



OUR STORY

FIAS Srl is a company dedicated to the production and distribution of flavors and extracts for the food and beverage industry, with a great focus on natural products. Thanks to its experience it is able to offer competence and a wide choice of products, guaranteeing flexibility and speed of response.

FIAS was founded in 1968 as a company specializing in the production of extracts and flavorings for soft drinks. In these 50 years FIAS diversified its production by addressing in particular the sweet, confectionary and bakery industry / market, and responding to customer needs by creating unique and successful tailor-made products.

From 2021 FIAS became part of the **Nactarome Group SpA**, a European platform specialized in the production of natural flavors, colors and functional ingredients for the Food Beverage sector and for applications in the Life Science market. Nactarome has 11 manufacturing facilities in four states in Europe, serving more than 90 countries internationally.

The **vision** of the Nactarome Group is to be an excellent partner, able to create significant innovations, to anticipate the great changes in the world.

The Group's **mission** is to be present in European countries by combining the flexibility and local presence of the individual operating units with all the advantages of a large company with an international presence. Nactarome intends to achieve this goal through an overall growth that will lead to a greater presence in local markets, greater revenues and an increase in organic presence, keeping sustainability and naturalness always in first place.



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1. GENERAL INFORMATION

The Company Code of Ethics is a document that defines the moral and social norms to which all directors, managers, employees and collaborators must comply.

FIAS prepared this document in line with international standards and guidelines, such as the foundations of the International Labor Organization (ILO), the United Nations General Declaration of Human Rights, the United Nations conventions on the rights of children, principles of the UN-Global compact as well as the guidance services of the OECD, with a view to establishing the principles of behavior and action that must govern the activity of every director, manager and every employee and collaborator within the Company.

2. PRINCIPLES OF CONDUCT

The Code of Ethics is based on the principles of conduct listed below:

- **Respect for people:** the Company achieves its objectives by ensuring total respect for the working people, promoting their professional and individual development, respecting the law and the rights of each person;
- **Guarantee of equal opportunities:** to implement a remuneration and career system based on commitment and meritocracy the Company is careful to guarantee equal opportunities to all workers, regardless of their gender, their family situation, their religious beliefs and their political orientation;
- **Integrity, seriousness and honesty** are the foundations on which the professional activity is based, both towards internal and external collaborators, and in relations with third parties, whatever the local practices. The dedication to one's work must not pursue personal interests and must in any case be in line with the common objectives of the Company, which is committed to spreading the culture of respect for the person, the environment, the territory and health.
- **The responsibility and transparency** of all recipients of this Code of Ethics, who must be inspired by these principles in the realization of the corporate mission. The Company's essential principle is compliance with the laws and regulations in force in Italy and in all the countries in which it operates. The recipients of the Code of Ethics are required to comply with current legislation. Under no circumstances is it permitted to pursue or realize the interest of FIAS or its Group in violation of the laws;
- **Professional commitment**, essential for achieving the objectives that the Company sets itself, in terms of health and safety, pollution prevention while respecting the external environment.

3. RELATIONS WITH THE COMMUNITY AND ENVIRONMENTAL PROTECTION

FIAS's environmental policy stems from the awareness of the influence, even indirect, that the conduct of its business can have on the context in which it operates, on economic and social development and on the general well-being of the community. Therefore, Fias intends to conduct its investments and its development in a sustainable way, both towards the environment and in respect of local communities.

FIAS undertakes to manage its activities in full compliance with current environmental protection legislation.

FIAS is committed to the adoption, where possible, of advanced energy efficiency criteria.

It is FIAS's goal to ensure that goods and services are supplied in a manner that complies with the ethical principles and respect for the person contained in this Code of Ethics.

4. PRINCIPLES OF ACTION

The Company defined the principles of action that regulate the activity of FIAS directors, managers and employees in the exercise of their functions, so that the Company's activity is conducted with economic sensitivity, in compliance with the law, the people, the occupational health and safety and the environment.

4.1) Respect for legality

The Company applies, in every field, the laws and regulations in force in order to achieve its objectives of quality, health and safety, and environmental protection.

For this purpose, it has prepared the necessary tools to inform and train each employee, whatever their qualification, of the legal regulations in the health and safety, environmental and hygiene fields, in relation to the activities carried out.

The Company periodically communicates to all collaborators the legislative implications related to their activity or failure to comply with the rules imposed, through scheduled internal courses and the provision of documents on the company intranet.

4.2) Respect for occupational health and safety

The Company uses a documented system, based on the Risk Assessment Document implemented in accordance with the current legislation, to ensure compliance with the management of the health and safety of its employees and the employees of third-party companies that work for it.

FIAS draws up its decisions on occupational health and safety and environmental protection, according to criteria and principles that can be summarized as follows:

- Avoid risks related to occupational health and safety and environmental protection

- Combat risks at source
- Evaluate all the risks associated with your business by identifying solutions aimed at reducing those that cannot be eliminated in any case
- Replace what is dangerous with what is not, or with what is less dangerous
- Adapt to the evolution of science and technology
- Adapt work to man by trying, compatibly with the work performed, to mitigate monotonous and repetitive work and to minimize its effects on health
- Program prevention actions, setting up coherent procedures that can integrate technique, work organization, working conditions, social relations and the influence of factors in the working environment
- Give preference to collective protection measures over individual ones
- Give clear and adequate instructions to workers, ensuring their constant training

Employees, collaborators and third parties are required to scrupulously comply with all the measures provided for by the procedures and internal regulations of the Company, in the field of occupational health and safety; in particular, each one is required to report any malfunctions to their direct supervisor or suggest possible improvements.

FIAS employees are required to observe the provisions and instructions given for the purposes of collective and individual protection. In particular, they must:

- correctly use the equipment, machinery, plants, means of transport and other work equipment, as well as safety devices in an appropriate manner.
- report the deficiencies of machinery, means, devices and equipment as well as any other dangerous conditions of which they become aware, working directly, in case of urgency, within the scope of their skills and possibilities, to eliminate or reduce such deficiencies or dangers.
- not to remove or not to modify, without the written authorization of the persons in possession of the necessary powers, the safety, signalling or control devices and not to carry out, on their own initiative, operations or manoeuvres that are not within their competence or that they can compromise your own safety or that of other workers.
- undergo medical examinations and health checks provided for by the health protocol prepared by the Competent Doctor on the basis of current legislation.

FIAS ensures the protection of the safety and health of its employees and third parties present in the company and is also liable for all actions or omissions of its employees and, therefore, for any damage caused to other employees and / or to third parties.

Strict compliance by all stakeholders with the provisions on occupational safety and health is therefore required.

For those who do not comply with the provisions issued by the Company, for the protection of safety in the workplace, the penalties provided for by laws, internal regulations, collective and individual contracts will be raised.

4.3) Protection of union freedom

The Company guarantees its employees and collaborators full freedom of association with trade unions without any interference or discrimination based on the role played.

Company union representatives are guaranteed time and the use of company premises for the performance of union activity in accordance with the provisions of current legislation and collective bargaining.

FIAS does not contribute in any way to the financing of parties, movements, committees and political and trade union organizations of their representatives and candidates, except for the cases provided for by specific regulations.

4.4) Regular employment, pay and working hours

The recruitment of personnel takes place on the basis of regular employment contracts, as no form of employment relationship that is not compliant or otherwise elusive of the provisions in force is allowed.

FIAS guarantees its employees and collaborators a remuneration in compliance with the provisions of the current and applied CCNL; the work done by employees is paid regularly and in full. Employees receive all mandatory benefits documented in national laws (e.g. insurance amounts, salary supplements or overtime bonus payments, paid holidays).

The Company guarantees compliance with the regulatory limits and those of the collective bargaining in force and applied in relation to working hours. Any overtime work will be voluntary and will be compensated separately in accordance with the provisions of the current and applied National Collective Labor Agreement.

For the type of activity carried out in Fias, remote, mobile and home work is not envisaged, but in cases of need and if applicable, in accordance with the provisions of the legislation, the Company can provide for its introduction in accordance with the worker.

The search and recruitment of staff must be carried out in full compliance with the applicable legislation on labor law or any other provision in force. Without prejudice to the obligations deriving from the provisions in force, the search and selection of personnel are subject to verification of the full compliance of the candidates with their experience, training course and substantial adherence to the professional profiles required by FIAS for the role they occupy in the respect for equal opportunities for all stakeholders.

In particular, it is expressly forbidden to violate the provisions in force on immigration, as well as to engage in conduct that could in some way integrate offenses such as trafficking in persons, enslavement or exploitation of child labor.

4.5) Child labour

The Company does not use and repudiates child labor and, as a general rule, does not employ underage workers.

If, in full compliance with international legislation (ILO conventions dedicated to child labour) and national legislation, Fias decides to provide for the recruitment of underage workers aged no less than sixteen years (age limit established by national legislation), it will guarantee particular conditions for the protection of their health and safety, a dedicated path of growth and professional training and will also prohibit their use during night shifts.

4.6) Respect for the principle of non-discrimination

The Company rejects all forms of discrimination; equal opportunity and equal treatment must be provided, regardless of race, skin colour, sex, age, physical or mental disability, sexual orientation, family commitments, religion, political affiliation, nationality, social background, trade union membership or other personal attribute.

Every worker must be employed, trained, promoted and paid exclusively on the basis of work performance.

In particular, in order to protect the principle of non-discrimination of women, no difference in treatment can be applied on the basis of the sex of the person, also guaranteeing equal conditions for working women to access top positions.

4.7) Compliance with the principles of transparency in accounting, administrative and corporate responsibilities

The Company adopts adequate standards of financial planning, control and accounting systems, operating with maximum accounting transparency.

This transparency is based on the truth, accuracy and completeness of the basic information in the accounting records.

The transparency and truthfulness of accounting are essential values and parameters.

Accounting transparency is based on the truth, accuracy and completeness of the documentation of each activity and related accounting operations, therefore each operation must be reflected in the supporting documentation of the activity carried out, such as to allow for accounting registration, detailed reconstruction and identification of the different levels of responsibility.

Each employee must make every effort to ensure that the management elements are represented correctly and promptly in the accounts and that the documentation is always traceable and accessible.

If employees find or become aware of falsifications, omissions or negligence in the accounting, or in the documentation on which the accounting records are based, they must immediately report them to their superior.

4.8) Compliance with the rules of free competition

The Company considers compliance with current competition law essential, therefore it intends to protect the value of fair competition, refraining from unlawful conduct and abuse of a dominant position.

Every relationship with customers and suppliers must be inspired by the general principles of commercial ethics; in particular, in relations with customers, FIAS ensures fairness and clarity in commercial negotiations and in the assumption of contractual obligations, as well as their faithful and diligent fulfillment.

All employees and recipients are obliged to refrain from engaging in anti-competitive behaviours prohibited by law such as, by way of example and not limited to, adherence to restrictive agreements on competition, the carrying out of acts that commit abuses of a dominant position likely to cause prejudice to the free trade, or the establishment of cartels for the fixing of prices or for the sharing of markets.

4.9) Gifts, presents and other benefits

The employee cannot ask, for himself or for others, gifts or other benefits, nor accept the latter, except for those of modest value or in accordance with normal commercial and courtesy practices, from anyone who has taken or who may in any case benefit from the activity of FIAS.

Furthermore, the employee cannot offer gifts or other benefits to all those subjects from whom he can acquire favourable treatments in the conduct of any activity connected to FIAS.

Illegal advantages cannot be attributed to public and private customers or suppliers.

4.10 Harassment and mobbing

FIAS condemns any harassing and / or persecutory behaviour damaging to the personal and professional dignity perpetrated by colleagues or superiors to the detriment of the worker.

The company will not tolerate any form of harassment or mobbing in the workplace, including written, verbal, physical or visual harassment and mobbing.

Sexual and racial harassment in any form, including derogatory language and conduct, is also strictly prohibited.

Harassment or mobbing includes, but is not limited to:

- Inappropriate or offensive jokes, actions or comments about race, colour, gender, sexual orientation, national origin, age, religion, disability, marital or family status, veteran status or other personal characteristics;
- Calling people by names that they or others might find objectionable or offensive;
- Threats, intimidation or hostile actions;
- Unpleasant swearing or use of sexually explicit, suggestive or degrading words;
- Unwanted or inappropriate physical contact;
- Unwelcome attempts at seduction, advances or sexual proposals;
- Public display of objects or images sexual or offensive in the workplace.

4.11) Drug use and alcohol abuse

The use, solicitation, sale or possession of drugs is prohibited within the Company; the competent doctor must be informed of any use of controlled substances or drugs under medical prescription.

In order not to compromise safety standards, it is forbidden to consume alcohol within the Company.

In work contexts outside the Company's premises, while representing the Company itself, alcohol must be consumed in moderation.

Anyone who violates this policy will be subject to disciplinary measures according to the CCNL.

4.12 Behavior of employees towards third parties

All employees are required to observe polite and respectful behavior towards third parties with whom they relate to carry out their work.

Employees are also required to behave politely and respectfully at all times in which they represent or may appear to represent the company externally, even outside working hours.

Employees are required not to offer third parties a negative image of the Company by engaging in inappropriate behavior or attitudes or by disseminating information incorrectly or confidential and in any other form capable of discrediting the reputation of the Company itself, including through use of social media.

4.13) Relationships with colleagues

Relationships between workers at different levels of responsibility in the Company organization will be based on mutual fairness. All staff are required to behave according to the principles of order, solidarity, loyalty, morality and dignity towards the Company and colleagues, helping to ensure that the climate in the workplace is as correct, healthy and relaxed as possible.

In the event that one or more employees reasonably believe that their personal rights or dignity have been significantly harmed by other employees of the company, they must contact their managers who are required to take action to try to restore a workplace as serene as possible. The intervention by managers must always privilege, as far as possible, the form of dialogue with the interested parties.

It is forbidden to introduce objects that are dangerous or offensive to personal dignity into the Company, to post on company notice boards and in other spaces made available to employees' communications, articles, representations and any consideration in any express form that are disrespectful or detrimental to personal and / or professional dignity of individuals or colleagues.

4.14) Relationships with suppliers

The Company requires its suppliers to share the ethical principles established in this document and consequently reserves the right to establish contractual rules aimed at encouraging compliance and sanctioning any non-compliance.

The choice of suppliers and the purchase of goods and services are carried out in pursuit of the corporate interest, based on objective assessments of competitiveness, quality, possession of technical / professional requirements, cost-effectiveness, price, integrity, reliability of the supplier itself, and, in any case, in compliance with the regulations in force and the internal procedures of the Company provided for this purpose.

In any case, as regards the relationships with suppliers, the conduct must be oriented towards mutual respect for the general principles of commercial ethics; in particular, the principles of maximum clarity and good faith, loyalty, transparency and truthfulness must be observed right from the negotiation stage.

The choice of contractors and external workers must be carefully evaluated, with particular reference to the coordination and surveillance of their activities, also in terms of health and safety and environmental protection; that is, in order to ensure all the requirements regarding health and safety in the workplace and the prevention of environmental pollution.

The choice of the supplier and the purchase of goods and services of any kind must take place in compliance with the principles of competition and equality of the conditions of the bidders and on the basis of objective assessments relating to competitiveness, quality, usefulness and price of the supply.

4.15) Relationships with customers

Customers represent a value for FIAS whose protection is essential for the pursuit of the corporate mission, therefore the Company establishes a relationship with customers based on fairness, respect, mutual trust and satisfaction and based on research and offering maximum collaboration.

Fias guarantees its commitment to provide customers with products, services, assistance and advice in line with their expectations. The Company undertakes to ensure the achievement of the required quality and safety standards and to periodically monitor the quality of the service provided to the customer.

Any form of illicit commercial relationship with potential customers aimed at stipulating commercial agreements is prohibited.

The Company also undertakes to satisfy its customers in fulfillment of the obligations established by contracts. Any changes and variations in the provision of the service must be communicated promptly and in the most appropriate way.

Contracts and communications with customers must be:

- Clear, simple and formulated with the language as close as possible to that of the customers
- Compliant with the regulations in force and with the indications of the steering and control Authorities
- Polite, respectful and calm tones

Contractual relationships with third parties, nationally and internationally (suppliers, external collaborators, partners, competitors, media, supervisory authorities and public administrations) must be based on loyalty and correctness, in the protection of corporate interests. In the same way, loyalty and fairness must be demanded from third parties, who will be duly made aware of the existence of this Code of Ethics.

FIAS undertakes to encourage interaction with customers by managing and quickly resolving any complaints and making use of appropriate communication systems.

FIAS rejects litigation as an instrument aimed at obtaining undue advantages and uses it on its own initiative only when its legitimate claims do not find due satisfaction in the interlocutor.

FIAS protects the privacy of its customers, according to the regulations in force on the subject, undertaking not to communicate or disseminate the related personal, economic and consumer data, without prejudice to legal obligations.

The Company will not entertain relationships with customers in relation to which situations of dubious legitimacy or conflict of interest emerge.

4.16) Economic relations with associations, contributions and sponsorships

To ensure consistency in contributions and sponsorships, management must always be based on the following criteria:

- Clear and documentable destination of resources;
- Authorization by the Administrative Body or by anyone delegated to manage such relationships within the Company;
- Compliance with the applicable ethical and deontological principles, as well as the applicable legal requirements.

4.17) Conflict of interest

Each employee must immediately report to their immediate superior any situation that constitutes, generates or may even appear to be a conflict of interest.

Each collaborator is required to avoid any possible conflict of interest, with particular reference to personal interests.

Any activity that conflicts with the proper fulfillment of one's duties or that could harm the interests and image of the Company must be avoided.

The employee, in his professional activity in favor of the FIAS company, cannot carry out work activities in favor of competing companies:

- Performing, without the consent of the Company, his professional activity in favor of competing companies as consultant, collaborator, member of the Board of Directors or of the Board of Statutory Auditors;
- Representing, acting and working on behalf of a FIAS supplier or customer.

4.18) Protection of information owned by the Company

The information is processed by the Company in full compliance with the confidentiality and privacy of the data subjects, in accordance with current legislation.

The acquisition, processing and storage of such information takes place according to specific procedures aimed at preventing unauthorized persons from becoming aware of it and in full compliance with the privacy protection regulations.

Each collaborator is required to respect confidentiality and caution regarding the security of information, including those in electronic form, to guarantee its integrity and availability. Collaborators who become aware of information not in the public domain must use the utmost caution and care in using such information, avoiding its disclosure to unauthorized persons, both inside and outside the Company.

Any information known to a collaborator in relation to their business is the property of the Company. Employees are required to keep information learned in the performance of their duties confidential in accordance with the law, regulations and circumstances, undertaking to use them exclusively for the performance of their work and avoiding, through their behaviour, disclosing information of property of the Company that has not yet become public.

The employee must observe this duty of confidentiality even after the termination of the employment relationship, making sure that the obligations envisaged by the current privacy regulations are respected; he must also carefully guard the documents entrusted to him and take every care to avoid the undue dissemination of information.

FIAS protects the privacy of its employees, in accordance with the relevant regulations in force, undertaking not to communicate, disseminate or use, without prejudice to legal obligations, the related personal data without the prior consent of the interested party.

4.19) Protection of Company assets

Each employee is required to work diligently to protect the Company's assets through responsible behaviour and according to the principles established by the national collective bargaining in force.

By way of example and not limited to, each employee / collaborator of the Company, without exception, must:

- Use the Company assets entrusted to him scrupulously and sparingly;
- Avoid improper and / or personal use of the Company's assets;
- Spontaneously hand over all company assets upon resignation or dismissal; detaining even just one of them, without the written authorization of the Company, will be considered voluntary abduction and prosecuted by law.

4.20) Use of computer systems

As regards the use of IT systems, each employee undertakes to observe the rules of conduct adopted by the Company; the employee is also responsible for the safety of the systems used and subject to the regulatory provisions in force and the conditions of the license agreements.

Except as provided for by civil and criminal laws, the use of network connections for purposes other than those inherent to the employment relationship is part of the improper use of company assets and resources; for example, to browse websites with indecent content or to send messages that are offensive or that may damage the image of FIAS.

Specifically, the use of personal computers and / or company tablets entrusted to each one is also considered improper use, if they are used for purposes other than those inherent to the employment relationship with FIAS and in particular they should not be used by persons unrelated to the Company.

Everything contained within these machines is considered company property.

Each employee is personally responsible for the legitimate use of the assets and resources entrusted to him for the performance of his duties and is required to make the necessary commitment in order to prevent the possible commission of crimes through the use of IT tools.

5. VIOLATION OF THE CODE OF ETHICS

5.1) Checks

The Code of Ethics is one of the founding elements of the Company's control system and rules.

The Company must constantly ensure compliance of conduct with what is indicated in the Code and, if necessary, carry out specific verification programs.

The internal control system must be oriented towards the adoption of tools and methodologies aimed at countering potential risks for the Company, in order to reasonably ensure compliance with the laws and internal provisions and procedures.

5.2) Compliance with the Code of Ethics

Compliance with the rules of the Code of Ethics must be considered an essential part of the contractual obligations of employees pursuant to and for the purposes of Article 2104 of the Civil Code.

It must also be considered an essential part of the contractual obligations assumed by non-subordinate collaborators and / or subjects having commercial relations with the Company.

The Executives and Managers of the Company are responsible for ensuring that the Company's expectations towards employees are understood and put into practice by them.

The Executives and Managers, therefore, must ensure that the commitments expressed in the Code of Ethics are implemented.

In order to guarantee the effective application of the Code of Ethics, the Company, in respect of privacy and individual rights, requires that all those who become aware of any cases of non-compliance with the Code report freely, directly and in a reserved way to their managers, or to the HR Department, or in writing using the appropriate box.

It will be the Company's responsibility to ensure that no one, in the workplace, can suffer retaliation, unlawful conditioning, inconvenience and discrimination of any kind for reporting the violation of the contents of the Code of Ethics or internal procedures.

The confidentiality of the identity of the whistleblower will in fact be guaranteed, without prejudice to legal obligations and the protection of the rights of the Company or of the persons involved in the report.

5.3) Sanctioning provisions

Compliance with the principles summarized in the FIAS Code of Ethics is an obligation of all directors, managers, employees and collaborators of the Company and of all persons who have working relationships with the Company itself.

Consequently, their violation is to be considered an infringement of contractual obligations and will be treated in compliance with the National Collective Agreement.

6. IMPLEMENTATION OF THE CODE OF ETHICS

6.1) Commitment to disseminate the Code of Ethics

The company undertakes to ensure a timely internal and external dissemination of the Code of Ethics by:

- Posting in a place accessible to all;
- Distribution to all members of the corporate bodies and to all personnel;
- Making available to third parties;
- Publication on the Company's website;
- Consultation in electronic format in the directory F / Common Folders (Q) / DATA / Code of ethics;
- Request for a hard copy to the HR Department of the Company;
- Other forms deemed suitable.

6.2) Declaration of acknowledgment and acceptance

This Code of Ethics is sent to all directors, managers and employees in the manner defined by the internal regulations relating to Quality Assurance which provides for the confirmation of acknowledgment and acceptance of the code.

A copy will be given to each new employee at the time of recruitment.