

CONTENTS

CONTENTS	1
1. INTRODUCTION	2
2. SCOPE OF APPLICATION AND RECIPIENTS	2
3. ETHICAL PRINCIPLES SET OUT IN THE CODE ADOPTED BY EDIT	2
4. RULES OF CONDUCT	6
5. WHISTLEBLOWING AND REPORT MANAGEMENT	13
6. BREACHES AND DISCIPLINARY CONSEQUENCES	13
7. APPROVAL OF THE CODE OF CONDUCT AND RELATED AMENDMENTS	14

1. INTRODUCTION

In view of the specific nature of its business and the stakeholders with whom it interacts, EMMI DESSERTS ITALIA S.p.A., hereinafter “EDIT”, has deemed it necessary to establish a set of ethical principles and rules of conduct by which its activities must be guided, with the aim of fostering sound ethical integrity and a corporate culture attentive to compliance with applicable laws.

EDIT has decided to adopt a Code of Conduct that clearly and transparently sets out the values that guide it in pursuing its business objectives and in properly conducting the related activities.

Accordingly, this document (hereinafter the “Code of Conduct”) has been formally adopted on the understanding that compliance with it is an essential condition for EDIT’s proper operation, for safeguarding its reliability and reputation, and for continuously increasing customer and consumer satisfaction, all of which contribute to EDIT’s present and future development.

2. SCOPE OF APPLICATION AND RECIPIENTS

EDIT bases all actions, operations, relationships and transactions undertaken in the management of its corporate, production and commercial activities on the ethical principles and rules of conduct set out in this Code of Conduct.

This Code of Conduct is binding on all persons who, within EDIT, perform representative, administrative or management functions, or who exercise management and control, including on a de facto basis; on all employees; on all collaborators (including, by way of example, consultants, suppliers, agents, representatives, intermediaries, etc.); and on anyone who, in any capacity, has business relations with EDIT (hereinafter the “Recipients”).

Everyone must therefore be familiar with the provisions of the Code of Conduct and is expected to contribute actively to ensuring compliance with it.

To this end, EDIT undertakes to ensure the widest possible dissemination of this Code of Conduct, including through appropriate information and training tools and by raising awareness of its contents.

3. ETHICAL PRINCIPLES SET OUT IN THE CODE ADOPTED BY EDIT

EDIT endorses, accepts and complies with the following ethical principles:

- legality
- equality and impartiality
- transparency, fairness and reliability
- professionalism
- confidentiality
- the value of human resources
- protection of minors and prevention of child labour
- responsible recruitment

- fair remuneration
- health and safety
- protection of competition

3.1 Legality

In carrying out activities for or in the interest of EDIT, Recipients shall act in strict compliance with applicable laws and regulations.

3.2 Equality and impartiality

EDIT protects and promotes respect for human dignity, which must not be subject to discrimination on grounds of age, sex, sexual orientation, personal or social circumstances, race, language, nationality, political or trade union opinions, or religious beliefs.

In managing the various corporate activities and in all related decisions, Recipients shall act impartially in EDIT's best interests, making decisions with professional rigour and objectivity based on objective and neutral assessment criteria.

3.3 Transparency, fairness and reliability

The actions, operations, negotiations and, more generally, conduct of Recipients shall be guided by the highest standards of transparency, fairness and reliability.

When managing corporate, production and commercial activities, Recipients shall provide information that is transparent, truthful, complete and accurate.

All actions and operations must be duly authorised and correctly recorded, as well as verifiable, lawful, appropriate and adequately documented, so that the relevant decision-making, authorisation and implementation process can be reviewed at any time.

3.4 Professionalism

EDIT safeguards professionalism as an essential value for its growth and success, requiring Recipients to demonstrate professionalism, commitment and diligence appropriate to the nature of the duties entrusted to them to achieve their assigned objectives.

3.5 Confidentiality

EDIT recognises confidentiality as an essential rule of conduct. It therefore ensures the confidentiality of information in its possession and refrains from using confidential data unless expressly authorised and, in all cases, in strict compliance with applicable privacy legislation.

Accordingly, Recipients must refrain from using confidential information concerning the company or third parties, acquired through their work, for personal purposes or, in any event, for purposes unrelated to the performance of their assigned duties.

No Recipient may therefore obtain any direct or indirect, personal or financial benefit from the use of confidential information (including, by way of example, trade secrets, strategic or commercial information and personal data), disclose such information to others, or recommend or induce others to use it.

Information may be disclosed to third parties only by authorised people and, in all cases, in accordance with company rules.

3.6 The value of human resources

Human resources are an indispensable and valuable asset for EDIT's existence and future development.

Accordingly, in its staff selection and management policies, the company applies merit-based criteria and develops everyone's abilities, skills and potential, while ensuring training and professional development for its people.

EDIT guarantees equal opportunities for all and is committed to ensuring that authority is exercised fairly and properly, avoiding any form of abuse. It also safeguards the physical and moral integrity of its employees and provides working conditions that respect individual dignity.

To ensure full respect for the individual, EDIT opposes every form of abuse, coercion or exploitation, including forced labour and labour exploitation.

3.7 Protection of minors and prevention of child labour

EDIT recognises the protection of minors as a fundamental human rights principle and undertakes to prevent and combat all forms of child labour, economic exploitation, human trafficking, forced labour and other practices incompatible with human dignity.

The company does not employ workers below the minimum age established by applicable laws and relevant international conventions and undertakes to comply with the principles set out in the fundamental Conventions of the International Labour Organization (ILO), the United Nations Convention on the Rights of the Child, and international standards on human rights and working conditions.

EDIT strictly refrains from:

- employing minors below the legal minimum working age;
- employing young workers in hazardous activities or work incompatible with their physical, mental, social or moral development;
- any form of exploitation, coercion or abuse involving minors;
- using intermediaries or recruitment practices that may facilitate child exploitation.

EDIT neither uses nor permits child labour at any stage of its operations or in any form, whether directly or through suppliers, contractors, employment agencies or other intermediaries.

Accordingly, the Company does not maintain business relationships with parties that breach child labour legislation in the selection and management of personnel.

3.8 Responsible recruitment

No worker, candidate or prospective candidate shall bear any recruitment costs. All such costs shall be borne by EDIT or by the third party providing the service, with no right of recovery from the worker.

EDIT uses only duly authorised employment agencies and intermediaries, requires them to comply with the principle that recruitment must be free of charge for workers, extends this obligation throughout the subcontracting chain, and reserves the right to verify compliance, including through confidential interviews with the workers concerned.

3.9 Fair remuneration

EDIT recognises that fair and adequate remuneration is an essential element of dignity at work and undertakes to ensure full compliance with national remuneration legislation for all workers.

To this end, the Company duly applies the minimum pay levels established by the applicable National Collective Labour Agreements and ensures correct contractual classification in relation to the duties performed, responsibilities assigned and length of service.

It also guarantees equal pay treatment for workers in the same circumstances, including agency workers.

The Company also undertakes to ensure that remuneration paid for normal working hours is sufficient to provide a decent standard of living, in line with the principles and guidelines promoted by the International Labour Organization (ILO).

For this purpose, EDIT annually analyses the gap between the remuneration actually paid and the applicable living wage level. The findings are formally recorded and shared with Management, which, where necessary, assesses and promotes appropriate improvement actions to address any identified gaps.

3.10 Health and safety

EDIT undertakes to provide and maintain safe and healthy working environments in compliance with applicable occupational accident prevention legislation.

It promotes a culture of safety and awareness of the risks associated with work activities, requiring everyone, at every level, to act responsibly and comply with the company's occupational health and safety procedures.

With this in mind, every employee is personally expected to help maintain the safety and quality of their working environment.

EDIT undertakes:

- to carry out activities safely in order to protect the health of its employees and the communities surrounding its sites;
- to provide training and information to all those working on its behalf regarding the risks to which they are exposed, and to provide the means and personal protective equipment required by applicable law;
- to continuously monitor the effectiveness of the system for managing safety-related risks, in pursuit of continuous improvement in this critical area.

3.11 Protection of competition

Aware that a sound and fair competitive system contributes to the successful fulfilment of its corporate mission, EDIT complies with applicable competition laws and refrains from engaging in and/or encouraging conduct that may constitute unfair competition.

3.12 Reference to the general principles of the ETI Base Code

For all fundamental ethical principles not expressly provided for or addressed herein, reference shall be made to the ETI Base Code, which forms an integral part of this Code of Conduct.

The provisions of the ETI Base Code constitute the minimum standards required, although the Company remains committed to promoting working conditions that provide greater protection in these areas, in accordance with national laws.

4. RULES OF CONDUCT

The rules of conduct set out in this Code of Conduct are detailed in each of the following four Chapters:

- I) conduct of business activities;
- II) relations with third parties;
- III) management of financial resources / accounting;
- IV) human resources management.

Chapter I – Conduct of business activities

In performing their duties and responsibilities, each Recipient shall comply with all laws and regulations applicable to those duties and responsibilities, as well as with the contractual provisions governing their employment relationship with EDIT and/or the commercial and collaborative relationships between EDIT and its internal and external collaborators, consultants, contractual counterparties or suppliers.

In performing their duties and responsibilities, each Recipient shall also act in good faith, honestly and transparently, and always with professionalism and seriousness.

In performing their duties and responsibilities, no internal Recipient (director, statutory auditor, employee or internal collaborator) shall pursue interests unrelated to those of EDIT.

The pursuit of EDIT's interests under the preceding clause must never conflict with the provisions set out above.

Where any of the people referred to in the third paragraph, in performing their duties and responsibilities, find themselves for any reason in an actual, apparent or potential conflict or convergence of interests with EDIT, they must notify:

- the Board of Directors (if the person is a director);
- the Board of Statutory Auditors (if the person is a statutory auditor);
- their line manager (if the person is an employee);
- their internal contact person (if the person is a collaborator);
- and refrain from carrying out any act affected by the conflict or convergence of interests.

Section I – Use of company assets

In performing their duties and responsibilities, each internal Recipient (director, statutory auditor, employee or internal collaborator) shall use tools, equipment and workplaces:

- with due care and diligence;
- in accordance with the information or training received;
- in compliance with all laws and regulations governing their use for any purpose.

Each internal Recipient shall also use tools, equipment and workplaces responsibly and in a manner that preserves them, taking all reasonable steps to maintain them in the highest possible state of efficiency and safety and to reduce the risk of theft and/or loss.

Consistently with the foregoing, internal Recipients shall not use company tools, equipment or workplaces to pursue interests unrelated to those of EDIT.

When using the IT tools made available to them, internal Recipients shall comply with the "IT Regulations" that they have signed (Annex "A"), which is incorporated herein by reference and forms an integral part of this Code of Conduct.

Section II – Protection of confidentiality

Each Recipient is bound by confidentiality in respect of any data and/or information relating in any way and for any reason to EDIT's business activities of which they become aware in the performance of their duties or otherwise. Such data and/or information must not be disclosed to any third party, whether external to or within the corporate organisation.

Each Recipient is also bound by confidentiality in respect to personal and sensitive data relating to third parties with whom they come into contact in performing their duties and responsibilities.

In this regard, each Recipient shall ensure the proper application of the statutory provisions governing the processing of personal data.

Section III – Accuracy and transparency of corporate information

Every action, operation or transaction must be correctly recorded in the company's accounting system in accordance with statutory requirements and applicable accounting principles and must also be duly authorised, verifiable, lawful, consistent and appropriate.

To ensure that the accounts meet the requirements of truthfulness, completeness and transparency, adequate and complete supporting documentation for each operation must be retained on file to allow:

- accurate accounting records;
- immediate identification of the characteristics and underlying reasons for the operation;
- easy formal and chronological reconstruction of the operation;
- verification of the decision-making, authorisation and implementation process, and identification of the various levels of responsibility.

Each employee shall, within their area of responsibility, ensure that every event concerning EDIT's management is correctly and promptly recorded in the accounts.

Each accounting entry must accurately reflect the supporting documentation. Employees responsible for this activity shall therefore ensure that supporting documentation is readily available and organised according to logical criteria.

Information circulated within EDIT for the preparation of the financial statements and to ensure a clear and true representation of EDIT's economic, financial and asset position must comply with the principles of truthfulness, completeness and transparency, while respecting the autonomy of each company and its specific areas of activity.

Section IV – Gifts, hospitality and other benefits

In dealings with suppliers, political institutions and third parties generally, Recipients shall not promise, accept or offer gifts, benefits (whether direct or indirect), courtesies or hospitality whose nature or value exceeds normal business practice, local custom and ordinary courtesy or which, in any event, are intended to secure preferential treatment or other undue advantages in connection with EDIT's business operations.

Where gifts, benefits, courtesies or hospitality are offered or promised to Recipients, they shall promptly inform the competent corporate bodies, which will decide whether the offer or promise is admissible.

Section V – Prevention of conflicts of interest

In conducting their activities, Recipients must avoid situations in which the parties involved in transactions are, or may even appear to be, in a conflict of interest.

A conflict of interest arises where a Recipient pursues an interest other than the company's mission, carries out activities that may interfere with their ability to make decisions solely in EDIT's interests, or personally benefits from EDIT business opportunities.

By way of example and without limitation, the following conduct constitutes a conflict of interest:

- holding, even indirectly, equity interests or economic or financial interests in companies that are suppliers or competitors of EDIT;
- holding corporate offices or carrying out work of any kind for suppliers or customers.

Recipients shall refrain from activities contrary to EDIT's interests, aware that pursuing those interests can never justify conduct inconsistent with EDIT's ethical principles.

In the event of a conflict of interest, Recipients shall promptly inform the competent corporate body and comply with its decisions.

Chapter II – Relations with third parties

In performing duties involving interactions with third parties, including external Recipients such as external collaborators, suppliers, contractual counterparties and consultants, each internal Recipient shall act honestly, transparently, fairly, with integrity and lawfully. Each Recipient shall require equivalent conduct from every third party encountered in the performance of their duties.

Each internal Recipient shall observe the following rules when communicating externally information concerning EDIT and its activities:

information provided by an internal Recipient to third parties must be transparent, truthful and accurate;

internal Recipients shall refrain from making statements to third parties, on any occasion, that may harm EDIT's image.

In dealings with third parties, including the external Recipients listed above, internal Recipients are prohibited from receiving, giving or promising payments, benefits in kind, advantages or any other tangible or intangible benefit, other than modest gifts consistent with customary business practice.

Section I – Relations with public authorities and institutions

Relations with national, European Union or international public authorities and institutions must strictly comply with applicable laws and be guided by honesty, fairness and transparency.

Relations with national, European Union or international public authorities and institutions, and with public officials, persons entrusted with public services, or their bodies, representatives, agents, officers, members, employees, consultants or appointees, must not improperly influence their decisions, particularly those of officials acting or deciding on their behalf.

During negotiations or business dealings, including commercial dealings, with public authorities or institutions, EDIT shall refrain from:

- offering or granting employment opportunities and/or commercial advantages to public officials involved in the negotiation or relationship, or to their family members;
- offering gifts or other benefits;
- providing untruthful information or failing to disclose material facts when requested.

EDIT's representatives and/or employees are also prohibited from paying or offering, directly or through third parties, money or benefits of any kind or value to public officials, government representatives or public employees, whether to reward them for an act performed in office or to secure or delay an act contrary to their official duties.

Section II – Relations with customers

EDIT bases its business on quality, understood not only as service excellence but also as attention to customers' specific needs, professionalism, availability, prompt responses to commercial enquiries and careful handling of complaints, with the aim of achieving full customer satisfaction.

In relations with customers, Recipients shall act fairly and clearly and, wherever possible, use written communications to avoid ambiguity or misunderstanding regarding ongoing commercial relationships.

Section III – Relations with suppliers

EDIT manages relations with suppliers loyally, fairly and professionally, encouraging ongoing cooperation and strong, lasting relationships based on trust.

Suppliers are selected and purchasing terms determined based on objective and impartial assessments of quality, price and the guarantees offered.

In its relations with suppliers, EDIT observes the following principles:

- purchasing is entrusted to dedicated departments;
- goods and services are selected and purchased solely on the basis of value in terms of price and quality;
- all negotiations with current or potential suppliers must concern only the goods and services being negotiated.

In dealings with suppliers, Recipients shall act transparently and clearly and, wherever possible, use written communications to avoid ambiguity or misunderstanding regarding ongoing commercial relationships.

Commitments and relations with current and potential suppliers must be made in compliance with the conflict-of-interest provisions of this Code of Conduct.

EDIT requires suppliers and business counterparties to respect internationally recognised human rights, with particular reference to preventing child labour, forced labour, human trafficking and all forms of exploitation.

Suppliers must be able to demonstrate compliance with applicable employment and child-protection laws and cooperate with the company in any verification, audit or risk-assessment activities. Failure to comply with these principles may result in suspension or termination of the business relationship.

Section IV – Relations with business partners and other contractual counterparties

Relations with business partners and contractual counterparties shall comply with the fundamental principles of this Code and with all applicable laws.

Activities involving contractual counterparties shall be guided by honesty, loyalty, availability and transparency and supported by competence, professionalism, commitment and efficiency.

When developing initiatives with business partners, the principles set out in this Code of Conduct must be observed. In particular, Recipients shall:

- establish relationships only with reputable partners engaged solely in lawful activities and whose corporate ethical culture is comparable to EDIT's;
- ensure transparency of agreements and avoid entering into secret arrangements or agreements contrary to law;
- maintain transparent and collaborative relations with partners;
- promptly report to their manager or the Company's control bodies any partner conduct that appears contrary to the ethical principles of this Code.

Section V – Relations with public entities

EDIT contributes to the economic well-being and growth of the communities in which it operates. In conducting its activities, it therefore respects local and national communities and promotes dialogue with trade unions and other associations.

Relations between EDIT and representatives of political and trade union institutions and regulatory authorities are based on integrity, transparency and fairness, are limited to the duly authorised functions concerned, and strictly comply with applicable laws and regulations.

Recipients involved in such relations shall refrain from any conduct, even if not criminally relevant, that could be construed as actual or potential undue influence over the activities of the institutions and bodies referred to above. In particular, they shall not promise, offer or provide, directly or indirectly, money, goods or benefits to promote or favour EDIT's interests.

Recipients may not circumvent this prohibition through other forms of aid or contribution, including sponsorships, consultancy arrangements or corporate appointments intended for the same purposes.

Section VI – The external control system

EDIT promotes a culture of control at every corporate level, raising employees' awareness of the importance of external controls and of compliance with applicable laws and company procedures in carrying out work activities.

External controls comprise all tools necessary or useful to direct, manage and verify corporate activities, with the aim of ensuring compliance with laws and company procedures, protecting company assets, managing activities efficiently, and providing accurate and complete accounting and financial data.

All personnel are responsible, within their functions, for defining and ensuring the proper operation of the control system through the control activities they perform over their respective processes.

Monitoring and assessment of control, risk-management and corporate-governance processes are entrusted to internal and external auditors.

For internal and external audits, including those requested by the independent auditors, EDIT guarantees unrestricted access to the necessary data, documents and information.

Chapter III – Internal administrative activities

Section I – Management of financial resources

For individual commercial transactions forming part of the company's core business, and more generally for any transaction involving movements of financial resources, each Recipient shall, within their area of responsibility, verify that the amounts transferred are appropriate and relevant to the underlying transaction.

For the transactions referred to above, each Recipient shall, within their area of responsibility, comply with all applicable legal and regulatory requirements concerning accounting, recording and any other prescribed obligations.

Section II – Accounting

Each EDIT employee involved in the accounting cycle shall, within their area of responsibility, verify compliance with the statutory and regulatory provisions governing the proper maintenance of the company's accounts.

The accounts shall in all cases be maintained in accordance with the principles of truthfulness, transparency, accuracy and completeness.

Chapter IV – Human resources management

Section I – Employee selection and management

Personnel selection is based solely on candidates' suitability for the requirements identified by EDIT in light of its current needs.

EDIT's staffing needs and recruitment requirements must not conflict with constitutional, statutory or regulatory provisions or public-policy principles and must never involve discrimination of any kind, including on grounds of sex, race, religion or political opinion.

Accordingly, personnel selection and recruitment, including through employment agencies, must be free of charge for candidates and workers. Recipients are prohibited from requesting, accepting or permitting any payment, deposit, deduction or benefit connected with recruitment to be requested from a candidate or worker in any form.

Before any employment relationship is established, and in all cases before work begins, EDIT verifies the worker's age by inspecting an original identity document. The same obligation is contractually extended to suppliers, contractors and employment agencies whose personnel work at the Company's sites.

Any disciplinary or reward measure, and any assignment of personnel to specific duties or responsibilities, shall be based solely on the capabilities and merit, or lack thereof, of each EDIT employee.

Relations among EDIT employees shall be guided by fairness, honesty and integrity, and managerial authority shall be exercised only within the scope of each employee's assigned duties and responsibilities.

Section II – Health and safety in the workplace

EDIT adopts a corporate policy aimed at achieving the highest standards of health and safety protection in the workplace.

In connection with internal Recipients' duties and responsibilities and EDIT's relations with third parties, including external Recipients, preserving and safeguarding physical integrity are primary values to be protected.

Final provisions

Each Recipient is expressly prohibited from:

- engaging in conduct that may constitute a criminal or administrative offence;
- carrying out preparatory acts aimed at committing criminal or administrative offences.

Each Recipient shall conduct themselves in compliance not only with all statutory and regulatory provisions relevant to the duties or tasks performed, but also with the principles set out in this Code of Conduct.

Any breach of statutory or regulatory provisions and/or of the principles referred to in the preceding paragraph that comes to a Recipient's attention **must be reported through the**

channels provided by the whistleblowing system or through the other applicable company procedures.

Each Recipient is responsible for raising any doubts or uncertainties and for requesting information and clarification regarding the meaning and application of the principles set out in this Code of Conduct.

5. WHISTLEBLOWING AND REPORT MANAGEMENT

EDIT promotes a corporate culture founded on integrity, transparency and respect for the law, encouraging the good-faith reporting of any conduct, act or omission that may constitute a breach of laws, regulations, company procedures, this Code of Conduct, or other principles and values adopted by the company.

All employees, collaborators, suppliers, consultants and, more generally, stakeholders who have dealings with EDIT are encouraged to promptly report any unlawful conduct or irregularities of which they become aware during their work or professional activities.

Reports may concern, by way of example and without limitation:

- breaches of laws or regulations;
- fraudulent or corrupt conduct;
- undeclared conflicts of interest;
- breaches of occupational health and safety requirements;
- discrimination, harassment or other conduct that harms human dignity;
- environmental violations;
- human rights violations, including child labour, forced labour and worker exploitation;
- improper use of company assets, information or resources;
- any conduct contrary to the principles of this Code of Conduct.

EDIT ensures that reports are handled confidentially, impartially and promptly, in compliance with applicable law and the principles of fairness and good faith.

The company prohibits any form of retaliation, discrimination, penalty, intimidation or adverse treatment against anyone who submits a report in good faith or cooperates in verification and investigation activities.

Where breaches of this Code of Conduct, company procedures or applicable law are established, EDIT shall adopt appropriate corrective and disciplinary measures, together with any action necessary to prevent recurrence.

EDIT provides dedicated reporting channels governed by the company Whistleblowing Procedure. The operating arrangements, the persons responsible for managing reports and the applicable protection measures are set out in the internal documentation in force from time to time, which is incorporated into this Code of Conduct by reference in its entirety.

6. BREACHES AND DISCIPLINARY CONSEQUENCES

Compliance with this Code of Conduct shall be regarded as an essential part of EDIT employees' contractual obligations under the employment laws applicable to them. Accordingly, any breach of the provisions of the Code of Conduct may constitute a breach of employment obligations and/or a disciplinary offence in accordance with applicable law.

Compliance with the principles set out in this Code of Conduct forms part of the contractual obligations undertaken by collaborators, consultants and other parties having business relations with EDIT. Accordingly, any breach of the provisions contained herein may

constitute a breach of the contractual obligations undertaken, with all resulting legal consequences concerning termination of the contractual relationship and compensation for any resulting damage, in accordance with applicable law.

It is understood that, where breaches are committed by persons holding representative, administrative or management positions within EDIT, the competent corporate body shall adopt the disciplinary measures it considers most appropriate, taking into account the nature and seriousness of the breach and the position held by the person responsible, in accordance with applicable law.

7. APPROVAL OF THE CODE OF CONDUCT AND RELATED AMENDMENTS

This Code of Conduct was approved by EDIT through its Managing Director, in his capacity as the Company's Legal Representative and pursuant to the powers granted to him by the Board of Directors. Any amendments and/or updates shall be approved by the same authority and promptly communicated to all Recipients.

Gattico-Veruno, 06/10/2026

Pablo Pinetti

MANAGING DIRECTOR

A handwritten signature in black ink, appearing to read "Pablo Pinetti".