable element for the reliability of DALTERFood Group in its relations with stakeholders and, more generally, with the entire civil and economic context in which it operates. Respect for ethical principles and transparency in the conduct of business are, in the view of the Group, a necessary condition, as well as a competitive advantage, for pursuing and achieving the goal of creating and maximising value for its employees, shareholders, customers, suppliers, and for the community as a whole.

We expect the Suppliers involved in our production activities and supplier chain, and their suppliers, to share our values and thus observe the following social, environmental and ethical responsibilities.

Application

The acknowledgement of this Code is a preliminary requirement in all supply contracts with DalterFood Group.

For the purposes of applying this document, the concept of Group means the following companies

- Dalter Alimentari Spa
- Colline di Canossa Spa
- Dalter UK Ltd
- Vip Italia GmbH
- Baltic Cheese Sia

In accepting the purchase order, with reference to the Code, the Supplier undertakes to ensure that all its activities are subject to the provisions contained in this Code. Besides these responsibilities, Suppliers shall comply with all laws, regulations, directives, guidelines in force, as well as obligations in any contracts stipulated with the Group.

This Code is in effect until a subsequent revision is published.

1. MANPOWER AND HUMAN RIGHTS

DalterFood Group protects and promotes the value of each person, respecting their physical, moral and cultural integrity, and undertaking to guarantee equal rights for everyone, refusing all discrimination based on gender, race, sexual orientation, religion, political opinion and personal or social beliefs.

Consequently, its Suppliers undertake to comply and ensure compliance, in their work environment and throughout the supply chain, with applicable laws on:

- **CHILD LABOUR:** Suppliers undertake to not use child labour and to not support the use of child labour by suppliers and sub-suppliers. In the case of young workers, risky tasks will not be assigned to them.
- **FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING:** Suppliers undertake to observe the right of each person to join trade unions or other forms of collective association of their own choice, and the right to collective bargaining, in

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compliance with provisions of the law in the country where the Suppliers operate. Moreover, they undertake to guarantee that trade unionists or other equivalent positions are not subject to discrimination and may freely communicate, in the workplace, with persons belonging to their association

- **DISCRIMINATION:** Suppliers undertake to not discriminate or support discrimination in hiring, remuneration, access to training, promotion, dismissal or retirement, based on age, gender, race, nationality, invalidity, sexual orientation, personal or political beliefs. Moreover, they will ensure that conduct, including gestures, language or physical contact that are sexually coercive, threatening, offensive or aimed at exploitation, is not permitted.
- **DISCIPLINARY PROCEDURES:** Suppliers will guarantee that they do not use or support the use of corporal punishment, mental or physical coercion, verbal abuse.
- **WORKING HOURS:** Suppliers undertake to respect the working hours corresponding to the contract applied in the country where they operate. They also undertake to give staff at least one day's rest in a week, and to pay overtime according to the higher rates envisaged in the contract. They will guarantee that no more than 12 hours of overtime is worked by employees, per week, and that overtime is requested on a voluntary basis.
- **REMUNERATION:** Suppliers undertake to guarantee that the salary paid always corresponds to the contract in force and that they will ensure the social security and insurance payments required by the law in the country where they operate. Under no circumstances will Suppliers keep the personal documents of workers

2. HEALTH AND SAFETY

The Supplier declares it is aware of the risks associated with its own activities and undertakes

- To guarantee a safe, healthy workplace through appropriate plans to align with applicable regulations
- To adopt adequate measures to prevent incidents and harm to health that may occur during work or as a consequence of it, minimising, as far as is practicable, the causes of hazards attributable to the workplace.
- To give adequate information on health and safety to all staff
- To carry out adequate analyses that identify the potential causes of accidents and to take all reasonably possible measures to prevent them
- To guarantee, for all staff, both male and female, separate, sanitised washrooms
- To make available free of charge drinking water in the washrooms and at dedicated dispensers

3. ENVIRONMENTAL SUSTAINABILITY

DalterFood Group requires Suppliers to comply with all environmental legal requirements that are applicable and to demonstrate a continual improvement in their environmental performance. Specifically, as regards

- Substances that are hazardous and subject to restrictions: Suppliers will identify and handle chemical agents and other products that could pose a hazard to the environment, in such a way as to guarantee their handling, use, storage and disposal in safe conditions. Suppliers shall identify, monitor, control, trace and reduce hazardous atmospheric emissions, wastewater and waste from their operations. They shall also observe our requirements on limiting the use of certain substances and requirements on labelling for recycling and disposal.
- Reducing waste: Suppliers shall reduce or eliminate all types of waste. If waste cannot be entirely eliminated, Suppliers shall manage and control all stages associated with waste, in order to comply with applicable laws and regulations, in a manner that is safe and respects the environment. These measures include, among others, actions to avoid leaks unlawfully ending up in the discharge system, as well as actions for treatment, as required for all wastewater and solid waste from production activities, industrial processes and sanitary facilities, before discharge or disposal.

4. MANAGEMENT SYSTEMS

The Supplier undertakes to

- define and maintain procedures to assess and select suppliers/sub-contractors (and where applicable sub-suppliers) based on their ability to comply with requirements of reference standards
- maintain appropriate records of the commitment made by suppliers/sub-contractors (and where appropriate, sub-suppliers) to social responsibility, through the written commitments of these organisations
- participate in company monitoring activities, as requested;
- promptly take remedial and corrective actions concerning any nonconformity regarding requirements of the Standard;
- promptly inform the company of any significant economic relationship with suppliers/sub-contractors and sub-suppliers; maintain daily evidence of the conformity of suppliers and sub-contractors to the requirements of the reference Standard
- take actions, if the company uses assets and/or services of the suppliers/sub-contractors or sub-suppliers classified as home workers, to ensure that said workers have access to levels of protection similar to those that may be accessed by directly employed staff;
- manage and respond to problems raised by employees and other parties concerned about the conformity/nonconformity of company policy and requirements of the Standard;
- provide reasonable information and grant access to parties concerned, where contractually required, to assess conformity to requirements of the reference Standard.

5. ETHICS AND CONFORMITY

The Supplier undertakes to observe the highest ethical standards to promote honesty and integrity in all company operations that include

Company integrity

- The Supplier undertakes to avoid even only apparent conflicts of interest in relations with the Group and to immediately report any personal relationship with our employees that may have an influence on relations between the two companies.
- In the event the Supplier grants company benefits to our employees, said shall take place sporadically and for a value that is entirely moderate.
- The Supplier shall carefully record business operations in specific company registers and documents.
- Suppliers may not offer or accept any form of corruption, extortion or bribery, and they also undertake to not make unlawful payments directly or indirectly.

Intellectual property

The Supplier undertakes to respect intellectual property rights and will transfer technologies and know-how in such as way as to safeguard such rights.

Protection of personal data and privacy

The Supplier undertakes to protect the privacy of the personal information of all entities it has business relations with, including other suppliers, customers, consumers and workers.

Supplier's Acknowledgement

In signing below, we confirm the following:

- we have received and acknowledged the contents of the Supplier Code of Conduct of DalterFood Group published on the website DalterFood Group
- we are aware of all relevant laws and regulations of the countries where our company operates,
- we undertake to notify DalterFood Group of any suspected breach of the Code,
- we undertake to observe the requirements of the Supplier Code of Conduct without any amendment or annulment
- we undertake to distribute the Supplier Code of Conduct to all our employees / sub-contractors guaranteeing that they also comply with the provisions therein.

Company name

Signature Stamp/seal of the company

Name and position

Business registration number / Statutory ID / Code / Number of the company

Place and date