



CODE  
OF ETHICS  
THIRD EDITION

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# Introduction

This is the third edition of Fruttigel's Code of Ethics, after the first in 2009 and the second in 2019.

The introduction of the second edition said: *Fruttigel's Code of Ethics came into effect in 2009. [...]. In this period many things have changed in our economy and in our society and it is necessary for the Code will take these into account [...]*, but no one, at the time of the 2019 review, could have imagined that the changes that the world has experienced over the of the previous eleven years - from 2009 to 2019 - would have been surpassed in intensity by those of the following three years, the same changes that we are experiencing even now and which are indirectly reflecting in this third edition.

In fact, it was inevitable to consider all the big changes of these three years: a society profoundly affected by the pandemic, growing social inequality, war, and the deterioration of the economy, with the final effect, that doing entrepreneurship is increasingly demanding, but also - for people - to work, realize the own aspirations, and enjoy the right serenity.

It is in difficult conditions like the ones we are experiencing that it is more necessary to face, look for and give active listening and willing to communicate, in short, to collaborate, especially among those who are sharing the working day time. Therefore, it involved a group of Fruttigel workers for the revision of the Code who, during the re-reading of the Code, tried to identify the best way to deal with the questions that inevitably occur day by day in the workplace or relations with different interlocutors, from customers to suppliers, in this connection, what is happening in our society and in our economy.

This new modality of revision was also adopted to encourage greater knowledge and wider use of the Code, which is not an organizational tool or a disposition imparted by a hierarchical order, but a way of organizing and facilitating the work and relationships

between those that are living more directly the company, both workers and collaborators, but also suppliers, customers and communities with which Fruttigel interacts.

The re-reading and adjustments compared to the previous edition also had the aim to improve the Code, and be more readable, efficient, understandable, and easily usable to be able to speak clearly to all internal and external audiences.

## Fruttigel's Mission

*Fruttigel is a significant player in the agro-industrial supply chain, in which cooperation is encouraged in the areas of production, processing and distribution, helping to offer people wholesome food.*

***To nurture** entrepreneurial, professional and social relations, founded on the values of responsibility, participation, respect and transparency.*

***To consolidate** the company's financial, industrial and relational values, assets for existing and future shareholders and for the development of cooperation.*

***To foster** innovation, service improvements and professional expertise in order to increase the efficiency of the supply chain and competitiveness.*

***To adopt** technological and organisational systems that guarantee the health of consumers and workers and protect the environment, contributing to the social development of neighbouring communities.*

***To show** that even in highly complex industrial conditions it is possible to do business while respecting people, their work, competition and the market.*

## Core values

All of Fruttagel's activity is guided by these values:

### **Food safety**

Fruttagel's main commitment pertains to consumer health. The food people eat must contribute towards their wellbeing.

### **Environment**

Protecting land, respecting natural resources, saving energy: these are Fruttagel's fundamental rules.

### **Entrepreneurship**

Fruttagel sees its business as being a producer of shared value, competing in the market and fostering innovation.

### **Cooperation**

The idea and practice of cooperation represents for Fruttagel its historical roots, social intentions and willingness to promote collaboration among workers both inside and outside the factory.

### **Integration**

Fruttagel seeks to add to the value of the food chain, and works to maintain a balance of interests among its stakeholders.

### **Community**

Fruttagel considers people as individuals with active relationships in the physical and social environments.

### **Accountability**

Fruttagel believes that everyone is responsible not only for himself, but for the whole of which he is a part.

## References

Fruttagel's Code of Ethics recognises and refers to the recommendations and requests of leading international organisations in the area of business ethics, including the Base Code of the Ethical Trading Initiative (ETI).





# General Principles

## 1. Recipients of the Code

The recipients of the Code are all those who for various reasons and with different degrees of responsibility work directly and indirectly to achieve Fruttigel's goals.

## 2. Definition of ethical behaviour

Ethical behaviour is a way of acting in keeping with the company's values and mission, a duty for all those making up the organisation of Fruttigel and working to achieve its goals.

## 3. Entrepreneurial responsibility

Fruttigel is committed to increasing its role in the market and the importance of cooperation in the agro-industrial chain, adding to the company's value, increasing benefits for its stakeholders, using resources as efficiently as possible.

## 4. Respect for work

Fruttigel protects the physical and moral integrity of workers, ensuring safe, healthy working conditions that respect individual dignity. Fruttigel is committed to ensuring that all players in the supply chain have the same respect for their employees and collaborators.

## 5. Confidentiality of personal data and respect for the private sphere

Fruttigel guarantees respect for people's private sphere and ensures the confidentiality of personal data in its possession. All personal data may be used exclusively for purposes relating to the running of the business, complying with established security measures.

## 6. Confidentiality of information

Fruttigel considers information on the company's business activity to be an asset of the organisation, to be protected and managed correctly. Everyone is required to protect the information acquired,

avoid improper or unauthorised use and manage its contents in the ways established by Fruttigel.

## **7. Environmental Protection**

Fruttigel manages its activities with respect for the environment. For this reason it uses the most suitable technologies to prevent risk and reduce direct and indirect environmental impacts.

## **8. Food security and health**

Fruttigel operates so that its products and processes ensure and protect the health of consumers and reduce environmental impacts. To achieve these ends, Fruttigel believes that all workers need to take individual responsibility, and for its part the company seeks the most innovative technical solutions.

## **9. Integration with the community**

Fruttigel believes in and is committed to collaboration and reciprocity with the territories in which it operates. In this way it promotes dialogue with local communities, institutions and social partners to increase job opportunities and economic development.

## **10. Value creation**

Fruttigel - by safeguarding the company's assets and responsibly managing its business and invested capital - is committed to creating medium/long-term value for all shareholder categories. It is also committed, through collaboration, to attaining shared value.

## **11. Commitment to reporting**

Fruttigel provides its shareholders and all stakeholders with complete and accurate information to allow checks on the consistency between its activities and the principles set out in the mission, in part through the drafting and dissemination of the sustainability report.

## **12. Value of training and communication**

Fruttigel is committed to active engagement with all interlocutors and realizes to the aim a transparent communication, recurring or ongoing with them, for sharing and exchanging competences

and knowledge, and for the development of the collaboration in a reciprocally way.

### **13. Accountability towards future generations**

Fruttigel acts to add value to its assets, aware of its indivisibility and intergenerationality, and to safeguard all tangible and intangible assets and corporate resources, making sure they are not used inappropriately.

### **14. Accountability of the directors**

The directors are obliged to implement the provisions of this Code, being committed to its dissemination and to the continuous improvement of the organisation.

Directors must promote the interests of the cooperative and not exploit their position to obtain benefits for themselves or their organisation of origin.

### **15. Commitment to contributing shareholders**

Fruttigel sees itself as a tool for the growth of member farms through the direct and indirect enhancement of contributions received, the cost-effectiveness and quality of technical means and the agronomic services offered. Fruttigel encourages and supports contributing farm members to ensure that the quality and cost of their production is competitive, and is committed to enhancing the agricultural raw material of contributing members in order to strengthen cooperative ties.

### **16. Commitment towards the agro-industrial sector**

In all its economic, professional and social relationships Fruttigel seeks to add to the value of agro-industrial chain production and foster its fair distribution among actors in the supply chain.



## CHAPTER TWO

# Relations with employees

### 17. Reference to the Membership Charter

With regard to the conduct expected of workers in the workplace and to communication, safety and quality, this Code refers to the Membership Charter (Carta dell'appartenenza) released in 2017, which must be considered as an integral part and an analytical device of the Code itself.

### 18. Definition of employee

For the purposes of this Code of Ethics, an employee is anyone who has a fixed-term, open-ended or temporary employment relationship with Fruttigel, or relationship regulated by any other contractual form, providing it is designed to contribute to achieving the company's aims.

### 19. The value of example

All those who hold positions of responsibility are called upon, through their conduct, to bear witness to the values and provisions of this Code of Ethics.

In particular, they must comply with discipline and honesty criteria when running the company, generating value and mutualistic benefits and handling professional and human relationships.

### 20. Personnel selection

Personnel are hired through a carefully organized selection process, approved by company management and part of the Quality management system. The aim is to identify the most suitable candidate from an objective standpoint for each vacancy, without discrimination of any kind and with full respect for equal opportunities.

### 21. Representation and trade union relations

Fruttigel, having complete respect for trade union freedom and for provisions contained in laws and contracts, encourages a constructive climate for trade union relations.

All those holding positions of responsibility are required to contribute to seeing this principle upheld.

## 22. Involvement and participation

Frutttagel considers the involvement and participation of its employees to be fundamental in improving the employment relationship. To this end, it is committed to providing its employees with information about how the company is performing at regular intervals, using ad hoc communication tools.

## 23. Transparent relations

Relations with employees are based on transparency criteria, giving them the opportunity to contribute to the development of the organization. From the moment they join the company, employees are informed of the regulations in force and involved in initiatives to facilitate their entry in the organization.

## 24. Value of training

Frutttagel recognizes the importance of training as an indispensable factor for increasing the competence of employees and collaborators and as an indispensable factor for sharing and exchanging skills and for increasing the sense of belonging.

## 25. Value of growth and skills

Frutttagel guarantees a work environment in which skills can be honed, and is committed to undertaking training initiatives for the professional growth of its employees.

To this end, those in positions of responsibility are required to transfer to collaborators the knowledge needed to carry out assigned duties.

## 26. Recognition of differences

Frutttagel guarantees equal treatment for all its workers and takes into account their conditions to facilitate work-life balance.

## 27. Protection of the individual and equal opportunities

Frutttagel, as Institution and people that constitute it, rejects all forms of discrimination. In particular, physical condition, disabilities, opinions, religion, nationality or ethnicity, gender, sexual orientation or gender identity cannot be the subject of discrimination.

As specified in the Membership Charter, each employee is required to be have in keeping with this principle, collaborating with and assisting colleagues.

Fruttigel helps to support workers going through periods of difficulty that may prevent the normal development of their working activity.

### **28. Protection of health and safety**

Fruttigel disseminates and furthers a safety culture among its employees, developing an awareness of risks and requiring responsible behaviour on the part of everyone.

Employees must comply with the goals and plans of the occupational health and safety management system, and actively collaborate to carry out all the necessary controls. Please refer to the Membership Charter on this point.

### **29. Colleague relations**

Relations between colleagues must be based on respect, tolerance, collaboration and solidarity. The working community must manifest itself as mutual support and as an awareness that the common advantage depends on everyone's commitment.

### **30. Abusing positions of authority**

Superiors shall not ask their collaborators for personal favours or act in a way not contemplated by employment contracts and by the provisions herein.

### **31. Conflict of interest**

All employees must avoid situations that may give rise to conflicts of interest with Fruttigel, and may not take personal advantage of possible business opportunities connected with the performance of their duties.

All employees must inform their direct superiors of potential conflict of interest situations of they may become involved in or aware of.

### **32. Diligence when using company resources**

Every Fruttigel employee must work with the diligence and ef-

iciency needed to safeguard company resources, guaranteeing their use in keeping with the company's interests.

Time too should be considered as a resource for the company, therefore all managers are required to make the most of the working time of collaborators.

It is the responsibility of all employees not just to protect these assets, but also to prevent their fraudulent or improper use. Please refer to the Membership Charter on this point.

### **33. Protection of the company's image and reputation**

Fruttigel's image and reputation is an asset that employees must protect through their behaviour, both inside and outside the company, taking into account the changes in society, technology and available tools.

### **34. Gifts**

Fruttigel employees may not receive gifts and benefits from third parties that extend beyond normal business courtesy.

Fruttigel's employees must pass on to the company any gifts received, so that they can be shared with all other employees.



## Relations with customers

### 35. Definition of customer

A customer is defined as anyone who purchases Fruttagel products.

### 36. Communication to customers

Fruttagel undertakes to provide existing or potential customers with all necessary information, and guarantee the correctness of information and clarity of pack aging information. At the same time, it considers customer comments and consumer complaints to be an opportunity for improvement as regards its quality policies.

### 37. Attention to customer needs

Full customer satisfaction is a primary objective for Fruttagel, which is committed to informing the customer in a complete and timely manner on product characteristics.

A certified management system ensures the quality of raw agricultural produce, product processing, packaging materials and the final product.

Fruttagel makes its experience and professional expertise available to client companies, in the belief that a synergic and coordinated approach to consumer expectations yields benefits for both parties.

### 38. Customer brand protection

Fruttagel considers the complete implementation of this Code to be essential for protecting its customers' reputations and brands, therefore it carries out controls on a continuous basis and listens carefully to their requests.

In the same way, Fruttagel expects similar behaviour from its customers.

### 39. Fairness in contracts and in business relations

Fruttagel guarantees fairness in contracts and trading relations, and undertakes to ensure that agents and intermediaries act in accordance with the same fairness rules.

Fruttagel encourages dialogue and collaboration with customers, and seeks out-of-court settlements in the event of disputes.



## Relations with consumers

### 40. Definition of consumer

A consumer is defined as anyone who uses the company's products in any capacity.

### 41. Commitment to listening

Fruttigel undertakes to evaluate consumers' requests and comments regarding its products and the way in which they are made, so as to constantly improve production.

### 42. Product quality and safety

Fruttigel with the aim to create products and process healthy, and safety and reduce environmental impact, guarantees consumers adequate product quality and safety standards and makes continuous research and innovation efforts.

This commitment to final consumers is also a commitment to sustainability in favor of the community.

### 43. Communication and information

Fruttigel recognizes consumers' right to be informed about the characteristics of its products and manufacturing methods. It accordingly undertakes to provide such information and to ensure that the producers it works with provide the same information.



## Relations with suppliers

### 44. Definition of supplier

A supplier is an individual or business that, in various capacities, individually or as part of a chain, supplies agricultural raw materials, semi-finished goods, goods, services and other resources necessary for Fruttigel to perform its activities.

They are all required to pursue the aims and adhere to the principles of this Code.

### 45. Suppliers of raw materials and semi-finished agricultural products

Suppliers of agricultural raw materials and semi-finished products are a special supplier category. Fruttigel is particularly committed to enhancing and developing their activities, ensuring that their long-term success results in the improvement of the entire supply chain, with benefits accruing to the community of customers and consumers.

The suppliers of raw materials and semi-finished agricultural products are accordingly expected to make a similar and adequate commitment.

### 46. Supplies of agricultural and semi-finished raw materials

Fruttigel possesses all the tools needed to guarantee controls on received products.

At the same time, it expects the suppliers of agricultural raw materials and semi-finished products to comply with the company's production and supply specifications, guaranteeing product safety and consumer health.

### 47. Selection and evaluation of suppliers

For Fruttigel the selection of suppliers is based on guaranteeing transparency and equal access opportunities, and on the clear adoption of the aims and principles of this Code, with special regard to the commitment to safeguard and enhance the environment.

In addition to cost effectiveness, suppliers are assessed according to their behavior, expertise, commitment to enhancing their performance, willingness to accept and facilitate Fruttage's acquisition of information.

#### **48. Collaboration with suppliers**

Fruttage considers its suppliers as partners and establishes long-term relationships with them, while avoiding any form of absolute and mutual dependence. This must be achieved by building a trusting relationship and a shared vision of work and service.

#### **49. Clarity in drawing up and managing contracts**

When drawing up and managing contracts, Fruttage shares the necessary information with suppliers, allowing both parties to fully fulfil the commitments made. Both parties must ensure the necessary confidentiality.

#### **50. Protection of suppliers' safety and health**

Fruttage undertakes to ensure the health and safety conditions of suppliers that have direct and authorized access to the company's premises, providing adequate information on this subject.

Likewise, Fruttage expects suppliers that have access to the company to comply with the conditions and procedures that guarantee health and safety at work of all.

Fruttage requires its suppliers to apply the same safety criteria to their employees and any subcontractors.

#### **51. Suppliers and Fruttage's image**

As part of a production chain, suppliers are jointly responsible for Fruttage's image. All are required to adopt standards of behaviour that will be to the benefit of themselves, Fruttage and the entire chain.

## CHAPTER SIX

# Relations with the local territory and the environment

### 52. Definition of territory

For the purposes of this Code, 'territory' means the public institutions, communities with them association and physical environment within which Fruttage operates.

### 53. Relations with institutions

Fruttage works for the recognition of its own economic and social role, and fosters dialogue with public administrations at all levels in a transparent and clear manner to protect its business interests and ensure that public administrations work effectively.

### 54. Relations with supervisory authorities

Fruttage guarantees the utmost collaboration with supervisory bodies, providing the required information in a clear and timely manner and ensuring, during controls and inspections, the utmost assistance, access to facilities and usability of all required documentation.

Fruttage considers findings made by control bodies to be a useful opportunity for improvement.

### 55. Relations with the environment

Fruttage is committed to the sustainability of its activities, and works to reduce environmental impacts, prevent risks and use natural resources in a sustainable manner.

To this end, it invests in research and in the use of the most suitable technologies, allowing the rational use of resources and the re-use of waste products and by-products.

### 56. Environmental information and communication

Fruttage undertakes to provide institutions with the information needed to understand any environmental risks associated with the company's activity and to report on the environmental impact of its activities.

### **57. Environmental and food education**

Fruttigel undertakes to spread a culture of respect for the environment throughout the territory, undertake awareness-building and environmental training activities internally and promote food education.

### **58. Relations with communities**

Fruttigel undertakes to take an interest in the life of the communities in which it operates and to listen to their requests.

### **59. Donations and sponsorships**

Fruttigel supports social and cultural initiatives and engages in sponsorships, considering only those initiatives that are consistent with its strategic objectives, sustainability and commitment to the territory, according to the guidelines drafted by the Board of Directors.

It also drafts an annual sustainability report on amounts disbursed and the main initiatives supported.



## Implementation

### 60. Body for implementing and disseminating the Code

Powers relating to the implementation and dissemination of this Code are reserved for the Ethics Committee, a body appointed by the Board of Directors and made up of five members, including a member of the Supervisory Body, pursuant to Legislative Decree 231/2001.

In its first meeting the Committee appoints a chairman from among its members.

### 61. Procedures for Committee functions

Committee procedures are drawn up by the Committee itself and submitted to the Board of Directors for its approval.

### 62. Promoting the spirit and contents of the Code

The Committee, together with the company's governing bodies, promotes the knowledge and implementation of the Code.

In the same way, the Committee and the governing bodies undertake to promote, disseminate and implement the Membership Charter.

### 63. Advice on interpretation of the Code and ethical training

Opinions regarding the Code's content and relative compliance may also be requested from a single member of the Committee. Fruttigel undertakes to undertake regular training initiatives for employees and collaborators on the aims and contents of the Code and the Membership Charter, in particular when they are first recruited.

### 64. Convening of the Ethics Committee

The Ethics Committee meets when convened by the chairman, or in his absence by the most senior member (by age), whenever deemed appropriate by a member.

The Committee is obliged to meet at least twice a year.

## 65. Limits to the powers of the Ethics Committee

Under no circumstances will requests be made to the Ethics Committee to rule on the correct interpretation of the law. The Ethics Committee is not empowered to interpret or apply laws or contracts.

## 66. Procedures

No matter how they become aware of violations or possible violations of the Code, including via anonymous reports, members of the Committee are obliged to notify the chairman of such cases.

The chairman is obliged to submit to the Committee the complaint reported by one of its members at its next meeting.

The Committee may decide to initiate a proceeding or file the case.

## 67. Procedures further to reports from third parties

Reports may be submitted to the Ethics Committee as a whole or to each of the members, verbally or in writing. If presented verbally, the complaint will be formalised in writing at the next meeting of the Committee.

If the Committee decides to file the case, it will notify the person who submitted it.

## 68. Preliminary investigation

Should the Ethics Committee decide to initiate a proceeding, it will be entered in the appropriate register, and be given a name and a number.

The documents and minutes relating to proceedings will be kept at the headquarters of the Cooperative by the Committee chairman.

## 69. Investigations and witness evidence

The Committee has the duty to carry out investigations and request information from company structures, as well as to consult witnesses, making it possible to issue a reasoned judgement.

Witnesses must be informed that their testimony may not be

confidential, but all the subjects involved in the investigation are individually bound to confidentiality regarding the information in their possession.

### **70. Confidentiality**

The Committee is responsible for the use of any information relating to the preliminary investigation. The person submitting a complaint must be informed of the use of any information brought to the attention of the Committee.

### **71. Voting**

All of the Committee's decisions will be taken on a simple majority basis.

### **72. Relations between the Ethics Commission and management bodies**

During the course of its activity, the Committee may contact any department or management area through the relevant managers. Should the Commission identify cases that may have disciplinary consequences pursuant to current contractual and legislative provisions, it shall refer the case directly to the competent bodies.

### **73. Outcome of the proceeding**

At the end of an investigation, the Committee can only issue a judgement on a violation or non-violation of the code.

In the event of an ascertained violation, the Committee may not impose sanctions, but is obliged to propose appropriate corrective actions to the Board of Directors.

### **74. Communication to the parties concerned**

The Committee must communicate to the persons submitting the complaint the opening or filing of the complaint within 30 days; an opened proceeding must reach a judgement within a further 30 days. It must then inform the party concerned of the result of the judgement, and the grounds for the decision.

The Committee is not obliged to make investigation documents public.

## 75. Advice on interpretation of the Code and ethical training

Opinions may be requested from the Ethics Commission on how to adhere to the Code.

In addition to undertaking regular training initiatives for employees and collaborators on the subject of ethics, Fruttigel is committed to carrying out information and awareness-building initiatives aimed at stakeholders on the same topics.

## 76. Relations between the Ethics Committee and the Board of Directors

The results of single verification activities must be periodically communicated to the Board of Directors.

Every year the Committee sends a communication to the Board of Directors containing a general assessment of the condition of Fruttigel from an ethical viewpoint, and proposes, if deemed necessary, an information and training plan on the contents of the Code and an adjustment program.

## 77. Relations between the Ethics Committee and Supervisory Body 231

Whenever the Commission, during the course of its activity, identifies cases falling within the scope of Legislative Decree. 231/2001, it shall report them to the relevant Supervisory Body. Relations between the Supervisory Body and the Committee are guaranteed directly by the member of the Supervisory Body who is also a Committee member.

## 78. Validity of the Code

This Code is valid for three years, at the end of which it will be reviewed, and possibly revised, with the participation of workers and stakeholders and the coordination of the Committee.

The changes must be approved by the Board of Directors.



## Composition of ethics committee

The members of the Ethics Committee, established following the approval of the Code of Ethics by the FruttageL Board of Directors, are as follows:

**Cristian Maretti** (*Chairman*)

Vice President of FruttageL, President of Legacoop Agroalimentare Nord

**Mario Viviani**

Expert consultant corporate social responsibility

**Cristina Di Lenardo**

Head of Human Resources, Personnel Selection and CSR Department

**Elisa Rossi**

Supply Chain and Processes Area at FruttageL

**Nicolina Sarno**

Administration and Personnel, Larino Plant

For the third edition the following workers contributed:

**Casadio Roberta, Di Padre Maria, La Vecchia Giuseppina, Lenzi Nicola, Liverani Aurora, Mastrocola Liliana, Rossi Paola, Tria Mina, Venturi Donata, Venzi Fabio**

Any communication concerning the implementation of the Code of Ethics may be sent to the competent Committee in the following ways::

- By letter, to:  
**FruttageL Ethics Committee**  
Via Nullo Baldini 26, 48011 Alfonsine (Ravenna) Italy
- By email, to:  
**[commissione.etica@fruttageL.it](mailto:commissione.etica@fruttageL.it)**

The Code of Ethics (3<sup>th</sup> Revision)  
was approved by the Board of Directors on 19 December 2022



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