



RISERIA  
**Provera**

**Code of Ethics**

### **The Code of Ethics**

was approved by the Board of Directors  
on 19 September 2024

Reports and requests for information may be addressed  
in the following ways:

> By letter which may be sent to the address:

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# 1 Foreword

## 1.1 INTRODUCTION

RISERIA PROVERA SRL was established in the early 1900s in Santhià as a rice mill within the family farm. For four generations, the secrets of good processing and the passion for the quality of its rice have been handed down. Back then, the pileria focused on processing classic Italian risotto rice such as Roma, Arborio and Sant'Andrea.

Today, the rice mill is dedicated to the processing of paddy rice using the classic method, the preparation of parboiled rice from brown rice and the milling of rice to produce wholemeal, semi-processed and white rice flours.

This Code of Ethics contains a series of principles that RISERIA PROVERA SRL recognises as its own and on which it intends to call for compliance by all those who contribute to the pursuit of the company's purposes, thus consolidating its orientation towards ethics and the prevention of unlawful and irresponsible conduct.

## 1.2 SCOPE OF APPLICATION

The Code of Ethics is the set of rights, duties and responsibilities of RISERIA PROVERA SRL (hereinafter, the 'Company') towards 'stakeholders' (employees, collaborators, suppliers, customers, Public Administrations, etc.). It represents the set of values, principles and lines of conduct that must inspire all those who directly or indirectly, permanently or temporarily establish relations with the Company or operate in its interest.

For RISERIA PROVERA SRL, the Code of Ethics constitutes a core element that illustrates and defines its ethical commitments, which are based on the development of the person, the centrality of human resources, and the development of the territorial context in which it operates.

The function of the Code of Ethics is to promote or prohibit certain behaviours and provide for sanctions proportionate to the seriousness of any breaches committed. Therefore, it represents a compendium of the programmatic and conduct lines that

guide the company's existence, acting as an aid and support to the realisation and implementation of a valid organisation and management model.

It constitutes, without any doubt, a guideline in economic, social, relational relations with particular attention to the areas of possible commission of offences.

### **1.3 GUARANTORS OF THE APPLICATION OF THE CODE OF ETHICS OF RISERIA PROVERA SRL**

The administrative body of RISERIA PROVERA SRL is responsible for supervising compliance with the Code of Ethics. All recipients of the Code may request any clarifications or report any non-compliance with the Code by sending an email to the company's email address.

## **2 Addressees of the Code of Ethics**

This Code of Ethics is addressed to all individual and collective subjects who establish significant relationships with RISERIA PROVERA SRL or whose interests are in various ways involved in the activities of the Company.

- **Members of statutory bodies Employees**
- **Internal and external collaborators**
- **Consultants**
- **Customers**
- **Suppliers**
- **Public administrations and local authorities, Trade unions and trade associations**

Each 'addressee' of the Code of Ethics is obliged to set an example to their colleagues through their own behaviour, to promote compliance with the rules and to work to ensure that everyone understands that compliance with the rules of the Code of Ethics is an essential part of their work. They also undertake to report all violations of the Code of Ethics of which they become aware.

To this end, RISERIA PROVERA SRL undertakes to implement all information and training actions towards all ‘addressees’ of the Code of Ethics to ensure compliance.

The provisions of the Code are binding for all recipients.

### **3 Purpose of the Code of Ethics**

The Code of Ethics was drafted to explain the guiding principles that characterise the activities of RISERIA PROVERA SRL and to provide all stakeholders with precise indications on the models and rules of conduct to be followed in the situations in which they work with and for the Company.

The Code of Ethics aims to:

- recognise the relevance and binding effectiveness of the ethical principles described below also in the context of crime prevention;
- define the values and principles that guide the activity and relations with all stakeholders;
- indicate the principles of conduct to which all addressees of the Code are bound;
- define a specific system of sanctions to ensure the effective and concrete implementation of the Code of Ethics.

### **4 Reference ethical principles**

The fundamental principles of this Code of Ethics by which RISERIA PROVERA SRL is inspired can be listed as follows.

#### **4.1 LEGALITY**

RISERIA PROVERA SRL acts in compliance with the law, in compliance with the Code of Ethics and in compliance with its Articles of Association.

The Company requires that every addressee of the Code follow the same behaviour, and in this regard it proposes not to initiate any collaboration or employment relationship with those who do not respect or violate this commitment.

## **4.2 CENTRALITY OF THE PERSON: DIGNITY AND RESPECT, VALUE OF HUMAN RESOURCES**

RISERIA PROVERA SRL bases the performance of its mission on the centrality of the person: it promotes the value of human resources as a substantial element for the achievement of its objectives. Among these, we can define as a primary objective the maximisation of its employees' satisfaction.

The Company builds relations with its staff on mutual trust, respect for contractual obligations, respect for the rights and duties of workers, as well as the fair and proper exercise of authority, avoiding any abuse.

In this regard, RISERIA PROVERA SRL ensures that authority does not turn into an exercise of power detrimental to the dignity and autonomy of workers, and that work organisation choices always safeguard the value of employees.

## **4.3 HONESTY AND FAIRNESS**

Fairness and moral integrity are an unailing duty for all Addressees. Addressees are bound not to establish any privileged relationship with third parties, which is the result of external solicitations aimed at obtaining improper advantages.

In the performance of their activities, the Addressees are bound not to accept donations, favours or benefits of any kind (except for objects of modest value) and, in general, not to accept any quid pro quo in order to grant improper advantages to third parties.

In turn, the Recipients must not make donations of money or goods to third parties or in any case offer unlawful benefits or favours of any kind (except for objects of modest value or commercial courtesy gifts authorised by the Company) in connection with the activity they perform for the benefit of RISERIA PROVERA SRL.

The intrinsic conviction of acting in the interest of the Company does not exempt the Recipients from the obligation to strictly comply with the rules and principles of this Code.



#### **4.4 CONFIDENTIALITY AND PRIVACY PROTECTION**

RISERIA PROVERA SRL is committed to ensuring the protection and confidentiality of personal data of Recipients and Stakeholders, in compliance with all applicable regulations on the protection of personal data.

Recipients are required not to use any confidential or non-confidential information, learned in the course of their work, for purposes unrelated to the exercise of such activity, and in any case to always act in compliance with the confidentiality obligations assumed by RISERIA PROVERA SRL towards all Stakeholders.

In particular, Recipients are required to maintain the utmost confidentiality on information relating to operations and relationships and/or documentation that could reveal their know-how.

#### **4.5 TRANSPARENCY AND CORRECTNESS OF INFORMATION**

The Addressees of the Code of Ethics are required to provide complete, transparent, comprehensible and accurate information so that stakeholders can make decisions independently and in full knowledge.

#### **4.6 IMPARTIALITY AND EQUAL OPPORTUNITIES**

RISERIA PROVERA SRL in its relations with Stakeholders, and in particular in the selection and management of personnel, work organisation, choice, selection and management of suppliers, as well as in its relations with Bodies and Institutions, avoids and repudiates any discrimination based on age, sex, race, sexual orientation, state of health, political and trade union opinions, religion, culture and nationality of its interlocutors.

RISERIA PROVERA SRL, at the same time, fosters integration, promoting intercultural dialogue, the protection of the rights of minorities and weak subjects.

#### **4.7 DILIGENCE**

The relationship between RISERIA PROVERA SRL and its employees is based on mutual trust: employees are, therefore, required to work to further the interests of the company, in compliance with the values set forth in this Code.

Recipients must refrain from any activity that may conflict with the interests of RISERIA PROVERA SRL, renouncing the pursuit of personal interests in conflict with the legitimate interests of the Company.

#### **4.8 TRACEABILITY**

RISERIA PROVERA SRL, in order to maintain traceability of operations performed in the performance of its activities and provision of services, keeps all documentation, including in electronic format.

#### **4.9 SAFETY AT WORK: RESPECT AND SAFETY OF THE INDIVIDUAL**

RISERIA PROVERA SRL is committed to ensuring its employees and collaborators safe, healthy working conditions, respectful of individual dignity, guaranteeing their physical and moral integrity, as well as working conditions that respect personal dignity and the principle of fair pay.

It is committed to spreading and consolidating a culture of safety by developing risk awareness and promoting responsible behaviour by all employees and collaborators; it also works to preserve, especially through preventive actions, the health and safety of workers.

To this end, the Company, attentive to the evolution of reference scenarios and to the consequent change in threats, implements technical and organisational interventions, through: the application of an integrated risk and safety management system, a continuous analysis of the risk and criticality of processes and resources to be protected, the adoption of the best technologies, the control and updating of work methodologies, and the provision of training and communication interventions.

The responsibility of each employee/collaborator towards their colleagues makes it compulsory to take the utmost care of accident risk prevention.

To this end, the technical planning of workplaces, equipment and processes is marked by the highest level of compliance with the current regulations on health and safety at work.

Furthermore, in accordance with Legislative Decree 81/08 RISERIA PROVERA SRL undertakes to adopt and periodically update all measures required by law (Risk Assessment Document, staff training and information, appointments, etc.).

Each employee/collaborator must take the utmost care in carrying out their activities, strictly observing all established safety and prevention measures, to avoid any possible risk for themselves, their colleagues and third parties.

#### **4.10 CONFLICT OF INTEREST**

RISERIA PROVERA SRL does not allow the Recipients of the Code of Ethics to be involved in relationships that may result in a clear conflict of interest, whether it be due to actions carried out:

- by employees and collaborators that lead them to pursue an interest that differs from the company mission or benefits them personally;
- by representatives of customers, suppliers and public administrations that lead them to act contrary to the fiduciary duties associated with their position.

This assessment shall be carried out on the basis of the regulations in force as well as on the basis of the good practices adopted in the company, also taking into account any professional, family and administrative relations. In cases where the existence of a conflict of interest may be feared, the Addressees are required to refer, without delay, to their hierarchical superior so that the Company may assess, and possibly authorise, the activity potentially in conflict.

In cases of violation, the Company shall take all appropriate measures to put an end to the conflict of interest, reserving the right to act for its own protection.

#### **4.11 UNFAIR COMPETITION**

RISERIA PROVERA SRL is committed to conducting business exclusively on the basis of free and fair competition, in full compliance with all applicable laws and regulations.

Each employee must maintain independence of judgement and action in the design, production, pricing and sale of products and services and avoid even the appearance of conspiracy or agreements with a competitor. It is illegal to enter into formal or informal agreements with competitors that may prevent, restrict or distort trade.

These agreements include, but are not limited to, agreements to fix prices, rig bids or divide or allocate markets, territories or customers.

Antitrust and relevant laws also prohibit:

- undue monopolisation of the market;
- entering into formal or informal agreements or arrangements with suppliers or customers that restrict competition;
- improper product bundling;
- imposing fixed or minimum resale prices;
- boycotting specific customers or suppliers;
- making false or misleading comments about competitors.

#### **4.12 PROTECTION OF COMPANY ASSETS**

Each Addressee of the Code of Ethics shall protect and respect corporate assets, guarding movable and immovable property, technological resources and computer supports, equipment, company means, information and/or know-how of RISERIA PROVERA SRL.

In particular, each employee and collaborator is required to use company assets by working diligently, behaving responsibly and protecting them.

Company assets must be used appropriately and in accordance with the company's interest, preventing third parties from misusing them.

It is expressly forbidden to use Company assets for personal or non-work related needs. In particular, it is forbidden to use work tools and vehicles in a way that may damage or alter them, under



penalty of damages to the property. With regard to computer tools, it is expressly forbidden to destroy company software, alter or deteriorate as well as intercept or interrupt computer communications. It is also forbidden to trespass computer systems protected by security measures, or to obtain access codes and disseminate them.

To this end, each recipient of the aforementioned Code must:

- use company assets according to company policies, scrupulously observing all security programmes to prevent unauthorised use or theft;
- avoid improper use of company assets that may cause damage or reduction of efficiency, or in any case in conflict with the company's interest;
- maintain the secrecy of confidential information concerning the Company, avoiding reserving it to third parties;
- scrupulously comply with the provisions of the company security policies, also in order not to compromise the functionality and protection of computer systems;
- not sending threatening or insulting e-mail messages, not using uneducated or unprofessional language, not making inappropriate comments that may cause offence to the person and/or damage the company image.

Each employee and collaborator is responsible for the protection of the assets and technological resources entrusted to him/her and has the duty to promptly inform his/her immediate superiors of events that are partially damaging to such assets and resources.

#### **4.13 SUSTAINABILITY AND ENVIRONMENTAL PROTECTION**

RISERIA PROVERA SRL has started a path for the integration in its corporate strategies and business models of ESG sustainability objectives in the triple exception: environment, social and governance.

For years, the company has created a virtuous chain linking selected farms that pay attention to the sustainability of their working environment: the rice field.

The entire agronomic process is shared, including the planning

of the rice varieties that best meet consumer demands and are most productive.

The cultivation techniques that farmers put into practice are dictated by care for their land and the knowledge that what they sow will be consumed by them, their families and other families around the world.

Biodiversity is a philosophy they have long espoused, in which they believe and on which they base their work. Even the choice to be part of the organic world pursues a path of life that preserves the biodiversity of the fields that make up the farms. Trained and prepared technicians support the farmers during all phases of cultivation.

RISERIA PROVERA SRL is becoming energy self-sufficient. It recycles 85% of the water used in its cooking plants. All its by-products are reused and none are sent to landfill. Incoming packaging is given away as used for subsequent reuse.

## **5 Rules of conduct and prohibited conduct**

Among the objectives pursued by the Code of Ethics, there is certainly the intention to illustrate and list the rules of conduct that all the Addressees of the Code are required to respect and follow while carrying out their activities.

### **5.1 RELATIONS WITH OTHER CORPORATE BODIES**

The top management and the offices envisaged by the Articles of Association are required to fully comply with the rules laid down by the Articles of Association, by the applicable national and EU legislation, as well as by the company's regulations and procedures.

### **5.2 RELATIONS WITH THE PUBLIC ADMINISTRATION AND LOCAL BODIES**

RISERIA PROVERA SRL is committed to maximum transparency and fairness in its relations with the P.A. and Local Bodies with

which it operates. Relations with public entities are maintained in compliance with the roles and functions assigned under the law, as well as in a spirit of utmost cooperation.

Relations with officials are limited to the Company structures in charge and duly authorised in compliance with the strictest observance of the provisions of the law, regulations as well as in respect of the integrity and reputation of the Company.

RISERIA PROVERA SRL undertakes to work with officials of the Public Administration and Local Bodies using the channels provided for that purpose and to represent the interests and positions of the Company in a transparent, rigorous and consistent manner, avoiding collusive behaviour or conflicts of interest.

RISERIA PROVERA SRL prohibits its employees and collaborators from:

- adopt behaviour that may bring any undue benefit or advantage to the Company through the omission, alteration or falsification of information;
- adopt any type of conduct contrary to the law; pay and offer, directly and/or indirectly, payments or material benefits to public employees and officials in order to influence an act of their office to obtain an advantage;
- grant any kind of advantage to public employees or officials;
- submit untruthful declarations to the Public Administration during the presentation and reporting of the activities subject to funding;
- allocate any funding obtained for activities or purposes other than those for which it was received;
- issue purchase requests that are not reflected in a specific and justifiable need of the company and that have not been authorised under the powers of attorney of RISERIA PROVERA SRL;
- alter in any way the operation of a computer or telematic system, intervening on data, information or programs contained therein, procuring an undue advantage to the Company.

### 5.3 RELATIONS WITH EMPLOYEES AND COLLABORATORS

RISERIA PROVERA SRL undertakes to recruit and establish working relationships with employees and collaborators in full compliance with current labour regulations. Recruitment takes place through job interviews that are based on meritocracy and on the actual compliance of the skills required and possessed.

In this regard, the Company undertakes:

- to hire with a regular employment contract, not allowing any form of irregular contract;
- not to employ workers younger than the age required by law or foreign workers without a residence permit or with an expired residence permit
- to base relations with their employees and internal and external collaborators on dignity and respect
- to respect the right of workers to freely associate and bargain collectively.
- The Company enhances the value of its internal resources by providing regular annual training that includes: skills updating, education and training. The areas of interest include safety and regulations in the relevant sector.
- In addition, it is committed to ensuring safe and healthy working environments, means and equipment, guaranteeing the dissemination of the safety policy adopted and developing among its employees the promotion of responsible behaviour to promote the company's safety policy.

RISERIA PROVERA SRL asks its employees and collaborators to perform their activities with diligence and loyalty, respecting the company's assets as set forth in this Code of Ethics.

In this regard, each employee and collaborator is:

- informed of the adoption of this Code of Ethics by receiving a copy upon hiring;
- has the right/duty to be informed by asking senior management and/or company management about any aspect of interpretation of the Code;
- is required to conform his conduct to the ethical principles that underlie the activity of RISERIA PROVERA SRL.



RISERIA PROVERA SRL prohibits its employees and collaborators to:

- engage in conduct contrary to the law or that may become one;
- engage in conduct that is or may become contrary to company regulations;
- behave in such a way as to generate conflicts of interest with one's role and that may create personal advantages or advantages for the Company for any reason;
- accept free gifts or benefits that may be interpreted as exceeding the normal activities of RISERIA PROVERA SRL, or in any case due to obtaining favourable treatment in the conduct of its business;
- use the Company's equipment for personal purposes (telephone, computer, printers, fax, company vehicles, equipment and other);
- engage in any type of conduct and action aimed at non-compliance with the rules set out in Legislative Decree 81/08 and with its own integrated management system on risks and health and safety at work;
- engage in any type of conduct and action aimed at committing computer crimes (Article 25 bis of Legislative Decree 231/01) and causing damage, in any form, to the Company.

#### **5.4 RELATIONS WITH CUSTOMERS**

RISERIA PROVERA SRL conforms its conduct in relations with customers to principles of legality, transparency, fairness, reliability, responsibility and quality.

Employees and collaborators of RISERIA PROVERA SRL, therefore, within the scope of their assigned duties, shall:

- scrupulously comply with all legal and regulatory provisions, the provisions of this Code of Ethics and the internal perspectives related to the management of customer relations;
- provide the customer with all information on the conditions and terms of contracts relating to the products and services offered, so that the customer is fully aware of them at the time of signing and finalising the agreement, scrupulously observing the relevant company procedures;
- preserve its independence from both internal and external influences.

## **5.5 RELATIONS WITH SUPPLIERS OF PRODUCTS AND SERVICES**

RISERIA PROVERA SRL, in establishing collaboration and working relationships with suppliers and external consultants, asks them to comply with the principles and rules of conduct set forth in its Code of Ethics.

RISERIA PROVERA SRL undertakes to select suppliers through transparent and non-discriminatory procedures.

Relations with suppliers are based on fairness, correctness and transparency. Suppliers are chosen based on objective criteria of cost-effectiveness, opportunity and efficiency.

The choice of suppliers on a purely subjective and personal basis or, in any case, on the basis of interests conflicting with those of the company is precluded.

The Addressees must put in place every possible control so that suppliers and customers are also able to comply with the fundamental ethical principles set out in this Code.

## **5.6 RELATIONS WITH POLITICAL, TRADE UNION AND CATEGORY ORGANISATIONS**

RISERIA PROVERA SRL undertakes not to put direct or indirect pressure on political, trade union or category representatives, including through the addressees of this Code of Ethics. It undertakes not to discriminate against any political and/or trade union organisation.

It is forbidden to involve the Company in any way for political or other purposes.

## **5.7 RELATIONS WITH SUPERVISORY AND CONTROL AUTHORITIES**

RISERIA PROVERA SRL undertakes to behave correctly and transparently towards supervisory and control Authorities, guaranteeing the availability of all documentation necessary and required for the performance of their activities.

Employees and internal and external collaborators are prohibited from altering, falsifying or making incomplete the information requested.

## **5.8 RELATIONS WITH THE MASS MEDIA: EXTERNAL COMMUNICATIONS AND INFORMATION**

RISERIA PROVERA SRL is committed to managing its external communications according to the principles of fairness, transparency and truthfulness, fostering awareness and consensus on corporate policies and the Company's programmes and projects.

Relations with the press and the media are maintained only by those expressly delegated to do so and are based on the protection of the company's image.

The advertising promotion of RISERIA PROVERA SRL respects ethical values, protecting minors and repudiating vulgar or offensive messages. It is forbidden for employees and internal and external collaborators to make announcements without the authorisation of the Company.

## **5.9 CONTRIBUTIONS AND SPONSORSHIPS**

RISERIA PROVERA SRL may adhere to requests for contributions limited to proposals coming from non-profit entities and associations or that are of cultural or charitable value. Sponsorship activities may concern social, environmental, sports, entertainment and art issues.

In any case, in choosing the proposals to which to adhere, RISERIA PROVERA SRL shall pay special attention to any possible conflict of interest.

# **6 The disciplinary system and sanctions**

The internal control system is geared towards the adoption of tools and methodologies aimed at countering potential corporate risks, in order to ensure compliance not only with the law, but also with internal provisions and procedures.

In fact, the violation of the principles set forth in the Code and in the procedures indicated in the internal controls compromises the fiduciary relationship between the Company and its directors, employees, consultants, collaborators in various capacities, customers, suppliers, commercial and financial partners.

Such violations shall therefore be immediately pursued by RISERIA PROVERA SRL in an incisive and timely manner, through the adoption of appropriate and proportionate disciplinary measures. The effects of violations of the Code of Ethics and internal protocols shall be taken into account by all those who, in any capacity, have relations with RISERIA PROVERA SRL.

Depending on the seriousness of the conduct engaged in by the person involved in one of the unlawful activities set forth in the Code, RISERIA PROVERA SRL shall take appropriate action without delay, regardless of the possible prosecution by the judicial authorities.

Without prejudice to the above, conduct in breach of the Code of Ethics constitutes:

- a serious breach for employees (blue collars, white collars, middle managers and executives), with the sanctions, applied depending on the seriousness, provided for by the CCNL for the category (verbal reprimand, written reprimand, fine not exceeding three hours' pay, suspension from work and pay up to a maximum of three working days, dismissal for just cause or justified reason) if criminal proceedings are pending or if a measure restricting personal liberty is taken against the employee, before adopting the disciplinary measure, the sanction of suspension from work and pay may be adopted, for the duration corresponding to the outcome of the criminal proceedings or until the end of the duration of the measure restricting personal liberty;
- just cause for revocation of the directors' mandate;
- cause for immediate termination of the relationship, in the most serious cases, for external collaborators and para-subordinates;
- cause for immediate termination of the relationship, in the most serious cases, for suppliers, contractors and subcontractors.



The identification and application of sanctions shall always take into account the general principles of proportionality and appropriateness with respect to the alleged violation.

In all of the aforementioned cases, RISERIA PROVERA SRL also reserves the right to exercise all actions it deems appropriate to claim compensation for damages suffered as a result of conduct in violation of the Code of Ethics.

## **7 Updating the Code of Ethics and the model of organisation, management and control**

Updating of the Code of Ethics is necessary if the following situations occur and is approved by the Board of Directors:

- legislative update;
- significant changes in the organisational structure of RISERIA PROVERA SRL.

## **8 Communications to the body in charge**

All parties involved may report, in writing via email and in non-anonymous form, any violation or suspected violation of the Code of Ethics to the body in charge of overseeing the implementation of the Code, which:

- provides for an analysis of the report, possibly hearing the author and the person responsible for the alleged breach
- acts in such a way as to guarantee whistleblowers against any kind of retaliation, understood as an act that may give rise even to the mere suspicion of being a form of discrimination or penalisation
- ensures the confidentiality of the identity of the reporter, without prejudice to legal obligations.

In the event of an ascertained breach of the Code of Ethics, the Body itself reports the report to the Company's governing bodies. The competent corporate functions, activated by the aforementioned bodies, define the measures to be taken according to the regulations in force and according to the disciplinary system adopted by the Company; they take care of their implementation and report the outcome to the Body in charge of monitoring the Code of Ethics.

## **9 Entry into force and dissemination**

This Code of Ethics comes into force on the date of its approval by the deliberating body.





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