



PARODI[®]
NUTRA

CODE OF ETHICS

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Vegetables Oils and Protein Flours for

GOURMET BEAUTY FITNESS PET-FEED NATURE



1. INTRODUCTION

The complexity of the situations in today's society reinforces the importance of clearly defining the values and responsibilities that Parodi Nutra srl recognizes, accepts, shares and assumes.

For this reason, the Code of Ethics of Parodi Nutra srl has been prepared, the observance of which by management and employees, as well as by all those who work for the achievement of the company's objectives, each within the scope of their functions and responsibilities, is of fundamental importance.

Parodi Nutra srl undertakes to promote the knowledge of the Code of Ethics to its employees and non-employees, and by the Stakeholders and their constructive contribution on its principles and contents. The company undertakes to take into consideration the suggestions and observations that may arise from the Stakeholders, with the aim of confirming or supplementing the Code.

In any case, Parodi Nutra srl carefully monitors compliance with the Code of Ethics, providing adequate tools and procedures for information, prevention and control and ensuring the transparency of the operations and behaviors put in place, intervening, if necessary, with corrective actions.

The Code of Ethics is brought to the attention of all those with whom Parodi Nutra srl has relations.

2. GENERAL PRINCIPLES

Compliance with the law, regulations, statutory provisions, self-discipline codes, ethical integrity and fairness are the constant commitment and duty of all Parodi Nutra srl employees and characterize the conduct of the entire organization.

The conduct of business and corporate activities of Parodi Nutra srl must be carried out in a framework of transparency, honesty, correctness, good faith and in full compliance with the rules set up to protect competition.

Parodi Nutra srl is committed to maintaining and strengthening a governance system aligned with the standards of international best practice capable of managing the complexity of the situations in which Parodi Nutra srl operates and the challenges to be faced for sustainable development.

In all its activities Parodi Nutra srl is inspired by the protection and promotion of human rights, inalienable and essential prerogatives of human beings and the foundation for the construction of societies founded on the principles of equality, solidarity, and for the protection of civil, political, social, economic and cultural rights and the so-called third generation rights (right to self-determination, peace, development and environmental protection).

Any kind of discrimination, corruption, forced or child labor is repudiated. Particular attention is paid to the recognition and protection of the dignity, freedom and equality of human beings, the protection of work and trade union freedoms, health, safety, environment and biodiversity, as well as the system of values and principles on transparency, energy efficiency and sustainable development, as affirmed by the institutions and international conventions.

The relationships between the employees of Parodi Nutra srl, at all levels, must be based on criteria and behaviors of honesty, fairness, collaboration, loyalty and mutual respect.

In no way can the conviction of acting for the benefit or in the interest of Parodi Nutra srl justify, even in part, the adoption of behaviors in contrast with the principles and contents of the Code.



3. VALUES RELATING TO LEGISLATIVE DECREE No. 231 OF 8 JUNE 2001

Parodi Nutra srl intends to ensure that the management, the employees as well as all those who act on its behalf, always operate in compliance with the law and therefore do not commit any offenses that may involve the application of one of the pecuniary and / or disqualifying sanctions that the Legislative Decree no. 231/2001 provides in the event that such crimes are committed for the benefit or in the interest of the Company itself.

4. RULES OF CONDUCT AND PROTECTION OF THE WORKERS

The rules of conduct contained in this section are intended to indicate the conduct to be observed in carrying out the various company activities in compliance with the general principles which inspire this Code.

The employees of Parodi Nutra srl, in carrying out their duties, favor a work environment free of prejudices, respecting the personality of the workers; in this sense, they actively collaborate to maintain an internal climate that guarantees respect for everyone's dignity. The relationships between the employees of Parodi Nutra srl are based on values of civil coexistence and are carried out in compliance with the rights and freedom of people, as well as the fundamental principles that affirm equal social dignity without discrimination for reasons of nationality, language, sex, race, religious belief, political and trade union membership, physical or psychological conditions.

Relations between employees, regardless of the levels of responsibility, are carried out with loyalty, fairness and respect, without prejudice to the roles and the various company functions. Each manager of an organizational unit exercises the powers connected to his / her corporate position with objectivity and balance, taking care of the professional growth of his / her collaborators and the improvement of working conditions. Each employee behaves collaboratively, performing their duties with responsibility, efficiency and diligence. Practices of corruption, illegitimate favors, collusive behavior, solicitations, direct and / or through third parties, for personal and career advantages for oneself or for others, are without exception prohibited.

It is never permitted to pay or offer, directly or indirectly, payments, material benefits and other advantages of any entity to third parties, representatives of governments, public officials and public or private employees, to influence or compensate for an act of their office.

Acts of commercial courtesy, such as gifts or forms of hospitality, are permitted only if of modest value and in any case such as not to compromise the integrity or reputation of one of the parties and cannot be interpreted, by an impartial observer, as aimed at gaining benefits improperly. In any case, this type of expense must always be authorized by the position defined by internal procedures and adequately documented.

5. PROTECTION OF THE ENVIRONMENT AND WORKPLACES

Parodi Nutra srl considers its contribution to the development of the territory not only from the point of view of the creation of wealth, but also from the point of view of its environmental and social sustainability, i.e. the reduction of unjustified inequalities, the growth of cohesion and social capital and the prevention and reduction of the negative environmental consequences of material and economic growth. The relationships of trust that the company establishes with the territory in which it operates must be able to include anyone who deserves it and can make a mutually beneficial contribution to sustainable development. The company recognizes the interest of future generations in a possibility of life that is not compromised by the scarcity of natural resources, the degradation of the environment and climate change caused by unresponsive behavior of current generations,



and considers it a priority to proactively manage one's responsibilities of an environmental nature, both towards the communities in which it operates and towards future generations, in a medium-long term perspective. Parodi Nutra srl therefore undertakes to have a preventive approach to environmental challenges, implementing an environmental policy aimed at the progressive reduction of the direct and indirect impacts of its business and the dissemination of greater sensitivity and commitment to environmental protection, with reference to both to the local context (quality of the soil, air and water of the territory in which we live) and to global challenges (biodiversity and climate change).

Preventive and defensive measures are favored, aimed at minimizing the need for an active response - always and only in proportion to the offense - to threats to people and property.

All Parodi Nutra srl People are required to actively contribute to the maintenance of an optimal standard of corporate safety, refraining from illegal or otherwise dangerous behavior and reporting to their superior or the body to which they are a part, any activities carried out by third parties to the detriment the company's assets or human resources.

6. ETHICS TOWARDS THIRD PARTIES - RELATIONS WITH CUSTOMERS AND SUPPLIERS

Parodi Nutra srl intends to develop lasting economic relationships with its customers, based on mutual trust and satisfaction. To this end, the commercial activity is based on a rigorous professional ethics oriented towards the substantial correctness of relationships and continuous improvement of performance through adequate identification of needs and a service characterized by high professionalism, reliability and accuracy.

In all areas of activity in which the company operates, it undertakes to adopt responsible commercial and marketing practices and to always respect the interests of the customer through:

- service models that, by recognizing equal dignity to customers, ensure each customer levels of relationship consistent with the intensity and value of the relationship and appropriate to the complexity of the needs to be met;
- products and services for which the customer can assess the actual compliance with their needs, with transparent, complete, clear and understandable commercial proposals, which promote full awareness of the agreements concluded;
- clear and timely communications on the status of existing relationships, changes in the conditions governing relationships and any other changes to existing contracts;
- the adoption, in compliance with the regulatory provisions, of the necessary measures to identify and manage any conflicts of interest, providing adequate information in this regard;
- refraining from any unfair commercial practice and any form of misleading advertising or in any case not fully responsive to the quality of the products and services advertised;
- constant monitoring of customer satisfaction levels, both through statistical surveys and through a precise orientation of the commercial network, and the management of complaints as an opportunity for improvement, pursuing a substantial and not just a formal solution and seeking elements of convergence with the customer to restore a relationship of mutual satisfaction;
- clear and exhaustive information on how to submit complaints and access to independent bodies for the resolution of disputes.

With regards to the suppliers, Parodi Nutra srl recognizes the importance of these relationships which must be based on mutual independence, trust, correctness, transparency and reliability to guarantee the acquisition of the goods and services necessary to ensure the efficiency and continuity of company production processes. To this end, the company adopts purchasing processes oriented towards the search for the best quality / price ratio according to the needs expressed by the users of the goods and services to be supplied, based on the requisites of cost-effectiveness, quality and technical, commercial and financial reliability and periodic assessment of service levels.



To all suppliers, the company ensures:

- clear and transparent selection procedures, which ensure equal information and equal access to the offer;
- conditions of correct and fair competition in the conduct of negotiations, also through the prevention and contrast of any form of conflict of interest and the pursuit of interests other than those of Parodi Nutra srl
- a constant and constructive comparison for the identification of areas for improvement of the relationship, with particular reference to transparency and compliance with contractual conditions, and for the promotion of greater social and environmental responsibility along the supply chain.

In the case of long-term relationships, which involve investments of a specific nature of mutual benefit, Parodi Nutra srl works to ensure fair compliance with the commitments and expectations on which the contractual relationship is based.

The most significant suppliers may be required to accept this Code of Ethics as part of the related contractual relationships. All suppliers are required to:

- comply with all laws and regulations, as well as any self-regulatory codes adopted, with particular reference to environmental aspects and health and safety in the workplace;
- provide clear, complete, truthful and correct information when negotiating and establishing contractual relationships and refrain from making offers that are inconsistent with their technical, commercial and financial capabilities or that are inconsistent with normal market conditions;
- not to disclose confidential information relating to the company and / or to its counterparties and business partners of which they become aware in the context of the relationship and to refrain from any conduct that could damage the reputation of Parodi Nutra srl or affect the normal conduct of its business;
- consent, where required, to carry out inspections and inspections at their premises and operating units, for the verification of the requisites required in the context of the selection and awarding supply processes;
- refrain from giving, promising, offering, accepting or receiving money, gifts, gratuities, hospitality or any other utility or benefit in relations with the staff of Parodi Nutra srl in order to obtain undue advantages in the assignment of supplies;
- report to the company, in the manner provided, any violation or suspected violation of the Code, by anyone committed, of which they become aware.

7. INTERNAL CONTROL AND VIOLATION OF THE CODE OF ETHICS

Employees or collaborators as well as subjects who in any capacity carry out their activities in favor of Parodi Nutra srl are required to know the rules contained in the Code of Ethics and the reference standards that regulate the activity carried out within their function.

In particular, employees / collaborators are obliged to:

- refrain from conduct contrary to the rules contained in the Code of Ethics;
- contact their superiors and company representatives, in the event of a request for clarification on the methods of application of the same;
- promptly report to their superiors and company contacts, any news, directly detected or reported by others, regarding possible violations and any request to violate them has been addressed; Parodi Nutra srl must ensure the absolute confidentiality of the sender of the communication;
- collaborate with the structures in charge of verifying possible violations;
- adequately inform any third party with whom they come into contact in the context of the work activity about the existence of the Code of Ethics and the commitments and obligations imposed by it on external parties;
- demand compliance with the obligations that directly concern their business;



- adopt the appropriate internal and, if within its competence, external initiatives in the event of non-fulfillment by third parties of the obligation to comply with the rules of the Code of Ethics.

As far as interest is concerned, Parodi Nutra srl must:

- monitor the application of the Code of Ethics by interested parties, and accept any reports provided by internal and external stakeholders;
- expressing opinions on the revision of policies and procedures, in order to ensure consistency with the Code of Ethics;
- provide, where necessary, with the proposal for periodic revision of the Code of Ethics.

Interested parties can report in writing, in non-anonymous form, any violation or suspected violation of the Code of Ethics to Parodi Nutra srl, which analyzes the report, possibly listening to the author and the person responsible for the alleged violation.

Parodi Nutra srl acts in such a way as to guarantee the whistleblowers against any type of retaliation, understood as an act that could give rise to even the mere suspicion of being a form of discrimination or penalization. The confidentiality of the reporting party's identity is also ensured, without prejudice to legal obligations.

8. COMMUNICATION AND TRAINING

The Code is brought to the attention of all internal and external interested parties through specific communication activities.

A copy of the Code of Ethics, on paper or electronic format, is distributed to employees, and to all third parties who enter into contractual relationships with Parodi Nutra srl

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STAMP AND SIGNATURE

Andrea Parodi
President
ParodiNutraSrl

Genova, 23 luglio 2021

Documento senza firma perché generato elettronicamente
Document without signature because electronically generated