

## ETHICAL POLICY

Grissinificio Zingonia S.r.l. SB is a company founded in 1992 and based in Ciserano, in the province of Bergamo. Its core business is the production and marketing of baked goods such as breadsticks.

In 2022, the company formalized its commitment to sustainability towards all its stakeholders by becoming a benefit corporation.

Further confirmation of its attention to human resources, the environment, and good business practices is the company's decision to join the SEDEX / SMETA network and adhere to the principles expressed in the ETI Code, which are summarized below and shared with all interested parties.

We adhere to the following principles:

- **Freedom of association and the right to collective bargaining:**  
We promote these freedoms with the aim of building constructive relationships with workers' representatives to improve working conditions. We do not discriminate against union members or union representatives.
- **Fair remuneration:**  
We are committed to ensuring wages in accordance with the National Collective Labour Agreement (CCNL), respecting workers' rights, and paying salaries as required by law. We guarantee a living wage (a minimum wage that allows for family sustenance with discretionary income).
- **Health and safety in the workplace:**  
We comply with Legislative Decree 81/2008 (Italian law), ensuring a safe and healthy work environment. We seek the best possible organizational and technological solutions within our means, train staff on health and safety risks, and provide appropriate protective equipment.
- **Protection of young workers and prohibition of child labor:**  
We only hire adults and promote collaborations with universities and schools to support school-to-work integration. We also promote the prohibition of child labor throughout our supply chain. We have established a remediation procedure for minors found working, to help eliminate this global issue. We comply with ILO Conventions on this matter.
- **No forced labor:**  
We do not engage in any form of slavery, human trafficking, or forced labor. All our workers are free to leave the workplace, and we do not withhold original identity documents or money. We condemn all forms of physical or verbal abuse.
- **No precarious employment:**  
We commit to hiring workers only under contracts recognized by the CCNL, avoiding precarious work.
- **No discrimination:**  
We are committed to offering equal opportunities and avoiding any form of discrimination in hiring,



Grissinificio Zingonia Srl

compensation, training access, promotion, dismissal, or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union or political affiliation.

➤ **Compliance with working hours as per CCNL:**

Our organization complies with the working hours established by the relevant National Collective Labour Agreements.

➤ **Environmental protection:**

We are committed to protecting the environment and promoting the best technological solutions to reduce consumption. We comply with environmental regulations and monitor our environmental performance over time to identify possible improvements.

➤ **Business ethics:**

We do not tolerate and actively oppose corruption, extortion, embezzlement, bribery, and commercial fraud. We comply with relevant laws and promote transparency in our business relationships with stakeholders.

➤ **Dissemination of ethical principles:**

We are committed to spreading these principles within our organization, to workers, and to all stakeholders. We also promote these principles throughout our supply chain within our sphere of influence.

In compliance with these requirements, the company declares adherence to the following regulations and conventions:

- ILO (International Labour Organization) Conventions
- United Nations Convention on the Rights of the Child
- Universal Declaration of Human Rights
- United Nations Convention on the Elimination of All Forms of Discrimination Against Women and Racial Discrimination
- United Nations Guiding Principles on Business and Human Rights
- International Covenant on Civil and Political Rights and on Economic, Social and Cultural Rights
- All relevant national and international laws, including Legislative Decree 81/2008 (health and safety in the workplace), EU Regulation 679/2016 (data protection), and Legislative Decree 152/2006 (environmental regulations)
- Legislative Decree 231/2001 on corporate administrative liability

Sincerely,

Ciserano, 22/09/2025

**The Management**

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