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| CBcotti srl | ETHICAL CODE | Rev. 20.07.2020 |
|--------------------|---------------------|-----------------|

Summary

| | |
|--|---|
| 1. OBJECTIVES AND PRINCIPLES | 2 |
| 2. CONDUCTING STANDARDS | 2 |
| 3. THE PRINCIPLES OF MANAGEMENT | 2 |
| 4. HUMAN RESOURCES MANAGEMENT | 3 |
| 5. RELATIONSHIP WITH CUSTOMER, SUPPLIERS, COMPETITORS..... | 4 |
| 6. RELATIONSHIP WITH THE ENVIRONMENT | 5 |
| 7. RELATION WITH THE CUSTOMER..... | 5 |
| 8. CONFLICT OF INTEREST | 5 |
| 9. MONEY LAUNDERING..... | 6 |
| 10. VIOLATIONS OF THE ETHICAL CODE AND SANCTIONING PROCEDURE | 6 |
| 11. ADOPTION, APPLICATION AND DISTRIBUTION OF THE ETHICAL CODE. | 7 |
| 11.1 SIGNALING | 8 |
| 11.2 REVIEW OF ETHICAL CODE THEMES | 8 |

| | | |
|--------------------|---------------------|-----------------|
| CBcotti srl | ETHICAL CODE | Rev. 20.07.2020 |
|--------------------|---------------------|-----------------|

1. OBJECTIVES AND PRINCIPLES

In this document called "Code of Ethics" (hereafter Code), CBcotti srl summarizes the key principles on which the basis of its industrial and commercial activity is based.

The company strictly pursues the application of laws and regulations in the countries in which it operates and applies principles of integrity and fairness, while respecting the rights of all those with whom it interacts.

The Code is brought to the attention of all employees in the most appropriate manner, through the delivery of the copy, the publication on CBcotti srl website and posted on the company.

The Code is an instrument of self-regulation that CBcotti undertakes to pursue and enforce, starting with the CEO and the member of the Board of Directors and the Procurator (P) for Sanitary and Environmental Activities, to All stakeholders involved:

- Members and advisors;
- executives;
- employees and collaborators;
- Any subject that has structured business relationships with CBcotti.

2. CONDUCTING STANDARDS

The subjects concerned are committed to respecting the objectives and principles of this document and its prescriptions as an integral part of their relationship or collaboration, to maintain a pattern inspired by high standards of fairness, honesty, confidentiality and transparency, contributing to strengthening the 'image of society.

CBcotti s.r.l commits itself to scrupulous observation of the objectives and principles listed above, through control and sanctioning actions so that they are constantly implemented.

3. THE PRINCIPLES OF MANAGEMENT

The interested parties undertake to:

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|--------------------|---------------------|-----------------|
| CBcotti srl | ETHICAL CODE | Rev. 20.07.2020 |
|--------------------|---------------------|-----------------|

- Observe the legal provisions, rules and procedures of the company, the prescriptions of this document;
- Use corporate assets solely for the purpose for which they were intended;
- Maintain corporate image-based behaviors based on fairness and honesty so as to contribute to the achievement of business goals;
- Preserving and safeguarding corporate assets relating to data and information;
- Do not use the name and image of the company for purposes and personal interests.

The principles also apply to consultants, freelancers and occasional service providers who engage in professional relationships with CBcotti srl.

4. HUMAN RESOURCES MANAGEMENT

CBcotti considers Human Resources an essential asset and devotes the utmost attention to their training, management, valorisation and recognition of their contribution.

CBcotti srl applies without any reservation to existing legislation, collective bargaining agreements and existing work contracts.

CBcotti srl wishes to entertain collaborative and constructive relations with the Trade Representations if it is constituted and respects the right to free association.

CBcotti srl selects, uses and promotes human resources on the basis of the professionalism and attitudes required for assignment.

- It undertakes not to use, even indirectly, forced and compulsory labor, forms of bondage, bondage, forced labor, child labor, and is not involved in trafficking in human beings. Rejects any discrimination based on age, sex, sexuality, health, race, nationality, political opinions and religious beliefs, rejects any form of discrimination in the recruitment and management of human resources.
- As regards working hours, the Company strictly adheres to Framework Law no. 300 dated May 20, 1970, and to the specifics of the CCNL of the Agro-Food sector in force.

CBcotti srl undertakes to enter into relationships with Suppliers who pursue the same principles as respect for Human Resources.

| | | |
|--------------------|---------------------|-----------------|
| CBcotti srl | ETHICAL CODE | Rev. 20.07.2020 |
|--------------------|---------------------|-----------------|

It undertakes to prevent any form of mobbing and exploitation of work, both direct and indirect, and to recognize the key criteria for wage and career development in the merit, work performance and professional potential.

The company pursues the protection of the health and safety of human resources. To this end, it puts in place all the technologically better preventive and protective measures and the investments needed to maintain a healthy, safe and adequate working environment, in full compliance with current legislation. A dedicated team of people inside and outside the company is tasked with continuous monitoring of the work environment, risk analysis, investment definition and the best procedures to ensure staff safety, including Emergency and First Aid.

5. RELATIONSHIP WITH CUSTOMER, SUPPLIERS, COMPETITORS.

The relationship with these external interlocutors is based on the ethical principles of fairness, professionalism, efficiency, loyalty and respect for equal opportunities for all those involved in the conviction of mutual interest and benefit.

In particular, CBcotti srl requires external interlocutors to comply with the principles and prescriptions of this Code.

CBcotti srl recognizes that fair and fair competition is a key element for the development of the company and the market. For this purpose, it manages its activities by promoting a competition based on product quality and respect for the principle of fairness.

In the selection of Suppliers, the Code of Ethics is attached to the questionnaire.

The companies with which CBcotti srl maintains relationships and all employees of the Company must refrain from illicit business practices.

Entities can not offer or accept gifts, gifts, utilities, either directly or through an intermediary, whose economic value is more than symbolic, exceeding a modest value and normal courtesy relationships. In the case of a higher real value, the person concerned is required to inform the Human Resource Manager in advance of the devolution in charity or other destination. In any case, the use of money is strictly forbidden.

| | | |
|--------------------|---------------------|-----------------|
| CBcotti srl | ETHICAL CODE | Rev. 20.07.2020 |
|--------------------|---------------------|-----------------|

6. RELATIONSHIP WITH THE ENVIRONMENT

CBcotti srl operates in full compliance with the environmental protection and environmental regulations (Legislative Decree 152/06 and succession), having obtained by the Regione Campania Decreto N ° 225 of 11/11/2011 the release of the " Integrated Environmental Authorization (AIA), relating to IPPC activity code 6.4b. Ensure that environmental laws and regulations are applied and respected by pursuing pollution prevention. CBcotti srl activates all the measures and makes the necessary investments so that there is a continuous improvement of its environmental performance. The commitment of the Company and the whole corporate body is focused on:

- Reducing pollution sources through the promotion of less resource-intensive activities;
- Reducing water consumption through the adoption of industrial wastewater recovery and reuse systems, monitoring and reduction of energy consumption and greenhouse gas emissions; actions to reduce or recover waste; guaranteeing an open dialogue with the Public Authorities; collaborations with Category Associations, Public and Private Institutions Authority to increase knowledge and promote greater focus on the environment.

7. RELATION WITH THE CUSTOMER

Full customer satisfaction is the primary goal of CBcotti srl, which commits ample resources to produce high quality products. The quality of raw materials, packaging material, production process and end product is monitored with appropriate control tools and procedures.

Consumer information is transparent and complete. All in order to pursue food security to protect and protect the health of the consumer.

CBcotti srl pursues the efficiency and rationality of its production, commercial, logistical and administrative organization to offer its customers competitive prices.

8. CONFLICT OF INTEREST

In the event that the Administrator or any employee of CBcotti is involved or has any interest in personal activities in contravention of the company or content of his / her work, this is defined as a conflict of interests.

By conflict of interest is meant:

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| CBcotti srl | ETHICAL CODE | Rev. 20.07.2020 |
|--------------------|---------------------|-----------------|

- collaborate in companies and / or activities that are in conflict with CBCotti's interests such as marketing products and / or services in competition with CBcotti products and / or services;
- Represent a CBcotti provider, or work for one of these or otherwise have the same direct or indirect holdings;
- Use for personal gains or purposes the name, assets or assets of the Company's assets, including information not available to third parties or non-disclosures, which concern CBcotti.
- In particular, the Directors strictly apply the provisions of the Civil Code and the Self-Regulatory Code relating to any interests of an administrator on own account or third parties in an operation of the Company.

In case of suspected conflicts of interest, the employee is obliged to report this suspect to the staff office that will forward the communication to the CEO and / or CP assuming all the precautions to avoid possible phenomena of retaliation.

9. MONEY LAUNDERING

CBcotti respects anti-money laundering laws as it operates so as not to engage in activities that involve the acceptance or treatment of money from criminal or illicit activities in any form or manner. For this reason, the CEO and / or CP will verify, as a precautionary measure, available information, including financial information, vendors and commercial counterparts, in order to ascertain the respectability and legitimacy of their business prior to establishing such relationships commercial.

10. VIOLATIONS OF THE ETHICAL CODE AND SANCTIONING PROCEDURE

The Code of Ethics is the expression of the employer's power to regulate the work; Consequently, employees who do not comply with and / or violate the Code are liable to disciplinary sanctions under the CCNL or, in the most serious cases, through appropriate and proportionate disciplinary measures compatible with the Law.

In addition, tomato supply contracts for industry provide explicit reference:

- ✓ ☐ compliance with current regulations on safety and health at work,
- ✓ ☐ Work contracts (CCNL),
- ✓ ☐ the legislation on social security and welfare,

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|--------------------|---------------------|-----------------|
| CBcotti srl | ETHICAL CODE | Rev. 20.07.2020 |
|--------------------|---------------------|-----------------|

✓  work for immigrants.

To this end, CBcotti will disseminate the Code and not withdraw the supply if it suspects the failure to comply with at least one of the points listed.

Protecting your image and safeguarding your resources, CBcotti will not engage in any kind of relationship with people who do not intend to comply with the current regulations and / or refuse to behave in accordance with the values and principles set forth in the Code of Ethics.

11. ADOPTION, APPLICATION AND DISTRIBUTION OF THE ETHICAL CODE.

The Code of Ethics and any future updates will be approved by the Board of Directors. This Code and future updates are and will be announced to all current and future employees of the writer in the manner described in paragraph 1. It will also be disseminated at least in 3 languages according to the recipient: Italian, French and English.

The code is disseminated as described in paragraph 1. It is equally disseminated through the SEDEXGLOBAL portal (non-profit association) and adheres to the Sedex Member Ethical Trade Audit (SMETA) program through third party audits.

To this end, the CEO and the PC (see paragraph 1) are concerned with the application of the Code and, in particular, they undertake the following tasks:

- Verify the application and compliance with the Code of Ethics through a monitoring activity consisting of accepting and promoting the continuous improvement of ethics;
- Monitor initiatives to disseminate knowledge and understanding of the Code of Ethics, ensuring the development of ethical communication and training activities, analyzing and integrating the proposals for reviewing corporate policies and procedures with significant impacts on corporate ethics;
- Receive and analyze reporting on violations of the Code of Ethics;
- Perform the Quality Examiner at least one Internal Audit per year on the application of this code.

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|--------------------|---------------------|-----------------|
| CBcotti srl | ETHICAL CODE | Rev. 20.07.2020 |
|--------------------|---------------------|-----------------|

11.1 SIGNALING

Everyone may report, in writing (even anonymously) or verbal, any breach or suspected violation of the code, to the staff of the staff who will forward the communication to the CEO and / or P, which will establish the validity of the alert, , the author of the alleged violation, taking all the precautions to avoid phenomena of retaliation.

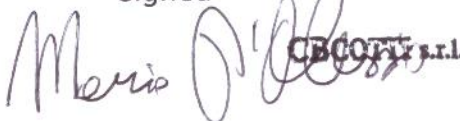
CBcotti forbids any retaliation or threat of retaliation against anyone who, in good faith, denounces a violation or abnormal situation.

It is the duty of the CEO and / or P to act in such a way as to ensure the reporting of any type of retaliation, as an act that can only be suspected of being a form of discrimination or punishment (for example, for suppliers: interruption of business relationships, for employees: failure to promote etc.) It is also ensured the confidentiality of the identity of the reporting person, subject to the legal obligations.

11.2 REVIEW OF ETHICAL CODE THEMES

the Code is subject to review by the Board of Directors. The audit activity takes into account contributions received from regulatory developments, practices and experience gained in applying the Code itself. Any changes and / or additions to the Code, introduced as a result of such auditing, are published and made available in the manner described above.

Nocera Inferiore July 20 2020

Signed

CBcotti s.r.l.