Erede Rossi Silvio
azienda agricola troticoltura

Sede Legale Via Madonna dei calcinai 2 - 62025 Sefro (MC)
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Code of Conduct 2025

(rev. 00 dated 30/06/2025)

1. Corporate Conduct

- Legality: All activities of 4 FISH are carried out in full compliance with local and international laws. We respect the laws, regulations, and rules of the countries in which we operate. If there is a conflict between the law and the Code, the law takes precedence. However, if the Code sets higher standards than local laws, cultural norms, or business practices, the Code shall prevail.
- Fair Competition: We operate ethically and competitively, avoiding unfair practices and anti-competitive behavior. The success of our company is based on the quality of our products, services, and people. We support free and fair competition and comply with all applicable antitrust and competition laws. We only enter into contracts, agreements, or commitments permitted by competition laws. As a rule, avoid contact with competitors as much as possible. There may be legitimate reasons to communicate or meet with competitors, but written approval from senior management is required for such interactions.
- Transparency: We maintain accurate, transparent, and traceable accounting and administrative records.
- Sustainability: We promote responsible and sustainable practices throughout the supply chain, with respect for the environment and society. We contribute to more sustainable protein production across the feed-to-food chain. Our companies seek new opportunities to create shared value for the entire sector and for society as a whole.

2. Personal Conduct

- Integrity and Respect: Every individual represents 4 FISH with honesty, fairness, and responsibility.
- Conflicts of Interest: Any actual or potential conflict of interest must be reported and managed with transparency. Business decisions must never be based on personal interests. We must always strive to avoid real or perceived conflicts between our private interests and professional responsibilities. Any conflict of interest must be reported immediately.
- Gifts and Hospitality: These are only acceptable if of modest value and in compliance with applicable regulations. All forms of bribery, kickbacks, or improper payments are strictly prohibited. Gifts and hospitality can help build business relationships, but they may constitute bribery if offered or accepted in exchange for favors or business advantages. Offering or accepting bribes or incentive payments is not allowed in any of our global business dealings, whether in the public or private sector. Use common sense: always ask yourself whether offering or accepting a gift or invitation could (or could be perceived to) improperly influence a business decision.
- Relations with Public Entities and Politics: We maintain a neutral stance and do not offer undue advantages to public officials or politicians**.**

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Workplace Environment

- Health and Safety: We ensure a safe, orderly, and compliant work environment in accordance with current regulations.
- Non-Discrimination: All collaborators must be treated with respect, without any form of discrimination.
- Harassment and Abuse: Offensive, harassing, or degrading behavior that violates personal dignity is not tolerated.
- Workers' Rights: We respect freedom of association, the right to minimum wage, and we reject all forms of child labor and forced labor.
  We are committed to providing a safe, collaborative, and inclusive work environment where employees and business partners are respected and valued.
  We commit to complying with national laws and the globally recognized core labor standards of the International Labour Organization (ILO) (the eight fundamental conventions are listed in the appendix – 87, 98, 29, 100, 111, 138, 182, and 105).
  We respect the rights of our workers and ensure they are properly informed. We guarantee that their interests are represented by trusted individuals, who are free to carry out their representative duties without fear of personal retaliation.
- All employees are engaged in accordance with legal requirements (e.g., registration with health insurance institutions, payment of legally mandated taxes, etc.), and all necessary measures are taken to protect and preserve their health (e.g., provision of personal protective equipment, training by experts on the use of potentially hazardous equipment for health or the environment, medical assistance in the event of accidents, etc.).
- Should violations or breaches of national legislation, ILO directives, or the control points of voluntary certifications (such as Global GAP and ASC) occur, they will be addressed and remedied.
  We acknowledge that non-compliance may result in the loss of our conformity status.
- This Code of Conduct is explained to workers through dedicated training sessions and is also displayed on the company bulletin board.
- Health and Safety: We guarantee a safe, orderly, and compliant working environment in accordance with applicable regulations.
- Non-Discrimination: All employees must be treated with respect and without any form of discrimination.
- Harassment and Abuse: Offensive, harassing, or degrading behavior that harms personal dignity is not tolerated.
- Workers' Rights: We respect the freedom of association, the right to a minimum wage, and reject all forms of child or forced labor.
  We are committed to providing a safe, collaborative, and inclusive work environment where employees and business partners are respected and valued.
  We comply with national laws and the globally recognized standards of the International Labour Organization (ILO), including the eight fundamental conventions listed in the appendix (Nos. 87, 98, 29, 100, 111, 138, 182, and 105).

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We respect the rights of our male and female workers and ensure they are kept informed. We guarantee that their interests are represented by individuals they trust, who are free to perform their representative duties without fear of personal prejudice.

- All employees are engaged in compliance with legal requirements (e.g., registration with the health insurance fund, payment of legally mandated taxes, etc.), and all necessary measures are taken to protect and maintain their health (e.g., provision of personal protective equipment, expert training in the use of potentially hazardous tools for health and the environment, medical assistance following accidents, etc.).
- Should any violations or infractions of national legislation, ILO directives, or the control points of voluntary certifications (such as Global GAP and ASC) occur, they will be rectified. We acknowledge that failure to comply will result in the loss of conformity status.
- This Code of Conduct is presented to workers through dedicated training and is also displayed on the company bulletin board.

Protection of Assets and Information

- Company Resources: Facilities, devices, and company resources must be used responsibly and exclusively for professional purposes.
- Confidentiality: All confidential or strategic information must be protected from unauthorized disclosure.
- Personal Data Protection: We process data in compliance with privacy laws, ensuring security, fairness, and transparency.
- Digital Communication: The use of social media must respect the company's image and values.

Individual Responsibility and Reporting

- Exemplary Behavior: Each employee is responsible for their own actions and the decisions they make.
- Ethical Dilemmas: In case of doubt, it is important to consult with your supervisor or Management.
- Reporting: It is possible (and necessary) to report any violation of this Code. No one will face retaliation for reporting in good faith.
- Consequences: Failure to comply with the Code may result in disciplinary measures, including termination of employment.

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APPENDIX

Below are the key declarations of the fundamental ILO (International Labour Organization) standards, which are valid globally.
(Workers have been informed of this appendix along with the self-declaration on good social practices. This is only an excerpt; other binding “labour law” regulations within Italian legislation also apply.)

ILO Convention No. 87: Freedom of Association and Protection of the Right to Organize
(Adopted in 1948, ratified by Italy in 1958)

- Workers and employers have the right to form organizations (unions, works councils, etc.) to protect their interests and to join such organizations.
- These organizations cannot be dissolved by the authorities.

ILO Convention No. 98: Right to Organize and Collective Bargaining
(Adopted in 1949, ratified by Italy in 1958)

- Workers must be protected from discrimination or harm due to union membership (e.g., dismissal for being part of a union or conditions requiring them to leave a union in order to be hired).
- The establishment of collective labor agreements (CLAs), which regulate wages and working conditions between employers’ and workers’ organizations, should be promoted.

ILO Convention No. 29 on Forced or Compulsory Labour
(Adopted in 1930, ratified by Italy in 1934)
ILO Convention No. 105 on the Abolition of Forced Labour
(Adopted in 1957, ratified by Italy in 1968)

- All forms of forced or compulsory labour are prohibited (except for state-mandated services such as military service, etc.).
- The prohibition includes coercion for political or educational purposes. Corporal punishment, withholding documents or wages to pressure workers is also forbidden.

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ILO Convention No. 100 on Equal Remuneration
(Adopted in 1951, ratified by Italy in 1956)

- Pay must not be determined based on gender. All workers performing the same job must receive equal social benefits, job-sharing opportunities, and access to training.

ILO Convention No. 111 on Discrimination in Employment and Occupation
(Adopted in 1958, ratified by Italy in 1963)

- All individuals, regardless of race, gender, or religion, have the right to material well-being and intellectual development in freedom, dignity, economic security, and equal opportunity.
- No discrimination (distinction, exclusion, or preference) will be made based on race, nationality, religion, disability, gender, sexual orientation, maternity, age, political belief, or membership in political parties or unions. Employees will not be subjected to pregnancy or HIV testing.

ILO Convention No. 138 on Minimum Age for Admission to Employment
(Adopted in 1973, ratified by Italy in 1981)
ILO Convention No. 182 on the Worst Forms of Child Labour
(Adopted in 1999, ratified by Italy in 2000)

- In accordance with national laws, minors will not be employed (compulsory schooling generally ends at age 15, or 14 in some countries).
- Young workers (usually under 18) will not be assigned tasks that endanger their life, health, or morals.