

## ETHICAL POLICY

### (IN CONFORMITY TO ETI CODE OF SEDEX / SMETA)

**Nutrafood Srl** is an Italian company, member of Döhler Group, that creates and produces spreadable creams, filling, bases, offering integrated solutions for the food and beverage industry, with an innovative and completely customized approach. The range includes organic, lactose-free, vegan, almond-based, dried fruit or oilseed products, in which naturalness is combined with pleasantness, taste with health, innovation with creativity.

As a global partner and trendsetter in the food and beverage industry, we have comprehensive knowledge of the market, many years of experience in developing successful applications, and the integrated ingredient expertise of a full-service provider. In addition to BtoB solutions, Nutrafood offers Private Label service as spread creams in jar and ready-to-drink plant-based drinks.

The company has adopted this ethical policy, in compliance with the ETI code of conduct of SEDEX / SMETA, with the aim of promoting the following principles internally and throughout the chain of suppliers:

**-the right to freedom of association and collective bargaining:** we promote these freedoms with the desire to build constructive relationships with the representatives, in order to improve working conditions by involving workers. We do not apply any discrimination against union members or union representatives;

**-Equal remuneration:** we are committed to guaranteeing the remuneration provided by the CCNL and respect for workers' rights, and to pay wages in the forms provided by law, guaranteeing the living wage (minimum remuneration that allows family sustenance with a discretionary income)

**-Respect and promotion of Health and Safety in the workplace:** we comply with the provisions of Legislative Decree 81/2008 (Italian law) ensuring a safe and healthy work environment, looking for the best possible organizational and technological solutions with the resources available, training staff on health and safety risks and giving them the appropriate protective devices

**-Protection of young workers and prohibition of child labor:** we are committed to hiring adults only and promoting forms of collaboration with universities and schools, to ensure integration between school and work. We also promote the ban on child labor in our supply chain. We have defined a remedial procedure for minors found at work in order to contribute to the elimination of this problem present worldwide. We respect the ILO Conventions on this matter.



**-Absence of forced labor:** we do not resort to any form of slavery, trafficking in human beings and forced labor. All our workers are free to leave the workplace and original identity documents or sums of money are not withheld. We condemn any form of physical or verbal abuse.

**-Absence of precarious employment:** we undertake to hire workers only with the forms contractually provided for by the CCNL avoiding precarious work;

**-No discrimination:** we are committed to offering equal opportunities and to avoid forms of discrimination of any kind in hiring, compensation, access to training, advancement, dismissal or retirement, based on race, caste, nationality of origin, religion, age, disability, sex, marital status, sexual orientation, membership of trade unions or political parties.

**-Respect of the working hours provided by the national labour contract :** Our organization respects the provisions of the national labour contract of reference regarding working hours (in any case no more than 60 hours per week) The overtime hours are paid with a surcharge.

**-Respect and protection of the environment:** we are committed to protecting the environment around us, and to promoting the best technological solutions to reduce consumption. We comply with binding environmental regulations and monitor our environmental performance over time in order to identify possible improvements;

**- Commercial ethics:** we don't tolerate and we are committed to fighting corruption, extortion, embezzlement or bribery, commercial fraud. We are committed to respecting the relevant laws and promoting transparency in commercial relations with our stakeholders

**- Dissemination of ethical principles:** we are committed to disseminating them within our organization, to workers and interested parties. In the supply chain, we periodically commit to their promotion, within our sphere of influence





In compliance with these requirements, the company declares to comply with the following regulations and conventions:

- To the Conventions of the International Labor Organization (ILO)
- To the United Nations Convention on the Rights of the Child
- To the Universal Declaration of Human Rights
- To the United Nations Convention on the Elimination of All Forms of Discrimination Against Women and all forms of racial discrimination
- The United Nations Human Rights Guidelines
- To the International Covenant on Civil and Political Rights and Economic, Social and Cultural Rights.
- To all national and international laws on the matter, including Legislative Decree 81/2008 and subsequent amendments, relating to health and safety in the workplace and European Regulation 679/2016 relating to the confidentiality and processing of personal data and to Legislative Decree 152/2006 on environmental matters and subsequent amendments
- To the provisions of Legislative Decree 231/2001 on corporate administrative liability

Basiliano , 12/05/2020

CEO

