



# CODE OF ETHICS



# ” Table of Contents

## 1. INTRODUCTION

- 1.1 Mission and company values
- 1.2 Our story
- 1.3 What is the code of ethics?
- 1.4 Where can it be found?
- 1.5 Who is it intended for, and where does it apply?

## 2. General principles

- 2.1 Legal compliance
- 2.2 Inclusiveness
- 2.3 Fair competition
- 2.4 Financial integrity and the fight against corruption
- 2.5 Environmental sustainability

## 3. Relations with employees and contractors

- 3.1 Equal opportunity and development
- 3.2 Involvement
- 3.3 Health and safety
- 3.4 Conflict of interest
- 3.5 Work environment
- 3.6 Abuse of authority
- 3.7 Confidentiality and use of corporate assets

## 4. Customer and end-consumer relationships

- 4.1 Definition
- 4.2 Behaviour
- 4.3 Confidentiality
- 4.4 Innovation
- 4.5 Product safety

## 5. Supplier relations

- 5.1 Selection and evaluation
- 5.2 Gift

## 6. Community and institutional relations

## 7. Relationship with the environment

- 7.1 Fighting poverty

## 8. Reporting and penalty system

## 9. Validity

# ” 1. INTRODUCTION

## 1.1 Mission and company values

*“We believe that companies built and forged by their people, who represent the true distinctive value of organizations. The first goal of our Company is to ensure that the expectations of all its stakeholders are met by providing a rigorous system of professionalism and prohibiting behaviour that violates current regulations.”*

For this reason, Veroni intends to pursue its business goals within the framework of the principles of honesty and fairness it has always been defined by, aware that achieving and maintaining a high standard of quality is only possible in an environment of respect, loyalty, and trust between people. These values have allowed the Company to build and maintain its reputation.

## ● 1.2 Our story

The roots of the Veroni Salumificio reach back to 1925, when five brothers from a large family in Correggio ran a well-established grocery store known for its fine quality. Fiorentino, Francesco, Paolo, Adolfo and Ugo Veroni had clear ideas, extensive expertise with cured meats, and a solid entrepreneurial spirit. Together, they made the decision to “expand the business, creating a company specializing in the production of a full range of traditional Italian cured meats for a wider market.”

The choice to focus on high-quality products was an immediate success. Today, with the fourth generation of the family at the helm, the Veroni name stands for quality, innovation, and safety.

“We don’t want to lose the family identity that has allowed us to grow,” says Honorary President Francesco Veroni (b. 1942). “As the family hands down its knowledge from generation to generation, the company’s capacity to respond to market demands grows: the family is a treasure trove of our company’s historical and ethical values. Craftsmanship is defined by values, not specific measures.”

Today the Company is structured into 4 subsidiaries, 6 production plants (divided by product specialization), and a slicing centre in the USA.





### 3. RELATIONSHIPS WITH EMPLOYEES AND ASSOCIATES



#### 3.1 Equal opportunity and development

The Group encourages and promotes equal opportunities for women and men. It also values each person's skills, potential and dedication: to do this, it uses clear and consistent evaluation criteria and provides appropriate training.

#### 3.2 Involvement

The Group takes care to involve everyone in the pursuit of its business objectives and includes everyone in problem solving based on their respective skills and responsibilities. To this end, organizational clarity and transparency are crucial: that is why the corporate organizational chart, spread throughout the Group, defines the roles of each person within the company.

#### 3.3 Health and safety

In line with this Code, the Company is dedicated to implementing behaviours that support good health and promote improved health for its employees and the community, by spreading knowledge that can help people improve their lifestyles.

The Company protects the well-being and safety of its employees in compliance with relevant regulations. The Company is committed to ensuring investments, consistent with the availability of resources, aimed at progressively improving the safety standards present within the company's facilities. Emphasis must be placed on the importance of the activities carried out by the working group consisting of the RSPP (Health and Safety Manager), RLS (Workers' Safety Representative), the Production Manager and Staff Manager. As stipulated by specific legal regulations, smoking is forbidden on all company premises, including outdoor courtyard areas, as is the use of alcoholic substances or narcotics inside the plants.

#### 3.4 Conflict of interest

Directors, employees and associates work together to pursue the overall objectives and interests of the Group. They must inform their superiors or contact persons without delay, taking into account the circumstances, of situations or activities in which they may have individual interests that conflict with those of the Group (or if they have close relatives with such interests) and in any other case in which relevant reasons of convenience apply. Directors, employees and collaborators respect the decisions that are made by the Group in this regard.

### 3.5 Work environment

The Company guarantees that the principles of impartiality shall be respected at all times in labour relations. In particular, the Company is committed to ensuring:

- the right of workers to freely join trade unions, to gather in assemblies as provided for by laws and contracts;
- the right to the establishment of a trade union representation that can freely and respectfully carry out its role;
- the right to a stable employment relationship, favouring the permanent contract and limiting the contracting and outsourcing present within the Company;
- The right to fair pay, applying the provisions of the declarations included in the national contract;
- an appropriate distribution of duties so as to allow working hours to be adhered to, while maintaining an appropriate number of resources in the organization (the Company reiterates the importance of taking all vacation and leave hours available in the year);
- The right to privacy, maintaining confidentiality of workers' personal and professional information;
- The right to fair disciplinary action as governed by laws and contracts.

The Company is also committed to ensuring the prohibition of child labour that leads to the physical or psychological exploitation of the individual.

#### 3.6 Abuse of authority

No abuse of authority is acceptable in working and cooperative relationships. Accordingly, a higher-ranking person may not perform any act or engage in any conduct towards a subordinate that does not comply with the provisions of the law or applicable collective and individual agreements.

The company is committed to ensuring that the work environment is not intimidating or hostile to individuals or groups of workers in any way. Sexual or psychological harassment (bullying) or any attempts to limit individuals' professional growth will not be tolerated.



### 3.7 Confidentiality and use of corporate assets

Directors, employees and associates must ensure strict confidentiality with regard to news and information on corporate assets or pertaining to the business

of the Group, in compliance with the provisions of the law, applicable regulations and internal procedures.

Directors, employees and contractors must carry out their work and services with diligence, efficiency and fairness: in doing so, they make the best use of the tools and time at their disposal and assume the responsibilities associated with fulfilment. They must not use for personal purposes any information, property and equipment they have access to through their function or assignment.



## 4. RELATIONSHIPS WITH CUSTOMERS AND END CONSUMERS

### 4.1 Definition

The company considers VAT-registered companies that buy and resell products (retail establishments or distribution chains) as its customers. The end consumer is defined as an individual person who purchases and consumes the product.

### 4.2 Behaviour

The Group ensures equal treatment of its current and potential customers. To this end, the Group does not discriminate among customers.

The Group bases its customer and consumer relations on listening, helpfulness, courtesy, honesty, transparency, fairness, professionalism and, in all cases, compliance with the general principles of this Code: human rights, financial integrity, protection of intellectual property, independent information and accountability, and fair competition.

Customer and consumer satisfaction is a top priority. Therefore, the Group implements measures to verify that customers and consumers are satisfied with its products and services, so as to continuously improve the level of its business offerings and be able to quickly and effectively remedy any cases of dissatisfaction. All communications to customers and consumers must be truthful, fair, and honest. The Group wholly refrains from any deceptive, aggressive or otherwise unfair practices in advertising or other commercial communications.

### 4.3 Confidentiality

The Group shall take all necessary measures to ensure that customer data and information are handled in a manner that complies with the legal or regulatory provisions applicable on each occasion.

### 4.4 Innovation

The Group constantly pursues innovation in its products and services. For this reason, the Group pays attention to customers' needs and anticipates market trends as far in advance as possible. With this in mind, the Group devotes resources to research into and development of new solutions.

### 4.5 Product safety

The Group ensures the safety of the products it markets: to do so, it ensures scrupulous compliance with all legal, regulatory and technical standards applicable on each occasion and puts appropriate control procedures in place.



## 5. SUPPLIER RELATIONSHIPS

The Group considers anyone who provides goods or services necessary for the production of its products to be its supplier.

In procuring, the Group seeks quality goods and services at market price, recognizing equal treatment of current and potential suppliers. In turn, in addition to accepting the principles of this Code, the Group's suppliers must ensure respect for workers' rights and protections against child labour in all circumstances. The Group bases its relations with suppliers on the principles of fairness and loyalty.

### 5.1 Selection and evaluation

The selection of suppliers is based on the principle of objective evaluation of bids and on multiple criteria, including, for example, the technical suitability of the products or services proposed, the possession of certifications, the quality of the products or services, the affordability of the bid, respect for the environment, and acceptance of the principles set forth in this Code.

The Group adopts special procedures to transparently and impartially assess the reliability and competence of each supplier, the cost-effectiveness of its offer, and its guarantees of service and timeliness.



### 5.2 Gifts

Particular attention should be paid to the management of gifts and giveaways. It is expressly prohibited to accept or offer goods or services of any kind that in nature and quantity cannot be considered as mere acts of business courtesy, especially if they are aimed at obtaining an improper personal advantage.

## 6. RELATIONSHIPS WITH COMMUNITIES AND INSTITUTIONS

The Group has very deep ties to its home territory and boasts nearly 100 years of history. Collaboration and mutual exchange among people, institutions and infrastructure has given great impetus to the family's entrepreneurial abilities, fostering business development and the growth of a positive social fabric.

Relations with institutions, including the Public Administration, must comply with the principles set forth in this Code. Behaviour that could in any way influence the choices of interlocutors, as well as offering or requesting gifts (goods and/or services), information or favours of any kind that could jeopardize the integrity and reputation of the Company should all be avoided.

Whenever it deems it appropriate, the Group may support projects of public entities aimed at realizing utilities and benefits for the community and the territory, as well as the activities of foundations and associations, always in compliance with current regulations and the principles of the Code.

The Group does not fund any political party or any spokespeople of any party.

The Group informs its stakeholders of its activities for the benefit of the community.



## 7. RELATIONSHIP WITH THE ENVIRONMENT

The Group is committed to imparting a “culture of sustainability” to all its employees so that everyone, within their own sphere of operation, directs their knowledge and

actions towards the constant search for tools to protect the land, save valuable natural energy and reduce emissions.

For the group, environmental protection is a priority and therefore it ensures careful management of resources (including consumables, packaging materials, and energy), requiring the active cooperation of all employees to avoid unnecessary waste and verifying that the behaviours of all employees are in line with the principles stated. Special attention is paid to research and development into new product packaging.



### 7.1 Fighting poverty

The company is active in the fight against poverty, especially for the local community. In particular, in addition to making donations to charities or associations, it supplies local non-profits with food products that are in perfect condition, have slight imperfections, or are close to their expiration date.



## 8. REPORTING AND SANCTIONS SYSTEM

To report violations of this Code or to clarify any of the points therein, you may contact the Human Resources Office at: [ufficio.personale@veroni.it](mailto:ufficio.personale@veroni.it)

The company guarantees anonymity for those submitting reports. Violation of these regulations undermines the fiduciary relationship that binds the Company to the recipients and constitutes, for employees, a disciplinary offense in accordance with the provisions of Article 7 of the Workers' Statute and Articles 67-68-69-70 of the National Collective Bargaining Agreement - Food industry.

### 9. VALIDITY

This code is effective immediately upon approval by the Board of Directors. The code may be amended to follow the evolution of the company's business and current regulations.

This document was approved on 11/30/2022.



## **CONTACTS**

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[www.veroni.it](http://www.veroni.it)



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