

GIELLEPI SPA CODE OF ETHICS

INTRODUCTION

This Code of Ethics summarizes the principles of behavior that directors, managers, employees and collaborators in any capacity, as well as suppliers of Giellepi SpA, must respect in conducting business activities, in carrying out work services and, in general, in internal and external relationships with Giellepi SpA. It does not claim to be exhaustive.

Giellepi SpA is committed to operating with integrity, transparency, and respect towards all stakeholders, including the communities in which we operate, our customers, suppliers, and employees. This Code of Ethics establishes the fundamental principles that guide our business behavior and our commitment to sustainability, social responsibility, and good governance.

MISSION

Giellepi aims to create added value for its customers' brands through innovative ingredients and formulations, supported by scientific data and clinically validated, useful for maintaining well-being and health.

CORPORATE ETHICAL VALUES

The values that define Giellepi SpA's identity and have been consolidated throughout its history form the foundation for the company's proper functioning and the achievement of its mission. Giellepi SpA is inspired by the following principles:

- **Dedication and Care:** We put people at the center. Giellepi has always considered the centrality of people in all corporate and external activities. This means paying attention to each individual's history, to every single detail of their work, both in human relationships and in the work environment.
- **Reputation:** We work daily with a strong sense of ethics and transparency to be credible and trustworthy in every aspect of our business. We respect the work of each individual with the goal of earning the trust of all our employees and our clients.
- **Conscious Innovation:** We interpret market changes to identify the raw materials and technologies that can represent drivers of innovation and modernity for our clients.

For us, innovation means offering practical, ethically sustainable solutions that often address unmet needs.

- **Strategic Collaborations:** We build strong partnerships with international companies that share our values, basing relationships on mutual trust and transparency to generate long-term value.
- **Corporate Culture:** Through our Academy, we invest in scientific research projects aimed at improving our products' understanding, in line with our mission of improving quality of life. We strive to promote a healthy lifestyle and evidence-based nutritional supplements. We work on topics that stimulate new ideas and foster personal development.
- **Sustainability:** We put the well-being of our employees at the center, promoting a work-life balance. We support local businesses and promote initiatives to protect the environment and promote corporate culture.

PRINCIPLES OF BUSINESS OPERATION

Giellepi SpA adopts the following operating principles:

- **Integrity and Transparency:** We operate with honesty and transparency in all our activities, ensuring that the information we provide is truthful, accurate, clear, and timely. All our business decisions are made in compliance with applicable laws and regulations.
- **Environmental Sustainability:** Although Giellepi does not own any production facilities, we are committed to minimizing our environmental impact:
 - Let's reduce the use of plastic and paper in offices.
 - We use electricity from 100% renewable sources.
 - We actively participate in local sustainability initiatives.
 - We promote the adoption of hybrid vehicles to reduce emissions.We also explore opportunities to contribute to the circular economy by evaluating the use of secondary raw materials.
- **3. Social Responsibility:** the well-being of our employees is at the heart of our business:
 - We promote smart working and provide benefits in the form of welfare services.
 - We ensure gender equality and an inclusive, fair, and respectful work environment.
 - We invest in ongoing training, with a dedicated annual budget and refresher courses to improve skills.
 - We contribute to local initiatives, supporting social organizations, and promote community involvement.
- **Quality and Innovation:** Our mission is to offer high-quality and safe products, investing over 20% of our profits in innovation and scientific activity:

- We ensure that all our ingredients meet the highest standards of safety and intrinsic quality.
- We partner with suppliers who demonstrate ethical and sustainable practices, monitoring their compliance through regular questionnaires and audits.
- **Supplier Relations:** We carefully select our suppliers, ensuring they meet ethical, environmental, and quality standards:
 - We monitor supplier behavior through questionnaires and KPIs.
 - **Kosher and Halal** certification requirements , to ensure global inclusivity.
- **Governance and Compliance:** Our governance system is based on:
 - Regular meetings with management to assess company positioning, share objectives, and update regulations.
 - An ISO 9001 certified quality management system, with procedures and periodic reviews to ensure process efficiency and effectiveness.
 - Continuous interaction between internal functions for better sharing of issues related to the normal business flow

GENERAL GUIDELINES

- **Human Rights**

Respect for fundamental rights is essential. Giellepi SpA promotes and protects human rights in all circumstances, rejecting any form of discrimination based on gender, ethnicity, language, religious or political belief, social status, or health conditions. The company adopts the principles enshrined in the Universal Declaration of Human Rights, the UN Convention on the Rights of the Child, the International Labour Organization, and the OECD Guidelines for Multinational Enterprises.
- **Compliance with Laws**

Giellepi SpA operates in full compliance with the laws and regulations in force in the territories where it operates.
- **Integrity and Conflicts of Interest**

Directors, employees, and collaborators of Giellepi SpA act with integrity, avoiding situations that could create conflicts of interest between their roles and the company's interests.
- **Fight against Corruption**

Giellepi SpA categorically rejects corruption. Bribing or attempting to bribe public or private officials is never permitted under any circumstances. No one may offer, promise, or accept money, goods of any kind, or

advantages to obtain or perform undue services.

- **Fair Competition**

Giellepi SpA believes in fair competition as a fundamental element for corporate development and its market reputation. Therefore, it complies with competition and antitrust regulations, avoiding any behavior that could compromise free and fair competition.

- **Commitment to Dialogue**

Giellepi SpA promotes ongoing dialogue with all its stakeholders and their representatives, respecting mutual interests, and guarantees timely responses to every request.

- **Importance of Communication**

Communication is seen as an essential tool for sharing skills and strengthening a sense of belonging to the company.

- **Valorization of Diversity**

Giellepi SpA is committed to promoting greater awareness of diversity, encouraging a culture of inclusion in every area.

- **Value of Training**

Giellepi SpA recognizes training as a fundamental tool for increasing employee competence and the overall value of the company.

- **Collaboration and Cooperation**

Collaboration and cooperation, among employees and across different company departments, are essential. These values are based on mutual attention to each other's interests and a shared commitment to growing the company.

- **Data and Personal Information Protection**

Giellepi SpA guarantees the confidentiality of the personal data in its possession in accordance with current privacy regulations. The data is used exclusively for purposes related to company operations, in compliance with the security measures adopted.

- **Confidentiality of Information**

Information relating to company activities that has not yet been publicly disclosed is considered confidential and must be treated with the utmost discretion by directors, employees, and collaborators. The use of company information, both internally and externally, is governed by an appropriate internal procedure.

- **Health and Safety at Work**

Giellepi SpA is committed to ensuring a safe working environment that respects the personal dignity of each individual. It complies with current regulations regarding occupational health and safety, adopting the best technical solutions to ensure compliance with the highest standards. In compliance with current health regulations, it promotes regular medical check-ups. The company combats any form of violence, mobbing, or discrimination, ensuring peaceful and dignified working conditions for all.

- **Environmental Protection**

Giellepi SpA recognizes the environment as a precious asset, adopting technologies and processes that reduce environmental impact and promote the conservation and regeneration of natural resources. The company encourages environmental awareness among all its stakeholders.

- **Sharing the Code of Ethics**

Giellepi SpA requires all those who collaborate in its activities to comply with the principles and behaviors outlined in this Code.

CONCLUSION

This Code of Ethics represents Giellepi SpA's commitment to sustainable and responsible growth. All employees, collaborators, and partners are expected to share these principles to ensure that our actions reflect our corporate values.

Giellepi S.p.A. encourages all employees, collaborators, and partners to report any behavior, situation, or practice that violates the principles and provisions of this Code of Ethics, company policies, or applicable laws. Reports may be submitted in writing to the dedicated email address: bd@giellepi.it

All reports will be treated with full confidentiality regarding the identity of the whistleblower, the person reported, and the facts reported. Reports will be handled with the utmost care and impartiality, in compliance with applicable laws and the principles of fairness and transparency.

Giellepi S.p.A. guarantees that no whistleblower in good faith will suffer retaliation, unlawful influence, inconvenience, or discrimination of any kind for reporting a possible violation of the Code of Ethics or internal procedures. All reports are recorded, analyzed, and addressed promptly, in order to take the necessary corrective measures to verify the facts and prevent further incidents.


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