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**EUROSPIN GROUP**

**CODE OF ETHICAL  
BEHAVIOUR**

**Set of rules of conduct  
of a person or group of people.**



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# 1 INTRODUCTION

## 1.1. PREFACE

Eurospin is a trading group with an international vocation that, because of its size and the importance of its activities, plays a significant role in the market and the economic development and welfare of the communities in which it operates.

The Eurospin Group considers it essential to conduct all its activities in full compliance with all applicable laws and in a context of fair competition, with honesty, integrity, fairness and good faith, respecting the legitimate interests of customers, employees, commercial and financial partners and the communities in which Eurospin is present with its activities and partners.

The Board of Directors of Eurospin Italia SpA (the "Parent Company") and its subsidiaries (hereinafter "Eurospin", "Eurospin Group" or the "Group") have, therefore, decided to adopt this Code of Ethics (hereinafter also the "Code") considering that any organization wishing to act in a lawful manner in the society and environment that surrounds it, has a duty to communicate its ethical principles clearly and transparently. Through this Code, Eurospin intends to clearly define and disseminate the principles and values that underpin the Group's activities, as well as the commitments and ethical responsibilities to be adopted by all the companies of the Eurospin Group in order to protect Eurospin's reputation and image and safeguard the assets of the company.

The Code of Ethics is divided into three sections:

1. **Ethical Charter:** formalizes the *mission*, the value of reputation and the ethical principles that form the foundation of the culture of the Eurospin Group;
2. **Code of Conduct:** outlines the standards of conduct and behaviour patterns to follow to ensure respect for the values and principles of Eurospin;
3. **Bodies and implementation and control procedures:** identifies those responsible for implementing and monitoring the Code of Ethics.

## 1.2. RECIPIENTS AND SCOPE

The recipients of this Code are all those who carry out their activities in the Eurospin Group, which is to say all members of its corporate bodies, the employees of companies belonging to the Group at all levels (executives, managers, employees and the staff of the stores and warehouses), and all those who, in various capacities, act in the name, and on behalf, of Eurospin, regardless of the legal nature of the relationship



(such as promoters, project workers, temporary workers, temp agency employees). The Code of Ethics is also brought to the awareness of all those with whom the Eurospin Group has business relationships.

Despite the cultural, social and economic diversity of the various countries in which Eurospin operates, the Code applies to all the companies of the Eurospin Group in Italy and abroad, and is binding for the behaviour of all recipients. All recipients are required to observe and require observance of the principles of the Code in the context of their own functions and responsibilities.

The conviction that one is acting for the advantage of the Eurospin Group cannot justify the adoption of behaviours that conflict with the principles set out in this Code or applicable laws.

The rules of this Code of Ethics supplement the rules of conduct that employees are required to follow, also in accordance with the rules of ordinary diligence which employers are required to follow, as governed by the law applicable to labour relations.

## **2 ETHICAL CHARTER**

### **2.1. EUROSPIN'S MISSION**

The *mission* of the Eurospin Group is to meet the needs of its customers by offering, every day of the year, a targeted assortment of large-consumption products of quality and guaranteed freshness at affordable prices.

The goal is to satisfy our customers with courtesy and availability, creating trust in our brands and safeguarding the good reputation of the Eurospin Group.

### **2.2. THE VALUE OF REPUTATION**

A good reputation is, in fact, an essential intangible resource for the Eurospin Group and co-workers must never lose sight of it.

A good reputation encourages investment, customer loyalty, attracts the best people and creates good relationships with suppliers and creditors.

### **2.3. BASIC ETHICAL PRINCIPLES**

In pursuing its mission, Eurospin adopts the following values and principles of reference:

- **Customer orientation:** experience in our industry and customer satisfaction are the key principles on which Eurospin bases its organization to continuously



improve its performance. The Eurospin Group pursues its business success in the market by offering quality products and services at competitive prices while complying with all laws that ensure fair competition.

The Eurospin Group recognizes that the esteem of those requesting products or services is of primary importance its business success.

In addition, Eurospin demonstrates its care for customers by exclusively placing quality products on the market that guarantee the application of strict controls to ensure authenticity in the case of *food* products and safety in the case of *non-food* products.

- **Legality:** the Eurospin Group recognizes compliance with the current law in all the countries in which it operates as a fundamental principle. In performing their duties, all Eurospin's employees are required to obey the law and adhere to high ethical standards of behaviour.
- **Honesty and Integrity:** honesty is a fundamental principle for all activities of the Eurospin Group and is an essential element of corporate management. The behaviour of employees in the performance of their duties must, therefore, be characterized by honesty, fairness, cooperation and loyalty.
- **Fair Competition:** Eurospin intends to protect the value of fair competition by condemning any behaviour that is collusive, predatory or abuses its dominant position.
- **Clarity and truth in every transaction:** each operation and/or transaction, understood in the broadest sense of the term, must be legitimate, authorized, consistent, reasonable, documented, recorded and verifiable at any time. Eurospin undertakes to provide complete, transparent and understandable information to allow its stakeholders to make informed decisions about the relations with it.
- **Respect for the dignity of persons:** every employee of Eurospin is entitled to fair, courteous and respectful treatment by their managers, subordinates and peers. In internal and external relations, no form of discrimination is allowed on the basis of race, nationality, sex, age, health status, physical disability, sexual orientation, political opinions, union affiliation, philosophical orientation or religious beliefs. Sexual harassment or physical or psychological bullying are not tolerated in any form.



### 3 CODE OF CONDUCT

This section highlights the main rules of conduct, divided by stakeholder of reference, which the various recipients of the Code must observe to comply with the values and style of the Eurospin Group.

As a fundamental principle underlying each of its activities, Eurospin demands full observance of applicable law and the highest availability and cooperation of employees in their dealings with government agencies, judicial authorities, law enforcement personnel, public officials and control bodies that perform inspections on behalf of any other government.

It is therefore strictly forbidden to: (i) destroy or alter records, reports, accounts and or documents (whether hardcopy or electronic), (ii) make false statements to the competent authorities in anticipation of, during, a judicial proceeding, investigation or inspection, (iii) maintain relationships with witnesses, consultants or parties to civil and/or criminal proceedings in order to interfere with their freedom of self-determination.

It is forbidden to persuade those performing audits or inspections or the competent judicial authorities through offers of professional positions, gifts, money or other benefits (directly or through third parties).

When entering into relations of any kind with customers, suppliers, external collaborators and partners, as well as in the management of those already in place, to the extent known on the basis of information that is public and/or, in any case, available, using due diligence and in observance of current law, it is prohibited to:

- maintain relations with persons linked to criminal organizations and/or involved in illegal activities such as, by way of example and, in any case, not limited to, traffic in arms and drugs, stolen goods, money laundering, use of money or goods of illicit origin, terrorism and, in any case, with individuals lacking the necessary requirements of seriousness and commercial reliability;
- maintain financial relationships with individuals, even indirectly, that impede human development and contribute to the violation of fundamental human rights (such as using child labour, promoting sex tourism, etc.);
- alter the operation of a computer or remote communication system in any way or illegally intervene, in any way, on the data, information and programs they contain or that pertain to them;



- use any trademarks, patents, designs, logos or identification marks belonging to other by counterfeiting their characteristics or infringe upon rights claimed by third parties.

Every employee of each Eurospin Group company and, more generally, every recipient of this Code of Ethical Behaviour, is required to notify the President of the Board of Directors of the company they work for, or with which they have commercial relations, of any situation and/or episode that contributed to threatening their personal economic/business freedom and, more generally, that of the Eurospin Group. In this sense, and by way of example, they must report threats, extortion or other crimes that, directly or indirectly, have limited economic activity and benefitted companies or individuals linked to criminal organizations.

The Board of Directors of the Eurospin Group company that receives such a complaint must, without delay and in the person of its President:

- notify the Board of Directors of Eurospin Italia SpA and its Supervisory Body appointed pursuant to Legislative Decree no. 231 of 8th June 2001;
- make a formal complaint to the competent authorities (such as the prefecture, etc.).

Anyone convicted by the sentence of a court for one of the crimes referred to in article 416-bis (mafia-type associations, including foreign) or crimes committed using the conditions listed in article 416-bis of the Italian Penal Code or in order to facilitate the activities of such groups (article 7 of Law no. 203 of 12th July 1991) will, without delay, be terminated by the Eurospin Group through the action of the specific competent corporate function/body.

### **3.1. PARTNERS AND SHAREHOLDERS**

The creation of value, which compensates for business risk, is the primary goal of the Eurospin Group, which it pursues through the careful protection of solidity while, at the same time, promoting economic competition. The management of the Eurospin Group is required to observe the contents of the Code in proposing and implementing projects, actions and investments useful to increasing the value of the business's assets, management and technology over time and the long-term well-being of its employees and the community.

***Transparency and correctness of intercompany transactions***



Eurospin guarantees all its partners correctness, clarity and equal access to information, to prevent their misuse.

Eurospin carries out intercompany transactions with the criteria of substantial and procedural correctness for the purposes of a transparent and objective valuation and in compliance with the regulations governing domestic and transnational intercompany operations.

The considerations for the exchange of goods and/or services between Group companies must be defined according to market conditions and must always be justified.

### **3.2. EMPLOYEES**

Employees are all those who have a relationship of employment or association with the Eurospin Group that involves a hierarchical relationship.

Employees are expected to act with ethical rigor and professional commitment, in order to protect the reputation of Eurospin, establishing relations with each internal or external stakeholder based on trust and mutual cooperation.

Every employee is required to know the rules of the Code and the law of reference that regulate activities performed as part of their function.

#### ***Enhancing the value of persons***

Human resources are indispensable for the existence of the company.

Eurospin acknowledges that the dedication and professionalism of its employees are essential values and conditions for the achievement of the Group's goals and, therefore, it undertakes to develop the abilities and skills of every employee, also through a constant commitment to training so that the energy and creativity of every individual are fully expressed for the fulfilment of their potential.

Eurospin offers all employees the same employment opportunities, acting in such a way that everyone can receive equal treatment, based on merit, without discrimination.

The business role of the Eurospin Group is performed by protecting both working conditions and the psycho-physical well-being of workers, in respect of their moral personality, preventing their subjection to illegal treatment or undue discomfort. In addition, the Eurospin Group is committed to ensuring the employee's physical safety by scrupulously respecting rules and regulations in stores, distribution centres and warehouses.

#### ***Personnel selection***





Personnel are to be evaluated based on the correspondence of the candidate's profile to the company's expectations and needs, in respect of equal opportunity for all the persons involved.

The information requested is strictly related to the verification of the aspects covered by the professional and psycho-attitudinal profile, in respect of the candidate's opinions and privacy.

The Eurospin Group takes appropriate measures to avoid favouritism, nepotism or other forms of patronage in the selection and recruitment of personnel (such as preventing the selector from being a relative of the candidate).

### ***Establishment of the employment relationship***

Personnel are hired with regular employment contracts; no form of irregular work or working "off the books" is tolerated.

At the establishment of the working relationship, every employee receives accurate information regarding:

- the requirements of the function and the tasks to be performed;
- regulations and wages, as governed by the national collective bargaining agreement;
- standards and procedures to be adopted (including the Code of Ethics).

This information is provided to the employee in such a way that the acceptance of the job is based on a real understanding of the task assigned and commitments to be made.

### ***Harassment in the workplace***

The Eurospin Group requires that internal and external work relationships do not involve harassment, meaning by this: the creation of a work environment that is intimidating or hostile or that creates situations of isolation of individuals or groups of workers, unjustified interference with the performance of the work of others or obstructing the work prospects of others for merely personal reasons.

The Eurospin Group does not tolerate sexual harassment, meaning by this:

- subordinating important decisions for the working life of the recipient to the performance of sexual acts;
- proposals of private interpersonal relations offered despite explicit or reasonably obvious distaste, that have the potential, in relation to the specific situation, to



disturb the tranquillity of the recipient with objective implications for their ability to work.

### ***Collaboration and sharing***

Collaboration and sharing are considered important values in the Group, since they allow the creation of a harmonious and challenging workplace based on mutual trust and respect. This develops a positive collaborative climate within the organization which in turn allows finding good, efficient solutions to problems encountered on the job.

### ***Business Conduct***

Employees must act appropriately in affairs of interest to the Eurospin Group and relations with the government agencies, regardless of the competitiveness of the market and the importance of the affair involved.

Bribes, illegitimate favours, collusion or solicitation - direct and/or through third parties - of personal or career benefits for oneself or others are prohibited.

The Eurospin Group acknowledges and respects the right of employees to participate in investments, business affairs or other activities outside of those performed in the interests of the Group, provided that such activities are permitted by law and compatible with obligations assumed with the Eurospin Group.

### ***Conflicts of interest***

Employees must avoid all situations and activities that may create a conflict with the interests of Eurospin or that may interfere with their ability to make impartial decisions in the best interest of the company and in full compliance with the Code of Ethics.

Employees must immediately report any situation that may constitute or give rise to a conflict of interest to their immediate superior.

In particular, all employees are expected to avoid conflicts of interest between personal and family economic activities and their duties within the organization they work for. By way of example, the following situations can lead to conflicts of interest:

- economic and financial interests of employees and/or their families in the activities of suppliers, customers and competitors;
- use of your position in the company or information acquired in the context of your work in such a way that could create a conflict between your personal interests and those of the company;
- performing work of any kind for customers, suppliers or competitors;



- accepting money, favours or benefits from persons or companies that have, or intend to have, business relations with the Eurospin Group.

### ***Use of corporate resources***

Every employee of Eurospin must take due care to protect company resources through responsible behaviour in line with the operating procedures established to regulate their use, avoiding improper use that could damage them or reduce their efficiency or, in any case, in conflict with the company's interests.

Similarly, employees are not only responsible for protecting these assets, but also for preventing their fraudulent or improper use for the benefit of themselves, third parties or even the Eurospin Group itself. Everyone must feel that they are a custodian responsible for corporate assets (both tangible and intangible) that are instrumental to the activities carried out. No employee may make improper use of the assets and resources of the Eurospin Group or allow others to do so.

### ***Confidentiality of information***

The Eurospin is committed to protecting information about its employees and third parties that is generated or acquired in-house and in business relations, and avoiding any misuse of this information.

Information, knowledge and data acquired or processed by employees during their work or as part of their duties belongs to the Eurospin Group and cannot be used, communicated or disclosed without specific authorization from their superior. Employees are obligated to protect the confidentiality required by the circumstances of each piece of information learned as part of their duties.

Without affecting the prohibition against disclosing information about the organization and its business methods or using it in such a way as to cause damage to it, every employee must only acquire and process the data necessary and suitable for the purposes of the department they work for and directly connected to their own jobs, in observance of the law.

### ***Accounting transparency***

Accounting transparency is a value that Eurospin recognizes as an important part of its activities. Accounting transparency is based on the truthfulness, accuracy and completeness of the basic information for the relative accounting records. Every employee is required to cooperate so that management acts are recorded in the company's books correctly and in a timely manner. Adequate documentation is kept for all activities in order to:



- facilitate record-keeping;
- identify different levels of responsibility;
- allow the accurate reconstruction of the transaction, also to reduce the likelihood of errors of interpretation.

Each record must exactly reflect what is shown by the supporting documentation. Every employee is responsible for making sure that documentation is easily traceable or ordered according to logical criteria.

Employees who come to know of omissions, falsifications or carelessness in accounting or in the documents on which accounting records are based is required to report the facts to their supervisor.

### ***Internal Controls***

Internal controls are all necessary or useful tools for addressing, managing and verifying business activities with the aim of ensuring compliance with laws and company procedures, protecting corporate assets, efficiently managing assets and providing accurate and complete accounting and financial data.

It is the policy of the Eurospin Group to promote a culture at all levels characterized by an awareness of the existence and importance of controls and oriented to the exercise of control. The attitude toward controls must be positive for the contribution that they make to increasing efficiency and legality.

The responsibility for implementing an effective internal control system is shared by all levels of the organization; consequently, in the context of the work they perform, all employees are responsible for the implementation and proper functioning of the control system.

In the context of their responsibilities, area/function managers are required to participate in the company control system and have their employees participate in it.

The internal auditors, those responsible for management controls and, in general, the staff of the Parent Company and the auditing firm have free access to the data, documents and information useful for control and audit activities.

### ***Health, Safety and Environment***

As part of its activities, the Eurospin Group is committed to contributing to the development and welfare of the communities in which it operates, with the aim of ensuring the safety and health of employees, outside collaborators, customers and the communities affected by its activities and reducing the environmental impact of its activities.



The activities of the Eurospin Group must be managed in full compliance with current law on prevention and protection.

Operational management must refer to advanced standards of environmental protection and energy efficiency, while improving health conditions and occupational safety.

In the context of their duties, the employees of the Eurospin Group participate in the prevention of risks, protecting the environment and safeguarding their own health and safety and that of their colleagues and third parties.

In addition, Eurospin places on the market only *food and non-food* products that are safe for the health of customers.

### **3.3. GOVERNMENT**

Government means all those public or private bodies that perform a "public function" or a "public service", with which Eurospin and its employees interact. By way of example, but not exhaustively, this includes: local government (municipalities, provinces, regions, etc.), social security, the national health service, the food and drug unit of the Carabinieri, the fire department, local police, etc.

#### ***Legality, correctness and transparency in relations with government agencies***

In relations with government agencies, Eurospin's conduct is inspired and guided by respect for the correctness and transparency in business dealings.

The persons assigned to follow a negotiation, request or institutional relationship with the government must not attempt to improperly influence decisions or act illegally, such as offering money or other goods that could affect the impartial judgment of the government representative.

Illegal acts include the use of altered or falsified statements or documents, the omission of information and, in general, the use of artifice and deception in order to obtain concessions, permits, financing or grants from the European Union, the state or other public body.

#### ***Selection of third parties to manage relations with the government***

If Eurospin uses a consultant or third party to represent it in relations with the government or the concessionaires of a public service, they must accept the principles of this Code.

In relations with the government, Eurospin must not be represented by third parties that may be in potential conflict of interest or do not have a good reputation.



### ***Management of the information or remote communication systems of the government***

In addition, in the context of relations with the government, it is prohibited to alter the operation of a government information or remote communication system or manipulate the data it contains.

### ***Gifts and benefits***

It is prohibited to offer goods or other benefits to representatives, officials or employees of the government, even through interposed persons. Commercial courtesy, such as gifts or forms of hospitality are acceptable if they are of modest value and do not compromise the integrity or reputation of one of the parties and cannot be construed by an impartial observer as aimed at gaining undue advantages. In any case, these expenses must always be authorized by your supervisor and documented properly.

### ***Grants and Subsidies***

Eurospin guarantees the accuracy and completeness of documents prepared to obtain grants, financing, permits and concessions from the government (European Community, state and local agencies).

Eurospin also guarantees that the subsidies or financing obtained will be used for the purposes for which it was requested and granted.

## **3.4. CUSTOMERS**

Customers are all those who use the products and services offered by the Eurospin Group.

### ***Quality and efficiency of the products and services offered***

As relates to its customers, Eurospin undertakes to achieve and maintain the highest standards of quality of the products offered, in any case, aligning itself to the quality targets required by its customers and current law and orienting its actions towards excellence.

### ***Honesty in business dealings***

The relationships with customers are based on the principles of simplicity and clarity, avoiding the use of any deceptive practices. Eurospin is committed to:

- efficiently and courteously supplying quality products that meet or exceed the reasonable expectations and needs of the customer;
- providing accurate and exhaustive information about products and services so that customers can make informed decisions;



- being truthful in advertising or other communications.

Eurospin repudiates any form of misleading advertising and presents its products transparently and truthfully from every point of view.

### ***Customer health and safety***

Concern for the health and safety of its customers and consumers in general are essential aspects of Eurospin's way of doing things. For this reason, Eurospin only places on the market healthy and authentic *food* products and safe *non-food* products; for every product offered for sale, its quality and conformity to the law of reference must be certified and verified through stringent controls that involve the entire production cycle.

### **3.5. SUPPLIERS**

Suppliers are those that provide the goods, services and resources necessary for conducting business and that contribute to determining the quality and efficiency of the final product offered to the customer.

#### ***Selection and evaluation of suppliers***

The supplier selection process is based on objective evaluations, according to the principles of honesty, quality, technical capability, cost, continuity, loyalty, punctuality and ethics.

The Group does not maintain relations, either directly or indirectly, with persons suspected of belonging to criminal organizations or, in any case, outside the law. Eurospin develops partnership relationships with counterparts of established reputation and experience, establishing these relationships in accordance with the principles of this Code.

With the aim to encouraging/promoting respect for ethical principles and protecting health and safety in the workplace, the environment, intellectual property, industry and trade throughout the supply chain, Eurospin encourages its suppliers to apply the same criteria for selection of subcontractors.

With particular reference to suppliers of products intended to be placed on the market by the Group, Eurospin only uses suppliers it is confident will respect strict systems for controlling the quality, authenticity and safety of products.

#### ***Payments, gifts and benefits***

The compensation paid to suppliers should always be commensurate with the performance specified in the contract.



Eurospin absolutely prohibits giving or receiving gifts and/or benefits (money, objects, services, favours, or other benefits) to/from suppliers and/or their representatives (potential or actual) such as to promote unlawful conduct or, in any case, such as to lead an impartial observer to interpret that as intended to achieve an advantage, even not economic.

In relations with suppliers, behaviours are prohibited that promote money laundering, the receipt and use of goods or benefits of unlawful origin in both a domestic and international context, as well as behaviours aimed at soliciting or accepting a personal benefit to/from employees of supplier companies.

### **3.6. COMMUNITY AND MASS MEDIA**

This includes all stakeholders whose interests are directly or indirectly affected by Eurospin's activities.

In order to improve the social environment in which it operates, Eurospin expresses its commitment to issues that are sensitive and relevant to the community, such as employment and culture.

In any communication with the outside, information about the Group and its activities must be truthful, clear and verifiable. Employees also refrain from any conduct or making any statements that could in any way damage the image and interests of the Group.

#### ***Donations and generosity***

In any donations and acts of generosity, Eurospin favours initiatives that offer a guarantee of quality, transmit an ethical message and contribute to social development.

#### ***Supporting social and cultural initiatives***

In the support and, in general, the sponsorship of social and cultural initiatives, Eurospin only considers initiatives that promote the local area and the principles of environmental and social responsibility.

#### ***Relations with the mass-media***

Information directed to the outside must be truthful and transparent.

The Eurospin Group must present itself accurately and consistently in communication with the media. Relations with the media are exclusively reserved to the corporate functions that have been delegated the responsibility and agreed in advance.

Employees may not provide information to representatives of the mass media or promise to provide it without authorization from the competent functions. Employees may not, in any way or form, offer payments, gifts or other benefits aimed at influencing





the professional activity of the media, or that could reasonably be interpreted as such.

#### **4 BODIES AND IMPLEMENTATION AND CONTROL PROCEDURES**

Eurospin has appointed a Supervisory Body for each Group company pursuant to Legislative Decree no.231/2001 (hereinafter the "SB") to guarantee respect for, and the correct implementation of, the provisions of its Code of Ethics. The SBs of the Group companies will cooperate with the competent bodies and functions of each company for the implementation of adequate monitoring of the principles of the Code of Ethics and will also periodically report to the SB of the parent company.

The Supervisory Board:

- consults with the competent functions to provide appropriate training courses;
- clarifies doubts of interpretation and situations of ethical dilemma;
- collects reports of alleged violations;
- conducts the necessary investigations, reporting the outcome to the competent functions and ensuring that sanctions are imposed;
- guarantees the confidentiality of the identity of informants, protecting them from retaliation.

The recipients of the Code are required to cooperate with the competent Supervisory Body in the performance of their assigned activities, ensuring free access to all documentation deemed necessary.

##### ***Communication and training***

The Code of Ethics is made known to all recipients through communication and training, and acceptance of its principles is required by signing an acknowledgment form.

The Board of Directors of each Group company is responsible for:

- the widest possible dissemination of the Code among its employees and partners;
- monitoring the implementation of, and compliance with, the Code of Ethics within the company as part of daily activities;
- in the case of an ascertained violation, assessing the facts and the consequent application of appropriate sanctions;
- ensuring that no one may suffer any retaliation whatsoever for providing their supervisor information regarding possible violations of the Code.



This Code is available on the Eurospin website and is distributed to the recipients in the manner that on a case-by-case basis is considered most suitable for effective disclosure.

In order to promote the sharing of the Code of Ethics, Eurospin encourages the competent functions to prepare appropriate training programs that make it possible to clarify any aspect of the application of the Code.

### ***Updating***

The Code may be amended and supplemented, also based on suggestions and instructions from the Supervisory Board, through a resolution of the Board of Directors.

### ***Reports***

Communications to the Supervisory Board of each Group company (such as reports of alleged violations or requests for clarification or opinions) should preferably not be made anonymously and can be sent by recipients and all other stakeholders to the following addresses:

#### **For Eurospin Italia SpA:**

**E-mail:** odv@eurospin.it

**Mailing address:** to the attention of the Supervisory Board, c/o Eurospin Italia SpA, Via Campalto 3/d, 37036 - San Martino Buon Albergo (VR)

#### **For Eurospin Sicilia SpA**

E-mail: odv@eurospinsicilia.it

Mailing address: to the attention of the Supervisory Board, c/o Eurospin Sicilia SpA,

Via \_\_\_\_\_

Eurospin is committed to protecting those who make good faith reports of alleged or apparent violations of the Code from any retaliation by prosecuting those responsible through the applicable disciplinary actions.

### ***Violations of the Code of Ethics***

Observance of the principles of the Code is an essential part of contractual obligations to Eurospin under current law. Violations of the Code of Ethics constitute a breach of the obligations that the employee has assumed towards the Group company and/or the Parent Company, whether they refer to employment, collaboration or administration.

Eurospin is committed to enforcing this Code through the timely application of the sanctions required by the disciplinary system of the Organizational Management and



Control Model required by Legislative Decree no.231/2001 as well as the disciplinary system required by applicable national collective bargaining agreement or contracts of reference signed with the relative counterparts.

