

# Policy & Code of Ethics

Over the years, we have grown into a global and far-reaching logistics company, but our core values and commitment remains the same; to provide our clients with reliable and sustainable solutions, from ways of working, to only engaging with like-minded producers.

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## Corporate Principles

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We believe that our people represent the building block of the BFG, the element that allows us to make a difference and overcome the challenges we face.

We are aware that the variety of points of view, cultures and ideas within us represent an inestimable wealth, to be protected and cultivated.

We are convinced that the trust of our customers and good working relationships are the basis for lasting success.

We believe that our contribution to the well-being of the community that hosts us and the communities of the countries in which we operate is important.

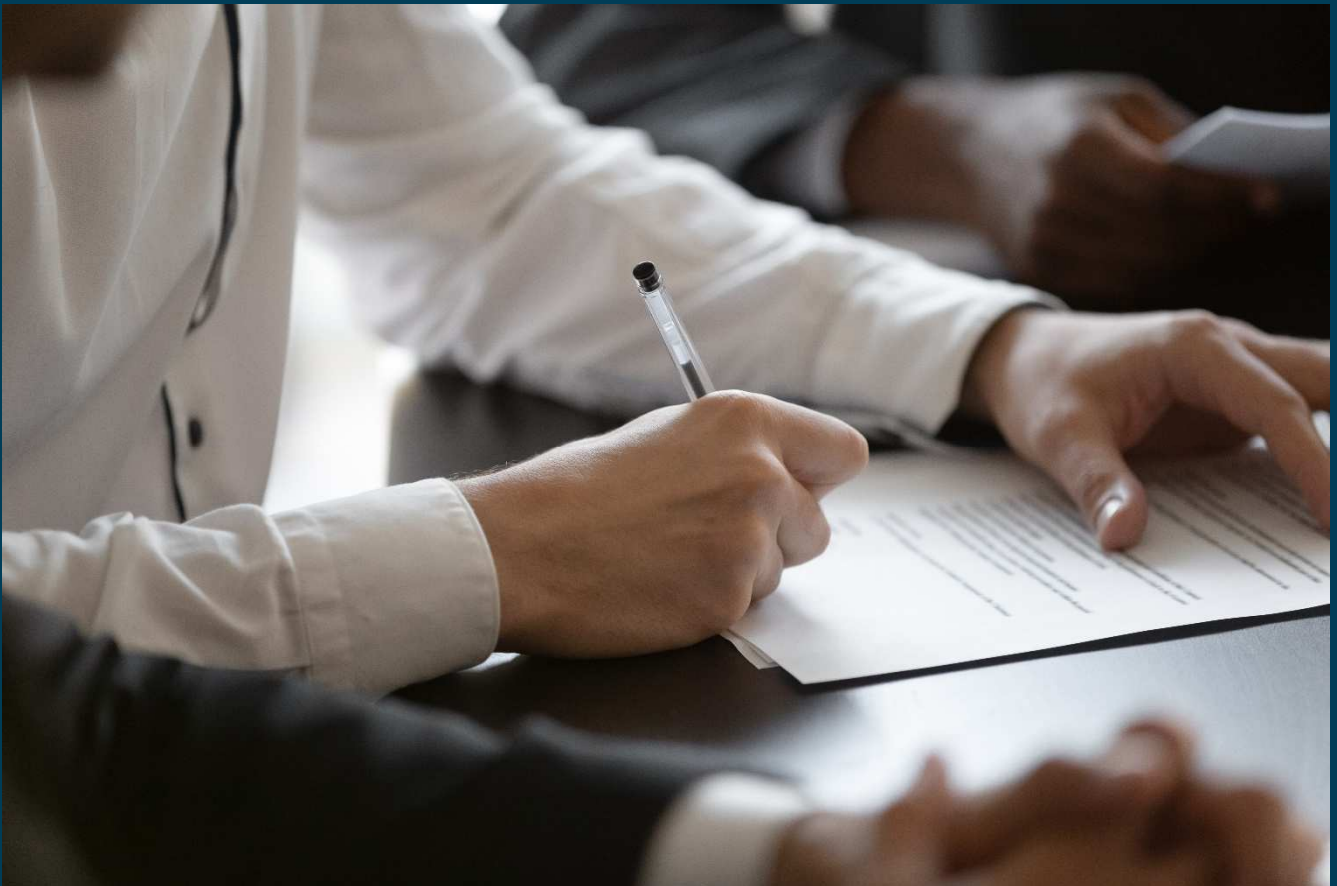
We believe that example is significant and we want to be a point of reference in the market in which we operate, for our partners and our competitors, both from a commercial and moral point of view.

We are aware of our corporate responsibility towards environment, society and our employees and we want to clearly demonstrate this in our business practices and in our daily work.

We think that our long experience and our ability to innovate are the two sides of a single coin, which represents the recognition of our work and the guide of our actions.

The Board of Directors supports the values described in this Code of Ethics and expects all employees and managers to play an exemplary role in their daily work, helping to spread a corporate culture based on respect.

This Code refers for the points developed therein to the Internal Regulations of BFG, as validated by the Personnel Representatives and approved by the Labor Inspector of the Principality of Monaco.



## Table of contents

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<b>A</b>	<b>Human Resources</b>	p. 05
1.0	The people in BFG	p. 06
2.0	The rules of conduct in the company	p. 07
<b>B</b>	<b>Values leading our actions: Loyalty and Coherence</b>	p. 11
1.0	Our Clients	p. 12
2.0	Our Suppliers	p. 13
3.0	Conflict of interest	p. 15
4.0	Illicit commercial activities	p. 16
5.0	Competition and intellectual property law	p. 17
<b>C</b>	<b>Institutions and control bodies, local communities</b>	p. 18
1.0	Transparency and Clarity in Relations	p. 19
2.0	Procedural and Control Rules	p. 22
<b>D</b>	<b>Company policy</b>	p. 25

# A Human Resources

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## 1.0 The people in BFG

- 1.1 A safe working environment
- 1.2 A positive work environment
- 1.3 Discrimination and Harassment
- 1.4 Employment promotion and protection
- 1.5 Bargaining and employee representatives
- 1.6 Process of selection and job placement in BFG
- 1.7 Training and development
- 1.8 Confidentiality of personal data

## 2.0 The rules of conduct in the company

- 2.1 The protection of company-owned assets
- 2.2 Correct use of IT systems
- 2.3 The confidentiality of company information and the obligation of confidentiality
- 2.4 External communications
- 2.5 Gifts, giveaways and benefits
- 2.6 Organization of work, duties, schedules and shifts
- 2.7 General Discipline

## 1.4 Employment promotion and protection

We are committed to adopting strategies that combine business growth and profitability with the protection and development of employment - both direct and induced - and to promote the quality of work, compatibly with the constraints of the external economic.

## 1.5 Bargaining and employee representatives

We inspire our decisions and behaviors towards our collaborators by rigorous observance of the regulations, in compliance with the rules and in close collaboration with the democratically elected "Personnel Representative", in a constructive spirit of company-employee relations.

## 1.6 Process of selection and job placement in BFG

The selection process takes place in compliance with the Monegasque Labor Code, equal opportunities and the person, in a structured and clearly explained way to the candidate.

We provide the candidate with correct and comprehensive information about the organization and the position for which he will be evaluated.

The candidate is required to correctly transmit to the recruiter all the information useful to make the selection process effective and efficient.

We are committed to putting in place all the activities that facilitate the insertion of the new employee in a collaborative environment that promotes professional growth.

## 1.7 Training and development

BFG is committed to providing its collaborators with all the resources for training, updating and professional improvement and the knowledge tools necessary for carrying out the related activities.

We define and put into practice a careful planning of training activities and we place all collaborators in the conditions to access them, according to opportunity and to an assessment of potential and needs. Collaborators have a duty to contribute to this commitment, both by actively participating in training initiatives and by sharing and applying the contents learned.

We value everyone's contribution, guaranteeing equal growth opportunities based on the evaluation of results and assigning responsibilities consistent with the role and paths of the individuals and enhancing the skills acquired.

The collaborators undertake to be participatory and proactive in the evaluation process.

## 1.8 Confidentiality of personal data

As part of our business activity, we collect a significant amount of personal data and information (relating, for example, to employees, collaborators, clients, suppliers ...), which we undertake to treat in compliance with all laws on confidentiality in force in the jurisdictions in which we operate.

In particular, each employee is called:

- to collect data only if expressly authorized;
- to exercise the utmost diligence in the collection of personal data and in their storage, making sure of the prior consent of the interested party;
- not to communicate or in any way disclose personal data to unauthorized third parties.

We always put safety first in the selection, definition and use of procedures, including IT procedures, intended for the processing of personal data and confidential information to protect fundamental rights and freedoms and the dignity of the person concerned.

## 2.0 The rules of conduct in the company

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### 2.1 The protection of company-owned assets

Each employee is required to work diligently to protect company assets, through correct and responsible behavior and in line with the operating procedures set up to regulate their use, accurately documenting their use. What indicated in this paragraph applies both to the work performance in presence, at the company offices, and to the smart working regime.

In particular, each employee must:

- use with care the assets entrusted to him;
- avoid improper use of company assets that may cause inefficiency or damage to the corporate interest.

Each collaborator is responsible for the protection of the assets entrusted to him and has the duty to inform promptly the functions in charge of any threats or harmful events for BFG.

### 2.2 Correct use of IT systems

The telephony, e-mail, Internet and Intranet access systems belong to the Company.

The purpose of these systems is to improve the performance of the work activity.

Each employee must therefore keep in mind that:

- the use of the telephone, e-mail and Internet at the Company must take place for legitimate professional purposes. Personal use of the Internet at work must be kept within reasonableness and in no case must it affect network security or business productivity. Furthermore, the sites consulted must not be contrary to public order and morality;

- all information entered into the computer system is the property of the Company;
- it is the responsibility of the individual employee to keep all passwords and identification codes confidential, to prevent unauthorized access to company data and information;
- for company computers, only software programs that have been purchased by the Company for the purpose of conducting its business should be used;
- the reproduction or duplication of software programs is absolutely prohibited: any collaborator who knowingly or unknowingly duplicates software material exposes the Company and himself to the risk of serious penalties.

Each collaborator is also required to:

- scrupulously adopt the provisions of corporate security policies, in order not to compromise the functionality and protection of the IT systems;
- do not send threatening and insulting e-mail messages, do not use low-level language, both in written and verbal communication, do not make inappropriate comments that may offend the person and / or damage the corporate image;
- not to send e-mail messages that could bind the Company to third parties without having the right to do so;
- take the utmost care in the custody of assigned or supplied mobile devices and do not pass them on to third parties.

## **2.3 The confidentiality of company information and the obligation of confidentiality**

Each person, depending on their position within the BFG organization, can come - directly or indirectly - into possession of confidential information concerning the Company, its know-how, its activities, its products, such as, by way of: strategies, research and development activities, industrial processes and data, technical, production, commercial and marketing data, promotional or sales activities or advertising campaigns, operating financial results, corporate transactions, information on salaries and staff.

The knowledge developed by BFG constitutes an inestimable heritage that every employee must protect. In fact, in the event of improper disclosure of such information, BFG could suffer damage both to assets and to image.

Information therefore represents a strategic component of corporate assets and, as such, must be protected and managed with the necessary caution proportional to their importance.

Therefore, each employee is required to:

- refrain from disclosing any information concerning BFG that is not in the public domain, at any time, both during and after the termination of the employment relationship;
- always take all necessary precautions to prevent the disclosure of confidential information: this also means making sure not to leave such information in sight on your desk, in your work area or at the copy machine where anyone could have access and steal it unduly and make sure that after the business meetings all documentation and any other material have been adequately collected and, if necessary, properly disposed of;



- keep confidential information in locked physical archives and / or in suitably protected IT archives;
- do not leave your PC and any other IT support unattended (mobile device, USB sticks, CDs, etc.) and place them in a locked cabinet / chest of drawers;
- treat confidential matters with the utmost discretion, particularly in public or even in the workplace, if in the presence of unauthorized personnel to access such information;
- ask the external recipients of confidential company information to respect its confidential nature.

## 2.4 External communications

BFG recognizes the primary role of clear and effective communication in internal and external relations. The disclosure to the public, by collaborators at any level, of information relating to BFG or some specific sectors, in the form of speeches, participation in conferences, publications or any other form of presentation to the public, must receive prior authorization by the Management.

Specifically, communication to the media is of particular importance for the purpose of maintaining the corporate image, therefore only collaborators institutionally responsible for communication or those explicitly authorized can provide information regarding BFG.

All other collaborators are not authorized to provide information to media representatives, nor to have any type of contact with them aimed at disseminating confidential or in any case unpublished company news, taking care instead to communicate any requests received to the company function in charge.

## 2.5 Gifts, giveaways and benefits

Gifts and gratuities - of a value exceeding reasonable limits or inconsistent with normal working relationships create situations of conditioning and therefore interference in the performance of the employment relationship which must be exempt from obligations of acknowledgment.

Therefore, BFG prohibits its collaborators (as well as their family members) from accepting, let alone requesting for themselves or others, gifts, benefits or favors offered by people with whom they have business relationships, which could compromise the independence of judgment of the same or at least they can create the suspicion that the same has failed.

Money, tangible goods (such as travel, watches, jewelry, exceptional wines, leather goods, valuables, clothing, mobile phones, hi-tech devices, ...) and also services and discounts on purchases of goods or services.

On the other hand, normal business courtesies are included, for example, small gifts such as flowers, gadgets, books, sweets etc. Any invitations to lunch or dinner from suppliers or business partners must never affect the correctness of professional relationships and must always allow the sphere of personal relationships to be kept separate from that of working relationships.

It is allowed to use, even for personal use, the scores accumulated during business trips, offered by airlines or hotel chains. However, it is not permitted to request or modify airlines, flights or other types of bookings for the sole purpose of accumulating points or mileage, particularly if this entails additional costs for the Company. All reservations must in any case comply with the general rules of the company travel policy, in compliance with the general principles of sobriety and self-responsibility.

The use of the company credit card must be limited to expenses incurred on behalf or in the interest of the Group. Furthermore, BFG collaborators are not allowed to grant benefits or give objects to third parties that go beyond normal business courtesy, as explained above, and can therefore be perceived by the recipient as attempts to influence decisions and behaviors.

## **2.6 Organization of work, duties, schedules and shifts**

BFG provides an overall planning of activities that ensures that everyone occupies the most appropriate role, maximizing the usefulness of the organization while respecting equal opportunities.

To this end, we constantly update the system of organizational responsibilities, skills and functions performed by the existing staff.

The collaborators undertake to assume the responsibilities relating to the tasks entrusted and to act cooperatively throughout the period of their stay in the Company.

In defining and managing schedules and shifts we reconcile, as far as possible, working needs with respect for free time and the quality of life of collaborators. On the other hand, it is the obligation of each employee to respect the schedules and shifts assigned and promptly report the absence.

In the case of work reorganization, the value of human resources is safeguarded by providing, where necessary, training and / or professional retraining actions.

## **2.7 General Discipline**

All BFG collaborators personally contribute to promoting and maintaining a climate of mutual respect in the workplace; particular attention must be paid to respecting one's own safety and that of work colleagues.

## **B Values leading our actions: Loyalty and Coherence**

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### **1.0 Our Clients**

- 1.1 Fairness
- 1.2 Contracts and communications
- 1.3 Quality control and customer satisfaction

### **2.0 Our Suppliers**

- 2.1 Choice of a Supplier
- 2.2 Integrity and independence in relationships

### **3.0 Conflict of interest**

### **4.0 Illicit commercial activities**

### **5.0 Competition and intellectual property law**

## 1.0 Our Clients

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Our vocation is to guarantee the availability of our products in conditions of freshness and qualitative excellence. Clients are our partners for guaranteeing a level of service that is always adequate for the consumer.

### 1.1 Fairness

BFG guarantees a transparent and fair relationship with all customers in such a way as not to offer anyone an unfair competitive advantage over a competing customer.

We adopt specific policies based on the size, type, channel or commercial strategy of the customer, in order to always serve the final consumer in the best possible way and without ever engaging in discriminatory actions.

Because of this:

- we offer competing customers within a given sales channel equal opportunities in commercial relations;
- we do not terminate a relationship with a customer based on general information or agreements with other clients;
- we do not enter into agreements that prevent the customer from purchasing products from BFG competitors.

### 1.2 Contracts and communications

The contracts between BFG and its customers are complete, so as not to overlook any element relevant to the customer's decision and formulated in clear and easily understandable language.

### 1.3 Quality control and customer satisfaction

BFG is committed to ensuring the highest quality standards of the products and services offered on the basis of higher predefined levels and to periodically monitor the perceived quality.

## 2.0 Our Suppliers

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### 2.1 Choice of a Supplier

The choice of suppliers and the purchase of goods and services (including financial and consultancy services) are carried out by the competent corporate functions in compliance with the principles of impartiality and independence and on the basis of objective requirements of integrity, quality, efficiency and cost-effectiveness and ensuring sufficient competition for each supply request (for example by considering several companies in the selection).

With particular reference to consultancy services or specialist supply, adequate value will also be given, in the choice, to the trust relationship existing with the supplier. The lists of suppliers established in the Company must never constitute a reason for foreclosure for supplier companies that are not included in them, if these companies can still boast the possession of the necessary requirements to meet BFG expectations.

We require our suppliers:

- to comply with labor laws and regulations according to international standards;
- not to discriminate against its own personnel on the basis of race, nationality, sex and religion;
- not to resort, in carrying out their business, to the exploitation of child labor or unwilling prisoners (forced labor);
- to read the Code of Ethics and to undertake to respect it.

We do not enter into forms of collaboration with suppliers who do not accept these conditions and we contractually reserve the right to take all appropriate measures (including termination of the contract) in the event that the supplier, in carrying out activities in the name and / or on behalf of BFG, violates the law, contract or the Code of Ethics.

## 2.2 Integrity and independence in relationships

Relations with suppliers are governed by company procedures and are subject to constant monitoring.

The stipulation of a contract with a supplier must always be based on extremely clear relationships, avoiding any form of mutual dependence. Furthermore, to ensure maximum transparency and efficiency of the purchasing process, BFG provides:

- the periodic rotation of collaborators in charge of purchasing, where this practice is advisable and in any case in compliance with the skills and professionalism of the same;
- the separation of roles between the manager requesting the supply and the manager signing the contract;
- the traceability of the choices made.

All collaborators involved in the purchasing process:

- must remain free from personal obligations towards suppliers: any personal relationships of employees with suppliers must be reported to the direct Superior before any negotiations;
- are required to immediately report to their direct superior any attempt to alter normal commercial relations;
- observe the internal procedures for the selection and management of relationships with suppliers by maintaining a frank and open dialogue with suppliers in line with good commercial practices without precluding any person in possession of the required requisites the opportunity to compete to win a supply;
- adopt, in the selection, exclusively objective evaluation criteria according to declared and transparent methods;
- work to obtain the collaboration of suppliers and external collaborators in constantly ensuring the satisfaction of the needs of customers and consumers to an extent appropriate to their legitimate expectations, in terms of quality, cost and delivery times.

BFG pays suppliers a fee exclusively commensurate with the service indicated in the contract and payments cannot in any way be made to a person other than the contractual counterparty, except in cases of credit transfer.

## 3.0 Conflict of interest

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BFG recognizes and respects the right of all collaborators to participate in investments or business outside the workplace, as long as they are activities permitted by law and compatible with the contractual obligations undertaken. In particular, all BFG collaborators must avoid situations in which their interests may conflict with the interests of the individual companies and with the BFG in general.

Everyone is required to report to the direct Superior the specific situations and activities in which he or, to the best of his knowledge, his relatives or kindreds or de facto cohabitants, are holders of economic and financial interests in conflict with the interests of BFG in the context of suppliers, customers, competitors, contracting third parties or related parent or subsidiary companies.

By way of non-exhaustive example, the situations that may cause a conflict of interest are:

- participate in decisions concerning business with companies or entities in which the employee or
- his/her family's member have interests or even when such decisions may result in a personal advantage for an employee or a family member of the same;
- use the name of the Group and / or Group Company to obtain personal or third-party benefits;
- use their position in the Company or the information or business opportunities acquired in the exercise of their office, for their own benefit or that of third parties.

The obligation to avoid situations of conflict of interest must be understood as extended to consultants and collaborators in various capacities of the BFG Company.

## 4.0 Illicit commercial activities

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BFG and its collaborators place the utmost commitment and attention not to be involved in activities such as to involve money laundering (i.e., the acceptance or treatment) of income from activities criminals in any form or way.

Each collaborator must check in advance the information available, including financial information, on commercial counterparties and suppliers, in order to ascertain their respectability and the legitimacy of their activity before establishing these commercial relationships.

BFG collaborators are required:

- to make payments for goods and services provided to the Company only by means of transfer approved by internal procedures and documented;
- not to make payments to persons or entities in countries other than the one in which they reside or carry out an economic activity or have delivered the goods or provided the services;
- to entertain commercial relationships only with customers willing to provide the information necessary to verify the legitimacy of their economic activities and the origin of the funds used; not to accept third party checks in payment from customers. Sales must be collected by check, electronic transfer or payment mandate in which the customer is indicated as the payer and where possible the use of cash must be limited;
- not to ship goods to customers in a way that differs from standard procedures.



## 5.0 Competition and intellectual property law

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BFG recognizes the value of competition in its reference markets and undertakes to comply with the antitrust regulations applicable in the countries where it operates.

We refrain from commercial practices such as creating cartels, sharing markets, or restricting production or sales, which would constitute a violation of competition laws.

Particularly:

- we do not conclude contracts or agreements with competitors in order to limit dynamic and fair competition with and between them;
- we independently determine the prices and conditions of sale of our products and do not sell the Company's products at a price lower than their production cost;
- we do not use the relationships between BFG and customers to induce them to treat competitors unfairly.

As part of fair competition, BFG respects the intellectual property rights of third parties; therefore, collaborators are prohibited from committing violations of these rights.

We are committed and require the commitment of all collaborators for the protection of corporate brands that represent an invaluable asset for the Company and for the continuity of our work, as well as for all other intellectual property rights. Therefore, behaviors or initiatives that could damage brands, in particular (but not exclusively) in terms of their distinctive ability and their image, must be strictly avoided.

## **C Institutions and control bodies, local communities**

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### **1.0 Transparency and Clarity in Relations**

- 1.1 Institutional relations
- 1.2 Relations with stakeholder associations
- 1.3 Support for local communities
- 1.4 Corruption
- 1.5 Accounting records and internal control

### **2.0 Procedural and Control Rules**

- 2.1 Scope of application and obligations of collaborators
- 2.2 Diffusion
- 2.3 Specific duties for the management
- 2.4 Audit
- 2.5 Reporting Violations
- 2.6 Sanctions
- 2.7 Validity

## 1.0 Transparency and Clarity in Relations

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### 1.1 Institutional relations

BFG maintains relations with Public Institutions, in compliance with current legislation, in a spirit of loyalty, correctness and transparency.

Contacts with Public Institutions are reserved to the delegated functions of BFG and to those who have received an express mandate on the matter.

We undertake to establish, without any kind of discrimination, stable channels of communication with all institutional interlocutors at an international, national and local level and to represent the interests and positions of the Group companies in a transparent, rigorous and coherent manner, avoiding attitudes of collusive nature.

### 1.2 Relations with stakeholder associations

BFG maintains a constructive dialogue with representative associations and organizations that are actively committed to the improvement of civil, social, environmental, cultural conditions etc. and participates in partnership projects with them.

### 1.3 Support for local communities

It is BFG commitment to contribute positively to the promotion of the quality of life, to the social and economic development of the communities in which it operates and to the training of local people and skills, while carrying out its business activities in a manner compatible with a fair business practice.

We respect the cultural, economic and social rights of the local communities in which we operate and we contribute, where possible, to their realization.

## 1.4 Corruption

All BFG collaborators maintain relationships within and outside the Group with integrity, honesty and fairness.

BFG does not tolerate or admit behaviors such as the direct or indirect promise / offer of money or other benefits to representatives or appointees of public services or their family members, from which it can obtain any advantage for the Group companies. Likewise, it condemns any conduct aimed at obtaining, by Public Administrations or Supranational Bodies any type of contribution, financing or other provision of the same type, by means of altered or falsified declarations and / or documents, or by means of omitted information or, more generally, by means of artifices or deceptions, aimed at misleading the supplying body.

Gifts to representatives of Governments, public officials and public employees will be allowed, if admitted by the relevant national legislation, only if of modest value and in any case such as not to compromise the integrity and reputation of one of the parties and not to affect the autonomy of judgment of the recipient.

## 1.5 Accounting records and internal control

Each employee and each company function is responsible for the truthfulness, authenticity and originality of the documentation and information handled.

For each accounting entry that reflects a corporate transaction, adequate supporting documentation must be kept, easily available and archived according to appropriate criteria that allow for easy consultation.

The Group, in order to ensure the regular keeping of the mandatory accounting records, the correct preparation of the financial statements, reports, prospectuses and corporate communications in general, a regular control activity of the internal and external bodies and of the Public Authorities obliges its directors, collaborators and third parties who act on behalf of the same in compliance, in particular, with the following principles:

- to clearly draw up the financial statements and corporate communications required by law and to represent the equity and financial situation correctly and truthfully;
- not to prevent or otherwise hinder the performance of the control activities legally attributed to the persons in charge;
- in communications to the Public Authorities, do not expose untrue facts about the economic, patrimonial or financial situation, or hide others that have the aforementioned situation as their object.

Any collaborator who becomes aware of omissions, tampering, falsification or neglect of the accounting or supporting documentation on which the accounting records are based, is required to report the facts to the direct Superior or to the relevant control bodies (Internal Audit Responsible).

The Group recognizes the primary importance of internal control for proper management and for the reliability and credibility of corporate information.

Each employee is responsible for the proper functioning of the internal control system, within the scope of his / her role and skills, and is required to collaborate so that all management facts are correctly represented and documented.

BFG is committed to maintaining an efficient Internal Audit function that operates independently and objectively in line with international professional standards and that reports promptly to the Ownership of the Company about the outcome of the checks carried out.

All collaborators are required to provide support and collaboration in the verification activity carried out by Internal Audit.

In particular, all accounting and administrative documents must be archived in such a way as to allow them to be easily found and easily consulted by authorized parties; in particular, the persons in charge of the external auditing firm will be guaranteed free access to the documents and information necessary for the performance of their activities.

## 2.0 Procedural and control rules

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### 2.1 Scope of application and obligations of collaborators

The principles and rules of conduct contained in this Code apply to all employees of the BFG located all over the world.

No one, at any level of the Company, has the authority to request or allow the collaborator to violate any of the standards of conduct set out here.

All collaborators are required to know the rules contained in the Code and the reference standards, internal and external, which govern the activity carried out within the area of competence.

Each employee is also obliged to:

- diligently observe the rules of the Code, refraining from conduct contrary to it;
- contact their managers or the Internal Audit function in case of need for clarification regarding the interpretation and implementation of the rules contained in the Code;
- promptly report to the direct Superior (or to the subjects indicated in the following paragraph “Reporting violations”) any information learned regarding possible violations of the Code and any request received to violate the Code itself;
- offer the utmost cooperation to ascertain possible violations.

### 2.2 Diffusion

BFG undertakes to adequately spread the contents of the Code and the principles that inspire it among its collaborators. In order to ensure the correct understanding of the Code of Ethics, the BFG prepares its delivery to all new-hired employees, periodic dissemination and information plans and its publication on the company intranet, as well as any action aimed at promoting its knowledge. Training initiatives are differentiated according to the role and responsibility of the collaborators; for new hires there is a specific training program that illustrates the contents of the Code which compliance is required.

In particular, each collaborator will be duly informed that compliance with and observance of the Code, as well as company rules and procedures, constitute precise contractual obligations, with any consequent sanctioning in the event of violation of the same, based on the applicable national regulations.

## **2.3 Specific duties for the management**

Anyone who holds the role of Chief Officer, Executive, or Manager must be an example, carrying out their activities in accordance with the principles and rules of conduct contained in the Code and, through their work, must demonstrate to other collaborators that compliance with the Code is an essential aspect of their work, making sure that everyone is aware that company results must never be separated from compliance with the principles of the Code.

The commitments undertaken under this Code with reference to BFG, are understood to refer to the duties and responsibilities of all the Chief Officers, managers and executives who collaborate in various capacities within the BFG.

## **2.4 Audit**

Each corporate function oversees and guarantees the adherence of its actions and activities to the principles and rules of conduct of this Code of Ethics.

Furthermore, each function is responsible for carrying out checks within its own area of competence, for detecting non-compliance occurring internally and for reporting them, activating, where necessary, Internal Audit.

## **2.5 Reporting Violations**

The reporting of violations of this Code, or presumed such, must be made by each collaborator to his / her direct superior or to the Internal Audit function. No collaborator may be subjected to disciplinary proceedings in the event of incorrect reports made in good faith.

## 2.6 Sanctions

Failure to comply with the rules of conduct contained in this Code of Ethics will have relevance for the imposition of disciplinary sanctions up to dismissal, according to the applicable national regulations and in any case without prejudice to the possible adoption of different sanctions related to other types of liability.

The application of disciplinary sanctions regardless of the outcome of any criminal proceedings or civil, as the rules of conduct imposed by the Code of Ethics are effective regardless of the crime and / or offense that any improper conduct may cause.

No unlawful behavior or in any case in violation of the provisions of this Code or even just illegitimate or incorrect may be justified or considered less serious, even if carried out in the interest or advantage of Group companies.

## 2.7 Validity

This Code has been submitted to the Personnel Representatives and approved by them. The Code comes into force from January, 19th 2022. It is periodically reviewed and updated.



## D Company Policy

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The company BELARDI FOOD GROUP SAM deal with:

Wholesale marketing, storage and distribution of foodstuffs, including chilled and frozen.

In support of its performance, the company management has taken steps to implement and support its Integrated System (ISO 9001: 2015-ISO14001: 2015-ISO22000: 2005).

The Integrated System involves all the functions of the company, creating an interdisciplinary and cross-functional articulation that embraces the entire corporate process.

Thus, the Management undertakes to motivate, sustain and support the personnel in achieving the following objectives:

- Consider the company a collective welfare of all employees and support it in the desire for a continuous improvement;
- Implement, maintain, update and continuously improve the Integrated Quality Management System in order to meet the requirements of the ISO reference standards.
- Maintain compliance of all activities with the laws of the State and with EU Directives, in particular those relating to one respect for the Environment and Food Safety;
- Monitor the adequacy of the resources available in relation to the current activities and to guarantee the availability of human and instrumental resources to achieve the set objectives;
- Promote the necessary actions to prevent and avoid the recurrence of non-Conformities on company processes and on the Integrated System;
- Promote and Support the cultural and ethical competences and values of the one organization so that it is considered a territorial and social resource;
- Promote the cultural growth of its staff in terms of scientific competence and consistency with the organization's Quality Policy, guaranteeing and promoting continuous professional updating;
- Increase staff involvement in company processes through the motivation of the same; - Increase business competitiveness for greater presence and visibility on the market;
- Ensure the use of information by promoting internal communication within the organization, so the staffs are familiar with the documentation of the Integrated System and implement company policies and the envisaged operating procedures in their work;
- Ensure that the requirements of the provided services are defined and respected, in order to increase customer satisfaction;

- Monitor the commitments and objectives through the adoption of adequate indicators; - Monitor the "Customer Satisfaction" by analyzing the return information;

- Adapt the organization and activities in compliance with the mandatory and voluntary regulations of interest to the same;

- Promote and implement any reasonable initiative aimed at minimizing risks and removing the causes that may endanger food safety;

- Promote awareness of its environmental impact;

- Guarantee the continuous improvement of the organization in terms of safety in the workplace, continuous training of personnel, adjustment of instrumental resources, elimination of all possible barriers to the performance of staff duties consistently with the Policy;

- Support the compliance of one's own work with food and environmental safety regulations, through activities aimed at:

- Attention and an ongoing commitment to improve their performance by reducing the impact on the environment;

- Responsible and conscious use of natural resources;

- Practice of early assessment of the environmental and safety impacts of all new activities, processes and products;

- Attention to environmental issues through continuous training of personnel and separate waste collection;

- Maintain and extend food safety through an appropriate Food Safety Culture by complying with the following requirements:

commitment by management, department heads and all employees to the safe distribution of products;

leadership role and involvement of all employees in food safety practices;

awareness, by all company employees, of the dangers for food safety and of the importance of food safety and hygiene;

open and clear communication between all employees of the company, within an activity and between consecutive activities, including the communication of deviations and expectations;

- Support the compliance of one's own work with health and safety regulations in the workplace, promoting an occupational safety policy, attentive and responsible through:

- An organizational structure that has clear tasks and responsibilities;

- The use of systems and processes to guarantee the intrinsic safety of its activities;
- Training, information and training of its staff;
- Verification and evaluation, in terms of safety, of the reliability of the "haulers" and suppliers;
- Periodic identification of the dangers associated with the own activities, taking adequate preventive measures and using standards of recognized validity and formalized procedures within a management system;
- The recording, analysis and communication of incidents, planning and implementing the necessary improvement actions;
- Maintain high performance indexes in terms of quality, food safety and the environment, supporting the Integrated Management System;
- Attention to environmental issues and food safety through continuous training of personnel;

The Management is committed to making available resources and means adequate to the set objectives and targets, in terms of competence, information, economic and financial resources, and to constantly monitor its adequacy. The Management, intending to base its decisions on the analysis of data and information, promotes within the organization a methodological approach focused on the systematic collection of data and their timely analysis.

The Management undertakes to review at least once a year the adequacy of the Integrated System and to give indications on any corrections and / or improvements to be made to the structure of the System. On this occasion, it also verifies the achievement of the annual objectives of Quality, Environment and Food Safety and analyzes any deviations from what was planned.

The Quality, Environment and Food Safety Policy is periodically reviewed (when the Integrated System is reviewed and when the Integrated System is changed) and, when necessary revised.

In order to promote the dissemination and understanding of the Quality, Environment and Food Safety Policy, the Management meets both Function Managers and all workers in order to spread awareness of the individual's role in the organization.

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