

ATLANTE – CODE OF ETHICS

Contents

Introduction..... 2

Purpose..... 2

Principles 3

 Caring about individuals 3

 Honesty and law abidance 3

 Loyalty, fairness and transparency..... 3

Rules 4

 Caring about individuals 4

 Honesty and law abidance 7

 Loyalty, fairness and transparency..... 9

Oversight Authority 12

 Purpose..... 12

 Organisation structure 12

 Addressing violations..... 12

Date of entry into effect and dissemination 13

Introduction

The present code of ethics sets out the ethical principles followed by Atlante and aims to create the conditions conducive to their implementation in all corporate activities.

It defines the reference framework against which all corporate activities are assessed and concretely establishes fixed minimum standards of behaviour for the entire staff.¹

Everyone is responsible for making sure that all the provisions contained herein are abided by.

Purpose

Atlante has always aimed to take care in its operations and dealings with its employees, suppliers and customers and to act in full respect of principles and values that are based on a passionate commitment to **quality of life**.

In order to make the “corporate discipline” that Atlante strives for concrete and tangible, it is essential to establish how individuals should behave within the company and towards all business partners.²

This code of ethics is hereby adopted:

- To help the staff of Atlante to be more **aware** of their professional identity as a point of strength, both personal and corporate; such awareness can only be fully realized if everyone follows a clearly defined and shared path
- **To define clearly, safeguard and preserve** the distinctive elements of our experience and, at the same time, to provide – through the use of a written tool – solid and factual points of reference as regards the choices that should be made and the behaviours that should be adopted
- To enhance all internal processes aimed at achieving greater **cohesion and unity** through the recognition of a set of shared values
- To enhance **transparency** in external relations by highlighting to stakeholders the values and rules that Atlante considers to be part of its cultural and professional heritage as specific and inalienable assets
- To prohibit any behaviour that violates not only **legal provisions** but also the **values** that Atlante intends to promote

The goal of Atlante is to make a profit. Although the existence of Atlante, as with any business enterprise, is premised on its ability to create wealth, the legitimacy of the company as a social institution also depends on its ability to foster development and meet the requirements of the numerous entities with which it enters into a relationship.

¹ The term “staff” refers to all directors and employees of Atlante.

² The term “business partner” refers to all those who establish business relations with Atlante, irrespective of the nature of the relationship (suppliers, customers, co-workers etc.).

ATLANTE – CODE OF ETHICS

Nowadays, the words “ethics” and “profit” are often perceived as irreconcilable. It is our opinion, however, that it is possible to pursue profit and at the same time to adopt **ethical behaviours** and **ways of operating**. This code of ethics aims to make it easier to achieve such a goal.

The implementation of this code of ethics facilitates the daily running of the company. The staff of Atlante are thus required to familiarise themselves and behave in accordance with it, including in their dealings with business partners.

All staff, in accordance with the law and in full compliance with this code of ethics, are required to behave with loyalty, fairness and integrity in respect of Atlante, their co-workers and more generally all those with whom they do business, irrespective of the nature of the relationship.

The management of Atlante, in turn, will work to make sure that all its staff and counterparts always behave, within their areas of competence, in line with the principles set out in this document.

Principles

The code of ethics of Atlante, and the good practices that arise from it in terms of behaviour, are based on the following key principles.

Caring about individuals

At the core of our corporate culture and identity is the principle of caring about individuals.

Atlante believes in the fundamental value provided by its human resources: real corporate progress can only take place if **progress is also made by the individuals** who are part of the company.

We are committed to supporting, promoting and developing the professional skills and specific abilities of each employee, while requiring professionalism, dedication, loyalty, honesty and team spirit from all our staff.

By the same token, we are committed to making sure that our products (foods and beverages) can be consumed by the broadest section of the population as possible.

Honesty and law abidance

Honesty and law abidance are assets, not a business limitation.

In its relationships with customers, suppliers, partners and public authorities, Atlante strongly believes that acting honestly and with respect for the rule of law is an advantage, not a liability.

It is our opinion that an approach that is based on honesty and that goes beyond merely conforming to legal provisions adds value to our corporate culture, which is why we promote specific corporate ethical standards as a framework for the promotion of a culture of individual integrity.

Loyalty, fairness and transparency

Business relations should be based on loyalty, fairness and transparency.

Atlante firmly believes that loyalty, fairness and transparency can make it easier to gain and consolidate a successful position on the market over time. The stability of business relations, in fact, can be defined not only in terms of a company’s ability to offer its products and services at competitive conditions, but also in

ATLANTE – CODE OF ETHICS

terms of its ability to acquire credibility in respect of all business partners, thus proving trustworthiness over time.

Rules

The following rules set out the means for guaranteeing respect for the above-mentioned principles.

Caring about individuals

Relations

In order to build workplace relations that promote an attitude of caring about individuals, we must look first and foremost at ourselves: we are committed to treating others as we would wish to be treated.

Working relations between employees should be based on mutual respect and principles of civil coexistence.

All staff members should carry out their work on the basis of assigned tasks, in full respect for and ensuring the dignity of their colleagues.

Corporate transparency

It is only possible to foster shared ownership in corporate strategies if the work to be done is seen as a personal responsibility that cannot be delegated: our aim is not to promote internal competition but, rather, to promote shared responsibility for the achievement of goals.

Atlante is committed to communicating clearly to its employees about roles, tasks and goals for improving the business, with the aim of enhancing both individual awareness of each work assignment and the overall context to which that work contributes.

All current staff and newly hired employees are provided with information and explanations about the contents of this code of ethics.

Appropriate use of time

A culture of making appropriate use of the time spent at work should be based not on the need for oversight but on a sense of individual accountability.

Staff who make appropriate use of their time in the office show respect for the company, their colleagues and all business partners. Punctuality should be a core value when it comes to keeping appointments and attending

ATLANTE – CODE OF ETHICS

meetings.

Discrimination

The value of individuals is to be defended in its entirety.

We have every intention of preventing and countering any form of discrimination against anyone who meets in and works at Atlante.

We are committed to ensuring the full respect of all persons (employees, co-workers, consultants, suppliers, customers and other business partners) and tolerate no discrimination, whether based on race, nationality, health condition, disability status, gender, sexual orientation or personal conviction in respect of religion, politics or trade unions.

All decisions affecting work relations with our staff and co-workers will always be based on criteria such as impartiality, merit, competence and professionalism, in accordance with the principles of equal opportunity and non-discrimination in respect of human resources management actions affecting, among others, wages, promotions, recruitment, hiring, firing and training.

Nobody in the company is allowed to infringe upon the personal privacy of the employees.

We do not tolerate harassment or bullying in personal conversations, whether on the telephone or in writing.

Anyone who believes he or she has been the victim of discrimination or harassment, or who believes that the aforementioned principles have been violated, should inform the Oversight Authority, which will carefully assess the specific circumstances and take the necessary remedial measures.

Health

Atlante is aware of the importance of guaranteeing the best health and safety conditions for its employees and for those who consume its products.

We are committed to safeguarding our staff's health and safety in the workplace and to disseminating a culture of responsible behaviour and of employee health and safety while encouraging the regular use of facilities (gyms etc.) to enhance well-being and health.

Company representatives in positions of responsibility as regards the health and safety of employees must pursue not only the goal of complying with the minimum safety standards required by law in terms of prevention and protection but also of making sure that the whole staff is guaranteed excellent opportunities and results, with a view to concretely safeguarding as much as possible conditions conducive to individual health, safety and well-being.

ATLANTE – CODE OF ETHICS

Each employee, in turn, is required to work in a safe way, carefully abiding by the required provisions and avoiding any reckless or negligent behaviour, and to report to the specific contact persons in the company any weaknesses in the system designed to protect employees' health and safety.

Given that it has been scientifically proven that there is a link between nutrition, lifestyle and individual health, we are committed to including, on the packaging of our products, information aimed at encouraging consumption patterns that are in line with a healthy lifestyle, in addition to the information required by law.

In order to make sure that our products can be consumed by the broadest section of the population as possible, we have undertaken, together with our suppliers, to produce foods and beverages that are free of non-essential allergens and to reduce the use of additives to a bare minimum.

Training

Learning, strengthening and continually developing skills is necessary for improving the company's competitiveness and ensuring the professional growth of staff.

In order to create the best possible working conditions, and to encourage clear and transparent forms of communication with its business partners, Atlante is committed to investing in all its employees, both in terms of professional skills and foreign languages.

Each functional area is committed to building the capacity of its staff members.

Compensation

The sector of the market in which Atlante operates establishes benchmarks for the determination of wages. Atlante is committed to management practices that are sustainable, while also believing that individuals and their needs are worth much more than their average market value.

Atlante has thus undertaken to evaluate the allocation of wages using criteria that are higher than the reference average, as a means of beginning an investment in its human capital that enables individuals and the company as a whole to work better.

Social accountability

Atlante operates in a social context in which it is an active participant and in respect of which it intends to engage in the responsible promotion of the individual.

Our goal is not to make citizens and stakeholders happy in order to obtain a

ATLANTE – CODE OF ETHICS

return in terms of image, but rather to concretely support organisations and situations worthy of attention.

We are therefore committed to monitoring and responding to the needs of all our professional counterparts, allocating part of our revenues to non-profit organisations, on a case-by-case basis.

Honesty and law abidance

Respect for the rule of law

In the definition of corporate goals, consideration should always be given to their sustainability in relation to the law.

We intend to work in full compliance with the law of all the countries where we have entered into business negotiations.

We have thus agreed to study in detail the reference legal framework, with a view to preventing any errors and to operating as professionally as possible when conducting negotiations.

In cases where the applicable laws or regulations fail to clearly state the behaviour to be adopted, we will, at all times, be guided by the principles of loyalty and honesty.

All of our commercial operations (invoicing, management of orders etc.) will be run in a competent, well-prepared and professional way, in accordance with all applicable fiscal and legal regulations.

It is forbidden to engage in activities that could lead Atlante to becoming involved in unlawful practices.

Safeguarding company assets and data confidentiality

We undertake to use all company assets with due diligence, care and respect, preserving them from possible material damage or destruction, improper use and embezzlement, loss or theft.

The commitment to safeguarding property includes both tangible and intangible assets, such as intellectual property, data subject to confidentiality provisions and trademarks.

All the data and information associated with business activities are regarded as company-owned assets that therefore need to be treated with due care and respect, safeguarding confidentiality.

ATLANTE – CODE OF ETHICS

Atlante also ensures compliance with confidentiality requirements through its staff members, who are called upon to prevent the loss or theft of information (and any ensuing damage), including when the disclosure is involuntary. In this respect, special attention should be paid when saving or transmitting information.

The staff at Atlante is therefore committed to protecting the confidentiality of company data (commercial secrets, development plans, agreements, projects for the development of new products etc.), as well as of data and restricted information that may have been shared with Atlante by suppliers, customers or other business partners.

Should staff members become aware of information that is privileged and not in the public domain, they should take the utmost care in using it; such information should remain strictly confidential and its disclosure either within or outside the company is to be avoided.

We undertake to refrain from using the company's assets or resources for strictly personal purposes.

Corruption

Atlante intends to prevent and condemn any form of corruption.

In order to ensure the growth of Atlante as a business, staff members shall never – either publicly or privately – offer or promise individual or illicit benefits, be they of a financial nature or of any other kind, nor shall they engage in behaviour that may lead to suspicion that such conduct has taken place.

By the same token, staff are not entitled to accept any such benefits offered by others.

It is also forbidden to exert pressure on public officials, civil servants or government employees for the purpose of inducing them to engage in acts that are in conflict with the duties of their office.

Gratuities

Our business relations and our ability to compete on the market must be based on professionalism and on the quality of our products and services. Our decisions shall never be influenced by favours received.

No staff member is allowed to accept from business partners presents whose value exceeds the amount considered to be reasonable in the context of hospitality (that is, about 100 euro), or money, loans, bribes or monetary benefits in general.

ATLANTE – CODE OF ETHICS

By the same token, no attempt should be made to try to influence our business partners (public or private) by offering them gifts, lunches, entertainment or favours in general that could reasonably be seen as exceeding generally accepted standards of courtesy.

Loyalty, fairness and transparency

Communication

In our relations with suppliers, customers and business partners in general, we are committed to a corporate style that is always based on courtesy and good manners.

Moreover, we shall always endeavour to make sure that, wherever possible, our communications are conducted in the language of our business counterpart and that responses are provided promptly, preferably in written form.

The answers provided by the staff of Atlante to requests from colleagues and business partners shall deal with the subject of the request, highlighting the intent to follow up on the matter and, possibly, providing from the outset comprehensive information about products and services to make sure that the counterpart is able to make informed decisions.

Our advertising or any other form of communication shall always be truthful.

Supplier relationships

The staff at Atlante is committed to ensuring loyalty, fairness and transparency in its relationships with suppliers, while aiming nonetheless to guarantee the maximum competitive advantage for the company.

The choice of our suppliers must be based on objective considerations with regard to criteria such as competitiveness, quality, economic convenience and price, but it must also be inspired by the principle of prudence in order to avoid establishing business relations with entities that are directly or indirectly involved in illicit dealings.

Moreover, in assessing our suppliers over time, we shall take into account the products and the value for money they offer, as well as the ethical attitude that they demonstrate in the course of their business relations with Atlante.

In the purchase of goods and services, the rules in this code constitute

ATLANTE – CODE OF ETHICS

minimum (not maximum) standards. This code shall not be used to limit suppliers who may wish to go beyond these ethical requirements.

It is the responsibility of those in charge of preparing purchase agreements for goods and services to make sure that such agreements always specify comprehensive terms by scrupulously checking all the details contained therein and reducing as much as the possibility of any misunderstandings or disputes with suppliers.

We believe that it is ethically essential to safeguard the environment. We are committed, therefore, not only to meeting environmental standards and regulations, but also to purchasing goods and services with a low environmental impact, thereby promoting this type of culture among our suppliers.

We agree to pay invoices by no later than their due date. This is obviously a requirement of an administrative, technical nature, but it is also a way for us to acknowledge concretely the importance that Atlante attributes to its business partners and to a relationship based on mutual interest.

We shall refrain from using agreements with consultants, brokers, agents or other service providers to cover miscellaneous expenditure items.

Customer relations

We are committed to abiding by the same standards with our customers as with our suppliers. We firmly believe that competition should be free and part of an economic framework wherein it is managed responsibly.

In their relations with customers, the staff of Atlante shall, therefore, ensure loyalty, fairness, transparency and strict compliance with contractual provisions.

In order to better understand the nature of the work required and to avoid, as far as possible, any disservice or dissatisfaction, we shall always provide our services on the basis of clearly defined agreements and activities. To that end, we ask that our customers make available, before stipulating an agreement, all data necessary to allow Atlante to correctly perform the business task assigned.

We are committed not only to always meeting the requirements officially stipulated in agreements but also to trying to exceed our customers' reasonable expectations and needs, while at the same time scrupulously abiding by all in-house procedures with regard to customer relations.

In order to ensure efficiency and effectiveness in respect of both services delivered to and communications with customers, the staff of Atlante will always and promptly share any information available (data, documents etc.) with other functional areas within the company.

ATLANTE – CODE OF ETHICS

Atlante shall not enter into any contractual commitment that could lead it to having to resort to unacceptable savings as regards the quality of its services and safety in the workplace. For this reason, the ability of Atlante to deliver the services required over time shall be fully assessed in advance.

Atlante is committed to addressing and resolving, as promptly as possible, any complaint that may arise. In so doing, It encourages transparent communication between the parties from the outset. Formal dispute procedures shall be started only after all alternative conflict resolution avenues have been reasonably deemed to have been exhausted.

The maintenance of the business relationship over time will depend on economic factors but also on the ethical nature of a customer's behaviour in its business relations with Atlante.

Atlante has no intention of entering into any kind of agreement with its competitors for the purpose of fixing prices or splitting up markets: its sales policies shall always be established in an independent manner.

During negotiations, Atlante shall not offer or promise illicit financial advantages or other benefits to the employees of public or private customers.

Conflict of interests

It is the task of our whole staff to make sure that the best interests of Atlante are guaranteed at all times; this means that any situation potentially leading to a conflict between the interests of an individual and those of the company shall be avoided whenever and wherever possible.

Should a conflict of interests arise or should someone consider that such a situation could occur, a report should be made to the Oversight Authority, which is then required to act promptly in order to address and resolve it.

Competition

Any commercial opportunity that might arise during the course of a business relationship must not be exploited by individual employees to their own advantage or in such a way as to lead to competition between them and the company.

Any business opportunity that could be of interest to the company must undergo a preliminary assessment by management.

ATLANTE – CODE OF ETHICS

Oversight Authority

Purpose

The in-house organism known as the **Oversight Authority** is hereby established for the following purposes:

- To ensure that the management principles and rules of the code of ethics are abided by
- To promote the principles stipulated in the code of ethics within Atlante, as well as in respect of the relationship between Atlante and its customers, suppliers and business partners in general
- To update, if necessary, the code of ethics keeping in mind its suitability to the company structure and any changes in the legal framework

The code of ethics follows an approach based on values. It should be used primarily to foster and enhance responsible forms of behaviour and, to a lesser degree, to prevent unlawful actions. Consequently, the Oversight Authority must inform and train, on a regular basis, all the staff of Atlante and the company's main stakeholders on the contents of the code of ethics.

Organisation structure

In order to ensure representation at all corporate levels, the Oversight Authority consists of three members, appointed according to the following criteria:

	Organisation level	Number of representatives	Appointment method	Term in office
Level 1	Management	1	Appointment made by law	Unlimited
Level 2	Executive level (directors)	1	Appointment made by in-house vote	Two years
Level 3	Non-managerial positions	1	Appointment made by in-house vote	Two years

The in-house electoral system stipulates that every employee can vote for one representative in level 2 and one representative in level 3. The vote is cast by secret ballot. Elected representatives serve for a three-year term, after which new elections have to be called; incumbents may be elected for another term.

The Oversight Authority meets once a year or more frequently in response to specific reports or critical situations.

The three members of the Oversight Authority must be present at all meetings, which must be formally convened; if necessary, others from within or outside the company may be called upon to attend.

Addressing violations

Should a violation of the code of ethics be reported or otherwise become known, the Oversight Authority will consider which remedial measures to take.

The members of the Oversight Authority are the points of reference for all employees who wish:

ATLANTE – CODE OF ETHICS

- To report any violations of the code of ethics
- To ask for clarifications with regard to the implementation or interpretation of the code of ethics

In both cases, care should be taken to safeguard the employee's anonymity, to the extent that this is reasonably possible.

Date of entry into effect and dissemination

The present code of ethics was adopted on 1 January 2014 with immediate effect.

A copy of the code of ethics is to be delivered to all staff members of Atlante and made available for reference on the company's website and, in hard copy, in the offices of management.

A copy of the code of ethics shall be given to all newly hired employees of Atlante and its contents shall be the subject of specific training sessions delivered at the beginning of the work relationship.