



Perfetti Van Melle Code of Conduct



January 2022

A MESSAGE FROM OUR CHAIRMAN

Our Group's reputation for being an honest, fair and capable firm is one of our most valuable assets, which we are determined to preserve. Maintaining high ethical standards within our company and in our relations with customers, suppliers, authorities and the public in general is vital to our continuous success wherever we operate.

For this reason, we have developed the Perfetti Van Melle Code of Conduct (CoC), which sets forth the principles that apply to all Perfetti Van Melle employees and other stakeholders everywhere and in every circumstance. It is critical that its content is well known and understood by each of us, as it highlights our responsibility, as a Group and as individuals, to implement and protect our core Values and our ethical standards in the way we do business.

Let's adopt this Code of Conduct and Core Values to guide our behavior every day and everywhere making PVM a great company to work for and to work with.

Ubaldo Traldi
Chairman of the Board
Perfetti Van Melle Group B.V.

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VISION, MISSION & PURPOSE

OUR VISION

We will enhance our world leadership in confectionery by creating value for consumers through innovative and gratifying high-quality products.

OUR MISSION

We at Perfetti Van Melle:

- Develop, manufacture, and market high-quality and innovative products for our consumers through the efficient use of our resources and in collaboration with our business partners.
- Create a fulfilling workplace for our employees built on trust, mutual respect, and appreciation of their diversity.
- Value the role we play in our communities, as a socially and environmentally committed organization.
- Generate economic value through superior growth and profitability.

Continuous focus on these principles will lead us toward Our Vision.

OUR PURPOSE

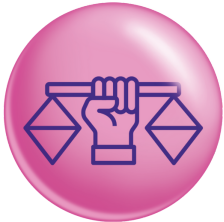
Innovative Treats. Better Future.

We create innovative treats to surprise and delight our consumers. We continually improve our products and processes to enhance the lives of all our stakeholders and reduce our environmental impact.

OUR VALUES



Living the Perfetti Van Melle Values requires courage, vision, trust, commitment, and pragmatism. The following values will guide our actions in realizing our mission:



**INTEGRITY WITHOUT
COMPROMISE**

We conduct our business with honesty, integrity, and respect for those with whom we have relationships.



**ACHIEVING
EXCELLENCE**

We pursue quality in everything we do. We strive for continuous improvement in the way we operate. Unremitting attention is given to details at every stage and resources are used in the most efficient way.



**DEDICATION TO THE
CONSUMER**

We will meet and exceed the differing needs and expectations of our consumers, offering them high-quality, state-of-the-art, and innovative products.

VISION, MISSION, PURPOSE & VALUES

OUR VALUES

VISION, MISSION, PURPOSE & VALUES



**CARE FOR
OUR PEOPLE**

We are committed to creating a global workplace where teamwork, involvement, open communication, flexibility, and fun exist. We treat our people fairly; we value different styles, skills, experiences and backgrounds; and, acknowledge that these differences result in greater creativity and better insights. We encourage them to take initiative and expect them to approach their jobs with passion and commitment. We offer our people training opportunities and ongoing development so that each individual can reach his or her full potential.



**SOCIAL AND
ENVIRONMENTAL
RESPONSIBILITY**

We will conduct our business as responsible members of society, respecting the laws of the countries in which we operate, contributing to the progress of the local communities in line with the legitimate role of the business. We will operate safely, responsibly, and with sound environmental practices, aimed at minimizing our impact on the environment and working toward long-term sustainability.



INDEPENDENCE

We are committed to achieving ambitious business goals while securing our company's profitability, thus ensuring our independent growth.

WHAT IS THE CODE OF CONDUCT?



The Code of Conduct is a document approved by the Board of Directors of Group B.V. (PVM Group BV) that contains the principles and commitments undertaken by all the Companies belonging to PERFETTI VAN MELLE GROUP (Group) as a whole and by each one of its employees, both toward the Group and to third parties.

We respect and support internationally recognized human rights guidelines as laid out by the United Nations (UN) Guiding Principles on Business and Human Rights, the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises, and the International Labor Organization (ILO). In case there is a conflict between these international standards and applicable local laws, we will comply with the laws, yet continue to seek ways in which we can honor these international standards. Realizing that the standards and expectations by which we guide our business activities are essential to human rights, Perfetti Van Melle is also committed to collaborate as appropriate with businesses, governments and civil societies to protect those rights.

The purpose of the Code of Conduct is to state to all PVM employees and other stakeholders of every Operating Company of the Group our commitment to adhering to ethical principles under all circumstances, and in particular to:

- Be Guided by the principles of the UN, OECD, and ILO.
- Comply with the laws and regulations of each Country where the Group operates.
- Be equitable, fair, and polite in relationships with fellow employees.
- Respect the interests of all stakeholders (customers, consumers, business partners, government agencies, authorities, and the external community).
- Play our business role with professionalism and integrity.

WHAT IS THE CODE OF CONDUCT?

CODE OF CONDUCT

The principles contained in the Code of Conduct are the foundation of our corporate policies and inspire the practices, guidelines, and operating procedures adopted by the Group. Whenever more detailed clarifications are needed on how to implement the Group's values and culture in operational practices, specific guidelines will be issued to supplement those already existing.

The Code of Conduct also indicates how to report violations of the Code and the measures to be applied in the event of violations. Perfetti Van Melle has in place a Whistleblowing Policy that encourages all our employees and other stakeholders to report any concerns related to our direct or indirect activities. Our whistleblowing policy is designed to protect the individual and makes it easy for disclosures to be made without fear of retaliation.

WHO IS SUBJECT TO THE CODE OF CONDUCT?



The Code of Conduct provisions apply, without exception, to all employees, managers, board members of the companies belonging to the Group, and other stakeholders. We also share our CoC with all third parties who enter into business relations with the Group and its Operating Companies in all the Countries where the Group operates.

All employees are required to read the Code and to conduct themselves in accordance with the principles stated herein. Employees are also required to report any violations of this Code to the relevant persons/functions as indicated in greater detail in the last part of this document.

Compliance with the provisions of the Code of Conduct is considered an essential part of the contractual obligations of employees and any person or entity conducting business with the Group.

The Management of the Group is responsible for making sure that this Code is distributed, explained to, and understood by, all Group employees. The Management must also ensure that the requirements of the Code of Conduct are met by all Group Operating Companies and Functional Departments.

CODE OF CONDUCT PROVISIONS

CODE OF CONDUCT PROVISIONS

1. Conflicts of Interest

In performing their tasks, all employees shall avoid all situations which may give rise to potential conflicts of interest, in particular with respect to personal and/or family interests that might influence their independent judgment and come into conflict with their responsibilities toward the Group.

Employees shall immediately report any situation that constitutes or may give rise to a potential conflict of interest to their managers and/or to the Top Management of their Company. Specifically, employees must report the existence of any permanent or temporary employment relation, any financial, commercial, professional, or family relation with persons or entities external to the Group, which may interfere with or affect the fairness of their conduct, or compromise the integrity of their actions.

2. Gifts, Presents & Benefits

This Code prohibits the offering and receiving of gifts or benefits which may be viewed as exceeding customary business and courtesy practices, or which may be interpreted as means to obtain privileged treatment in the performance of work activities. Gifts with a high money value or in cash or securities are not allowed.

In particular, any behavior intended to corrupt government officers, officials or employees of Public Administration, authorities or public institutions in any form or through any means, is strictly prohibited. Local laws and regulations on the matter shall be scrupulously complied with. Entertainment and gifts offered to public officers, if allowed, shall be approved by local and Business Unit Management and shall comply with local laws and regulations.

The provisions in this section shall be applicable whether the gifts and/or benefits are offered directly or through third parties.

The term “gifts” includes benefits such as holiday packages, participation in events, or employment promises. In case of doubt whether to accept or offer a gift whose value exceeds token value, employees must immediately inform their supervisor/manager.

3. Competition & Anti-Trust Regulations

In operating in the market, the Group conducts its business fairly, avoiding those behaviors that may constitute a misuse of dominant position or impair free competition. The Group observes all free competition and anti-trust regulations applicable in the countries where it operates. Employees are requested to contact the Corporate General and Legal Affairs Department for clarifications and assistance on these regulations. The Group Operating Companies shall inform the Corporate General and Legal Affairs Department of any anti-trust initiatives they undertake.

The Group shall not deny, conceal or delay any information requested by antitrust authorities or by other regulatory bodies in the course of their inspection activities, and shall actively cooperate throughout the investigative procedures.

4. Accounting Record Accuracy & Transparency

The Group's administrative and accounting methods are such as to ensure the utmost transparency, truthfulness, accuracy, and completeness of all accounting records and data.

To prevent any misuse of corporate funds or recording of fictitious transactions, each transaction must be documented by appropriate records, reporting the nature of the transactions and the person(s) who authorized the transaction. Employees shall also act in strict compliance with all administrative and accounting procedures applicable at Group and/or Operating Company level.

The information provided by each Operating Company in their periodical financial reports must be complete, accurate, reliable, and comprehensible.

5. Protection of Corporate Assets

Employees shall diligently protect the company's assets, using all tools and instruments assigned to them carefully and responsibly, avoiding improper use.

In particular, with regard to the use of computer equipment, employees shall strictly observe the company's procedures and regulations to avoid compromising computer system operation and security. Specifically, employees shall:

- Use the tools available to them (programs, e-mail, internet, telephone, fax, etc.) for purposes related to business needs.
- Not download unauthorized programs or install unauthorized software, or any programs or software other than those provided by the employer.
- Not send abusive e-mail messages, or messages that may be offensive to the recipient and/or damaging to the company's image.
- Not visit websites displaying improper or offensive contents.

The Group reserves the right to prevent any misuse of its assets and infrastructure using applicable controls in compliance with existing laws and regulations.

6. Protection of Information & Intellectual Assets

All information and intellectual property owned by the Group, whether commercial, financial, technological, or of other nature, constitutes an asset that the Group is determined to protect. Employees shall not disclose to unauthorized persons, inside or outside the Group, any information which may compromise the security and integrity of the Group's technological and commercial assets.

The Group considers the protection of its intellectual property, including trademarks, patents, formulas, computer software, etc., as a top priority to be pursued with all legal means available.

Similarly, the Group shall keep strictly confidential any information received from third parties. Specific policies and procedures for the protection of information are implemented and updated on an ongoing basis.

7. Human Rights

As a global company, Perfetti Van Melle believes our business can flourish only if conducted in a manner that is respectful and protective of human rights. We recognize our responsibility to be respectful of human rights wherever we conduct business. The fair and equitable treatment of our employees and other stakeholders is our top priority.

Human rights are the most highly valued issue of all our key stakeholders, including employees, workers, customers, consumers, the communities in which we operate, and civil society. We believe there is both a moral and a business case for upholding human rights throughout our entire operations. We seek to protect the rights of all individuals, including our own employees and the employees of those with whom we conduct business.

We are committed to providing fair working conditions (including wages, social security, and the right to collective bargaining), and a diverse, equitable, and inclusive work environment.

In compliance with contractual obligations and employment regulations, Group Operating Companies are committed to observing the fundamental human rights and employment regulations applicable in different countries. In particular, all employees are hired through regular work contracts in the forms allowed by the different country legislations. Any form of child labor or forced labor is strictly forbidden.

7. Human Rights

7.1 Modern Slavery, Human Trafficking & Forced Labor

Perfetti Van Melle condemns, as defined by the ILO, any form of forced or compulsory labor, including forced prison labor, indentured labor, bonded labor, modern slavery, and human trafficking. We recognize our responsibility to take a robust approach to such matters and believe that they have no place, in any form, in society.

Our goal is to ensure that all of our employees – whether direct-hires or those whom we contract through a third party – enjoy freedom of movement; and, are not restricted through any physical restriction, abuse, threats, or practices such as the retention of identification documents or their possessions. We want to ensure that they have the right to work freely; understand the terms of their employment; and, are regularly, fairly compensated. We condemn, as defined by the ILO, any form of forced or compulsory labor, including forced prison labor, indentured labor, bonded labor, modern slavery and human trafficking.

7.2 Child Labor

The Group recognizes child labor as a violation of fundamental human rights, and understands our role in preserving children's rights to childhood. Respecting the guidelines of the ILO, we have in place strict policies and procedures around adherence to age requirements. We aim to prevent any employment practice that deprives children of their childhood, their dignity, their opportunity for education, or their potential. We are committed to collaborating as appropriate with business, government, and civil society to make progress on this complex issue.

Our hiring process requires that all candidates, whether hired directly or contracted through third-party agencies, are screened for – among other things – age, education, and work experience.

When hiring employees through third-party agencies, we strive to retain contract employees only from reputable employment agencies. We require that the agencies with whom we partner adhere to the highest standards of ethics, including age verification of their employees.

7. Human Rights

7.3 Working Hours & Fair Wages

Perfetti Van Melle is dedicated to fair and responsible treatment of our employees. We believe fair compensation is essential to an adequate standard of living. We comply with minimum wage regulations in the areas where we conduct business. We respect the ILO conventions on standard normal working hours, as well as the regulations within the countries where we operate.

7.4 Health & Safety

The Group considers the health and safety of its employees a top priority. For this purpose, it strives to ensure that the conditions in the workplace are healthy, safe, and respectful of individual dignity. We routinely run safety campaigns in all of our sites. Workplaces comply with the laws and regulations of the locations in which we operate, as well as our own safety guidelines. Internal occupational health and safety study groups have been established specifically to monitor and improve working conditions. We strive for “Zero accidents and work-related injuries or illness.” We believe raising awareness is crucial to this effort. We provide training (safe ways of working, first aid, and emergency response) to help our employees understand measures we can all take in providing a safe and healthy workplace.

To ensure the respect of individual dignity, the Group strictly forbids any:

- Abuse of power. It is considered abuse of authority when a manager or supervisor requests, due to his/her position, any personal service or favor, or exhibits attitudes or performs actions that are against the employee's dignity or independence.
- Acts of psychological violence. Attitudes or behaviors that are discriminatory or offensive to the person or his/her beliefs.
- Sexual harassment, including any behavior or speech that may be physically or morally harmful to another individual.

The Group requires that all manufacturing units develop and implement OH&S management system to be certified accordingly to ISO 45001. ISO 45001 is an international standard on occupational health and safety management.

7. Human Rights

7.5 Diversity, Equity & Inclusion

Perfetti Van Melle offers our employees fair treatment and a truly diverse, equitable, and inclusive working environment.

We do not tolerate discrimination, unfair or unequal treatment in any manner and recruit and reward based on capability and performance, regardless of race, gender, sexual orientation, gender identity or expression, lifestyle, age, educational background, national origin, religion, or physical ability.

Recognizing that a true commitment to an inclusive society must extend beyond the confines of our own organization, we seek also to portray our brands in a thoughtful and respectful manner, reflecting our richly diverse consumer base.

7.6 Environment

We are committed to reducing our impact on the environment. We wish to create and maintain competitive operations, with a long-term sustainable future. To do that, we focus on reducing carbon footprint, energy and water consumption, limiting waste and atmosphere emissions from our locations and businesses, reducing packaging material, adopting renewable energy sources wherever possible, and maintaining ISO 14001 certification. We have in place a sustainability governance model, overseen by our Chief Sustainability Officer, Sustainability Steering Committee, and Executive Committee (made up of our chief officers and CEO).

7. Human Rights

7.7 Freedom of Association & Collective Bargaining

Perfetti Van Melle recognizes and respects the rights of our employees to join or leave organizations of their own choosing. They are free to form their own employee organizations or trade unions; and, to bargain collectively to pursue their own interests, without the prior authorization of their employer.

7.8 Selection, Management & Development of Personnel

The Group applies the highest standards for hiring and managing our valued employees. We recruit and reward employees on the basis of capability and performance — regardless of race, gender, sexual orientation, gender identity or expression, lifestyle, age, educational background, national origin, religion, or physical ability.

7.9 Employees' Privacy

Employees' privacy is protected through compliance with law requirements and the adoption of appropriate methods for the processing and maintenance of the personal data that employees are required to provide to the company. Except as provided by law, no personal data shall be disclosed without prior authorization from the party concerned. Conducting surveys or investigations on personal opinions or preferences, or on employees' private life in general, is strictly forbidden.

8. Relations Between the Group's Operating Companies

While recognizing the independence of its subsidiaries, PVM Group BV requests each Operating Company to adopt the values stated in the Code of Conduct, and to cooperate loyally in the pursuit of the Group's objectives, including compliance with all applicable laws and regulations.

PVM Group BV also requires its subsidiaries to avoid any behavior or decision which, though beneficial to themselves, may be harmful to the integrity or the image of the Group or of other Operating Companies.

Decision making and communication processes within the Group must follow principles of truthfulness, fairness, completeness, transparency, and respect of each Operating Company's independence.

9. Customer & Supplier Relations

All relations and communications with customers shall be based on the utmost integrity and compliance with applicable regulations. No improper or unfair business practices shall be used.

In purchasing processes, suppliers shall be selected on the basis of objective criteria, including price and service quality, offering equal opportunities to all suppliers. The Group Operating companies shall ensure adequate competition among suppliers, for example by requesting offers from more than one vendor.

The following are priority selection criteria:

- Appropriately documented availability of means, including financial resources, organizational structures, design capabilities and resources, know-how, etc.
- Existence and implementation of quality management and food safety systems as specified in the PVM Group Certification Schemes.
- Compliance with the rules of the PVM's Code of Conduct or their own business conduct policies.

Specifically, contracts with third parties, including suppliers, shall contain provisions requiring:

- Self-certification by the supplier attesting observance of specific social obligations listed under Section 7 and subsequent sub-sections (e.g., respect of fundamental workers' rights, equal treatment and non-discrimination principles, and protection of minor labor).
- The possibility of visiting the supplier's manufacturing units or operating sites to verify that these requirements are met.

Any violations by the suppliers of the general principles stated in this Code of Conduct shall result in penalties and/or other measures, in order to safeguard the reputation of our Group, in particular versus Public Authorities and the community. For this purpose, the Group encourages the Operating Companies to include, whenever applicable, ad hoc provisions in the individual supply contracts.

10. Consumer & Media Relations

The Group Operating companies are committed to ensuring prompt, accurate, and truthful responses to customers' inquiries on topics such as product quality, use, and guidelines for consumption.

The Operating Companies' advertising and promotional communications shall be responsible, correct, and truthful, as well as mindful of the sensitivity of the audience, especially the younger public.

The Group's external communications shall respect the public's right to information. Responses to any media inquiry will be provided in an accurate, truthful, and timely manner. The publication of false or misleading news or comments shall not be tolerated under any circumstances.

To ensure complete and consistent information, the Group will conduct media relations exclusively through persons specifically designated by the Management and in accordance with the relevant Group policy.

11. Relations with the Community & The Government

11.1 Financial Relations with Political Parties, Labor Organizations & Associations

It is the policy of the Group not to provide donations, contributions, or support to political parties, union organizations, and the like. We are open to cooperating with third parties that have a different policy, provided that their contributions take place according to the applicable laws and are fully disclosed at the moment these third parties enter into a relationship with the Group; or, in any moment thereafter if such contributions, donations, or support are made after the commencement of the relationship with the Group.

11.2 Contributions to Charitable Organizations

The Group may fulfill the requests for charitable contributions, on condition that the requesting entity or association is a non-profit organization with legally valid charters and bylaws.

11.3 Relations with Public Authorities

Relations with national Authorities, as well as national and international institutions, shall concern the implications of laws and regulations applicable to the Group Operating Companies. The Operating Companies shall respond to requests for information or communicate their positions on matters concerning their business activities.

For this purpose, the Group shall:

- Establish permanent communication channels with institutional representatives at the international, regional, and local levels.
- Represent the interests and positions of the Group Operating Companies in a transparent, rigorous, and consistent manner, avoiding collusive behaviors.

To ensure utmost transparency in relationships, interactions with institutional representatives shall only be carried out through persons/functions designated by the Management of the Group.

VIOLATIONS TO THE CODE OF CONDUCT & DISCIPLINARY MEASURES

Compliance with the Code of Conduct

Compliance with the Code of Conduct is an essential part of the contractual obligations undertaken by our employees, temporary workers, independent contractors, and other parties doing business with the Group.

The Management of Group's Operating Companies and of the Corporate Functions is responsible for ensuring that all employees understand and meet the Group's expectations. Therefore, the Management must make sure that the commitments stated in the Code of Conduct are implemented in all the Business Units and Corporate functions.

Reporting Violations



For an effective enforcement of the Code of Conduct, the Company expects anyone who becomes aware of a case of non-compliance with the Code within the Group to report the violation.

All employees should report any violation, or suspected violation, to their direct manager/supervisor or, in cases when this may be ineffective or inappropriate, they should contact the Human Resources Department and/or the General Manager and/or the Managing Director of their company, or directly the Compliance Office / Officer (Compliance Office) of their Company or, in absence of it, the Compliance Officer of PVM Group B.V.

The Group Whistleblowing Policy encourages all our employees and other stakeholders to report any actual or attempted violation to the Code of Conduct. The Group Compliance Office can be contacted by filing an anonymous report online at www.perfettivanmelle.ethicspoint.com or calling the Perfetti Van Melle Group EthicsPoint Hotline.

The Group shall make sure that no one who reports an actual or attempted violation to the Code of Conduct is subject to any form of retaliation, illicit conditioning, harassment, or discrimination at the workplace, as a consequence of his/her reporting a violation of the Code of Conduct or of any internal procedure.

Any form of reprisal against persons who, in good faith, report violations of the Code of Conduct, constitutes a violation of this Code as well. Accusing other employees of a violation with the conscious knowledge that the accusation is false is also a violation of the Code of Conduct.

The Compliance Office of PVM Group BV is composed of three members, one non-executive Board Member external to the Group, the Chief Human Resources Officer, and the Head of Group Internal Control, Audit and Compliance.

Third Parties shall address their notice of violation directly to the Compliance Office of PVM Group BV.

Disciplinary Measures

Violations to the principles stated in the Code of Conduct and in the Company's internal procedures compromise the trust between the Group and any person(s) who commits the violation (including managers, employees, consultants, contractors, customers, suppliers, business or financial partners).

Once a violation is ascertained, firm and immediate actions shall be taken against the offender(s) through appropriate and proportionate disciplinary measures in accordance with applicable laws and regulations. When the violation constitutes a criminal offense, such measures shall be applied in addition to and regardless of the initiation of a criminal prosecution.

Disciplinary measures applied for violations of the Code of Conduct are adopted by the Company in accordance with applicable regulations and employment contracts stipulated at the national or company level. Such measures may include termination of employment.

To safeguard its image and protect its assets, the Group shall not entertain relations of any nature with parties who do not intend to act in strict compliance with applicable regulations, and/or who refuse to conform their behavior to the values and principles stated in the Code of Conduct.

Code of Conduct Distribution



The Management of the Group is responsible for distributing the CoC to all our employees worldwide through our internal communication channels. All our employees are required to review, understand, and live up to our CoC. To achieve this, we provide both classroom and eLearning opportunities for employees to learn how to fulfill these commitments.

The Code of Conduct is published with adequate prominence in the Group intranet and in the websites of the Group and of the Operating companies in their respective local languages. Hard copies of the Code of Conduct shall be distributed to all current and future employees. Additional copies may be requested from the Human Resources Department or the Compliance Office of PVM Group BV.

Revisions and updates of the Code of Conduct are defined and approved by the Board of Directors of PVM Group B.V.

For proper understanding of this Code of Conduct across the Group, a communication program is in place to ensure that the Code is explained and distributed with relevant frequency to all employees of all the Group Operating Companies and Corporate Functions.

CODE OF CONDUCT DISTRIBUTION



Perfetti Van Melle Code of Conduct

January 2022

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