



**MODEL OF ORGANIZATION, MANAGEMENT AND CONTROL  
PURSUANT TO LEGISLATIVE DECREE 231/01  
BY**

**DOLOMITES MILK S.R.L.**

**CODE OF ETHICS**



## **INDEX**

### **FOREWORD**

#### **1. GENERAL PRINCIPLES**

- 1.1. Objectives
- 1.2. Basic principles
- 1.3. Target audience
- 1.4. Whistleblowing
- 1.5. Control tasks of the Supervisory Board
- 1.6. Disciplinary proceedings and sanctions

#### **2. HUMAN RESOURCES AND EMPLOYMENT POLICY**

#### **3. OCCUPATIONAL HEALTH AND SAFETY**

- 3.1. The company's occupational health and safety management system (HSMS)

#### **4. ENVIRONMENTAL POLICY**

- 4.1. The corporate environmental protection management system (EMS).

#### **5. BEHAVIOR TOWARD THIRD PARTIES AND IN BUSINESS**

- 5.1. General principles
  - 5.1.1. Conflict of interest
  - 5.1.2. Gifts or other benefits
- 5.2. Relations with the Public Administration
- 5.3. Relationships with consultants
- 5.4. Relations with political and labor institutions
- 5.5. Customer relations
- 5.6. Relations with suppliers and subcontractors.
- 5.7. Relations with competitors
- 5.8. Relations with the mass media, Research Societies, trade associations and other similar bodies
- 5.9. Community relations

#### **6. CONDUCT IN THE MANAGEMENT OF THE COMPANY**

- 6.1. Relationships with partners
- 6.2. Capital and equity transactions
- 6.3. Transparency and truthfulness in tax and customs accounting and documentation

#### **7. THE PROTECTION AND USE OF CORPORATE ASSETS**

- 7.1. Corporate information systems.
- 7.2. Industrial property and confidentiality

#### **8. CONFIDENTIALITY AND DATA PROTECTION**



## Foreword

Dolomites Milk S.r.l. is a limited liability company, headquartered in 39054 Renon (BZ), Via Gastiers 3, with fully resolved, subscribed and paid-up share capital of 10,000,000.00 euros, registered with the Chamber of Commerce, Industry, Handicraft and Agriculture of Bolzano with tax code, Part. VAT and registration number 02982020212. The Company is part of the Loacker group of companies and is subject to the management and coordination of the majority shareholder (88%) A. Loacker SpA.

The Company's object is the production, processing and distribution of foodstuffs, in particular dairy products. The company may carry out all other commercial, industrial, financial, movable and real estate activities that will be deemed by the administrative body to be instrumental, accessory, connected, necessary or useful for the realization of the activities that constitute the corporate object.

Since its founding, the Company has inspired its activities and corporate policies by a set of ethical and operational principles and values, which nurture efficiency, good management and development of business activities over time, with social responsibility, respecting all stakeholders and the community, as well as current legislation.

In adherence to these ethical and operational principles and values, therefore, this Code of Ethics (hereinafter also the Code) has been prepared, part of a more complex Model of Organization, Management and Control pursuant to Legislative Decree 231/2001, as amended, the observance of which is of fundamental importance, both for the proper functioning and reliability of the Company and for the protection of its prestige, image and *know-how*, factors that constitute a decisive asset for the success of the company.

The Code thus encapsulates a set of values and guidelines that must be respected by all those who come into contact with Dolomites Milk S.r.l. or, more generally, are legitimate stakeholders in it.

## 1. General principles

### 1.1. Objectives

The Code of Ethics is drafted to ensure that the business of Dolomites Milk S.r.l. continues to be managed ethically and sustainably in all its aspects, with a sense of social responsibility and in compliance with the fundamental principles encapsulated in this Code.

All those who work and operate in Dolomites Milk S.r.l., without distinction or exception, are committed to observing and enforcing these principles within the scope of their functions and responsibilities. All actions, operations and negotiations carried out and, in general, the conduct put in place by the Recipients (as better defined in paragraph 1.3 below) in carrying out their work activities must be inspired by current regulations and internal procedures, in particular, by the company management system and company procedures.

The Code of Ethics is also drafted to ensure that Employees inspire their activities to the achievement of the Company's main objectives and behave correctly in the performance of their duties and tasks thus refraining from engaging in unlawful conduct and preventing the commission of offenses considered by the regulations under Legislative Decree 231/2001.

The pursuit of the identified ethical objectives will be ensured through training activities aimed at making all stakeholders aware of the existence and contents of this Code of Ethics. Dialogue and participation are indispensable for all Recipients to share the values in this Code.

### 1.2. Fundamental Principles

In order to ensure the achievement of the stated objectives, all personnel of Dolomites Milk S.r.l. are required to comply with the basic principles dictated by the Company's ethical standards:



- **Compliance with the law:** The Company aims to comply with all applicable laws and regulations wherever (in any territorial, spatial or simple context) Dolomites Milk S.r.l. is present, conducting business with integrity and in a manner that enhances the Company's reputation.
- **Respect for Human Rights:** All activities shall be conducted with respect for human dignity and human rights. The Company agrees with the UN Universal Declaration of Human Rights and the fundamental Conventions of the ILO (International Labor Organization) and will not tolerate the use of juvenile labor in its facilities or those of Suppliers and Subcontractors. The management of human resources must be carried out in compliance with the principles dictated by this Code of Ethics as well as with the regulations in force in the Italian State; in particular, the Company neither admits nor tolerates forms of discrimination on the basis of sex, sexual orientation, *disability*, religion, color, nationality, race or ethnic origin, towards Employees and among Employees.
- **Health and Safety of Employees:** All workplaces must be set up in compliance with the current rules, laws and regulations on health and safety in the workplace; in particular, they must meet the best possible *standards*, be safe and suitable to promote the prevention of accidents and minimize exposure to health hazards to employees.
- **Respect for the environment and environmental impact:** The Company undertakes to comply with current environmental protection regulations, as well as to launch an environmental management system that monitors and assesses risks to the environment arising from its activities, products and means used, waste production, emissions, etc., in order to reduce environmental impact by means of appropriate measures.
- **Moral responsibility and fairness in business:** The Company will conduct its business activities in compliance with the laws and regulations on competition as well as on the protection of intellectual property, copyright, trademarks and patents. The Company will not tolerate any form of bribery or extortion, blackmail or other similar forms of payment made or received from third parties. All Employees shall be informed so as to avoid conflict of interest or engage in business that may integrate conflict of interest, whether in professional relationships or personal activities. All operating units and Employees of Dolomites Milk S.r.l. shall act in compliance with this Code of Ethics and the company's rules of conduct as well as the rules of conduct towards third parties and in business (referred to in paragraph 5 below).
- **Transparency in business operations:** All business operations will be fully and accurately recorded, in accordance with "best practice" in terms of accuracy and clarity *of reports* both externally and internally; to this end, all Employees are required to comply with Dolomites Milk S.r.l.'s internal procedures on control and *reporting* at all levels.
- **Data protection and security:** Company assets will also be protected through the protection of confidential information. The Company and its Employees are bound secrecy and confidentiality of information and data learned during the course of their work.
- **Dissemination, information and training:** All Employees shall be provided with specific and appropriate training for the performance of the role or task entrusted, as well as training suitable for ensuring compliance with the Company's Organizational Model and this Code of Ethics, in addition to training on environmental protection, health and safety in the workplace, and prevention of workplace accidents. The Company will also demand compliance with and sharing of the standards set forth in this Code of Ethics from suppliers and subcontractors, noting in particular that the latter will not exploit child labor, will not tolerate discriminatory practices of any kind at their production units, and will comply with the regulations and laws set forth on workplace health and safety, as well as environmental protection regulations.

### 1.3. Target audience

The Code must be observed by all Directors, the Management, Employees, and Collaborators (to be understood as consultants, proxies, partners), hereinafter collectively the Recipients.



Each Recipient is obliged to know the Code, to actively contribute to its implementation, promotion and to report any shortcomings and/or violations. Dolomites Milk S.r.l., for its part, undertakes to promote awareness of the Code among Recipients with appropriate information and training procedures.

The Code will be made known to all those who have dealings with the Company.

Dolomites Milk S.r.l. condemns any behavior that contradicts the values, principles and provisions dictated by the Code, even where such behavior is supported by the presumed conviction of acting to the advantage or in the interest of the Company.

Compliance with the rules of the Code must be considered an essential part of the contractual obligations of the Recipients and in particular of Employees and Management also pursuant to and for the purposes of Articles 2104 and 2105 of the Civil Code.

For full compliance with the Code, each Recipient may contact the Supervisory Board established by the Company pursuant to Legislative Decree 231/2001.

#### **1.4. Whistleblowing**

The Recipients of this Code of Ethics are required to comply with it in all its parts and at the same time to supervise its observance by all other Recipients at any level. To this end, Dolomites Milk S.r.l. has activated an internal channel for reporting any offenses and violations of the Company's Organizational Model.

#### **1.5. Control Tasks of the Supervisory Board**

In addition to the widespread control over the application of the Code of Ethics which every employee is responsible for, Dolomites Milk S.r.l. has set up within itself, pursuant to Legislative Decree 231/2001, a Body appointed by the Board of Directors and with a collegial composition, which is responsible for the control, exact observance, application and updating of the Organizational Model as a whole and this Code of Ethics. The duties and powers of the SB with respect to the Organizational Management and Control Model are specified in the appropriate section of the Organizational Model.

#### **1.6. Disciplinary proceedings and sanctions**

Violation of the norms of the Model, including the principles of the Code, understood as such the proposition of actions or behaviors that do not comply with the prescriptions of the Model, or the omission of actions or behaviors prescribed therein, as well as the violation of the measures for the protection of the reporter of behaviors detrimental to the Model or reports with malice or gross negligence of violations of the Model that prove to be unfounded may constitute non-fulfillment of the obligations of the employment relationship, with all the consequences provided for by current regulations and collective agreements, if any, including with regard to the preservation of the employment relationship and may also result in compensation for damages arising to Dolomites Milk s.r.l..

The types of sanctions are provided for in current regulations and/or collective bargaining.

The sanctions imposed will be proportionate to the seriousness of the violation and never such as to harm the dignity of the human person.

As for non-compliance with the provisions set forth in this Code of Ethics, as well as in the event of the commission of relevant offenses pursuant to Legislative Decree 231/2001 by consultants, agents, managers, partners, collaborators in general, and suppliers of goods or services, the relevant penalty provisions will be contained in the respective contractual agreements that determine the conditions of the relationship to.

## **2. Human resources and employment policy**

Human resources are an essential and indispensable element of Dolomites Milk s.r.l.

The Company offers everyone the same opportunities for work and professional growth, making sure that everyone can enjoy fair treatment based on merit criteria, without any discrimination. Dolomites Milk S.r.l. is committed to developing the abilities and skills of Employees so that, within the scope of work



performance, the energy and creativity of individuals finds full expression for the realization of their potential.

The Company shall provide for the adoption of merit, competence and otherwise strictly professional criteria for any decision regarding an Employee or Collaborator. The Company also provides for the selection, hiring, training, remuneration and management of Employees and Collaborators without any discrimination.

Dolomites Milk S.r.l. protects the psycho-physical integrity of the worker, respect for the worker's personality, preventing the worker from being subjected to unlawful conditioning or undue hardship.

The Company expects Employees and Collaborators to cooperate with each other to maintain a climate of respect for each other's dignity, honor and reputation in the company and to take action to prevent insulting or defamatory attitudes.

Every member of Management, Employee, Collaborator has the right to work in an environment free from discrimination on the basis of race, class, age, national origin, disability, language, religion, sex, ethnic, labor union or political affiliation, or otherwise.

Dolomites Milk S.r.l. requires that internal and external labor relations be marked by the utmost fairness and no harassment, meaning:

- The creation of an intimidating, hostile or isolating work environment against individuals or groups of workers;
- The hindering of individual job prospects of others for mere reasons of personal competitiveness or discriminatory reasons.

### **3. Occupational health and safety**

The health and safety of employees and all those who may be affected by the activities of Dolomites Milk S.r.l. is a top priority of the Company.

Dolomites Milk S.r.l. is committed to providing a safe working environment that fosters accident prevention and minimizes exposure to health risks in order to eliminate illnesses and accidents in the workplace, with particular reference to the specific risks of the work that is conducted at the production facilities and construction sites where the Company operates.

To this end, Dolomites Milk S.r.l. inspires its corporate policy to pursue the goal of "zero accidents," and to this end it will adopt strategies for periodic and systematic assessment, of workplace risks, healthiness of work environments, and accident risk management.

#### **3.1. The company's occupational health and safety management system (HSMS)**

Through a corporate occupational health and safety management system (HSMS), Dolomites Milk S.r.l. is committed to spreading and consolidating a culture of safety itself from a prevention perspective, developing risk awareness and promoting responsible behavior by all Recipients.

Dolomites Milk S.r.l.'s objective is to protect human resources, constantly seeking the sharing of the objective outlined above, both internally and externally, with suppliers, subcontractors, business partners and companies involved in the Company's activities, with a view to the constant improvement of the SGS.

In order to ensure the implementation of all planned and necessary tools, Dolomites Milk S.r.l. ensures that the SGS is provided with adequate economic, financial and personnel resources that are maintained over time, resorting to external resources in all cases where there are no adequate skills within Dolomites Milk S.r.l.

### **4. Environmental policy**

Environmental protection and energy conservation are a fundamental value and a primary goal of the Company in order to minimize the negative environmental consequences of its operations.



#### **4.1. The corporate environmental protection management system (EMS).**

Through a corporate environmental protection management system (EMS), Dolomites Milk S.r.l. is committed to disseminating and consolidating a culture inspired by the protection of the environment from a prevention perspective, developing risk awareness and promoting responsible behavior by all Recipients. Dolomites Milk S.r.l.'s objective is to protect the environment, constantly seeking the sharing of the objective outlined above, both internally and externally, with suppliers, sub-suppliers, business partners and companies involved in the Company's activities, with a view to the constant improvement of the EMS. In order to ensure the implementation of all planned and necessary tools, Dolomites Milk S.r.l. ensures that the EMS has adequate economic, financial and personnel resources that are maintained over time, resorting to external resources in all cases in which there are no adequate skills within Dolomites Milk S.r.l.

## **5. Behavior toward third parties and in business**

### **5.1. General principles**

Dolomites Milk S.r.l. in the management of business and business relations, is inspired by the principles of legality, loyalty, honesty, fairness, transparency, efficiency and openness to the market.

Every business operation and transaction must be properly recorded, authorized, verifiable, legitimate, consistent and congruous.

Recipients whose actions may be in any way referable to Dolomites Milk S.r.l., shall follow proper conduct in business dealings of interest to the Company itself and in dealings with the public administration, regardless of the competitiveness of the market and the importance of the business transacted.

Economic resources, as well as the Company's assets, must not be used for illegal, improper or even dubious purposes. No advantage may accrue to the Company from illegal practices, illegitimate financial or any other kind of favor.

#### **5.1.1. Conflict of interest**

Recipients must pursue, each in the performance of his or her activities, the general objectives and interests of Dolomites Milk S.r.l.. Accordingly, they shall refrain from carrying out activities with respect to which they (or close relatives) have or may have interests that conflict with those of Dolomites Milk S.r.l. or that may interfere with their ability to make, in an impartial manner, decisions in the best interests of the Company and in full compliance with the rules of the Code.

In the event that the conflict of interest cannot be avoided, Directors, Management and Employees with a conflicting interest are required to inform the relevant bodies without delay. In particular, Directors must inform the other Directors of any interest they, on their own behalf or on behalf of third parties, have in a particular transaction of the Company. Directors, Management and Employees shall respect the decisions that are made by the Company in this regard.

#### **5.1.2. Gifts or other benefits**

In the performance of work activities or in representing Dolomites Milk S.r.l., it is not permitted, even if not for the purpose of obtaining a profit or advantage, to pay or offer, directly or indirectly, gifts, payments, material benefits or other utilities of any amount to customers, suppliers, public officials or third parties in general.

Acts of business courtesy, such as gifts or forms of hospitality, are permitted when they are of modest value and in any case such that they do not compromise the integrity or reputation of either party and cannot be interpreted by an impartial observer as aimed at acquiring improper advantages. In any case, this type of expenditure must always be authorized by the appropriate business function and properly documented.

Recipients acting on behalf of Dolomites Milk S.r.l. who receive gifts or favorable treatment, not directly attributable to normal courteous relations, must promptly inform their hierarchical superior and the SB in the manner described in the relevant whistleblowing procedure.





## 5.2. Relations with the Public Administration

In relations with Authorities and Public Institutions (Italian or foreign, with their officials and employees, with public officials and public service officers, with whom the Company comes into contact as part of its business) the Recipients whose actions may be in some way referable to Dolomites Milk S.r.l., must act in full compliance with the principles of this Code, the applicable regulations and in any case with fairness and transparency.

Dolomites Milk S.r.l. takes care of the establishment of refresher programs on the evolution of current legislation for already trained as well as newly hired personnel.

Dolomites Milk S.r.l. will strictly adhere to state, regional or provincial law regulations provided for the issuance of any authorization measures.

In the event Dolomites Milk S.r.l. applies for the disbursement of public financing, subsidized tax or contribution treatments or other forms of benefits that require specific requirements, it is made explicit obligation to proceed with truthfulness, fairness, transparency and full compliance with the laws in force. Likewise, in the event of the allocation of the benefit, an explicit obligation is made to allocate disbursements to the specific authorized purpose, with immediate and formal notification to the disbursing entity in the event that any essential condition for the disbursement of the loan/contribution has failed.

Corrupt practices, illegitimate favors, collusive behavior, solicitation, directly and through third parties, of personal and career advantages for oneself, Dolomites Milk S.r.l. or others, are strictly prohibited and may be sanctioned.

## 5.3. Relationships with consultants

In maintaining relationships and appointing consultants Dolomites Milk S.r.l. adheres to the following principles:

- prior to the assignment of each engagement, the Society verifies the suitability of the consultant;
- the terms of the relationship are established in a manner consistent with current regulations and set forth in a special written agreement;
- the fees and/or payments stipulated in the agreement are reasonable and congruent with the service to be provided;
- the contractual agreement provides specific terms for the performance of services, as well as the respective rights of the parties on the contractual term;
- no payment can be made for the specific legal transaction except in the manner and terms stipulated in the contract;
- in any case no payment can be made in cash.

## 5.4. Relations with political and labor institutions

Dolomites Milk S.r.l. does not make contributions, direct or indirect and in any form, to political and labor parties, movements, committees and organizations, their representatives and candidates, except within the scope permitted by current regulations and in compliance with the principle of transparency.

## 5.5. Customer relations

Dolomites Milk S.r.l. pursues its business success by offering quality products and services in compliance with applicable regulations, market, customer and consumer protection.

In its relations with customers, the Company is guided by the principles of cordiality, equal treatment and impartiality. Dolomites Milk S.r.l. is committed to respecting the right of customers to receive quality services and to have complete information about the products and services offered so that customers can make informed decisions.

Concretely this means:

- An exact definition of contractual relationships (costs, rates)
- A timely maintenance of contractual conditions
- Friendliness, speed and timeliness of responses





- fairness in handling sensitive data professional competence.

#### **5.6. Relations with suppliers and subcontractors.**

Recipients, to the extent of their competence, are required to monitor that suppliers commit their conduct to the ethical standards of the Code.

The Company recognizes that attention to the selection and control of its suppliers and subcontractors is an essential element for the provision of quality, safe and competitive products and services on the market. In the event that there are well-founded doubts about the ethical behavior and compliance with the aforementioned principles by a supplier or subcontractor, Dolomites Milk S.r.l. will take appropriate action without delay.

In the selection of suppliers and sub-suppliers, Dolomites Milk S.r.l. Employees are obliged to scrupulously observe all internal rules and procedures in order to meet requirements in relation to quality, safety and cost.

#### **5.7. Relations with competitors**

Dolomites Milk S.r.l. reaffirms that it is guided by the principles of loyalty, legality, fairness, transparency, efficiency and reliability in managing business and business relations.

Dolomites Milk S.r.l. particularly pursues its business success in the market through offering innovative and competitive products and services and in compliance with all national and international regulations set to protect fair competition.

In particular, within the framework of the current national and international regulations on competition, the activities of Dolomites Milk S.r.l. and the conduct of Recipients whose actions may be in some way referable to the Company, must be inspired by the most complete autonomy and independence with respect to the conduct of Dolomites Milk S.r.l.'s competitors in the domestic and foreign markets.

#### **5.8. Relations with the mass media, Research Societies, trade associations and other similar bodies**

Information transmitted externally referable directly or indirectly to Dolomites Milk S.r.l. must be timely, complete, truthful and transparent.

Relationships with the mass media, research institutes, trade associations and other similar bodies, as well as the disclosure of other information, are reserved for the members of the Board of Directors or the person specifically delegated to do so, in compliance with the limits of the delegation granted.

#### **5.9. Community relations**

Dolomites Milk S.r.l. is also committed to the local community and community in which it operates, fostering a proper relationship with local authorities, creating and fostering new job opportunities for the community of local realities.

To this end, Dolomites Milk S.r.l. is committed to engaging in dialogue with local authorities, local business associations, local academic and professional organizations, and the community in order to promote a culture of health and safety in the workplace, as well as to raise awareness and empowerment on issues of occupational safety and environmental protection.

### **6. Behavior in the management of the Company**

#### **6.1. Relationships with partners**

Directors must manage the Company in accordance with fairness, transparency and legality, pursuing the interest and welfare of the shareholders.

Directors shall refrain from engaging in any conduct aimed at unlawfully influencing the vote of shareholders at shareholders' meetings.



## **6.2. Capital and equity transactions**

The Board of Directors, the Management and Employees, if involved in the performance of duties related to the following operations:

- Distribution of profits and reserves,
- capital transactions (increases and decreases in the same), as well as fulfillments related to such transactions, such as contributions in kind and valuation of the same,
- Mergers, demergers, and transformations,

are required to act with fairness, honesty, transparency and in a manner that complies with the civil law for the protection of the interests of the Company's creditors in the maintenance of their asset guarantees.

In preparing documents and/or reports pertaining to the aforementioned transactions, the Directors, Management Employees and Collaborators are required to ensure the completeness, clarity and truthfulness of information and the utmost accuracy in the processing of information and data.

## **6.3 Transparency and truthfulness in tax and customs accounting and documentation**

The principles of transparency and truthfulness in accounting records, as well as in tax and customs documentation, not only apply to the work of Management and Employees in administrative offices, but also apply to each Employee, in whatever area of the company he or she works.

Accounting, tax and customs transparency and truthfulness is based on the truth, clarity and completeness of basic information for the relevant accounting records and tax and customs documentation and declarations.

Management and Employees are therefore required to cooperate to ensure that management events are correctly and timely represented in accounting and related tax and/or customs documentation.

Appropriate supporting documentation of the activity performed shall be kept on file for each transaction. Each record must reflect exactly what is reflected in the supporting documentation.

It is the responsibility of every member of Management and every Employee to ensure that documentation is easily traceable and ordered according to logical criteria and in accordance with the procedures established by the Company.

## **7. The protection and use of corporate assets**

The corporate assets of Dolomites Milk S.r.l. consist of tangible physical assets, such as furniture, plant, equipment, cars, machinery, computers, and intangible assets, such as confidential information, *know-how*, trademarks, technical knowledge developed and disseminated to and by the Directors, members of Management and Employees, and licenses.

Security, that is, the protection and preservation of these assets, is a fundamental value in safeguarding corporate interests.

The Board of Directors, Management, and each Employee is personally responsible for maintaining this security through compliance with and dissemination of the company's directives in this regard and by preventing fraudulent or improper use of company assets.

The use of such assets by the Board of Directors, Management and Employees must be functional and exclusive to the performance of corporate activities or for the purposes authorized by the corporate functions concerned.

### **7.1. Enterprise Information Systems.**

Maintaining a good level of cybersecurity is essential to protect the information that Dolomites Milk S.r.l. uses every day and is vital to the effective development of corporate business policies and strategies.

WHEREAS the use of the company's IT and telematic resources must always be inspired by the principles of diligence and fairness, Recipients who make use of the company's IT systems must adopt the additional



internal rules, aimed at avoiding unconscious and/or improper behavior, which could cause damage to the Company, other Recipients or business partners, in compliance with the instructions provided by the competent company function.

## **7.2. Industrial property and confidentiality**

Know-how, technical knowledge, developed and disseminated to and by the Board of Directors, Management and Employees, and licenses are central and indispensable assets of the company.

Security, that is, the protection and preservation of these assets, is a fundamental value in safeguarding corporate interests.

Any news, information and other material pertaining to business organization, negotiations, financial and commercial operations, *know-how* (contracts, deeds, reports, notes, studies, drawings, photographs, software), obtained by a Recipient in connection with his or her work for Dolomites Milk S.r.l. is strictly the property of Dolomites Milk S.r.l. itself. Upon termination of the working relationship, for whatever reason, with Dolomites Milk S.r.l., all material forming company *know-how*, including documents and computer supports, must be returned to the Company.

The Directors, Management, Employees and each Recipient of this Code are obliged to consider as strictly secret and confidential all documents and all business information and technical-industrial experience of particular value and other information, including commercial information, relating to the products and services, processes, strategies and projects covered by the activity of Dolomites Milk S.r.l., communicated and/or acquired during the term of a contract, and this even after the expiration of the contractual relationship.

It is forbidden, for the Recipients, to use said news for their own benefit or for the benefit of third parties, and to disclose said information to third parties or to make any use of it in such a way that could cause harm to Dolomites Milk S.r.l..

## **8. Confidentiality and data protection**

In carrying out its activities Dolomites Milk S.r.l. acquires, keeps, processes, communicates and disseminates documents and other data containing personal information of Employees, Customers, Suppliers, Collaborators and business contacts. At the same time Dolomites Milk S.r.l. holds with it confidential documents and information related to negotiations or business, projects and procedures.

The trust of these people in entrusting their data, as well as the protection of their confidentiality and that of the information entrusted to them, is a fundamental value for Dolomites Milk S.r.l.

Dolomites Milk S.r.l. is therefore committed to ensuring the proper handling of all personal data and information used in the conduct of its business activities.