



# CerealVeneta

CEREAL, SEED AND PULSE PROCESSING



*Title:* **CORPORATE CODE OF ETHICS**

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## 1. GUIDING PRINCIPLES

Ethics is the tendency to strive towards one's absolute value. Morality is the conformity of a given behaviour to the dictates of the society in which one lives; ethics contributes to civilisation.

CerealVeneta, in addition to complying with all European, national, local authority and voluntary certification laws, rules and regulations, has since 2013 adopted a code of ethics for the enhancement of the company and everyone working in it.



In addition, guidance provided by ethical principles is also important, legally speaking, given the contents of Italian Legislative Decree no. 231/2001 et seq. on the liability of entities for offences committed by all those working on behalf of those entities (from managers to employees to partners).

This manual aims to show employees, regardless of their job or relationship, a different way of understanding work and life, i.e., a way which, far from being exploitative, is aimed at constantly increasing their value and that of the company, without needing to eliminate anything or anyone, but through on-going efforts of integration, training, professional and intellectual growth:

**1<sup>st</sup> principle:** the growth process is by integration.

**2<sup>nd</sup> principle:** the way of growth is through training.

**3<sup>rd</sup> principle:** nothing and no one is "eliminated".

**4<sup>th</sup> principle:** growth cannot be separated from social and environmental aspects.

**5<sup>th</sup> principle:** training is professional and intellectual, therefore, CerealVeneta proposes these principles to everyone, and adopts measures and company rules to encourage, incentivise and promote, the ethical aspects presented herein.

In order to comply with these principles, CerealVeneta issued the following Code of Ethics in July 2013, which is included in the Quality Manual and posted on the company notice board:

*“The journey of life poses difficulties, which, once overcome, shape all men and women, giving them strength to face new challenges, ventures, and battles as they go on living. Life is indeed the ultimate challenge, test, and intellectual battle, which must be lived without ever making us feel small, incapable, weak, predestined, inferior, or subservient. We must confront the absolute and infinite, always striving to find the way, or rather, the “third way”, to success, without ever needing to eliminate anyone but always adding value.*

*Being Open to Others makes it possible to learn from everyone without any prejudices and constraints of race, gender, age, religion, social status, and other human and social barriers.*

*Truth is not transmissible and knowledge does not determine behaviour. This is why it is necessary for everyone, while staying humble and persevering, to implement and avail of tools for training, sharpening their skills, adding value, and acquiring knowledge.*

*CerealVeneta, implements the dissemination of technical knowledge to raise awareness in employees regarding their role in the company while also providing academic training to add value to everyone's lives.*

*The current economic crisis, which is the result of failing to invest in ourselves in favour of attractive financial returns that make life “easier”, must NEVER, under any circumstances, EVER, be taken as an excuse to stop doing, growing, fighting, while giving in, delegating, or abandoning ourselves at the mercy of all aspects of corporate and personal life.*

*No one can bathe twice in the same river. Everything changes, continuously and incessantly. In a world where life seems to offer no protection or choices at times, CerealVeneta accepts the challenge of globalisation, but, through integration, changes and upholding values”.*

## **Corporate ethics policy**

The guidelines contained in this Code of Ethics are an integral part of the Quality Policy of CerealVeneta Srl.

Following a first and important implementation in 2015, CerealVeneta renews its commitment to ethics with this new revised edition of its Code of Ethics.

CerealVeneta asks all employees to read this document, provide feedback, and propose additions and improvements while taking the opportunity offered by drafting this Code to thank everyone for their contributions and the value added.

## 2. MISSION AND VISION

The company's Mission and Vision are an integral part of the company's quality system, and have been drawn up by integrating the notions of quality, ethics, training and growth.

### **Ethical and social mission of work**

CerealVeneta's primary focus is on grain processing that contributes to the health of those who use it. Since its inception, CerealVeneta turned to wholegrain products as a source of health over refined products, whose benefits have been proven by the globally-recognised medical literature.

The company's products are therefore aimed both at people with various metabolic disorders (diabetes, obesity, gout, hypertension, celiac disease, food allergies, etc.) and at anyone wishing to look after their health.

### **Whole-grain, gluten-free, NON-GMO products**

CerealVeneta's work focuses above all on the promotion and dissemination of organic or integrated farming and NON-GMO whole-grain products.

### **“Gentle processes”**

CerealVeneta's processes (low-temperature roasting, pre-cooking, cryo-milling, cryo-micronisation) preserve the biological properties of foodstuffs (vitamins, anti-oxidants, vitaminoids, fibre, germ), while increasing or forming healthy structures such as melanoidins or furanones. In addition, its processes can make products more digestible and sanitise grain and flour from microbiological attacks, therefore avoiding the use of chemicals.

### **Research**

CerealVeneta carries out extensive basic and specific research into countless new or innovative raw materials, often unknown even to the general health-conscious public.

Raw materials under study include: Perilla, Nigella, Fonio, Veccia, Sorghum, Scagliola and other specialty grains.

Research areas include: gluten-free bread with a low and glycemic index and load, super-foods, damaged starches, products with very low levels of peroxides and aldehydes.

### 3. GENERAL PROVISIONS

#### Intended recipients of the corporate code of ethics

Everyone. In other words, no one is excluded from contributing in ways deemed appropriate ways and based on their training and awareness.

CerealVeneta would like to highlight that this code is an integral part of the employment contract.



#### Contribution reports

It is possible, proper, and ethical to report to the management or to the personnel relations contact person any ethical aspects that have not yet been considered or that can be improved, in addition to reporting non-compliance by any party, sector, or department.

Each report will be taken into account and evaluated.

CerealVeneta prohibits any retaliation against employees who make reports and, at the same time, if these are aimed at other people, will protect their rights, the goal being to increase value and not to punish.



## **Counselling contact person for difficult situations**

CerealVeneta has set up an impartial contact person to listen and provide counselling to employees experiencing any issues or situations of discomfort at work or that have repercussions on work, who may not wish to express their difficulties directly to the Management or their Supervisor.



Employees may experience a wide range of issues ranging from those that are work-related to acts deemed as humiliating or degrading, such as mobbing. In addition, employees may be exposed to: opinions on safety at work or specific personal, family, or social situations that may represent a social stigma, such as those related to race, religion, homosexuality, the use of certain drugs or substances of abuse. These and other situations may prompt employees to prefer mediation by a third party figure and a certain amount of privacy.

The counselling contact person shall address issues experienced by employees providing accurate advice and guidance.

The name, qualifications, telephone number, and e-mail address of the counselling contact person can be found in the company's Quality Manual and is also posted on the company notice board.

## **Rules, laws, regulations**

This code cannot replace mandatory provisions, but it can improve them and help find appropriate ways to fully implement such provisions where only partially implemented or not at all.

It goes without saying that binding legal provisions cannot be disregarded by anyone.



## 4. PRIVACY AND CONFIDENTIALITY

### Privacy legislation

CerealVeneta applies all the provisions in force on the protection of privacy (Italian Legislative Decree No. 196/2003 and subsequent amendments).

Mandatory privacy documentation is available in electronic and paper format.

A company **privacy manual** exists.

**Employees' personal files** are entrusted to the management and stored inside a closed filing cabinet.

The company's legal representative is responsible for **privacy**.

**Acute and chronic diseases.** Acute or chronic illnesses suffered by employees who do not wish to disclose them but who would like to be protected in the event of an acute attack are managed by the privacy officer; the latter shall only inform staff who need to provide emergency assistance in the event of a crisis, without compromising the person's life (epilepsy, allergy, fainting spells...).

**Use of drugs or special situations.** Only when deemed strictly necessary, the privacy officer will inform personnel of any specific situations, e.g., pregnancy, psychotropic medication, etc., to protect employees and their need for privacy.

Investigations into the opinions and personal preferences or the private life of staff are not permitted. Nor any form of denigration, degradation, mockery of a person, who must instead be helped to find purpose and value in his or her life

### Company rules, confidentiality

Company rules on privacy and confidentiality of sensitive data are fully explained in the company's Privacy Manual.



## 5. SAFETY AT WORK POLICY

### Safety legislation

Safety at work is of utmost importance to CerealVeneta, which has implemented an accurate and conscientious company programme in addition to all mandatory provisions.

The RAD (DVR) is continuously being updated and is highly comprehensive even in paper form, being divided into 15 risk-class folders.

All aspects are taken care of with the utmost precision:

- 1) Acute injuries.** All mechanical protections and PPE have been adopted to reduce accidents to those which are unpredictable.
- 2) Chronic diseases.** In practice, there are no particular situations that could expose employees to risks of chronic illness from exposure to chemical or physical or mechanical toxins, with the sole exception of noise, which is a strongly controlled parameter.
- 3) Medical check-ups.** All employees are obliged to undergo recruitment and periodic medical check-ups.
- 4) Promotion of health and safety at work.** All employees are encouraged to cooperate to improve work safety and strictly comply with legal and company safety regulations, even if they go beyond what is required by law.



### RAD Manual (DVR)

The Risk Assessment Document (RAD, or “DVR” from its Italian initials) contains more in-depth information.

### Occupational safety notice board

CerealVeneta has a notice board displaying the main company risks, how to prevent them and instructions in the event of an accident.

## Health promotion

Health is not only about preventing accidents at work but is driven towards adopting a healthy lifestyle.

A healthy diet, no smoking, intellectual activity and moderate physical activity are essential for good health.

CerealVeneta also encourages the implementation of these health and lifestyle parameters with the management leading by example, as well as through information posted on the company notice board and in-house training courses.

In addition, CerealVeneta has an on-site nutritionist for any advice employees may need.



### **Drugs, alcohol, smoking and substances of abuse**

Without prejudice to the mandatory provisions of the law, CerealVeneta informs its employees (also through on-site training courses) on the consequences of the use or abuse of psychotropic and psychoactive substances, both for themselves and concerning others (fellow employees, forklift and road accidents, etc.).

Only **coffee** is accepted as a psychotropic substance, the use of which is also encouraged, even decaffeinated, due to its clear positive health effects (unless it causes tachycardia, hypertension, stomach pains, or insomnia).

**Alcohol** cannot be consumed during working hours. It must be noted that mandatory provisions require zero blood alcohol levels (when operating a forklift truck or driving a company car). While drinking a glass of wine may have benefits, this must be done privately and not during working hours; after finishing work, and not before or during the working day.

The toxicity of **drugs** varies widely. CerealVeneta complies with all mandatory provisions. Employees who are dealing with these issues can seek help from the company's hearing officer without worrying about repercussions; the latter shall assess employees, advising them on the best course of action while avoiding affecting the safety of fellow employees.

**Drugs** that affect attention span (benzodiazepines, antipsychotics, anti-anxiety drugs, etc.), even when prescribed by NHS doctors, have been widely recognised as dangerous for driving safety. CerealVeneta's corporate contact person is available for advice in these cases too.

CerealVeneta requests all employees to comply with safety regulations. When driving to visit other companies or to attend market fairs, both in terms of sleep and when due to the use of alcohol or other substances, employees must be honest with themselves and admit when they are not well-enough enough to drive to avoid being involved or involving others in traffic or other work-related accidents. Far from this being a moral disqualification, it is instead a demonstration of common sense, understanding the situation, and great respect for oneself, one's colleagues, and society as a whole.



### **Provisions adopted in the RAD (DVR) on driving safety**

- Scheduled vehicle insurance and inspections.
- Winter snow tyres compulsory during prescribed periods.
- Seat belts are also compulsory for rear passengers;
- Preferably use NCAP 5 star assessment vehicles;
- Smoking is not allowed in cars;
- Cars must be in perfect working order and regularly maintained;
- Prohibition of consumption of any alcohol six hours prior to driving a vehicle and limited to the equivalent of one glass of wine consumed 18 hours prior to driving;
- Employees are prohibited from driving company cars when using psychotropic or psychoactive substances, even if prescribed by a doctor (BNZ and other psychotropic drugs, when medically prescribed, conversely increase the risk of accidents). An exception to this is caffeine (coffee, cola...), which, although active on the CNS, increases concentration and attention and therefore reduces the risk;
- Obligation to stop, rest, have a coffee, in the event of feeling tired or sleepy when driving;
- Obligation to comply with road safety instructions (speed, safety distance...), and driving instructions (glasses...).



## 6. EQUAL OPPORTUNITIES POLICY

CerealVeneta not only prohibits discrimination between people but also fosters the education of all individuals and intervenes in personal and interpersonal crises on the grounds of gender, religion, age, race, or any other reason.

### **Pregnant employees or mothers**

Pregnant employees enjoy maximum protection.

As specified in the RAD (DVR, from its Italian initials) the following provisions apply:

CerealVeneta will implement one or more of the following measures to put into practice the protective measures deemed necessary to avoid the exposure of pregnant employees or mothers to risk:

- Temporary changes in working conditions or working hours.
- Transfer of the employee to another department or a low-risk job, with written notice sent to the Provincial Employment Office.
- Expulsion of the employee and simultaneous written notification sent to the Provincial Employment Directorate for a work prohibition order issue.



### **Gender equality**

The president of CerealVeneta Srl is a woman, as is the purchasing manager. There has never been any female-based gender preclusion.

### **Religious discrimination**

There is no reason for religious discrimination.

Employees are free to practice any religion and have their special needs met by negotiating them with their manager, management, and religious authority to avoid conflict with company guidelines (e.g., Muslim worshippers during Ramadan).



### **Employment of minors**

CerealVeneta has never used under-age employees. As set forth in the company RAD:

CerealVeneta does NOT use under-age employees, neither in production nor in any other department or task.



### **Uncomfortable situations**

CerealVeneta has provided Italian courses at its own expense to foreign employees who spoke no Italian.

When it comes to recruiting people from protected categories, CerealVeneta has a barrier-free structure in place.



### **Sexual orientation**

Discrimination on the basis of personal preferences and sexual orientation is unacceptable.

### **Sexual harassment**

Sexual harassment is unacceptable. Sexual interest must be expressed in a manner and form deemed appropriate by society. Nothing, least of all love, can result from violence and oppression.

### **Mobbing**

CerealVeneta ensures that bullying does not occur in the workplace. In addition to being punished by mandatory laws due to its impact on people's health, bullying undermines corporate integrity and damages the quality of work.

## Undeclared work

CerealVeneta does not accept undeclared work in its operations.

## Whistleblowing

CerealVeneta implements the protection of whistleblowers, as per Italian law No. 90/2012 with Article 54bis for the protection of employees who report wrongdoings in Italian Legislative Decree no. 165 of 30/03/2001.

Many of the issues in this chapter are governed by State law, even in a strict manner.

CerealVeneta's duty is not to substitute the State but to ensure that no abuses or injustices are committed and lend an extra hand concerning compliance with State laws.

CerealVeneta, through the company contact person, provides personnel with someone capable of assisting them in matters of a personal nature, concerning privacy, or when faced with personal difficulties that may arise. The company's contact person will assist personnel in resolving conflicts or unpleasant situations ethically, and provide guidance for anyone who requests it, on intellectual training to grow and develop their career.





## 7. ETHICS IN INTERNAL RELATIONS

### Communications

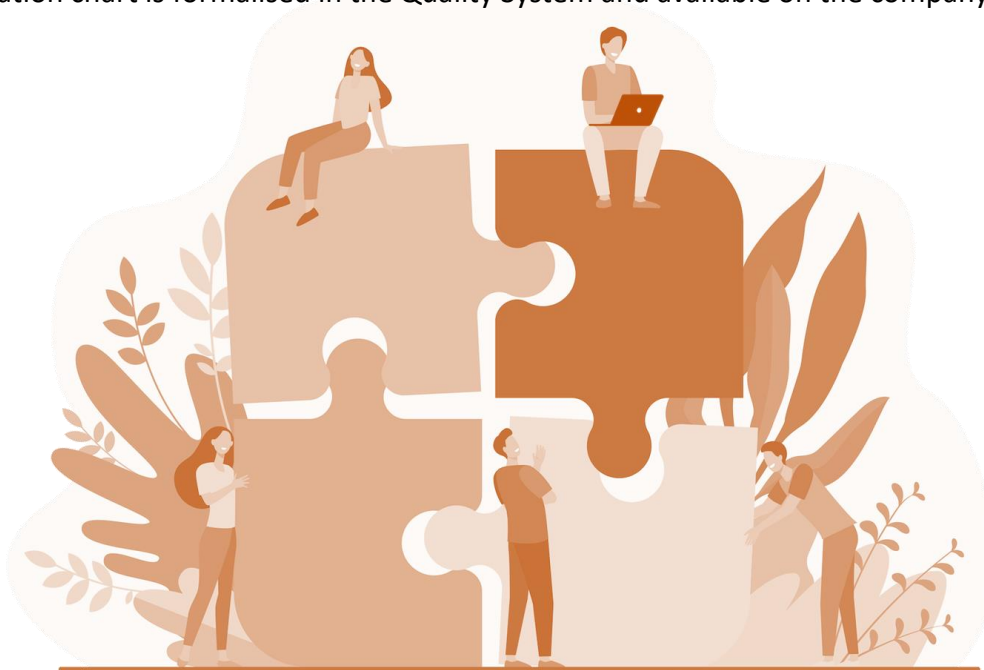
Communications is not just the "transfer of data", which is essential for good business performance, but the process of understanding the complete message conveyed by a person.

It is based on listening and interpreting between the lines of what is said, and not, therefore, on what is already known or how we view things.



### Organisation chart

The organisation chart is formalised in the Quality System and available on the company notice board.



## Duties of employees

All employees are expected to assume responsibility for their work, ask for information when something is unclear, and provide help to those who request it. Asking for help implies receiving specific training on the aspect in question, an explanation clarifying the “meaning” of the operation on which clarifications are being sought.



### All employees are obliged to comply with:

- Own property, property of others and company property.
- One's own, others' and the company's image and dignity values.
- Using tools and equipment in an appropriate way, including the Internet.
- Maintain the secrecy of company data and the confidentiality of colleagues' sensitive data indefinitely, without fail, even following the termination of employment.
- Work without ever endangering your own safety or that of colleagues.
- Not pursue personal goals that are in conflict with the company's or conduct business in competition with the company.
- Not indulge in reactionary and offensive language with anyone.
- Look after their appearance and present themselves neatly, in a clean and dignified manner that shows respect for themselves, their colleagues and the company.
- Comply with all applicable national or local laws.

The Company contact person and technical manager are available for any clarifications needed.

## Recruitment of relatives and friends

Close relatives or friends of CerealVeneta employees may be hired as long as the hiring is based on the new employee's specific skills, performance, experience and abilities.

This does not imply favouritism, but rather appreciating an employee's specific recommendation of someone with many achievements and qualities. It is also in the interest of CerealVeneta, the employee, and the person they recommended (i.e., no one excluded) that people who are known for their skills join the company.

## Career opportunities

CerealVeneta is always on the lookout to offer career opportunities to all employees and to acknowledge an employee's commitment to the company in financial terms. Therefore, it not only provides fair remuneration but also incentives for employees to increasingly achieve bigger goals in terms of work.



## 8. ETHICS WITH REGARD TO EXTERNAL RELATIONS, CUSTOMERS AND SUPPLIERS

### Gifts, favours and other benefits

CerealVeneta does not allow its employees to accept gifts, favours or other benefits from people or companies during the course of their work.

Symbolic exchanges showing hospitality and cordiality are possible and indeed encouraged, such as accepting or offering coffee, business lunches and the like, which should however be reported to management or the person in charge.

It is recalled that the use of certain systems may constitute a criminal offence in terms of corruption if carried out for public officials.

CerealVeneta also strictly prohibits the taking advantage of any kind for personal benefit, not only in pecuniary terms, but also in giving or receiving loans, erotic favours, " profit skimming ", bribes or the like.

"Ethics' also means that these rules cannot be circumvented e.g. by using third parties!

### Relations with customers and suppliers

Relationships with people are often difficult, including with colleagues or customers. Misunderstandings, trade-offs, and mistakes are inherent to the act of speaking. While these cannot be eliminated, training is needed so as not to incur in fundamentalism, taking absurd and counter-productive positions for themselves and for the company.



Relations with the company's customers must therefore be based on the utmost fairness and respect for the contact person, as well as compliance with regulations in force, without availing of any commercially unfair practices. Product quality is critical. However the sales process is equally critical!

In purchasing processes, suppliers are selected on the basis of objective criteria, such as price and quality of service, timeliness of delivery and payment.

CerealVeneta promotes personal and intellectual training, encouraging employees to read and helping them to do so through appropriate company training of an analytical and cultural nature.

### **Relations with the public administration, SIAN, SPISAL, NAS, etc.**

Relations with the public administration, SIAN, SPISAL, and others, are inspired by principles of fairness, impartiality, and independence and are specifically reserved for the relevant company departments, the management, and technical manager.

### **Media relations**

Corporate communications with the mass media, magazines, newspapers, TV, etc., are entrusted to the salesperson, to the

Marketing department, and the duty lies with the company's legal representative.

In the event of various disasters, these must be dealt with through the company's crisis management procedure, for which the company's legal representative is responsible.

### **Political parties and trade unions**

CerealVeneta does not finance political parties or discriminate against employees on the basis of their political party or trade union membership



### **Anti-trust and competition law**

CerealVeneta does not, and never will, engage in any conduct that may undermine the principle of free competition. This prohibition applies to the company itself, as a founding principle of CerealVeneta and all employees.

### **Transparency of accounting records**

The company operates with maximum transparency in terms of administration and accounting, ensuring the truthfulness, accuracy, and completeness of information relating to all accounting entries

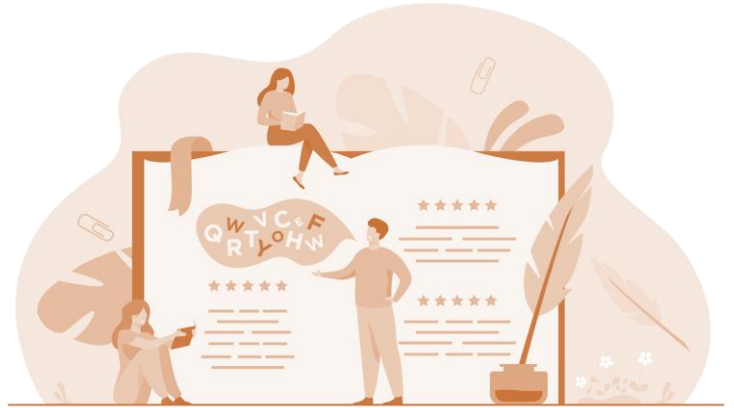


## 9. COMPANY CULTURE

CerealVeneta, through its belief, integration within the social fabric in which it operates and seeking to always achieve quality, has adopted a policy of company culture and employee well-being, which is expressed in various different aspects:

### **Cultural, intellectual promotion**

CerealVeneta also promotes, through sponsorship, events of a cultural and intellectual nature, such as lectures by leading personalities, with the aim of distributing books or fostering intellectual aspects or ways of life.



### **Promotion of education**

CerealVeneta promotes learning through sponsorships, or active participation, in events and demonstrations with schoolchildren in the area, including through visits to the plant.



### **Corporate welfare**

CerealVeneta has implemented, with the help of specialised companies, forms of corporate *welfare*.

## 10. ENVIRONMENTAL POLICY

Since its establishment, CerealVeneta has focused its activities on the highest civil and ethical aspects: from wholemeal to organic products and environmental health. To this regard, the company has seized opportunities to lend a real hand to the environment.

### **Alternative energies**

CerealVeneta has installed a solar system on the entire roof of the plant, which helps produce a considerable part of the energy needed for processing.

### **Atmospheric emissions**

CerealVeneta's emissions of combustion residue gas into the atmosphere are extremely low and periodically controlled. These are mainly made up of methane gas combusted by a state-of-the-art, highly efficient thermal power plant, and dust comes from the milling of various seeds, i.e., flour dust, which in any case is controlled by law.





### **Asbestos, radiation and other chemical or physical poisons**

There are no toxic materials such as asbestos, heavy metals or other chemicals in the company. No toxic radiation is produced, such as X-rays.

### **Land grabbing**

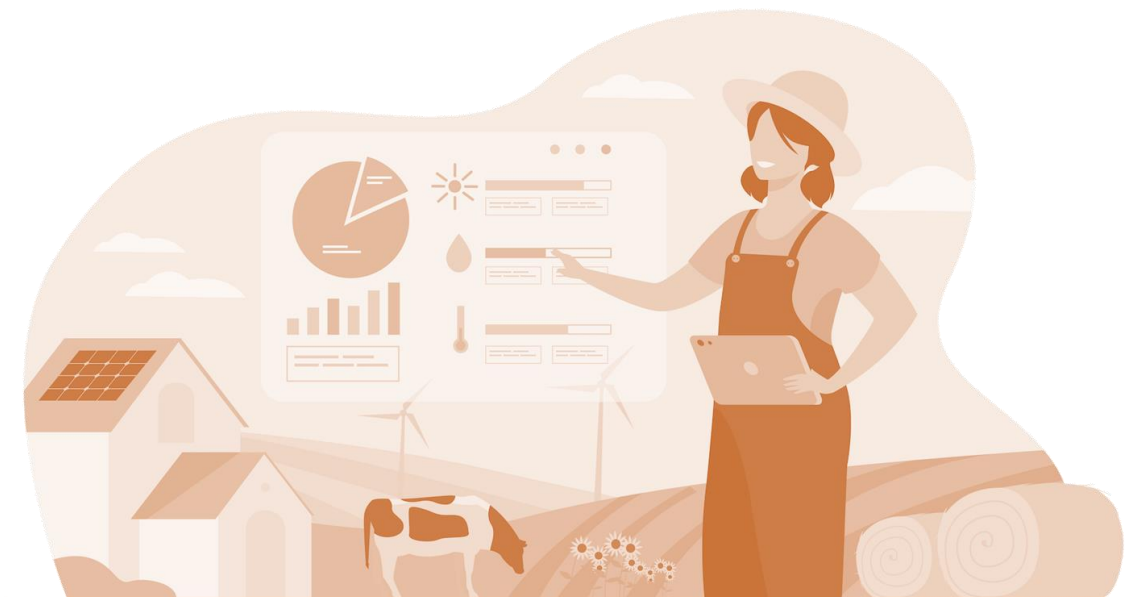
CerealVeneta does not accept land-grabbing policies, does not even indirectly encourage them and, indeed, is committed to continuing its policy of enhancing the resources of the local community.

### **Sustainable agriculture**

CerealVeneta promotes a model of ethical and sustainable agriculture. It encourages local, organic, wholemeal and *gluten-free* production.

### **Water policy**

CerealVeneta does not use water in its processes. Nevertheless, it pays attention to water quality and ensures that there is no waste in everyday personal use.



## **Waste**

All CerealVeneta's waste, although free of toxicity, is disposed of in accordance with the law after it has been sorted for recycling. This is not only the case for its business activities, but also for waste arising from personal use in dining areas and the cafeteria.

## **Other types of pollution**

CerealVeneta pays attention to all types of pollution. In this respect, it has drawn up a RAD plan with 15 folders, one for each risk-class.

## **Green policy**

We believe that nothing explains the "green" spirit and the striving for quality and environmental value of the company's family management team more than the cherry tree in bloom on the green lawn in front of the company's executive offices.



## 11. INTELLECTUAL TRAINING

CerealVeneta actively fosters the intellectual training of all employees.

Among other initiatives:

- Intellectual training courses with internationally renowned lecturers.
- Registration, transcription and publication of these courses in book form. Course booklets produced as above are distributed free of charge to employees.
- Establishment of a company library, with free book loans.



## 12. INTERNAL MONITORING SYSTEM OF THE CODE OF ETHICS

CerealVeneta Srl undertakes to implement, comply with and enforce the ethical rules described herein.

The person in charge of internal ethical monitoring activities is the company's Legal Representative, who may delegate these activities or some of them to a trusted person.

Tasks include continuous monitoring of the effective application of the code of ethics, reporting infringements to the management as well as opinions and observations on possible revisions or implementations of the code of ethics.



## 13. BREACHES AND PENALTIES OF THE CODE OF ETHICS

Infringements to be reported to the relevant authorities or subject to penalties by the company concern those relating to the Workers' Statute, Italian Legislative Decree no. 231/01, Italian Law no. 190/12 et seq.

Concerning breaches of the CerealVeneta Code of Ethics in the strict sense, the company will call for compliance, implement training, and implement standards, rules, and reasons to stimulate the growth of all individuals and the company.

