

 DRS – DEPOSITI REGIONALI SURGELATI Srl	Code of Ethics and Principles SMETA Certification – 4 Pillars	Code of Ethics and Principles Rev. 00 del 03-03-2026
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CODE OF ETHICS in compliance with SMETA (Sedex Members Ethical Trade Audit) – 4 Pillars

1. INTRODUCTION

The Management of DRS – Depositi Regionali Surgelati Srl is committed to operating according to principles of legality, integrity, transparency, and respect for human rights, in compliance with the SMETA (Sedex Members Ethical Trade Audit) methodology, the ETI Base Code, ILO Conventions, and applicable national legislation (Legislative Decree 81/08 and subsequent amendments, labor regulations, GDPR privacy, anti-corruption laws).

This Code of Ethics applies to:

- Direct employees
- Collaborators
- Personnel of contractor companies and suppliers operating on-site
- Consultants and business partners (where applicable)

2. LABOR STANDARDS

Voluntary Work

No forced, bonded, or coerced labor is permitted. All employment relationships are voluntary and governed by contracts compliant with applicable laws.

Child Labor

The use of child labor is strictly prohibited in accordance with ILO Conventions and Italian legislation. Minimum age is verified through official documentation.

Freedom of Association

The Company respects workers' rights to join trade unions, elect representatives, and participate in collective bargaining.

Non-Discrimination

Any form of discrimination based on gender, nationality, religion, age, sexual orientation, disability, or political opinions is prohibited.

Working Hours

Working hours comply with the limits set by the applicable national collective labor agreement (CCNL) and current legislation.

Working hours are tracked, recorded, and properly archived.

Overtime work is occasional and limited to specific, exceptional, and unforeseeable needs, such as workload peaks or delays due to technical or organizational issues. All overtime is properly authorized, recorded, and compensated in accordance with applicable CCNL provisions and legal requirements.

Remuneration

The Company ensures that wages, including regular and overtime pay, comply with the applicable CCNL and current legislation. All compensation is paid regularly, transparently, and documented, in full respect of workers' rights.

Grievance Procedure (Whistleblowing)

A confidential system is in place for reporting unethical behavior without risk of retaliation.

A reporting box has been established for reporting violations of the Code. Reports can be submitted confidentially, and whistleblowers are protected against retaliation.

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3. HEALTH & SAFETY

The Company ensures a safe working environment, particularly considering the specific risks associated with frozen food storage (e.g., cold rooms, load handling, forklifts).

Key commitments regarding Health & Safety, also in compliance with Legislative Decree 81/08 and subsequent amendments, include:

- Updated Risk Assessment Document (DVR) and evaluation of specific risks
- DUVRI for contractors and external companies
- Mandatory safety training
- Adequate Personal Protective Equipment (PPE)
- Maintenance of refrigeration systems and intervention logs
- Emergency and evacuation plans
- Accident and near-miss records

The Company has appointed an external specialized technician as RSPP (Prevention and Protection Service Manager).

Periodic meetings are held to monitor company performance and identify areas for improvement.

4. ENVIRONMENT

The Company is committed to conducting its activities in full respect of the environment and territorial protection, avoiding damage or non-compliant practices.

Specifically, the Company commits to:

- Reducing energy consumption of refrigeration systems where technically feasible
- Monitoring and recording energy consumption
- Properly managing waste and discharges
- Ensuring compliant disposal of products
- Preventing spills and environmental contamination (e.g., ammonia, oils, chemicals)

All activities comply with applicable environmental regulations.

5. BUSINESS ETHICS

Anti-Corruption

Any form of corruption, bribery, improper payments, or undue advantages is strictly prohibited.

Conflict of Interest

Employees must declare any potential conflict of interest.

Transparency

Relationships with customers, suppliers, and contractors are based on fairness and traceability.

Supplier and Contractor Qualification

The Company verifies that contractors and suppliers comply with labor laws, health and safety regulations, and equivalent ethical principles.

6. IMPLEMENTATION AND MONITORING

Management disseminates this Code to all personnel and stakeholders, carries out periodic internal audits, reviews the Code annually, implements corrective actions in case of violations, and monitors compliance with SMETA principles.

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7. DISCIPLINARY SYSTEM

Violation of this Code may result in disciplinary measures, up to termination of the contractual relationship in the most serious cases.

8. APPROVAL

This Code of Ethics is approved by Management and enters into force from the date of signature.

Latina, *Date*: _____

Signature, Management _____