

Code of Ethics

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ORGANIZATION, MANAGEMENT AND CONTROL MODEL
Code of Ethics

Letter from the CEO

Reputation, ethics, reliability, professionalism, seriousness represent the founding values of our corporate creed. This system of values represents an invaluable patrimony for a company that operates in a context like ours.

Sharing these principles, combined with our freedom of thought, represent the driving force of our company, which sees its characterizing factors in professionalism and attention to the territory and social context.

Attention to the person as a whole plays a pivotal role in our company. We particularly care about the professional enrichment of our staff, supporting a continuous growth.

Laziale Distribuzione believes it is essential to express clearly and with conviction the values that inspire it and the responsibilities that are proper to it in relations to local communities, public administrations, and all the people who work for the company as well as all the other interlocutors and stakeholders.

This Code of Ethics intends to represent our corporate vision with conviction and passion. If the principles and rules listed in the Organization Model would result inappropriate over the years, we will intervene modifying them in order to keep coherence and consistency with our principles and convictions.

Laziale Distribuzione disseminates these values and monitors their compliance with principles, safeguards, protocols, appropriate training and information tools and through an adequate penalty system. The Supervisory Body is the custodian of this Code of Ethics. Anyone who perceive that some of our business management practices show a contrast with what is reported in this code can mention it.

Alessandro Bursese

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1. Introduction

Laziale Distribuzione is a company that has been operating within integrated logistics for 40 years.

The main sectors of activity are the following:

- logistics and supply chain;
- national and international distribution services;
- pharmaceutical storage services;
- customs warehouse

The activities, carried out in warehouses located in the municipalities of Pomezia, Rome and Bologna, constitute a very differentiated offering with a wide-ranging international reach. The continuous investments in innovation and training have allowed the acquisition of a remarkable competitiveness in the market and the constant reduction of costs, thus becoming one of the most consolidated logistic and distribution realities in Italy.

The company has decided to adopt an Organizational Model pursuant to Legislative Decree 231/01, from which the approval of the Code of Ethics.

This Code of Ethics defines the set of rights, duties and responsibilities that Laziale Distribuzione S.p.A. expressly assumes towards its stakeholders (managers, employees, suppliers, consultants, customers and end consumers), with whom it interacts within the scope of its business.

The Code of Ethics is intended for all those who have relationships with the company, whether they are employees, collaborators, administrators, managers, consultants and other third parties, that is, anyone who interacts with the company's business.

The violation of the rules of the Code of Ethics may constitute a breach of the primary obligations of the employment relationship, or disciplinary offense, with legal consequences. It may result in compensation for damages deriving from it.

The Code of Ethics must be brought to the attention of all those with whom Laziale Distribuzione S.p.A. maintains commercial and other relationships and relationships.

Laziale Distribuzione S.p.A. undertakes to carry out and check any report of violation of the rules of the Code of Ethics. It undertakes to evaluate the facts and the consequent implementation, in case of ascertained violation, of adequate sanctioning measures for employees, members and for various interlocutors where applicable.

2. Ethical Principles in Business Conduct

All the ethical principles to which Laziale Distribuzione S.p.A. inspires itself are expressed in this Code (hereinafter also "the Company").

Compliance to this set of rules and values is essential and it is considered an essential part of the activities of the directors, shareholders, workers and any person who contributes to the pursuit of the company's social purposes or in any way connected to the Company (of followed also "Recipients").

The general principles identified for the conduct of the activities are:

- Legality;
- Transparency;
- Impartiality;
- Correctness;
- Good faith;
- Integrity and absence of conflicts of interest;
- Non-discrimination.

All Recipients are bound to observe them in their work and in the context of the relationships that the Company maintains, both permanently and occasionally, with third parties, public or private and with the stakeholders, in order to favor the ethics in business processes.

The Company undertakes to make the values of this Code of Ethics known to all its stakeholders and undertakes to ensure that each "third party" provides the undertaking to comply with the Code of Ethics. The Organization, Management and Control Model adopted by the Company is an expression of the Company's willingness to implement the principles contained in this Code of Ethics.

Legality

The Company has as its essential principle the compliance with applicable laws and regulations. This commitment is valid for all subjects who have relationships with the Company. Indeed, the Company will not begin (or terminate if already started) any hiring and / or collaboration relationship with those who do not intend to align themselves with this fundamental principle.

In no case can the pursuit of the Company's interest justify a conduct contrary to the current regulations. Even those who collaborate (suppliers, customers, consultants) with the Company are required to comply with the regulated rules.

Ethical-Behavioral Principles

Any activity must be performed professionally ensuring compliance with the following behavioral principles:

Transparency: each task must be carried out in full clarity, each action must be fully reconstructable and easily identifiable in all its passages, so that all relationships are comprehensible and the respective acts justifiable.

Impartiality: all Recipients must operate objectively and fairly, without applying undue favoritism or penalties to anyone involved, including public or private subjects, or subjects linked by any relationship of friendship, kinship or affinity.

Correctness: respect, by everyone, of the fulfillment of functions, the rights of each person involved in their work and professional activity. This respect is to be understood also from the point of view of privacy, committing to maintain total confidentiality on confidential information concerning interlocutors of various titles, both in reference to strategic information of the Company and concerning personal information. Implicitly, the refusal of any situation that creates arbitrary discrimination against staff, as well as substantial conflicts of interest between each employee.

Good faith: the pursuit of the Company's interest can never justify any conduct contrary to the principles of diligence and good faith. Any operation, action and behavior of those who work in the name and on behalf of the Company are inspired, in a formal and substantial way, by the legitimacy, protection of the company and correctness.

Integrity and absence of conflicts of interest: in carrying out any activity, the recipients must avoid finding themselves or even appearing to be in conflict of interest with the Company. In particular, the situations that can generate conflicts of interest are:

1. economic and financial interests of an employee of the Company and / or his family in the supply activity;

2. use of one's position within the Company or of the information or knowledge acquired working to generate a conflict between one's personal interests and the interests of the Company;

3. dissemination of fake and tendentious news or comments.

Any situation that could determine or generate a conflict of interest must be immediately reported to the supervisor; any employee must communicate in writing to its supervisor the existence of a financial, commercial, professional, family or friendly relationship which may influence the impartiality of his / her relationship towards a third party.

Non-discrimination: Recipients must avoid any discrimination against its interlocutors based on age, sex, health, race, nationality, public opinion and religious beliefs.

2.1. Employees, collaborators and consultants

The Code of Ethics is an integral and substantial part of the employment contract of each employee of Laziale Distribuzione S.p.A. .

Laziale Distribuzione S.p.A. must demand to its employees strict compliance to the provisions of the Code of Ethics.

Any violation of the Code of Ethics determines penalty measures.

Therefore, employees:

- are required to be aware of the rules contained in the Code of Ethics and of the reference standards that regulate the activity carried out within the scope of their function;
- are required to be aware of the rules contained in the Code of Ethics and of the reference standards that regulate the activity carried out within the scope of their function;
- have an obligation to refrain from conduct contrary to the principles of the Code of Ethics and the standards referred to;
- are required to collaborate with the structures in charge of verifying possible violations;
- must contribute to the maintenance of the working environment by respecting the sensitivity of others;
- may use the premises, equipment, machinery and information systems exclusively for carrying out the activity of competence;
- must adopt behaviors consistent with the Code of Ethics and refrain from any conduct that may harm Laziale Distribuzione S.p.A. or compromise honesty, impartiality or reputation;
- are required to use the corporate internet for reasons strictly related to business reasons therefore Laziale Distribuzione S.p.A. prohibits their use for viewing or distributing pornographic and child pornography material.

Anyone in the role of manager or director must represent an example in accordance with the principles of conduct in business contained in the Code of Ethics and, with his behavior, must demonstrate to employees that compliance with this Code is a fundamental aspect.

All managers and directors must report any case of non-compliance with the rules of this Code and they are responsible for ensuring the protection of those who have reported violations of the Code in good faith.

2.2. Relations with the Public Administration

Relations with the Public Administration must be transparent and consistent with its policy and must be entertained by who is formally delegated to it.

Therefore, it is not allowed to offer money or gifts, except in case of gifts or utilities of modest value. In any case, they should not lead to compromise the integrity or reputation of one of the parties and not to be understood as aimed at obtaining improper advantages. In any case, they must be previously authorized by the CEO.

3. Health, safety and environment

The activities of Laziale Distribuzione S.p.A. must be managed in compliance with the current legislation for the protection of working conditions. The company undertakes to guarantee an adequate working environment in terms of safety and health by adopting all the necessary measures.

The recipients of this Code undertake to comply with the prevention and safety measures put in place. They must not place other employees in front of unnecessary risks that could cause damage to their health or physical safety.

Without prejudice to the applicable legislation, Laziale Distribuzione S.p.A. adopts all measures aimed at reducing the environmental impact of its activities.

It undertakes to put in place measures aimed at raising awareness of the attention and respect for the environment by all recipients.

4. Abuse of alcohol or drugs

Laziale Distribuzione S.p.A. requires its employees to help keep the work environment respectful of others' sensitivity.

Therefore, it will be considered consciously assumed the risk of affecting these environmental characteristics, being under the effect of alcoholic substances, narcotic substances or substances having a similar effect during the working performance and in the workplace.

It is therefore forbidden to hold, consume, offer or sell drugs of any kind, alcohol or other similar effects in the course of work and in the workplace.

5. External Relations

Laziale Distribuzione S.p.A. and its employees, in performance of their duties, are required to keep relations with all the categories of the interested parties. They have to act in good faith, loyalty, fairness and transparency.

Laziale Distribuzione S.p.A. requires to its employees and other recipients of the Code of Ethics that any contact or relationship with customers is based on principles of honesty, professional correctness and transparency.

Commercial relations with suppliers must be carried out in compliance with the criteria of impartiality, economy, transparency, loyalty and fairness, avoiding relationships that can generate personal advantages or conflicts of interest.

Any relationships of Laziale Distribuzione S.p.A. with the information bodies are reserved exclusively to the administrative body, or to the expressly authorized recipients, and must be carried out in accordance with corporate communication strategies.

Information and communications must be correct, clear and homogeneous with each other, without prejudice to the confidentiality requirements required by the conduct of the business.

6. Internal control and violation of the Code of Ethics

The internal control system is implemented through the set of tools and procedures necessary to direct, manage and verify the activities of Laziale Distribuzione S.p.A., directing them to the achievement of corporate objectives and risk prevention.

The control system as a whole contributes to ensuring compliance with the laws, internal procedures, strategies and company policies, the achievement of the set objectives, the protection of the tangible and intangible assets of Laziale Distribuzione SpA, as well as the company management according to criteria of efficiency and effectiveness, the reliability of accounting and management information to the inside and outside of the company.

To this end, every operation and transaction, duly authorized and registered, can be verified with the support of adequate documentation.

Responsibility for the proper functioning of the internal control system refers to all recipients of the Code of Ethics, within the scope of the functions performed. Each employee is required to promptly

inform their direct manager of the onset of dynamics that may interfere with the correct management of the work activity.

Retaliation or discriminatory measures against personnel who, to protect the integrity of the Company, provide detailed indications of unlawful conduct, relevant pursuant to Legislative Decree no. 231/01 and based on precise and concordant elements of fact, or of violations of the organization and management model of the Company, which they became aware of due to the functions performed, are forbidden.

The effectiveness and functionality of the internal control system are guaranteed by the supervisory and control activities carried out by the competent company functions.

The violation of this Code affects the relationship of trust and it can lead to the activation of legal actions and the adoption of measures, towards the recipients, in accordance with the provisions of the law and with the envisaged contractual regimes.

7. Penalty system

In case of serious and repeated violations of the Code of Ethics or of the values of the Organization Model, penalties would be applied in accordance to the C.C.N.L. of reference and to the penalty system.

The violation by the employees subject to the CCNL and / or to the second level bargaining of the individual behavioral rules referred to in this related disciplinary offense Model.

The violation by the employees subject to the CCNL and/or to the second bargaining level of the individual behavioral rules referred to in this Model is considered a disciplinary offense.

The sanctioning regulations applicable to these workers - in compliance with the procedures set out in article 7 of law 300 of 30 May 1970 (Workers' Statute) and any special regulations included - are included in the sanctioning apparatus and by the CCNL application by Laziale Distribuzione SpA

All the provisions of the aforementioned CCNL, the systems and the internal aspects relating to the procedures and obligations to be observed in the application of the regulations remain stationary and are understood to be referred to here.

8. Update

Any changes and / or additions to this Code of Ethics must be made following the same methods adopted for its initial approval.