



GELATO D'ITALIA - INDIAN S.R.L.
D. LGS.N. 231/2001

ETHICAL STANDARD

*Note: this ethical code is a free translation of its original in Italian. In case of any discrepancy or unintended meaning, the original version will always take priority.

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1. Introduction

1.1. Premise

GELATO D'ITALIA S.R.L. (hereinafter also the Company and / or GELATO D'ITALIA and / or the Company) is a company established on 23/05/1980 which carries out its main activity in the food sector (production and sale of food products in the icicles, slushes, sorbets and the like and, more generally, in the ice cream sector (essentially attributable to three categories: ice-based products, ice-based products and vegetable-based products).

The Company is oriented towards the continuous improvement of its processes with the aim of ensuring customer satisfaction and promoting balanced and sustainable growth of the company.

Our business activity has an impact on the world around us and we are aware of it.

We have therefore chosen a business model capable of tying the company's objectives with the social and environmental objectives of the area, with a view to total quality.

Respect and balance are the watchwords of this corporate responsibility, which sees us committed in particular towards the environment and people, understood as employees, consumers, communities.

The Company develops its offer of products and services in compliance with all the legal provisions and rules set up to protect consumers' interests and fair competition.

The Company is aware of the important role it plays with respect to the market, the economic development and the well-being of the people who work and collaborate with it and the communities in which it is present.

The Company believes that credibility and reputation represent two of the main intangible factors of a company, capable - in themselves - of creating many other tangible values.

The Company therefore considers it essential to clearly and firmly express its ideals, its culture, its values placed at the basis of the behaviour of its corporate bodies, management and people who work with the Company and for the Company, towards the Public Administration, towards customers, towards suppliers, towards credit institutions, and towards the whole community, for the trust it places in the Company's activity.

1.2. Purpose and scope

This document has been prepared by GELATO D'ITALIA with the aim of defining a code of conduct, informed of the values characterizing the Company, which will act as a precise reference for all the activities in which it is involved in its internal and external relations.

This Code of Ethics (hereinafter also the Code) therefore defines the general principles of behaviour which apply, without exception, to all those who work for the achievement of the Company's objectives.

This Code of Ethics constitutes an integral and fundamental element of the Organization, Management and Control Model governed by Legislative Decree No. 231/01 adopted by GELATO D'ITALIA; therefore, the implementation of the Code is subject to control by the Supervisory Body appointed pursuant to the aforementioned Legislative Decree no. 231/2001 and the violation of the rules contained therein is sanctioned pursuant to the aforementioned Model.

1.3. Recipients and General Principles

The Recipients of the Code of Ethics are the persons entrusted with the governance of the Company, the employees, collaborators, consultants, third parties and in general all those who, directly or indirectly, permanently or temporarily, establish relationships or relations with the Company itself.

Recipients must never fail to respect the fundamental principles that inspire the Code of Ethics, such as honesty, moral integrity, correctness, transparency and objectivity in pursuing corporate objectives.

Each one, within the sphere of the responsibilities related to the role covered, must provide the highest level of professionalism available and carry out the assigned activities with commitment, contributing in a concrete way to the achievement of the corporate objectives.

The Company does not intend to enter into or continue any relationship with anyone who proves not to share the content or spirit of this Code, or violates its principles or rules of conduct.

In particular, since the actions taken by the Company's suppliers are sometimes attributed to the Company itself, affecting its reputation, GELATO D'ITALIA also requires those who are bound by supply contracts with the Company to undertake to comply with the standards of the Ethical code.

2. Corporate Values and Rules of Conduct

2.1. Ethical principles

The Company promotes and demands models of ethical behaviour in carrying out work activities, inspired by the principles of legality, good contractual faith, loyalty, fairness and transparency. The legitimacy of any behaviour adopted must be - formally and substantially - such as to protect and improve the credibility, reputation, reliability and image of GELATO D'ITALIA.

Corruption, illicit enrichment, collusion are, without exception, prohibited. The acceptance of money or gifts of any nature and consistency is prohibited if they cannot be regarded as mere acts of commercial courtesy, such as not to influence the behaviour of the recipient:

otherwise, it is mandatory to report the fact to your line manager and/or to the Supervisory Body.

The Company promotes and develops behaviours among its staff to favour the sense of identification in the company itself, aware that its business is developed with professionalism to be considered adequate only if this commitment is, in practice, shared and applied by all own staff.

Furthermore, all recipients must take all possible actions to avoid any form of discrimination and physical and psychological harassment and, in particular, any discrimination based on race, nationality, sex, age, physical disabilities, sexual orientation, opinions political, trade union or religious beliefs.

The Company promotes information, dialogue, collaboration and maximum transparency towards the institutions, associations and the social context in which it operates. It is forbidden to make false statements to institutions, associations and communities.

2.2. Compliance with the law

Acting in accordance with the laws is a priority requirement for GELATO D'ITALIA.

The Company has as an essential principle the respect of the laws and demands from its administrators, collaborators, employees in general, third parties with whom it has commercial and / or institutional relationships and from anyone who carries out functions or tasks on its behalf for any reason, compliance with the legislation and all current regulations and principles and procedures pre-established for this purpose, as well as ethically correct conduct, such as not to compromise their moral and professional reliability.

In no case, conduct carried out in violation of laws, current regulations and of this Code can be considered an advantage for the Company and, therefore, no one can be considered authorized to carry out such behaviour on the pretext of wanting to favour the Company.

2.3. Relations with the Public Administration

The Company pursues the objective of maximum integrity and fairness in relations, even contractual, with public institutions and local authorities and, in general, the Public Administration^{*1}.

^{*1}. Among the subjects belonging to the Public Administration, in accordance with the provisions of Legislative Decree no. 165/2001, must be considered included all the administrations of the State, including the Institutes and the Schools of every order and degree and the educational Institutions, the Companies and the Administrations of the State of autonomous order, the Regions, the Provinces and Municipalities, the Mountain Communities and their consortia and associations, University Institutions, autonomous public housing institutes, Chambers of commerce, industry, crafts and agriculture and their associations, all national, regional and local non-economic public bodies, administrations, companies and the entities of the regional Health Service. In a broader sense, the notion of public administration - according to opinion no. 11482/2004 of the Council of State - includes all entities, including private concessionaires of public services in charge of associations, all national, regional and local non-economic public bodies, administrations, companies and bodies of the

Service Regional healthcare. In a broader sense, the notion of public administration - according to opinion no. 11482/2004 of the Council of State - includes all entities, including private public service concessionaires in charge of public service, public enterprises and bodies governed by public law according to Community terminology, who are called to operate, in relation to the sphere of activity considered, within a public function.

The Company also believes that the active involvement of the various stakeholders, from local communities to public institutions, from associations to university and research institutions, can constitute a key element of development for the company so as to respond concretely to the needs of the territory and the society in which it operates, promoting its well-being and development.

All relationships with the Public Administration must be conducted in strict compliance with the laws and regulations in force, with the principles established in the Code of Ethics and in the Model 231 and must be based on maximum transparency and fairness in order to ensure the absolute legitimacy of the Company operations.

Relations with the Public Administration are held exclusively by the corporate officers in charge of this and / or authorized. All documentation relating to relations with the Public Administration must be duly collected and kept.

The operations carried out by the Company, as well as the main contacts with the Public Administration, must have adequate traceability; for each of them, it must be possible to check the relative decision-making, authorization and performance process.

Each operation must be adequately documented, in order to be able to carry out checks at any time that allow (i) to verify its characteristics and reasons and (ii) to identify the subjects who have authorized, carried out, registered and verified the operation itself.

The Recipients of this Code are not permitted, directly or indirectly, or through a third party, to offer or promise money, gifts or compensation, in any form, nor to exercise unlawful pressure, nor to promise any object, service, provision or favour to executives, officials and employees of the Public Administration, or to persons in charge of public service and to their relatives or cohabitants, in order to induce them to carry out an act in compliance with or contrary to the official duties of the Public Administration (having also for the purpose of favouring or damaging a party in a civil, tax, criminal or administrative process causing a direct or indirect advantage to the Company).

Only forms of gift, of negligible value, are admitted, provided they are also not aimed at inducing the above subjects to perform acts contrary to or in compliance with the duties of the public administration and in any case always in compliance with company procedures and with an obligation reporting to the Supervisory Body.

Those who receive explicit or implicit requests for benefits of any kind from subjects of the Public Administration, as defined above, must promptly inform the direct superior and the Supervisory Body so that the most appropriate initiatives to be undertaken can be identified.

The provisions indicated in the preceding points must not be circumvented by resorting to different forms of aid and contributions which, under the guise of hiring, assignments, consulting, advertising or others, have similar purposes as those prohibited by this paragraph.

The Company can provide contributions and sponsorships to support initiatives proposed by public and private bodies and non-profit associations, regularly established under the law and that promote the Ethical Principles of GELATO D'ITALIA.

Sponsorships and contributions may concern social, cultural, sporting and artistic events and initiatives; they can also be aimed at carrying out studies, research, conferences and seminars on subjects of interest to the Company.

It is not allowed to use or present declarations and documents certifying untrue facts and news, or to omit information to obtain, for the benefit or in the interest of GELATO D'ITALIA, contributions, financing, disbursements or other utilities granted, in any capacity, by the State, by a public body or by the European Union.

It is also forbidden to use contributions, loans or other disbursements, however denominated, granted to the Company by the State, by a Public Body or by the European Union for purposes other than those for which they have been assigned.

It is forbidden to alter the functioning of an IT or telematic system in any way or to intervene illegally in any way on the data, information and programs contained therein and relevant to it, in order to achieve an unjust profit with damage to others.

2.4. Relations with the Judicial Authority

All employees and / or collaborators have an obligation to report to the Company and to the Supervisory Body the request to make or produce before the Judicial Authority statements that can be used in a criminal proceeding relating to the exercise of their functions.

It is forbidden to put in place - in order to favour the interests of the Company or to otherwise gain an advantage for the same - any form of conditioning towards anyone, employee of the Company or third party, is called to make declarations before the Authority Judicial, usable in criminal proceedings.

In particular, all Recipients are prohibited from:

- induce anyone, through violence or threats or through the offer or promise of money or other benefits, not to make statements or to make false statements to the Judicial Authority, in order to favour the interests of the company or otherwise gain an advantage for the same;
- accept money or other benefits in order to make false statements or not to make statements to the Judicial Authority;
- act in order to influence in any way the behaviour of subjects called to make declarations before the Judicial Authority.

2.5. Relations with representatives of political forces and stakeholder associations

Representatives of political forces are natural persons who hold institutional positions or positions within political parties and movements. They are intended as representatives of interest-bearing associations, natural persons who hold positions or institutional positions

within organizations such as trade associations, trade unions, environmental organizations, etc.

In relations with these categories of people, no Recipient must promise or pay sums, promise or grant goods in kind or other benefits in a personal capacity to promote or favour the interests of GELATO D'ITALIA, also as a result of illicit pressure.

2.6. Money laundering, terrorism, arms trafficking and drugs

The Company condemns all illegal activities, in particular related to the trafficking of weapons and drugs, money laundering and terrorism or which in any case hinder human development and contribute to violating the fundamental rights of the person.

The Company undertakes to comply with all national and international laws and regulations regarding the fight against money laundering.

The Recipients must not in any way and under any circumstances be involved in events related to money laundering deriving from criminal activities or the receiving of goods or other utilities of illicit origin.

They are also required to check in advance the information available on commercial counterparties, suppliers, partners, collaborators and consultants, in order to ascertain their respectability before establishing business relationships with them.

It is forbidden to use cash or other bearer financial instruments (outside the limits permitted by law and in accordance with corporate procedures), for any collection, payment, transfer of funds, use or other use of financial resources, as well as the ban on the use of current accounts or savings books anonymously or with a fictitious header.

Payments to commercial counterparties, suppliers, partners, collaborators and consultants must be exclusively commensurate with the performance indicated in the contract and cannot be made to a person other than the contractual counterparty, nor in a country other than that of the parties or of the contract execution.

2.7. Activation and maintenance of commercial, consultancy and partnership relationships

When starting commercial relationships with new customers and / or suppliers, consultancy and partnerships (e.g. joint ventures) and managing existing ones, it is forbidden, based on public information and / or available in compliance with current regulations, to establish and maintain relationships:

- with subjects involved in illegal activities, in particular related to the offenses provided for by Legislative Decree no. 231/2001 and, in any case, with subjects without the necessary requisites of seriousness and commercial reliability;
- with subjects who, even indirectly, hinder human development and contribute to not respecting human dignity and individual personality and / or to violate the

fundamental rights of the person (e.g. exploiting child labour, promoting the trafficking of migrants or sex tourism, etc.);

- with subjects who do not formally undertake - for example in the contractual field - to comply with current legislation on labour - with particular attention to child labour and the exploitation of workers - and to the health and safety of workers, as well as in general all the principles envisaged by this Code of Ethics and by the 231 Model of GELATO D'ITALIA, in particular as regards compliance of product requirements and use of brands.

To protect the Company's image and reputation, it is essential that relations with customers, including advertising messages, are characterized by competence, availability and respect, and based on full transparency and fairness, respect for the law and independence in against any form of conditioning, both internal and external.

Suppliers of products and services and professionals who, for various reasons, maintain relationships with GELATO D'ITALIA recognize and share the ethical and behavioural principles adopted with this Code.

Suppliers are selected on the basis of protocols governing their accreditation, provide periodic checks of approval and include clauses and quality control and verification methods.

The undertaking of commitments and the management of relationships with suppliers of goods and / or services, current and potential, must take place in compliance with the contents of this Code of Ethics regarding the prevention of conflict of interests and specifically, the responsible parties and employees in the purchasing process:

- are required to respect the principles of impartiality and independence in the exercise of the tasks and functions entrusted, operating on the basis of the adoption of objective and documentable criteria;
- must remain free from personal obligations towards suppliers; any personal relationships of employees and / or consultants with suppliers must be reported to the management they belong to and to the Supervisory Body before each negotiation;
- must maintain relationships and conduct negotiations with suppliers in order to create a solid basis for mutually convenient relationships of adequate duration, in the interest of the Company;
- they are obliged to immediately report any attempt or case of alteration of normal commercial relationships to the Supervisory Body;
- must not offer goods or services, in particular in the form of gifts, to personnel of other companies or entities to obtain confidential information or significant direct or indirect benefits, for themselves or for the Company, without prejudice to the provisions of the general provisions of this Code Ethical;
- must not accept goods or services from external or internal subjects in the face of the release of confidential information or the initiation of actions or conduct aimed at favouring these subjects, even if there are no direct repercussions for the Company.

2.8. Correctness in administration

The Company pursues its purposes in compliance with the law, the Articles of Association and company regulations, ensuring the correct functioning of the corporate bodies and the protection of property rights and safeguarding the integrity of the assets.

The Company condemns any behaviour, by anyone put in place, aimed at altering the correctness and truthfulness of the data and information contained in the financial statements, reports or other communications required by law. Relations with the media are maintained exclusively by the function assigned to it. All communication interventions must be previously authorized.

The Company requires that the Recipients of this Code of Ethics maintain correct and transparent conduct in the performance of their function, especially in relation to any request made by the administrative body in office, the other corporate bodies, the Statutory Auditor and the Supervisory Body in the exercise of their respective institutional functions.

The corporate bodies, their members, employees and collaborators, on the occasion of checks and inspections by the competent public authorities, must comply with the protocols and procedures governing these situations, maintaining an attitude of maximum availability and collaboration without hindering in no way the functions of the Inspection and Control Bodies.

The Company acts in full compliance with competition law; It is therefore forbidden for the Recipients of this Code to perform acts and behave harmful to competition, including corruption between private individuals.

2.9. Relations with the Independent Auditors

The appointment of the Independent Auditors takes place according to a transparent procedure to guarantee, among other things, timely and adequate information on the personal and professional characteristics of the candidates for the office.

It is forbidden to confer on the Independent Auditors assignments other than accounting control which could jeopardize their independence and objectivity.

GELATO D'ITALIA has prepared measures to ensure an effective performance of the duties of the Independent Auditors, in particular for carrying out periodic checks, for making available various documents and for the ordinary and extraordinary requests for information made by them, also through the involvement of its internal staff, acting in the utmost transparency and fairness.

To this end, the exchange of information between the Statutory Auditor and the Supervisory Body is also promoted.

2:10. Relations with the Board of Statutory Auditors

The appointment of Auditors takes place according to a transparent procedure to guarantee, among other things, timely and adequate information on the personal and professional characteristics of the candidates for the office.

It is forbidden to confer on individual members of the Board of Statutory Auditors assignments other than accounting control which could compromise their independence and objectivity.

The Company has prepared measures to ensure effective performance of the duties of the Board of Statutory Auditors, in particular for carrying out periodic checks, for making available various documents and for the ordinary and extraordinary requests for information made by them, also through the involvement of its internal staff, acting with the utmost transparency and fairness.

To this end, the exchange of information between the Board of Statutory Auditors and the Supervisory Body is also promoted.

2:11. Conflict of interests and relationships with Related Parties

The Recipients of the Code are required to avoid all situations and all activities in which a conflict with the interests of the Company can manifest itself or that may interfere with their ability to take decisions impartially in the best interest of the Company itself and in full compliance with the rules of the Code of Ethics.

The Recipients of the Code must also refrain from taking personal advantage from acts of disposal of corporate assets or from business opportunities that they became aware of during the performance of their functions.

Personnel with senior management, called to make active decisions when there is a clear conflict between personal interests and those of the Company must:

- communicate the existence and characteristics of this conflict to the Supervisory Body and its hierarchical superior;
- refrain from exercising their decision-making role and delegate this role to other persons in charge of the corporate organization;
- in the event that the aforementioned abstention / delegation is not possible, however, involve other subjects in the decision-making process in order to give greater transparency to the process itself.

Transactions with related parties comply with criteria of substantial and procedural correctness, according to pre-established rules of conduct.

2:12. Protection of the individual and individual personality

The Company recognizes the value of dialogue and relations with all the company's stakeholders, in particular with the community in which it operates directly with the entire supply chain.

The Company condemns any behaviour harmful to the individual personality, the physical, cultural and moral integrity of the people with whom it relates, and undertakes to counteract any behaviour of this nature, including the use of irregular work.

The Company therefore condemns any form of physical or psychological abuse committed on minors, as well as any form of prostitution and / or child pornography.

The Company also condemns slavery and the use of child labour and therefore undertakes not to use or support these forms of work.

In the workplace, any form of discrimination and harassment for reasons related to race, sex, religion, age, sexual tendencies, disability, or other personal aspects unrelated to the activity must be excluded working.

The Company prohibits any conduct conducted for the purpose of harassing an employee or collaborator.

Illegal behaviour and abuse of any kind in the workplace, threats or attacks against employees, collaborators or the Company's assets and property are prohibited.

GELATO D'ITALIA is committed to respecting the privacy of employees and collaborators, by adopting methods for processing and storing personal and sensitive data that comply with current legislation and provide guarantees of effectiveness.

2.13. Protection of Human Resources

Human resources are recognized as a fundamental and indispensable factor for corporate development. Employees are the Company's main resource: for this reason, the latter wants to ensure the involvement of all collaborators in the sustainable vision of the company based on corporate responsibility that involves the entire supply chain.

The Code of Ethics therefore expresses GELATO D'ITALIA's commitment to ethical conduct also towards its employees.

The Company favours the insertion of young people in which to invest and protects professional growth and development in order to increase the wealth of knowledge possessed in compliance with current legislation on individual personality rights, with particular regard to moral and physical integrity of employees and collaborators. We must ensure equal opportunity, full integration and growth opportunities in the company for all workers.

The staff is selected on the basis of objectivity and transparency criteria and is hired exclusively on the basis of regular employment contracts; no form of irregular work is

tolerated. The candidate must be aware of all the characteristics relating to the employment relationship. It is necessary to provide staff with adequate remuneration for a dignified life. Employees are guaranteed compliance with the contractual and supplementary company standards of reference, facilitating the understanding of each worker of the remuneration procedures. Overtime is optional and must be paid. Reasonable daily and weekly working hours are guaranteed to employees, compatibly with the provisions of the law and the CCNL. The recognition of wage increases or reward and incentive systems and access to higher positions or roles (promotions) are linked in addition to the laws and collective labour agreements, to the individual merits of the employees. GELATO D'ITALIA undertakes not to favour forms of patronage and nepotism.

The Company defines, promotes and makes training programs mandatory for all staff based on the principles of necessity, diversification and reiteration.

The Company also undertakes to hire foreigners from outside the EU only if they have a regular and valid residence permit, or in any case have requested their renewal within the terms of the law.

In particular, GELATO D'ITALIA recognizes as its essential principles that:

- the use of child labour is prohibited;
- the use of work without consent, forced, in prison conditions or work in exchange for debt redemption is absolutely prohibited;
- the use of violence, threats, corporal punishment or other forms of physical, sexual, psychological or verbal persecution is also prohibited;
- it is forbidden to ask workers to deposit sums of money or to requisition original documents;
- the use of discrimination on the basis of race, caste, origin, religion, handicap, sexual or political orientation, age in the selection and hiring practices of personnel and against employees is prohibited.

GELATO D'ITALIA undertakes to respect the staff in their mental, emotional and physical integrity, adopting defined and non-arbitrary procedures in the management of disciplinary practices. The Company informs all staff of the rules that underlie any disciplinary sanctions, not allowing in any way the use of non-compliant sanctions or attitudes of mental or physical coercion, including verbal abuse.

The right to form or join trade union and / or collective associations is respected. The Company guarantees that all staff are free to join autonomously chosen unions and that staff representatives are not discriminated against and can freely communicate within the company with all employees.

Employees are guaranteed access to toilets and drinking water and a safe and healthy working environment is ensured.

2.14. Health and Safety in the workplace

The Company undertakes to prepare and maintain safe and healthy work environments in compliance with the accident prevention legislation in force and to spread and consolidate a culture of safety and health at work by developing awareness of the risks, promoting responsible behaviour by all collaborators. Consequently, the Company also undertakes to guarantee ever better health and safety conditions in the workplace, limiting the risks of occupational diseases and accidents, through intervention plans that involve all forms of prevention.

The Company undertakes to take measures to prevent accidents at work and to carry out adequate training for workers on safety at work.

In this sense, GELATO D'ITALIA prepares the necessary measures for the protection of workers' safety and health, including the prevention of professional risks, information and training, as well as the setting up of an organization and the necessary resources based on the following principles and criteria:

- a. eliminate the risks and, if this is not possible, reduce them to a minimum in relation to the knowledge acquired on the basis of technological progress;
- b. evaluate all the risks that cannot be eliminated;
- c. reduce risks at source;
- d. respect the ergonomic and health principles in the workplace in the organization of work, in the conception of workplaces and the choice of work equipment, in the definition of work and production methods, in particular in order to reduce the effects on health of monotonous and repetitive work;
- e. replace what is dangerous with what is not dangerous or less dangerous;
- f. program the measures deemed appropriate to ensure the improvement of safety levels over time, also through the adoption of codes of conduct and good practices;
- g. give priority to collective protection measures over individual protection measures;
- h. give appropriate instructions to workers.

2.15. Environment

GELATO D'ITALIA considers environmental protection as a fundamental value and is convinced of the compatibility between corporate development and respect and development of the environment and the community. Growing in harmony with the territory, limiting the environmental impact represents the objective pursued by the Company aimed at constantly improving the efficiency of production activities, investing in new technologies to decrease consumption and optimize resources.

Environmental policy has as main objectives:

- energy saving and the use of renewable sources, for the sustainable development of the business;
- the limitation of waste production, its correct management, the reduction of waste;
- training and awareness raising at all company levels, to contribute significantly to the change necessary to obtain tangible results.

GELATO D'ITALIA therefore undertakes to operate in full compliance with current regulations, applying the best available technologies, to promote and plan a development of its activities aimed at enhancing natural resources, preserving the environment for future generations by engaging, in particular to:

- a. take measures to limit and - if possible - cancel the negative impact of economic activity on the environment not only when the risk of harmful or dangerous events is demonstrated (principle of preventive action), but also when it is uncertain whether and to what extent the business activity exposes the environment to risks (precautionary principle);
- b. privilege the adoption of measures to prevent any damage to the environment, rather than waiting for the moment of repair of a damage already achieved;
- c. plan an accurate and constant monitoring of scientific progress and regulatory evolution in the environmental field;
- d. promote the values of training and sharing of the principles of the code among all those operating in the company, top managers or subordinates, so that they comply with the ethical principles established, in particular when decisions must be made and, subsequently, when they go implemented.
- e. sensitize employees and collaborators to environmental issues.

2.16. Use and safeguarding of the Company's property

The Recipients are required to operate with due care and diligence to protect the Company's property, through responsible behaviour and in line with the operating procedures prepared to regulate its use, documenting, where appropriate, their use.

The Recipients are responsible for the protection of the resources entrusted and have a duty to promptly inform the structures in charge of any threats or events harmful to the Company itself or its assets.

In particular, it is mandatory to:

- avoid improper use that may cause undue costs, damage or reduced efficiency or otherwise in contrast with the interests of the Company;
- scrupulously adopt the provisions of internal policies and procedures, even if not formalized, in order not to compromise the functionality, protection and security of the Company's IT systems, equipment and plants;
- avoid uploading borrowed or unauthorized software to corporate systems and never make unauthorized copies of licensed programs for personal, corporate or third party use;
- avoid using corporate e-mail for purposes other than your business and in any case do not send messages with abusive and / or threatening content or by using trivial language that could cause offense to the person and / or damage the image of the Company;
- comply with company policies that prohibit the use of the internet for purposes other than carrying out one's business and in any case for frequenting sites having content inappropriate for the corporate decor;

- avoid
 - i. communicating passwords or access codes which it possesses in any capacity,
 - ii. making unauthorized access to other people's IT systems and
 - iii. engaging in conduct aimed in any way at destroying or damaging IT systems or information;
- always operate in compliance with the safety standards provided for by the law and internal procedures, in order to prevent possible damage to property, people or the environment;
- use the Company's property, of any type and value, in compliance with the law, internal regulations, and the principles of this Code of Ethics;
- use the Company's assets exclusively for purposes connected and instrumental to the exercise of the work activity; the use or transfer of the goods by third parties or third parties, even temporarily, is prohibited, except when required by specific regulations or corporate agreements;
- operate, as far as possible, in order to reduce the risk of theft, damage or other threats to the assets and resources assigned or present, by promptly informing the functions in charge in the event of anomalous situations.

2.17. Consumer protection

GELATO D'ITALIA is characterized by the utmost respect for consumers and the satisfaction of their needs by implementing the best quality / price ratio. It undertakes to ensure, therefore, the quality and safety of the products offered for sale and to guarantee the truthfulness of the information relating to them in accordance with the law.

3. GELATO D'ITALIA's commitments regarding the dissemination, application and updating of the Code of Ethics

GELATO D'ITALIA is committed, towards all those involved in the application of this Code, to:

- ensure its timely disclosure, both by making it available to everyone and by implementing appropriate training programs;
- ensure its periodic revision and updating in order to adapt it to the evolution of civil sensitivity, environmental conditions and regulations;
- prepare appropriate support tools to provide clarifications regarding the interpretation and implementation of the provisions of the Code of Ethics;
- adopt an appropriate system of sanctions in relation to any violations;
- adopt adequate procedures for reporting, investigating and handling any violations;
- ensure confidentiality of the identity of those who report any violations, without prejudice to legal obligations, and their professional protection;
- periodically check compliance with and compliance with the Code of Ethics.

3.1. Reporting obligations and requests for clarification

Any behaviour contrary to the spirit of the code must be immediately reported to the Supervisory Body using the methods provided by the Model and, in particular, the appropriate email box.

Whistle-blowers will be guaranteed against any form of retaliation, discrimination or penalty; the confidentiality of the identity of the reporting person will also be guaranteed, without prejudice to legal obligations and the protection of the rights of the Company or of persons accused erroneously and / or in bad faith.

Using the same addresses indicated above, the Recipients can also request clarifications regarding parts of the Code of Ethics and / or of the Model on which they need interpretation and / or orientation.

4. Disciplinary System

Any behaviour contrary to the letter and spirit of the Code of Ethics will be sanctioned in proportion to the seriousness of any infringements committed, in accordance with the provisions of the disciplinary system defined by the Organizational Model, of which the Code of Ethics is an integral part.

The principles expressed in this Code of Ethics are an integral part of the conditions governing the employment relationship in the Company; any violations will result in the application of sanctions in accordance with the current sanctioning system provided for employees, managers, administrators and persons in charge of accounting control, and commensurate with the seriousness of the violation.

Failure to comply with the precepts contained in this Code of Ethics may result in the termination of the existing relationship with third parties on the basis of an explicit contractual provision.

5. Implementation of The Code of Ethics

The correct and effective application of the Code of Ethics is possible only through the commitment and assistance of all those who work on behalf of GELATO D'ITALIA in collaboration with the bodies responsible for the implementation and control process.

5.1 Internal Control

The task of supervising compliance with this Code rests with the Supervisory Body which reports to the Board of Directors at least annually.

5.2. Ethical training

GELATO D'ITALIA, in agreement with the Supervisory Body, undertakes to communicate to all interested parties the values and principles contained in the Code of Ethics, so that they are applied in corporate management.

All staff, subjects belonging to corporate bodies, auditors, consultants, and more generally all the Recipients of this Code must read the Code and undertake following the prescriptions and rules it contains.