



## CODE OF ETHICS

### OLEIFICIO COPPINI ANGELO S.P.A

Foreword

#### History

Oleificio Coppini Angelo was founded in 1955 by Giuseppe Coppini in Terni: the city of Saint Valentine and the Marmore Falls, nestled in the olive-covered hills of Umbria. Processing extra virgin olive oil is an ancient skill and Giuseppe passed the secrets of his trade on to his son Angelo, who in turn passed them on to his children Micaela, Andrea and Matteo. Over these three generations, the Coppini family has been able to inject new life into tradition with passion, combining the experience and values of the past with the most innovative production technologies.

**1970** “Ditta Giuseppe Coppini e Figlio” incorporated another local company, “Ditta Oleificio Paradiso”, thus renaming itself “Oleifici Coppini Paradiso di Angelo Coppini”. The production site stayed in the heart of the city centre, moving to larger premises of 600 sqm. in Via Fratini.

The new Coppini company logo established itself and soon became a brand known for guaranteed quality.

**1990** Significant business developments necessitated moving the company headquarters again: this time to a new site of 2,200 sqm. on the outskirts of Terni, part of a larger area measuring 15,000 sqm.

The company changed its name to “Oleificio Coppini Angelo Ditta Individuale” and the new site (unchanged to this day) enabled it to meet new challenges in terms of quality standards and advanced production technology.

**1994 - 1999** The third generation of the family joined the management of Oleificio Coppini Angelo. Mr Angelo Coppini continued to run the company with constant supervision of the quality of each production stage, thanks to his long experience and intimate familiarity with the company’s know-how. However, the lessons and passion passed on to his children led the company into a new phase of growth.

In 1994, Micaela Coppini started the export business and today the Coppini brand is distributed in over 45 countries worldwide.

In 1999, Mr Angelo handed over the production management to Andrea. These were the years when the company’s flagship was no longer olive oil, but the great variety and quality of Coppini extra virgin olive oils.

Oleificio Coppini Angelo became a family business.

1999 was also the year of the implementation of the HACCP (Hazard Analysis and Critical Control Points) system: the system of hygienic self-checks of every production stage to guarantee the highest food quality.

**2001** the company obtained UNI EN ISO 9002 certification, later upgraded in 2003 to UNI EN ISO 9001:2000.

**2005** “Oleificio Coppini Angelo Impresa Familiare” was converted into a limited liability company with a capital of EUR 100,000.00 f.p., whose shares were divided between the partners, Angelo, Micaela and Andrea Coppini.

**2008** The Oleificio was equipped with a new production plant that also allowed PET (polyethylene terephthalate) packaging. The production capacity reached 18,000 units per hour.

New company developments also led to an image makeover, with a restyling of the labels and logo.

**2010:** Matteo Coppini joined in the share capital of Oleificio Coppini Angelo S.r.l.

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**2011:** Oleificio Coppini Angelo stood out for its ecological commitment with a series of internal actions aimed at protecting the environment, including an investment of more than EUR 500,000.00 for the construction of a photovoltaic array capable of generating 185.75 kW of electricity.

**2012:** After only 7 years, Oleificio Coppini Angelo S.r.l. became a Public Limited Company, with a share capital of EUR 1,000,000.00 f.p., whose shares were divided among the shareholders Angelo, Micaela, Andrea and Matteo Coppini.

**2021:** The production area was expanded: 15,000 sqm including a building of 8,000 sqm and storage area.

### **The company's vision**

To share and teach the use of extra virgin olive oil throughout the world for better life conditions, thanks to its natural production system and its health benefits.

### **The company's mission**

To delight every customer with an oil of character, distinctive in quality, certified and safe, respectful of nature and people, upheld by strong family roots.

### **Coppini supports the environment**

Reduced CO<sub>2</sub> emissions: Cuore Verde is an environmentally friendly line, produced by reducing carbon dioxide emissions by -18%! (source: LCA - product lifecycle analysis).

Environmental certification: all Coppini products are certified with UNI EN ISO 14001:2015.

Clean energy: Oleificio Coppini Angelo has a photovoltaic array that generates electricity to meet 100% of the company's needs.

Responsible waste disposal: the company applies the waste disposal provisions of the Circular Economy Package (transposed by It. Leg. Decree 116/20) to the letter. It also consistently uses 100% recycled packaging.

### **INTEGRATED POLICY**

Oleificio Coppini Angelo Spa produces different types of olive/seed oils and condiments in-house, selecting quality raw materials and favouring those of Italian origin. The Management does everything possible so that processes and activities are oriented towards the achievement of the following goals with regard to food and product safety, environmental protection, ethical principles, and safety in the workplace:

1. Provide a product that conforms to the contractual standards, needs and expectations of the customers while striving for their full satisfaction
2. Establish specific objectives, in the Management Review, for the individual departments involved in product creation, laying down responsibilities and timeframes for their achievement
3. Achieve and maintain the prescribed quality of the service by the efficient and carefully planned deployment of human resources, means and materials, in a continuous process of business management improvement
4. Measure quality, environmental and occupational safety performance by means of control and measurement indexes on set objectives and targets
5. Empower human resources and their professional growth at all levels, through the definition of awareness and training programmes,
6. Develop a "food quality and safety culture", site quality and environmental engagement and responsibility among human resources with specific interventions,
7. Give preference to suppliers who ensure products and services that comply as far as possible with food safety, authenticity, quality, and environmental requirements;
8. Integrate checks and controls into the production process stages to prevent product contamination, comply with hygiene and health regulations, and preserve product identity and authenticity;

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9. Act in full compliance with the regulations, national and international laws, legal requirements applicable to the company's sector of activity and other requirements that the company subscribes to;
10. Support the ethical and safety aspects of workers by committing to continuous improvement of its system, based on the dictates of collective bargaining and safety at work requirements while ensuring the protection of workers' privacy;
11. Provide a product that is based on principles of environmental sustainability and ethics whose requirements meet the standards of safety, product authenticity, quality, and those laid down by current legislation, technical specifications, established production schemes, and the ethical code of conduct the company has drawn up;
12. Periodically and accurately review all activities carried out in order to reduce the impact of the company's operations on the environment, such as: waste management, water resources, waste water, atmospheric emissions, environmental noise pollution, consumption of raw materials and energy. Cyclically reconsider how and when to schedule the operation of production machines by also evaluating their energy consumption and the use of renewable energies, optimising the use of energy resources, applying best available technologies (BAT), using raw materials and materials with a low environmental impact;
13. Establish environmental objectives, aware of the impact that the activity carried out may have on the environment and taking into account the knowledge of the context that it operates in;
14. Strive for the continuous improvement of the integrated management system, in particular by reducing the risk of environmentally harmful occurrences and accidents at work, always working within a logic of prevention and reduction of risk for people's health and safety at work;
15. Bring to the attention of the stakeholders the studies, the research & development and technological innovation initiatives undertaken by the company with a particular focus on projects meant to assess and analyse the life cycle of its products according to their intended use and the expectations of consumers and customers;
16. Communicate, disseminate and promote the corporate policy, within the organisation and to all stakeholders, through appropriate methods of guidance, awareness and motivation, which serve to share the objectives and programmes. The organisation seeks an open dialogue with the public and stakeholders, cooperates with the public authorities, takes into account stakeholder requests in order to understand the environmental impacts of its activities and manage possible environmental emergencies. It shares the principles of environmental sustainability with suppliers, customers and other stakeholders involved in the integrated management system
17. Not use child labour or forced labour;
18. Respect freedom of association and the right to collective bargaining;
19. Condemn all unlawful conduct liable to offend people's dignity or physical and/or moral integrity;
20. Comply with social, environmental and worker health and safety regulations;
21. Comply with legislation and agreements applicable to Occupational Health and Safety;
22. Lay down and disseminate Social Responsibility objectives within the company;
23. Communicate internally the results achieved by the Integrated Management System. The organisation seeks an open dialogue with the public and stakeholders, cooperates with the public authorities, takes into account stakeholder requests in order to understand the environmental impacts of its activities and manage possible environmental emergencies. It shares the principles of environmental sustainability with suppliers, customers and other stakeholders involved in the integrated management system

In order to ensure that all those involved in the Company's activities (Area Managers, Employees, Manual Workers, Suppliers, Representatives) comply with the principles and objectives defined in the integrated policy, it was deemed necessary to update the principles contained in the Corporate

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Social Responsibility (*Ann. PG 5.6/02 annexed to the "Management Procedure"*), approved by the Board of Directors at its meeting of 29/09/2023 and adopt an Organisation, Management and Control Model (It. Legislative Decree 231/01, hereinafter the Decree) in accordance with the Guidelines issued by Confindustria.

## **CODE OF ETHICS**

1. NATURE AND PURPOSE OF THE CODE OF ETHICS (hereinafter referred to as: "Code").

This is an official document of Oleificio Coppini S.p.A. (hereinafter referred to as "Coppini", "Company" or "Firm"), approved by the Management, which collects the principles and rules of conduct that all those who operate within and with the Company are subject to. The Code amends and supplements the "Corporate Social Responsibility" document approved by the Board of Directors on 29.09.2023

The purpose of this Code is to declare and disseminate the values and rules of conduct to which Coppini intends to constantly refer in the exercise of its business activities. It reaffirms the principles with which compliance is required and identifies the sanctions to which both the Company's internal staff and external suppliers of goods and services and persons authorised to represent the Company are subject.

### 2. RECIPIENTS

This Code of Ethics is binding and must be observed by all personnel working for the Company or by any person who performs activities in the name of and/or on behalf of the Company, wherever they operate, both in Italy and abroad, including persons who perform functions of representation, administration or management of the Company, collaborators and external consultants acting in the interest of the Company.

### 3. AUTHORITY OF THE IMPLEMENTATION OF THE CODE

Compliance with the Code of Ethics is monitored by the Management. All recipients and third parties should report discrepancies with regard to compliance with the Code to the following e-mail address: [info@coppini.com](mailto:info@coppini.com) or by sending a letter to the following address: Oleificio Coppini Angelo S.p.a. Strada di Recentino 80; 05100 Terni.

### 4. ENTRY INTO FORCE, UPDATE AND PUBLICITY OF THE CODE

This Code has been adopted by resolution of the Board of Directors and shall take effect immediately, after distribution to the recipients.

The Company undertakes to disseminate the Code of Ethics, using all available means and opportunities of communication, including by transmitting it to stakeholders, business interlocutors or attaching it to main contracts.

This Code of Ethics is available on the Company's website and is posted on the notice board in the building where Coppini's activities are carried out.

All persons employed in any capacity in the organisation must be in possession of the Code of Ethics, be familiar with its contents and comply with it.

### 5. TRAINING

In order to ensure the correct understanding of the Code and on the basis of the indications of the Supervisory Board, the Company prepares a training plan aimed at all recipients of the Code within the organisation (including agents/representatives)

### 6. IMPARTIALITY AND CONFLICT OF INTEREST

In carrying out its activities, the Company operates according to principles of fairness, fair competition and transparency vis-à-vis all operators in the market.

Persons required to comply with this Code of Ethics shall, in the performance of their work, act with impartiality and neutrality and make decisions with rigour and transparency, in compliance with the law.

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All Company personnel must avoid situations or activities that could lead to conflicts of interest with Coppini or that could interfere with their ability to make impartial decisions.

In this regard, personnel shall not use their position in the company and the information acquired in the course of their work in such a way as to create a conflict between their personal interests and the interests of the company; moreover, without prejudice to the provisions of the relevant contractual regulations in force, the Company's personnel shall not take up external positions in companies or commercial enterprises whose interests are directly or even only potentially conflicting or interfering with those of Coppini.

#### 7. PERSONNEL MANAGEMENT

In compliance with the Conventions of the International Labour Organisation and current legislation protecting working conditions, the Company is committed to respecting fundamental human rights. In particular, the Company:

- avoids any form of discrimination against its personnel and offers all workers the same opportunities, so that everyone can enjoy fair treatment based on merit, without any discrimination;
- carefully selects and recruits employees, ensuring respect for the values of equal opportunities and equality in line with the relevant legal requirements, the Workers' Statute and the applicable National Collective Bargaining Contracts;
- creates a working environment in which the personal characteristics of the individual worker do not give rise to discrimination;
- ensures the protection of the privacy of staff and their right to work without being subjected to undue influence;
- ensures that internal and external labour relations do not result in the reduction or maintenance in a state of subjection by means of violence, threats, deception, abuse of authority, by taking advantage of a situation of physical or mental inferiority or a situation of need, or by the promise or giving of sums of money or other advantages to those in authority over the person;
- does not establish any employment relationship with persons without a residence permit and does not carry out any activity to facilitate the illegal entry of illegal immigrants into Italy;
- It does not use child labour or forced labour;
- It respects freedom of association and the right to collective bargaining;
- It condemns all unlawful conduct liable to offend people's dignity or physical and/or moral integrity;
- promotes a culture of safety at work, also through direct information and training meetings;
- promotes a culture of respect for the environment;
- promotes awareness of food culture and food safety;
- is committed to eliminating the causes of social inequalities that prevent the full development of the individual and respect for universal human rights by standing side by side with women, children and migrants, not involving minors in dangerous work and only employing them at the age permitted by the law, and not exploiting migrant and female workers.

#### 8. WORKING ENVIRONMENT

The Company considers the following behaviour reprehensible and offensive and therefore does not tolerate it:

- providing services under the influence of alcohol, drugs or substances with similar effects;
- consuming or selling drugs for any reason in the course of work;
- possessing pornographic material in any place that is traceable to the Company.

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The establishment of the Social Performance Team, within the company, within the framework of CORPORATE ETHICS, has the task of internal monitoring, and was done on a voluntary basis, ensuring the representation of all areas of the company.

The SPT is tasked with identifying and prioritising areas of actual and potential non-compliance with the SA8000 standard and suggesting to management the relevant actions to address the risks identified; it must effectively monitor activities at workplaces (worksites) in order to keep the following under control:

- The application of all elements of compliance with SA8000:2014;
- The implementation of actions planned to address the risks identified by the SPT itself;
- The effectiveness of the ways to comply with the Company's policies and the requirements of the standard.

#### 9. USE OF COMPANY ASSETS

Documents, work tools, equipment and facilities and any other tangible and intangible asset (including intellectual property rights and patents) owned by the Company shall be used exclusively for the achievement of institutional purposes, in the manner established by the Company; they may not be used by personnel for personal purposes, nor may they be transferred or made available to third parties and must be used and guarded with the same diligence as one's own property.

The company's assets also include business strategies and plans, customer lists, personnel data, marketing and sales programmes, product pricing policies, financial and accounting data and any other information relating to the company's business, customers and employees.

#### 10. ACCOUNTING AND FINANCIAL MANAGEMENT

The persons required to comply with this Code of Ethics, in whatever capacity involved in the activities of keeping accounts and drawing up financial statements, are required to comply with the rules, including regulations, concerning the truthfulness and clarity of the data and valuations.

The Company prohibits its employees from transferring money, goods or other benefits resulting from unlawful activities; or from carrying out other transactions in connection therewith, so as to obstruct the identification of their origin.

To this end, the Company and its employees must never engage or be involved in activities that involve the acceptance or processing of income from criminal activities, in whatever form or manner.

#### 11. OCCUPATIONAL HEALTH AND SAFETY

The fundamental principles and criteria with which the organisation identifies and which it promotes in order to correctly manage the Health and Safety of workers, in compliance with the best practices for the prevention and protection of risks to workers' Health and Safety, are set out below:

1. avoid all forms of risk;
2. assess risks that cannot be avoided;
3. combat and prevent risks at source;
4. replace what is dangerous with what is not dangerous or is less dangerous;
5. plan prevention actions, aiming at a coherent set of activities that integrates technology, work organisation, working conditions, relations between people and the influence of factors in the working environment;
6. prioritise collective protection measures over individual protection measures;
7. give appropriate instructions to workers. These principles are used by the company to take the necessary measures to protect the health and safety of workers, including occupational activities pertaining to risk prevention, information and training, and the provision of the necessary organisation and means. Lastly, all stakeholders (internal and external to the organisation) must comply with the following principles, as also set out in Art. 20 of It. Leg. Decree 81/08 as amended:



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- A. take care of their own health and safety and that of other persons present at the workplace, on whom the effects of their actions or omissions fall, in accordance with their training, instructions and the means provided;
- B. contribute to the fulfilment of obligations to protect occupational health and safety;
- C. comply with the orders and instructions given, for the purposes of collective and individual protection;
- D. correctly use work equipment, dangerous substances and preparations, means of transport and safety devices;
- E. make appropriate use of the protective equipment made available to them;
- F. obligation to immediately report any deficiencies in the above-mentioned means and devices, as well as any dangerous conditions of which they become aware, and to take direct action in the event of an emergency, within the scope of their competences and possibilities, to eliminate or reduce situations of serious and imminent danger;
- G. not remove or modify safety or warning or control devices without authorisation;
- H. not carry out, on their own initiative, operations or manoeuvres that do not fall under their duties or that may jeopardise their own safety or that of other workers;
- I. participate in education and training programmes organised by the employer.
- J. undergo the health checks provided for by It. Leg. Decree 81/08 or otherwise ordered by the Company Doctor

#### 12. QUALITY AND ENVIRONMENT

The Company considers respect for the environment a primary value in its economic activity and, therefore, orients its strategic choices to respond to the principles of sustainable development. It therefore requires that recipients comply with all legal obligations required by the relevant legislation. The Company complies with and requires its employees to:

- comply with existing environmental protection regulations and principles;
- correctly observe the principles enshrined in ISO 14001 certification with regard to compliance with all environmental requirements in the various company processes

The Company requires third parties acting on its behalf to ensure the protection of the Environment when carrying out the tasks entrusted to them.

All those who work for the Company are responsible for the good management of and compliance with the procedures adopted on Quality and Environment.

#### 13. RELATIONS WITH THE PUBLIC ADMINISTRATION

In all dealings with the Public Administration, Public Authorities and Public Institutions, the Company undertakes to fully and scrupulously implement the applicable laws and regulations and prohibits its employees from giving, offering or promising money or other benefits, or exerting unlawful pressure on public officials, public service appointees, managers, officials or employees of the Public Administration or their relatives or cohabitants to induce them to perform any act in compliance with or contrary to their official duties.

#### 14. EXTERNAL RELATIONS

In its relations with its customers, the Company's primary objective is to increase the degree of satisfaction with and enjoyment of its services/products, raising awareness of the needs of customers, including potential ones, and providing them with true, accurate, complete and correct information. Therefore, these relationships are managed in accordance with principles of maximum cooperation, helpfulness, professionalism and transparency, respecting confidentiality and the protection of privacy in order to create the basis for a solid and lasting relationship of mutual trust.

When choosing suppliers, the Company bases its choice on a careful technical/economic assessment, taking into account the following parameters: product analysis; the range; suitability to guarantee occupational health and safety; cost-effectiveness; technical and professional suitability; competence and reliability. Suppliers are asked to comply with the principles of this Code by signing a commitment document.

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During ongoing supply relationships, the Company maintains relations based on the principles of good faith and transparency and respect for the values of fairness, impartiality, loyalty and equal opportunities.

In its relations with external consultants, collaborators and agents, the Company abides by the same principles and selection criteria as those set out in the previous points.

#### 15. CONTRIBUTIONS, SPONSORSHIPS AND GIFTS

The Company undertakes to sponsor only events that have a cultural, sporting or charitable value, also with the aim of enhancing initiatives in the local area.

The Company undertakes to grant donations exclusively to associations, foundations, public and non-profit bodies that are duly established, in compliance with the requirements of accounting, civil and tax regulations and in accordance with the principles of utmost fairness and transparency.

#### 16. CORPORATE OBLIGATIONS

The Company, in preparing the financial statements and all other corporate communications required by law, requires its employees to:

- comply with the rules of the relevant codes and accounting principles;
- give a true and fair view of the Company's financial position. Furthermore, the Company prohibits:
  - making, other than in the case of a lawful reduction of the share capital, including by means of simulated conduct, repayments of contributions made by the shareholder or releasing him/her from the obligation to make them;
  - deciding distributions of profits or advances on profits not actually earned or allocated to legal reserves or distributing unavailable reserves;
  - fictitiously forming or increasing the capital of the Companies, by allocating shares for an amount lower than their nominal value, deciding the reciprocal subscription of shares, significantly overvaluing contributions of assets in kind or credits, or of the assets of the Companies in the event of transformation;
  - carrying out share capital reductions, mergers or demergers in breach of the legal provisions protecting creditors;
  - ascertaining, by simulated or fraudulent acts, fictitious majorities in company meetings.

#### 17. MANDATORY ACTIONS AND SANCTIONS

The Recipients are obliged to observe and enforce the principles of this Code and to comply with its rules of conduct.

Knowledge of and compliance with the provisions of the Code are an indispensable requirement for the establishment and maintenance of collaborative and fair relations with third parties, to whom the Company undertakes to disseminate all useful information.

Employees who violate the prescriptions contained in the Code will be subject to the measures allowed under the relevant European legislation and the National Collective Bargaining Agreement. Infringement of the provisions of the Code by suppliers, external collaborators and consultants is considered a serious breach of contract and shall result in termination of the contract

18. The Company is committed to ensuring a serene working environment, values professionalism and respects equal opportunities. Directors, executives, heads of department and employees are required to avoid any behaviour that may negatively affect the working environment

19. Coppini forbids all staff, administrators and representatives:

- from any and all kinds of illegal practices
- from any type of conduct that may constitute offences for the application of the sanctions laid down in It. Leg. Decree 231/01
- from accepting gifts of any kind and for any reason

#### 20. RESPONSIBILITIES OF THE SUBJECTS

All area managers or directors are obliged to ensure that the personnel subject to their direction, coordination or control comply with the prohibitions laid down and the moral and ethical principles set out in this code.

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## 21. PROCEEDINGS IN THE EVENT OF AN ESTABLISHED BREACH OF THE CODE

*“Whistleblowing”* - Art 6 paragraph 2 bis of the Decree

It is the obligation of all persons subject to the Code, who become aware of a breach of the obligations laid down and/or of the procedures pertaining to the function (special part of the Organisational Model), to report it to the Supervisory Board. Failure to report is a violation of the Code and is subject to disciplinary sanctions. The area manager or director, in addition to immediately notifying the Board of Directors and the Supervisory Board, must activate the sanctioning procedure. The Supervisory Board will forward a request to the Board of Directors to initiate the sanctioning procedure in the event that the violation is committed by members of top management. Reports should be substantiated and based on precise and concordant facts

The Company and the Supervisory Board, in order to protect the reporting party, guarantee his or her anonymity. To this end, reports may be sent to the e-mail box of the Supervisory Board.

Retaliatory and/or discriminatory behaviour towards whistleblowers is prohibited and will be subject to disciplinary sanctions

As far as employees are concerned, a disciplinary sanction will be imposed following the verification of the violation, which, depending on the seriousness, will range from a verbal warning to termination of the employment contract (sanctions provided for in the sector's National Collective Bargaining Agreement).

As far as consultants, collaborators and suppliers are concerned, specific means of termination of the contractual relationship will be activated.

## 22. CHOICE OF SUPPLIERS

The Company undertakes to use suppliers who offer guarantees of respect for legality, health, working conditions and the environment (supplier commitment on social ethics MOD 5.6/02). It does not enter into business relations with persons whom one might even suspect of belonging to or being close to criminal organisations.

## 23. ENFORCEMENT MECHANISMS OF THE CODE OF ETHICS - DISSEMINATION OF THE CODE

Oleificio Coppini Angelo S.p.A. undertakes to disseminate the Code of Ethics, sending it to all parties obliged to comply with it or attaching it to main contracts. The Code is also sent to the stakeholders. The company is committed to laying down and disseminating Social Responsibility objectives within the company. Published at [www.coppini.com](http://www.coppini.com).

## 24. SUPERVISORY BOARD

The Company appoints the Supervisory Board pursuant to Art. 6 par. 1 lett. B) with the task of supervising the operation of and compliance with the Code and the organisational models and ensuring that they are updated.

To be considered fit to perform its role, the Supervisory Board must meet the following requisites: autonomy, independence and honourableness, professionalism and continuity of action.

The Supervisory Board is responsible for the following tasks:

- supervision of the effectiveness of the model, i.e. consistency between the concrete conduct and the established model;
- examination of the adequacy of the model, i.e. its actual - not merely formal - ability to prevent the prohibited conduct;
- analysis of the maintenance of the model's robustness and functionality requirements over time;
- taking care of the necessary updating of the model in a dynamic sense, in the event that the analyses carried out make it necessary to make corrections and adjustments
- suggestions and proposals for adapting the model. Proposals concerning formal or minor aspects will be addressed to the Personnel and Organisation Department or the Director, while in other cases of greater importance they will be submitted to the Board of Directors;
- verification of the implementation and effective functionality of the proposed solutions (follow-up);
- supervising training activities;

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- communicating to the Head of Management reports received concerning violations of the Code of Ethics;

#### 25. TRAINING

In order to ensure the correct understanding of the Code, the Company, having also consulted the Supervisory Board, draws up a training plan aimed at raising awareness of the ethical rules.

#### 26. UPDATING THE CODE

Changes and/or additions to the Code must be approved by the Board of Directors after consultation with the Supervisory Board. The new version will be disseminated in the same manner as in point 23.

Approved by the Board of Directors on 03/04/2025

Signed by the Chairman

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