



**GOGGLIO®**

## **CODE of ETHICS**

**INDEX**

1. FORWARD AND OBJECTIVES	3
2. ADDRESSEES AND SCOPE OF APPLICATION	4
3. PRINCIPLES AND VALUES	5
4. BUSINESS CONDUCT	7
5. PERSONNEL POLICY	10
6. TRANSPARENCY OF ACCOUNTING AND INTERNAL CONTROLS	12
7. HEALTH, SAFETY AND ENVIRONMENT	14
8. CONFIDENTIALITY	16
9. IMPLEMENTATION OF THE CODE OF ETHICS	18

# 1

## Forward and objectives

---

This Code of Ethics (hereafter referred to as the “Code”) clearly expresses the values and responsibilities that the Goglio Group, namely Goglio SpA and all companies, controlled directly or indirectly by the Company, both in Italy and abroad (hereafter referred to as Goglio), recognize, accept, share and adopt during the execution of their work, with the objective and need to consider the legitimate interests of parties concerned with company business (“Stakeholder”). The ethical commitments and responsibilities of Goglio, also through this Code, are aimed at creating satisfaction for their customers, value for shareholders and professional development for employees and collaborators. The Code sets down principles, therefore, the observation of which by all to whom it is addressed is of the utmost importance for the regular operation, reliability of management and image of Goglio. With the adoption of the Code, more precisely, Goglio intends to provide itself with an instrument designed to prevent unlawful or unethical conduct, on the part of those who operate in the name of, and on behalf of, the Company.

# 2

## Addressees and scope of application

---

The principles and provisions of the Code are binding for members of corporate bodies, employees, temporary workers, consultants and collaborators, agents and any other figure who may, both in Italy and abroad, each in their own area of competence and responsibility, operate toward the objectives of Goglio (hereafter referred to as Goglio People). Goglio undertakes to promote knowledge of the Code among Goglio People and Stakeholders, and endeavors to consider suggestions and observations that may come from the Stakeholders, with the objective of confirming or integrating the Code. Goglio, in any case, carefully monitors compliance with the code, providing appropriate information, prevention and control tools and procedures, and intervenes, where necessary, with corrective measures

# 3

## Principles and values

---

### 3.1 COMPLIANCE WITH LAWS AND REGULATIONS

All activities carried out by Goglio and Goglio People must be fully compliant with current laws and regulations. In no way shall unlawful conduct be tolerated.

### 3.2 QUALITY OF SERVICE AND BUSINESS ETHICS

All Goglio business activities must be done with honesty, integrity, correctness and good faith, respecting the legitimate interests of Stakeholders and the communities where Goglio operates. These objectives are achieved by conducting activities in accordance with the highest quality standards, following logics of efficiency and fair trade, maintaining the value of fair competition with, and abstaining from any collusive and unlawful conduct to the detriment of clients or third parties. Goglio refuses to use any form of child labor, including work carried out by third parties.

### 3.3 CORRECTNESS, TRANSPARENCY

The conduct of business and Goglio business activities must be carried out in a framework of transparency, honesty, correctness, good faith and in full compliance with rules for the protection of competition. Every form of discrimination, corruption, forced or child labor is rejected. The recognition and protection of dignity, freedom and equality of human beings are held in particular regard, together with the protection of labor, free trade unions, health, safety, the environment and biodiversity, as well as the system of values and principles on transparency, energy efficiency and sustainable development, as affirmed by the Institutions and International Conventions. Goglio, in business relationships, aspires to and observes principles of loyalty, correctness, transparency, efficiency and fair trade, without distinction of importance of the deal. All actions, operations and negotiations and, in general, the conduct of Goglio People in the performance of their work are inspired by the utmost correctness, completeness and transparency of information, to legitimacy from a formal 3 Principles and values Page 6 of 20 .– CODE OF ETHICS – and substantial point of view, to the clarity and veracity of accounting documents, respecting regulations in force and internal procedures. Acts of commercial courtesy, such as gifts or forms of hospitality, are permitted when they are of modest value, and in any case do not compromise the integrity or the reputation of

any of the parties involved, and which would not be interpreted by an impartial observer as being aimed at acquiring improper benefits. Anyway this kind of expenses has to be always authorized by the person defined by the procedures and adequately documented.

### **3.4 WORKING ENVIRONMENT AND PROFESSIONAL CONDUCT**

Goglio promotes a working environment which, inspired by respect, correctness and collaboration, and on the basis of experience matured in the sector, renders its employees and collaborators participant and responsible, with regard to specific objectives to be reached and the means to pursue them. Goglio promotes the creation of an environment characterized by a strong sense of ethical integrity, in the conviction that this contributes decisively to the effectiveness of its internal control policies and systems, influencing conduct which could evade even the most sophisticated supervisory mechanism. All Goglio activities must be carried out with commitment and professional rigor, with the duty to provide professional contributions to the functions and responsibilities assumed, and to act in order to protect the prestige and reputation of Goglio. Goglio encourages the continual professional growth of technical and professional expertise of its human resources with view to protecting and enhancing the value thereof.

# 4

## BUSINESS CONDUCT

### 4.1 RELATIONS WITH INSTITUTIONS AND PUBLIC ADMINISTRATION

Goglio People, as well as external collaborators whose actions refer to Goglio, must maintain relations characterized by correctness, transparency and traceability with the Public Administration. All such relations are reserved exclusively to the appointed and authorized corporate figures, in line with approved programs and company procedures. It is not permitted to pay or offer, request or accept either directly or indirectly, any type of gratuity or personal gifts connected with the execution of Goglio business. This ban refers to money and other gifts given to (or received from) Public Officials and/or Public Service officials, both in Italy and abroad, with whom Goglio has or could have business relations. It is not permitted to make, induce or favor false statements to the Authorities.

### 4.2 POLITICAL AND TRADE UNION ORGANISATIONS

Goglio does not contribute, directly or indirectly, under any form, to parties, movements, political and trade union committees and organizations, their representatives or candidates.

### 4.3 LOCAL COMMUNITIES

Goglio actively contributes to the promotion of the quality of life, to the socio-economic growth of the communities where it operates, and to the development of the human capital and local skills, while at the same time carrying out its business activities in a manner compatible with proper commercial practice.

### 4.3 RELATIONS WITH CUSTOMERS

In relations with its customers, Goglio bases its behavior on criteria of transparency, fairness, honesty, efficiency and professionalism and compliance with the rules to protect fair competition.

The People of Goglio are obliged to:

- observe internal procedures for the selection and management of relations with suppliers and external collaborators;
- provide, with efficiency and courtesy, within the limits of the contractual provisions, high quality services that meet the reasonable expectations and needs of the customer;
- provide accurate and comprehensive information about products and services so that the customer can make informed decisions.

Contracts concluded with customers and all forms of communication and relationship with the customer, including advertising messages,

must comply with the provisions of the law and must meet clear and complete criteria, avoiding the use of any misleading and / or incorrect practice.

#### 4.4 RAPPORTI CON I FORNITORI

Goglio is committed to seeking suitable professionalism and commitment to sharing the principles and contents of the Code in suppliers and external collaborators and promotes the construction of lasting relationships for the progressive improvement of performance in the protection and promotion of the principles and contents of the Code.

In the relationships of contracts, procurement and, in general, supply of goods and / or services and external collaboration (including consultants, agents, etc.) the People of Goglio are obliged to:

- observe the internal procedures for the selection and management of relationships with suppliers and external collaborators;
- not exclude any person in possession of the required requirements from competing to win a supply at Goglio;
- adopt only objective evaluation criteria in the selection according to declared and transparent procedures;
- obtain the collaboration of suppliers and external collaborators that can guarantee the constant satisfaction of the needs of customers and consumers to an extent adequate to their legitimate expectations, in terms of quality, cost and delivery times;
- use to the greatest extent possible, in compliance with the laws in force and the criteria of legitimacy of transactions with related parties, products and services provided by Goglio companies at competitive and market conditions;
- include in the contracts the confirmation of having read the express obligation to comply with the principles of this Code;
- observe and require compliance with the contractually provided conditions;
- promptly report to their superior, and to the Supervisory Body of Goglio SpA, possible violations of the Code;

The remuneration to be paid must be exclusively commensurate with the performance indicated in the contract and payments cannot in any way be made to a person other than the contractual counterparty or in a third country other than that of the parties or execution of the contract.



#### 4.5 SUSTAINABLE PROCUREMENT POLICY

Goglio operates in compliance with all national and international regulations, respecting the values of corporate social responsibility, protecting the environment and promoting social progress.

Stakeholders have an important active role in the effectiveness of a responsible approach; therefore Goglio operates taking into account customer expectations and analyzing supplier performance.

The sustainable purchasing policy is based on objectives, actions and procedures, suitable to guarantee continuous improvement of purchasing processes and at the same time to achieve an ever greater integration of suppliers in Goglio policies.

Sustainability is at the heart of the purchasing processes: Goglio's suppliers are required to sign the Code of Ethics which includes environmental and social principles, requiring them to act respecting and sharing the same values.

The acceptance of the Code of Ethics of Goglio (in particular for personnel policy, health safety and the environment) is also confirmed during periodic audits.

The fundamental points of Goglio's purchasing policy are:

- Acceptance by suppliers of our principles as set out in the Code of Ethics and our sustainable purchasing policy: doing business sustainably is good for both contracting parties;
- Training on corporate ethical values: our employees, especially our purchasing department, are trained on these topics;
- Communicate to customers that Goglio contributes to a more sustainable supply chain.

# 5

## PERSONNEL POLICY

### 5.1 SELECTION AND MANAGEMENT OF HUMAN RESOURCES

The management and development of human resources is a strategic factor for Goglio.

Goglio is committed to the absolute respect of human rights in the management of labor relations. Goglio undertakes to adopt criteria of impartiality, merit, competence and professionalism for any decision concerning the employment relationships with its employees and collaborators in any capacity operating for the same. Any discriminatory practice in the selection, recruitment, training, management, career development and remuneration of workers shall be prohibited so that all can enjoy fair regulatory and remuneration treatment based solely on merit and competence criteria.

In the search and selection of personnel, Goglio adopts criteria of objectivity, competence and professionalism, applying the principle of equal opportunities without favoritism, with the aim of ensuring the best skills existing on the labor market.

Goglio, in compliance with contractual regulations, promotes business plans and training programs aimed at encouraging the development of everyone's skills and competences.

Goglio takes action to prevent any form of psychological, physical and sexual harassment of employees and condemns such forms.

All forms of discrimination, corruption, forced or child labour are repudiated.

Particular consideration shall be given to the recognition and safeguarding of the dignity, freedom and equality of human beings, the protection of labour and trade union freedoms, health, safety, the environment and biodiversity, as well as the system of values and principles on transparency, energy efficiency and sustainable development, as affirmed by the Institutions and International Conventions.

### 5.2 WORKPLACE HARASSMENT

Goglio demands that in internal and external work relations no harassment be given, meaning as such any aggressive, hostile and denigrating behavior directed towards a person, physically or psychologically persecutory, characterized by repetition, protracted and systematic, likely to create an environment that is not respectful, humiliating and detrimental to the psychophysical integrity of the person. Examples of harassment are the following behaviors:

- the creation of an intimidating, hostile or isolating work environment towards individuals or groups of workers;

- conduct detrimental to professionalism such as unjustified interference with the performance of work performed by others;
- behaviour detrimental to the image of the person;

Any form of violence or harassment or sexual or related to personal and cultural diversity is prohibited. The following shall be considered as such:

- make any decision relevant to the recipient's working life conditional on acceptance of sexual favours or personal and cultural differences;
- induce their collaborators to sexual favours through the influence of their role;
- propose private interpersonal relationships, despite an express or reasonably evident dislike;
- allude to physical or mental disabilities and impairments or to forms of cultural, religious or sexual orientation diversity.

### 5.3 ALCOHOL OR DRUG ABUSE

It is Goglio's policy to commit to creating and maintaining a safe, healthy and productive work environment for all Goglio staff.

Goglio acknowledges that the abuse (or improper use) of alcohol, drugs and other similar substances by its employees and / or collaborators negatively affects their duty of efficient work and can have serious harmful consequences for themselves, on the safety, efficiency and productivity of other employees and the Company.

It is forbidden to possess, consume, offer or transfer drugs or similar effects for any reason, in the course of work and in the workplace;

### 5.4 SMOKE

Smoking is harmful not only to users, but also compromises the health and safety of the working environment. For this reason, it is forbidden to smoke inside the Goglio offices in order to protect the healthiness of the workplace, respecting the people who work there. Goglio promotes voluntary initiatives aimed at people who intend to dissuade from smoking and will take into particular consideration the condition of those who feel physical discomfort due to the possible presence of smoke in situations of cohabitation at work and ask to be preserved from contact with "passive smoking" in their workplace.

# 6

## Transparency of accounting and internal controls

---

### 6.1 TRANSPARENCY OF ACCOUNTING

The Company condemns any conduct, by anyone, aimed at altering the clarity, correctness and truthfulness of the data and information contained in the financial statements, reports or other corporate communications required by law, addressed to shareholders, the public and the company in charge of auditing. All the subjects called to the formation of the aforementioned acts are required to verify, with due diligence, the correctness of the data and information that will be implemented for the drafting of the acts indicated above. All budget items, the determination and quantification of which presupposes discretionary assessments of the Functions/Departments in charge, must be supported by appropriate documentation and legitimate, shared and sustainable choices at all times.

Any type of corporate transaction likely to cause unfair damage to creditors is prohibited. It is forbidden to engage in any conduct aimed at causing damage to the integrity of the company's assets. It is also forbidden to carry out any act, simulated or fraudulent, aimed at influencing the will of the members of the shareholders' meeting to obtain a resolution different from the one that would have been taken.

For each operation, adequate supporting documentation of the activity carried out is kept on file, so as to allow:

- easy accounting registration;
- identification of different levels of responsibility;
- the accurate reconstruction of the operation, the verification of the decision-making process, authorization and its execution also to reduce the likelihood of interpretative errors.

Each registration must reflect exactly what results from the supporting documentation, in order to be able to proceed, at any time, to carry out checks that attest to the characteristics and motivations of the operation and identify who authorized, carried out, registered, verified the operation itself. It is the task of the People of Goglio to ensure that the documentation is easily traceable and ordered according to logical criteria.

The Persons of Goglio who become aware of omissions, falsifications, negligence of the accounting or documentation on which the accounting records are based, are required to report the facts to their superior or to their referent.

## 6.2 CONFLICT OF INTEREST

Goglio's management and employees are required to avoid all situations and activities in which a conflict with the interests of the company may arise or which may interfere with their ability to make, impartially, decisions in the best interests of the enterprise and in full compliance with the principles and contents of the Code or, in a general sense, to fulfill exactly the functions and responsibilities held. Any situation that may constitute or determine a conflict of interest must be promptly communicated to the superior in a managerial position, or to the body of which one is a member, and to the Supervisory Body. Likewise, the person involved promptly refrains from intervening in the operational/decision-making process and the superior in a managerial position or the body:

- identifies operational solutions to safeguard, in this specific case, the transparency and correctness of conduct in the performance of activities;
- transmits to the interested parties - and for information to their hierarchical superior, as well as to the Supervisory Body - the necessary written instructions;
- Archives the documentation received and transmitted.

## 6.3 INTERNAL CONTROLS

It is the policy of GOGLIO to spread at all levels a culture characterized by the awareness of the existence of controls and by the assumption of a mentality oriented to the exercise of control. The attitude towards controls must be positive because of their contribution to improving efficiency.

Internal controls are all the tools necessary or useful to direct, manage and verify the company's activities with the aim of ensuring compliance with laws and company procedures, efficiently managing activities and providing accurate and complete accounting and financial data.

The responsibility for implementing an effective internal control system is common at every level of the organisational structure; Consequently, all employees, within the scope of the functions performed, are responsible for the definition and correct functioning of the control system.

Within the scope of their competences, managers are required to participate in the company control system and to involve their employees and/or collaborators.

Everyone must feel responsible guardian of the company assets (tangible and intangible) that are instrumental to the activity carried out. No Goglio Person may misuse GOGLIO property and resources or allow others to do so.

# 7

## Health, Safety and Environment

---

### 7.1 HEALTH AND SAFETY

Goglio promotes the protection of the health and safety of workers, the environment and public safety, confirming its maximum commitment to ensuring that activities are conducted in compliance with international agreements and standards and the laws, regulations, administrative practices and national policies of the countries in which it operates. Operational management must refer to advanced criteria of environmental protection by pursuing the continuous improvement of health and safety conditions at work and environmental protection.

The People of Goglio, as part of their duties, actively participate in the process of risk prevention, environmental protection and public safety and protection of health and safety towards themselves, colleagues and third parties.

Research and technological innovation must be dedicated in particular to the promotion of products and processes that are increasingly compatible with the environment and characterized by increasing attention to the safety and health of operators in compliance with current legislation.

As part of their duties, GOGGLIO's employees participate in the process of risk prevention, environmental protection and health and safety protection for themselves, colleagues and third parties.

GOGGLIO also calls for strict and strict observance of accident prevention measures to third parties operating in its facilities and ensures that those who access them have the correct safety information and are adequately equipped to safely perform their duties within the GOGGLIO environments.

### 7.2 ENVIRONMENTAL POLICY

Goglio is committed to reducing the environmental impact of its operating activities, through precise objectives and actions concerning the following aspects:

- Compliance with national and international environmental legislation
- Care of the surrounding environment.
- Ensuring that all production operations are carried out with adequate environmental protection; In particular, soil, air, water, energy, waste and noise are taken into account.
- Continuous improvement of plant efficiency through the adoption of the most suitable raw materials and the most modern technologies that can ensure energy savings: reduction of emissions, adoption of cogeneration plants for

the production of electricity, reuse in production processes of recovered raw materials, etc.)

- Adequate training for all employees on environmental awareness and resource management
- Participation in international certification instruments in the field of environmental sustainability.
- Customer awareness about saving resources through the offer of eco-sustainable packaging products.

The Goglio environmental policy is part of the Group's general quality, food safety, health, safety and environment policy. The aforementioned policy is made public and subject to review and update on a triennial basis.

# 8

## Confidentiality

---

Any information and other material obtained by a Person of Goglio in relation to its employment, is strictly the property of Goglio itself. The Recipients may not use this information for their own benefit or for the benefit of their family members, acquaintances and, in general, third parties.

Therefore, particular care should be taken not to disclose inside information and to avoid any misuse of such information.

Without prejudice to the transparency of the activities carried out and the information obligations imposed by the provisions in force, it is the obligation of the Persons of Goglio to ensure the confidentiality required by the circumstances for each piece of information learned by reason of their work function.

Information and/or any other kind of news, data or documents that have the character of confidentiality, as they are related to the acts and operations of each task or responsibility, must not be disclosed, nor used, much less communicated, without specific authorization.

### 8.2 PRIVACY POLICY

Goglio undertakes to protect the information relating to its Persons and third parties, generated or acquired within and in business relationships, and to avoid any misuse of this information.

Goglio intends to ensure that the processing of personal data carried out within its structures takes place in compliance with fundamental rights and freedoms, as well as the dignity of the interested parties, as required by current regulations.

The processing of personal data must take place in a lawful and correct manner and, in any case, only data necessary for specific, explicit and legitimate purposes are collected and recorded.

The retention of data will take place for a period of time not exceeding

that necessary for the purposes of the collection.

Goglio also undertakes to adopt appropriate and preventive security measures for all databases in which personal data are collected and stored, in order to avoid risks of destruction and loss or unauthorized access or unauthorized processing.



### 8.3 TECHNOLOGY

Goglio's computer systems and equipment must never be used for outside businesses, illicit activities, gambling or pornography. You may not download or save illegal or inappropriate content or programs from the Internet to your company computer.

Employees must always use licensed software in accordance with the terms of the relevant license agreement. You may not sell, transfer or otherwise make available to any unauthorized person any software or related documentation licensed to or owned by the Company.

People of Goglio are forbidden:

- share username or password;
- access, download, create or forward emails, documents or images that are offensive or that cause discomfort to other people;
- install or use hardware or software on any of the Company's systems unless specifically approved by the IT team.

# 9

## Implementation of the Code of Ethics

### 9.1 SCOPE AND REFERENCE STRUCTURES

GOGGLIO is committed to ensuring:

- the appointment, by the Board of Directors, of a Supervisory Body and an Ethics Committee responsible for monitoring the functioning and compliance with the organizational processes and principles contained in the Code of Ethics;
- the dissemination of the Code to the Recipients;
- an adequate training and continuous awareness program on issues related to the Code;
- the deepening and updating of the Code in order to adapt it to the evolution of civil sensitivity and regulations relevant to the Code itself;
- the provision of every possible cognitive and clarification tool regarding the interpretation and implementation of the rules contained in the Code;
- carrying out checks on any news of violation of the rules of the Reference Code;
- the assessment of the facts and the consequent implementation, in the event of a proven violation, of appropriate sanctioning measures;
- that no one can suffer retaliation of any kind for having provided news of possible violations of the Code or the reference standards.

The principles and contents of the Code apply to People and activities of Goglio.

The representatives indicated by Goglio in the corporate bodies of the subsidiaries, consortia and joint ventures promote the principles and contents of the Code in the areas of their respective competence.

It is primarily the responsibility of the directors and management to give substance to the principles and contents of the Code, taking responsibility internally and externally and strengthening trust, cohesion and team spirit, and also to represent an example for their employees with their behavior and direct them to comply with the Code as well as to urge them to formulate questions and suggestions regarding the individual provisions.

## 9.2 OBLIGATIONS TO KNOW AND REPORT POSSIBLE VIOLATIONS

The Code is made available to Goglio People in accordance with applicable regulations and can also be consulted on the websites and intranets of Goglio SpA and its subsidiaries.

Each person of Goglio is asked to know the rules contained in the Code and the reference standards that govern the activity carried out within the scope of his function. The Recipients are obliged to:

- refrain from conduct contrary to these rules;
- carefully select, as far as it is competent, its collaborators and direct them to full compliance with the Code;
- request confirmation from third parties with whom Eni enters into relations that they have read the Code;
- contact your superiors and / or referents, in case of need for clarification on how to apply them;
- promptly report in compliance with the operating methods and existing procedures:
  - any news, directly detected or reported by others, regarding possible violations of the rules contained in the Code;
  - any request made to him to breach these rules;
- collaborate with the Supervisory Body and with all the structures responsible for verifying possible violations;
- take immediate corrective measures when required by the situation and, in any case, prevent any kind of retaliation.

In the event of violations or even when there is doubt of inappropriate conduct that may put the Group, its persons or those who have business relations with it at risk, it is possible to make a report following the instructions contained in the Whistleblowing Policy published on the [www.goglio.it](http://www.goglio.it) website.

## 9.3 GUARANTOR OF THE CODE OF ETHICS

The Code of Ethics represents, among other things, a non-derogable general principle of the Organization, Management and Control Model adopted by Goglio SpA pursuant to the Italian legislation on the "liability of entities for administrative offenses dependent on crime" contained in Legislative Decree no. 231 of 8 June 2001.

The functions of guarantor of the Code of Ethics are carried out by the Supervisory Body of Goglio SpA (the "SB").

The SB is assigned the task of:

- promote and facilitate the implementation of the Code of Ethics and the issuance of reference procedures; propose to the competent internal structures useful initiatives for greater

- dissemination and knowledge of the Code also in order to avoid the recurrence of ascertained violations;
- examine the news of possible violations of the Code, promoting the most appropriate checks; intervene, also on the report of the People of Goglio, in cases of news of possible violations of the Code deemed not duly addressed or retaliation suffered by the Person following the reporting of news;
  - communicate to the competent structures the results of the checks relevant for the adoption of any sanctioning measures; inform the competent line/area structures of the results of the relevant checks for the adoption of the appropriate measures.

Each information flow intended for the SB can be addressed to the e-mail box: [odv@goglio.it](mailto:odv@goglio.it)

#### **9.4 CONTRACT VALUE**

Compliance with the provisions of the Code must be considered an essential part of the contractual obligations of all Goglio Persons pursuant to and for the purposes of applicable law.

The violation of the principles and contents of the Code may constitute a breach of the primary obligations of the employment relationship or a disciplinary offense, with all legal consequences also with regard to the preservation of the employment relationship, and result in compensation for damages deriving from it.