



# ANTICORRUPTION POLICY



- Corporate Process Owner:** - HQ Corporate & Compliance Department
- Verified by:**
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  - Group Chief Institutional Relations & Sustainability Officer
  - Group Chief Internal Auditor
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# I. PURPOSE AND SCOPE

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Luigi Lavazza S.p.A. (hereafter, together with all its affiliates, collectively referred to as the "**Lavazza Group**" or the "**Group**" or "**Lavazza**") has committed to comply with all the rules and regulations governing its activities, in all the countries and jurisdictions where it operates.

While confirming its commitment as a **socially responsible business**, the Lavazza Group has intensified its actions aimed at integrating economic, social and environmental sustainability into its business, also in compliance with the most relevant international conventions, such as the internationally recognized guidelines of the United Nations Global Compact, whose fundamental principles regarding the fight against corruption have been adopted by Lavazza.

The objective of this "**Anticorruption Policy**" (the "**Policy**") is to provide **rules of conduct** and illustrate the **responsibilities** and **obligations** of employees, contractors and third-party stakeholders with whom the Lavazza Group has business relationships, with regard to **anti-corruption regulations**. It also aims to ensure that all recipients of the Policy behave consistently.

Given the role that the Lavazza Group plays at an international level, in addition to the governance and compliance tools already introduced by the Group, it is in fact appropriate to adopt a specific policy that identifies the behavioral principles to be adopted so that Lavazza always acts in compliance with the international rules and main legislations in force in the countries where Lavazza operates, aimed at **preventing corruption** in all its forms.


This Policy is inspired by the values, ethical principles and corporate culture defined in the **Lavazza Group's Code of Ethics** and have been drafted based on the analysis of the activities that may likely expose the Group to the risk of corruption.

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In compliance with the Group's values, Lavazza bases its activities on **high ethical standards** which must guide all its business relationships: the Lavazza Group conducts its business with loyalty, correctness, transparency, honesty and integrity, and provides specific rules to prevent, identify and manage the risk of corruption within the whole Group's sphere of influence.

The Group adopts a "**zero tolerance**" **approach towards any kind of corruption**, not only because this is illegal and carries the risk of severe penalties (such as very expensive fines against the company and/or the individuals involved, and the application of more severe penal sanctions like imprisonment) but also because corruption is an obstacle to the conduct of the Group's business, since it jeopardizes the regular functioning of the market, by leading economic operators to make their choices based on external factors rather than on the price or quality of the relevant goods and services, preventing the regular dynamics of the competition.

Furthermore, from an ethical point of view, corruption compromises the integrity of all the people involved and violates the fundamental values of the organization to which they belong.

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Lavazza undertakes to apply these ethical standards even in cases where this could make it impossible to develop its business or to get the services offered by suppliers and business partners, or even just delays in delivering existing activities.

Lavazza ensures that its **employees and stakeholders know and apply the Policy**.

Lavazza's Top Management is required to strongly commit themselves into promoting a **corporate culture that avoids any form of corruption** and to spreading the principles referred to in this Policy, as well as supervising their application.

To this purpose, Lavazza adopts specific **compliance programs** in each country where it operates directly, also through specific training and communication activities for its employees.

This Policy is published on the corporate website **[www.lavazzagroup.com](http://www.lavazzagroup.com)** (Compliance section) and on the company's intranet.



## II. LEGAL FRAMEWORK

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## Legal framework

The objective of this Policy is to provide rules of conduct and to illustrate the responsibilities and obligations of employees, contractors, and third-party stakeholders with whom the Lavazza Group has business relationships, with regard to compliance with anti-corruption regulations.

Lavazza operates in various countries. This Policy has been drafted taking into account the **anti-corruption regulations deemed most relevant at an international level**, including without this being limitative: *(i)* the Italian Legislative Decree no. 231/2001 (the “Decree 231”), *(ii)* the Foreign Corrupt Practices Act of the United States (the “FCPA”), *(iii)* the Bribery Act 2010 of the United Kingdom (the “Bribery Act”), *(iv)* the French law n. 2016-1691 also known as the “Sapin II Law”, *(v)* international anti-corruption treaties, such as the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and the United Nations Convention against Corruption (collectively, the “**Anti-Corruption Regulations**”).

**If the laws of a country (or the policies possibly adopted by any Lavazza Group company locally) provide for additional mandatory requirements, such mandatory requirements will prevail over the rules of this Policy, supplementing the provisions thereof.**





### **III. DEFINITIONS AND RECIPIENTS**

## 1. Definition of corruption and illicit conducts

Pursuant to international conventions, "**Corruption**" means the act of **offering, committing, giving, paying, requesting, soliciting, incentivizing, accepting or receiving money or other form of benefits, directly or indirectly, both in the private sector and in the public sector, in order to obtain or maintain an undue advantage or to unduly influence the achievement of an objective.**

The definition of Corruption therefore includes two types of conduct: **Active Corruption**, which consists in the act of bribing, and **Passive Corruption**, or the act of being corrupted.

The benefits of Corruption includes money and other kind of benefits, for example:

- gifts, presents and donations;
- reimbursement of entertainment, meals and travel, hospitality expenses, other than what is provided for by other Lavazza Group policies and procedures;
- sponsorships and similar financial support;
- provision of services, engagement for professional services, employment or investment opportunities;
- contracting or payment of fees capable of influencing a commercial or institutional counterparty;
- other utilities or advantages.

The definition of Corruption contained in this Policy does not replace (and does supplement) the specific definitions provided by the law of the countries where Lavazza operates.

## 2. Recipients

This Policy applies to Luigi Lavazza S.p.A. and to the entire Lavazza Group, including its employees and contractors, as well as to the third-party stakeholders with whom the Group has business relationships.

In particular, the recipients of this Policy are:

- all the Directors and the members of any governing body of the Group's companies and all their employees and contractors (the "**Corporate Recipients**" or simply "**Recipients**");
  - the clients and suppliers of the Group and, in general, the agents and counterparties of the Lavazza Group
- hereafter, collectively, the "**Recipients**".

All Recipients are **responsible**, each for their own area of competence, for ensuring compliance with the Policy.

Recipients who hold company roles with **supervision and coordination** responsibilities also must ensure that their employees comply with this Policy, and adopt measures aimed at prevent, identify and report potential violations.



## IV. GENERAL RULES

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## 1. General rules

In establishing business relationships with private and public counterparties, the Lavazza Group companies, and their representatives **act with transparency and integrity** and in compliance with all the applicable laws and regulations, **avoiding any form Corruption**.

The Lavazza Group companies and their representatives, as well as all the Recipients of this Policy:

- (i) **do not offer, promise, give or pay** (or authorize someone to do so) directly or indirectly, any amount of money or any other kind of benefit in favor of Public Officers or private counterparties;
- (ii) **do not request, solicit, incentivize, accept or receive** (or authorize someone to do so) directly or indirectly, any amount of money or any other kind of benefit from Public Officers or private counterparties,

with the objective of:

- **encouraging** a Public Officer or a private counterparty **to unduly perform its duties**;
- **rewarding** a Public Officer or a private counterparty **to carry out undue actions**;
- **rewarding** a Public Officer or a private counterparty **to improperly perform its duties**;
- **unduly influence the execution or omission** of an act proper to the functions of a Public Officer or a private counterparty or the adoption of any decision **contrary to their official duties or obligations**.


Also the offer or receipt by the Recipients of an economic **benefit aimed at facilitating the start or maintenance of a commercial relationship** are considered a violation of this Policy ("**Indirect Corruption**").

In order to ensure transparency, integrity and reliability of Lavazza's activities towards all stakeholders, all commercial and economic and financial transactions must be **duly documented in the accounting records** in a truthful, correct and consistent manner, indicating not only their amount, but also their nature and parties involved.

The Lavazza Group undertakes to manage **tax matters** according to a prudent and responsible approach, promoting transparency, collaboration and trust in order to improve relations with institutions, in compliance with the relative corporate policies.

To the extent applicable to each of them, all the Recipients of this Policy are required, among other things, to:

- **comply with** the specific rules referred to in **Section V** of this Policy;
- **declare any conflict of interest**, current or potential, with a third party or with a Group Company, as the case may be, as soon as they become aware of or suspect its existence. The

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term "**Conflict of Interest**" refers to any situation in which the personal interests of a Recipient (or a family member) may be in conflict with those of the Group, affecting the independence of action and judgment which must guide the business relationships and commercial relationships so that they are based on integrity and transparency;

- act with prudence when making or accepting, either directly or through an intermediary, any **investments** (e.g. in securities, derivatives or other financial products) where these activities can be considered **functional to carry out acts of Corruption** in any of its forms;
- before appointing third parties to act on behalf of a Group Company, carry out an **appropriate verification and assessment of the reputation and reliability of such third part**, and to document and manage properly the relevant contractual relationship;
- not to make **political contributions**;
- act with **prudence** in making **donations or sponsorships** on behalf of Lavazza;
- **report any act of corruption**, known or suspected, as soon as possible;
- comply with the **principle of segregation of duties** between those who execute, those who control and those who authorize actions and decisions, according to the internal policies and procedures of the Lavazza Group companies (where applicable);
- comply with the **rules for acting on behalf of the Lavazza Group Companies** and relevant **internal authorization processes**;
- **operate with professionalism, impartiality and transparency**, immediately reporting any situation that could generate a conflict of interest or a risk, even if only hypothetical, of Corruption.



## V. SPECIFIC RULES

## Specific Rules

This section defines the main rules applicable to certain "sensitive" areas which may favor acts of Corruption.

### 1. Gifts, gratuities, hospitality, entertainment expenses, donations and sponsorships

The Lavazza Group does not allow the giving and receiving of gifts, gratuities, hospitality, the payment of entertainment expenses and the disbursement of donations, contributions and sponsorships **that can result in forms of Corruption**, even if only in the form of an attempt.

From a commercial point of view, these acts and transactions may be lawful, appropriate and suitable tools for establishing and maintaining good business relationships. However, such acts can be **critical** if they are **capable of influencing a corporate decision, creating obligations of gratitude**, or even **illegal** if they can **favor acts of Corruption**.

The purpose of this Policy is not to prohibit such acts and activities, to the extent that they are lawful and carried out in good faith, i.e. they have the sole purpose of creating or maintaining profitable business relationships. This Policy prohibits those acts aimed at to **obtain or grant an undue advantage** (ref. definition of Corruption).

Below are the specific rules of conduct envisaged by the Lavazza Group in the process of managing and receiving gifts, gratuities, hospitality, payment of entertainment expenses and the disbursement of donations, contributions and sponsorships by and to its employees (and their families).

**These acts and transactions are prohibited if:**

- They do not fall within normal company practices;
- They are made in cash (bills) or equivalent means;
- Their value is excessive compared to the type and extent of the business relationship between Lavazza and its counterparty, or in any case they exceed the value established by the policies of the concerned Group Company (if any);
- They may compromise the independence in conducting business, the operational integrity and reputation of the employee or contractor, or may in any case influence their actions;
- They can reasonably be interpreted by an impartial observer as acts aimed at gaining undue advantage.

Receiving gifts **bearing the logo of the company** offering them, and which are of **modest value** it is generally considered a **regular company practice** and it is not prohibited.

The Lavazza Group companies can authorize the **payment of business travels and accommodation expenses** only if the following requirements are met:



- there is a precise and legitimate business purpose;
- expenses are appropriate and reasonable, also in light of the guest's qualification or business role;
- participation in corporate activities by the beneficiary is mandatory or necessary;
- expenses are linked exclusively to the individual who carries out the activity (i.e. friends, family or other third parties cannot receive payments in cash or other benefits from Lavazza Group companies);
- the trip does not involve deviations from the normal work schedule.

Any gift, gratuity, hospitality, payment of entertainment expenses and disbursement of donations, contributions and sponsorships must be **duly documented in writing, approved in compliance with the delegation of powers** in force within the Lavazza Group and **recorded** correctly and transparently in the company's accounting.

**Payments** must be made according to the relevant contract, and duly recorded.

Entertainment expenses to be reimbursed must be **formally approved**, on the basis of the authorization system adopted by the Company and must be **duly recorded** in the company's accounts. The relevant supporting documentation must be complete and correct.

It is always advisable to carry out a **prior assessment of the beneficiaries** to whom sponsorships and donations are addressed (e.g. philanthropic organizations).

Lavazza undertakes to establish relationships only with counterparties who enjoy a respectable reputation, conduct lawful activities, and are inspired by ethical principles in line with those of the Group, and are widely recognized for the honesty and correctness of their business practices.

**The Recipients of this policy may make donations on a personal basis**, using their own resources, provided that this does not lead to the onset of a real or potential conflict of interest with the Company to which they belong and that they are not made with the objective of obtaining or maintaining an undue or improper advantage.

More detailed rules of conduct on the offer/acceptance of gifts, gratuities, hospitality, entertainment expenses, donations or sponsorships can be defined in the **internal guidelines adopted by each Lavazza Group company (where present)**.

Where any **doubt** arises about the correctness of an act similar to those listed above, the interested parties are required to discuss with their company contact person (in the case of employees and collaborators, their manager) who will proceed with the appropriate assessments.



## 2. Supporting the local communities

Lavazza operates in a considerable number of Countries, interacting with many **local communities**. The Group aims to inspiring the local organizations and institutions with which it interacts, creating relationships based on clarity, ethics and impartiality, ethical values and social responsibility.

The Lavazza Group also undertakes to promote and contribute to the development of the local communities in which it is present.

To this purpose, the Group companies can **make donations to public and private entities**, including non-profit entities, as well as **organize and sponsor initiatives and events, and financially support specific social development projects**, also in collaboration with third parties.

In order to prevent acts of Corruption related to such initiatives, the Lavazza Group expects them to be conducted in compliance with the laws in force, the Group's internal policies and procedures, the delegation of powers' system in force. Lavazza also expects that the relevant financial transactions are suitably documented and recorded in the accounting registers.

The Lavazza Group will do everything reasonably possible to ensure that the funds allocated for these initiatives are received by the authorized parties and are used for the agreed projects and for the pre-established purposes.

## 3. Relations with Public Officers

**Lavazza does not tolerate and refuses any type of action aimed at influencing the conduct of Public Officers.**

The Lavazza Group prohibits any form of **payment** (or commitment to pay), either direct or indirect, **to Public Officers** (e.g. employees of national or local government, of international organizations, political representatives or candidates for a public office) for the purpose of **obtaining undue advantages**, including (without this being limitative):

- **obtaining permits or authorizations, or speeding-up** any governmental procedure;
- **influencing the outcome** of governmental activities, such as inspections, or avoiding them / inducing them not to report any irregularities;
- **obtaining undeserved or higher government contributions.**

All relations with Public Officers must be managed by **duly authorized personnel**, who must operate in compliance with the defined procedures, guaranteeing the traceability and correct archiving of the relative documentation.

Where possible and applicable, relations with Public Officers during negotiations or proceedings of any kind (e.g. during inspection visits) must take place **in the presence of at least two people**.

## 4. Relations with suppliers and advisors

The Lavazza Group may be held indirectly responsible for acts of Corruption committed by third parties with whom Lavazza has business relationships.

We therefore expect all persons who do business with the Lavazza Group to act in compliance with applicable laws and regulations, as well as in compliance with this Policy.

The Lavazza Group requires its suppliers and advisors to undertake to always act in accordance with the values and principles outlined in the **Lavazza Group Code of Ethics**, the **Lavazza Group Suppliers Code of Conduct** and **this Policy**, requiring them to provide transparent and timely information regarding any breach and adopt the necessary corrective measures.


For this purpose, the contracts between the Lavazza Group and its suppliers and advisors include **specific clauses** about compliance with (and acceptance of) the Lavazza Group Code of Ethics, the Lavazza Group Suppliers Code of Conduct and this Policy. According to said contracts, in the event of non-compliance and failure by third parties to plan and implement the necessary corrective actions, **Lavazza has the right to terminate the contractual relationship immediately and without prior notice.**

The Recipients of this Policy are not allowed to:

- **offer, promise, give or pay** (or authorize someone to do so), directly or indirectly, money or any other benefit to the Lavazza Group's suppliers and advisors in order to
  - obtain **favorable conditions** for Lavazza or **personal benefits and advantages**; or
  - obtain, provide or disclose **confidential information**;
 unduly favoring the Lavazza Group (ref. definition of "Corruption");
- **request, solicit, encourage, accept or receive** (or authorize someone to do so), directly or indirectly, money or any other benefit from Lavazza Group's suppliers and advisors for the purpose of **establishing or maintaining contractual relationships and business** with Lavazza, unduly favoring the Lavazza Group;
- **creating illicit funds for the purpose of Corruption** using money, gifts or other benefits received;
- conducting Corruption activities **through third parties**, in particular through suppliers, professionals and external consultants who act on behalf of the Lavazza Group.

Before entering into procurement contracts, **Lavazza should prior assess the prospected suppliers and advisors** in order to identify any possible "risk of counterparty": Lavazza intends to establish commercial relationships only with third parties who enjoy a respectable reputation, conduct only lawful activities and are inspired by ethical principles in line with those of the Group. The Group companies can adopt specific procedures to carry out this assessment.

All contractual relationships with suppliers and advisors, including the related economic terms and conditions, must be **documented in writing** and signed by individuals with adequate powers of representation, on the basis of the delegation of powers' system adopted by the Company.

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The traceability of the receipt and acceptance of goods and services purchased from suppliers and advisors is ensured by the functions in charge of the purchasing processes.

The performance and conduct of suppliers and advisors is duly **monitored** by Lavazza, and anomalies are duly investigated and reported.

All **payments** must be made in compliance with the agreed contractual terms and upon receipt of the relevant invoices, correctly approved on the basis of the approval system adopted by the Company and adequately recorded in the company's accounts.

## 5. Relations with clients and commercial partners

The Lavazza Group may be held indirectly responsible for acts of Corruption committed by third parties with whom Lavazza has business relationships.

We therefore expect all persons who do business with the Lavazza Group to act in compliance with applicable laws and regulations, as well as in compliance with this Policy.

The Lavazza Group requires its clients and commercial partners to undertake to always act in accordance with the values and principles outlined in the **Lavazza Group Code of Ethics** and **this Policy**, requiring them to provide transparent and timely information regarding any breach and adopt the necessary corrective measures.

To this end, the Lavazza Group establishes **business relationships** only with customers and commercial partners (e.g. sales agents, distributors) who enjoy a respectable reputation and who only conduct lawful activities, inspired by ethical principles in line with those of the Group.

For this purpose, the contracts between the Lavazza Group and its suppliers and advisors include **specific clauses** about compliance with (and acceptance of) the Lavazza Group Code of Ethics and this Policy. According to said contracts, in the event of non-compliance and failure by third parties to plan and implement the necessary corrective actions, **Lavazza has the right to terminate the contractual relationship immediately and without prior notice.**

The Recipients of this Policy are not allowed to:

- **offer, promise, give or pay** (or authorize someone to do so), directly or indirectly, money or any other benefit to the Lavazza Group's clients, current or potential, with the purpose of **establishing or maintaining a commercial relationship**, unduly favoring the Lavazza Group (ref. definition of "Corruption");
- **request, solicit, encourage, accept or receive** (or authorize someone to do so), directly or indirectly, money or any other benefit from Lavazza Group's clients and commercial partners, with the purpose of **establishing or maintaining a commercial relationship**, unduly favoring the Lavazza Group (ref. definition of "Corruption");
- **creating illicit funds for the purpose of Corruption** using money, gifts or other benefits received;
- conducting Corruption activities **through third parties**, in particular through agents, acting on behalf of the Lavazza Group.

**Discounts, contributions or bonuses linked to the achievement of certain objectives can be recognized to clients only if and to the extent that the agreed goals have been actually achieved,** according to the terms and conditions of the relevant contract. In the event of failure to achieve the contractually agreed objectives, contributions, discounts or bonuses can only be granted in exceptional and justified cases and must be approved in writing in compliance with the delegation system adopted by Lavazza.

In contractual relations with clients and commercial partners, the rules and principles defined by this Policy, section "Special Rules", paragraphs 1-3-4, are also applied, if and as compatible.

## 6. Extraordinary transactions

In the event of **extraordinary operations** (e.g. mergers, acquisitions, demergers, takeover, share capital increase / reduction, group re-organizations, etc.) the managers of the Lavazza Group involved, possibly supported by external consultants, are required to:

- identify the main **risk factors** associated with **compliance with the anti-corruption laws** that emerge in the context of the deal;
- request from the counterparty or prepare at the request of the counterparty **information** relating to compliance with **anti-corruption regulations**;
- define the **anti-corruption clauses** to be included in the transaction's agreement.

In contractual relations with the advisors assisting Lavazza with the extraordinary transactions, the rules and principles defined by this Policy, section "Special Rules", paragraphs 1-3-4, are also applied, if and as compatible.

## 7. Human resources

From the earliest stages of the **hiring process**, the Lavazza Group is committed to building loyal and transparent working relationships based on knowledge and sharing of possible professional and career paths.

The Recipients of this Policy are not allowed to:

- **offer, promise or accept** a request for money or other benefits in the form of **hiring, career advancement, recognition of bonuses, incentives and MBO awards** as forms of Corruption (even towards Public Officers) in order to obtain undue advantages for Lavazza;
- **use reimbursement of entertainment expenses as a means of creating illicit funds** for the purpose of Corruption.

Furthermore:

- the **personnel's selection process** must start only in response to an **effective need**; extra-budget hiring must be formally authorized in compliance with internal procedures;
- decisions regarding the **selection and hiring of personnel, career advancement and awarding** must be based on **objective and impartial factors**, e.g. the evaluation of performance and technical-professional skills;
- the **recruitment process** must be **traceable**, and the relative decisions must be formalized and accompanied by exhaustive and punctual documentation;
- the selection, assessment and hiring processes **must not be managed by a single individual** and must always be led by the HR Department;
- the hiring process must always include the **verification of candidates' previous professional experience and their suitability for the position** in question; any potential conflicts of interest or relationships with representatives of public institutions, suppliers and other relevant public or private subjects must be identified and examined;
- all employment relationships must be **formalized in writing** and **signed** by individuals with adequate power of attorney;
- **bonuses, benefits, performance targets and other incentive plans** must always be authorized in compliance with the system of powers and applicable policy;
- the types of reimbursable expenses and the related maximum amounts are defined in policies and procedures that all employees must observe;
- requests for **reimbursement of expenses** must be **formally authorized** in compliance with the authorization system adopted by the Company;
- **advanced payments** to employees and **reimbursements of business travel expenses in cash** must be authorized in compliance with the limits and procedures defined by the Group.



## VI. "RED FLAGS" AND SANCTIONS

## 1. “Red Flags”

Some situations (“Red Flags”) may **require further investigations** aimed at establishing whether a transaction or a specific relationship might constitute a **potential or actual risk of Corruption**.

For example:

- transactions and commercial relationships linked to a **country where Corruption is largely present and spread** (e.g. Lavazza’s counterparty is resident in such a country or the transaction involves this country). In order to identify this risk, reference can be made to the *Corruption Perception Index published by Transparency International since 1993*;
- requests for **payments in cash (bills)**;
- requests for **payments not provided by the relevant contract**;
- requests for **payments to beneficiaries that are not the contractual counterparty**, or that have to take place through **countries other than those connected to the contractual relationship**;
- payments to **undetermined third parties**;
- **absence of a written agreement**;
- **unusually close relationships with a Public Officer**;
- **refusal to undertake to comply with this Policy**;
- **payments without a purchase order number** (where applicable).

All Recipients of this Policy must pay attention and be ready to identify the scenarios described above; if with one of the Red Flag situations occur, any Recipient must:

- (i) assess whether **further investigations** and counterparty due diligence activities are needed; and/or
- (ii) **report the matter to its line manager** and/or local HR contact person, as well as to the Chief Human Resources Officer and/or Chief Legal & Compliance Officer of Luigi Lavazza S.p.A.

## 2. Whistleblowing

Lavazza offers to all its employees, contractors and, in general, third parties who have commercial and business relations with Group, **the possibility to report, in a confidential manner, any unlawful conduct or irregularity** which could lead to the violation of this Policy or of the anti-Corruption laws and, more generally, of the principles defined in the Code of Ethics, in the *Organization, Management and Control Model* adopted by Luigi Lavazza S.p.A. pursuant to the Italian Legislative Decree 231/2001 (where applicable) and similar applicable legislations, in the Lavazza Group’s policies and procedures as well as **potential violations of laws and regulations**, by setting up suitable reporting channels.

Anyone, inside or outside the Group, who has certain information or reasonable suspicion that a conduct may involve the risk of violation of this Policy or of the laws against Corruption, **must**



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**promptly report the fact, anonymously or identified, through the reporting channels made available by the Group.**

The Lavazza Group undertakes to protect the person reporting in good faith against any form of retaliation, discrimination or penalization for reasons connected, directly or indirectly, to the report.

For further information on the reporting process and mechanisms, it is advisable to refer to the **Whistleblowing Policy** published on the website [www.lavazzagroup.com](http://www.lavazzagroup.com) (Compliance Section) and on the company intranet pages.

### **3. Sanctions**

**Violations of this Policy and of the anti-Corruption laws could lead to sanctions and fines against the individuals involved**, under the local laws, and may lead, where applicable, to the individual's dismissal.

**Therefore, it is extremely important that all Recipients read this Policy carefully, and strictly comply with it.**

For any **doubts**, please contact your line manager and/or the local HR manager, or the Chief Human Resources Officer and/or the Chief Legal & Compliance Officer of Luigi Lavazza S.p.A.



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## SUMMARY

### Spread the message

Being an example for our colleagues in carrying out our day-to-day activities. Helping the Lavazza Group to spread a strong anti-corruption culture, ensuring that every person is aware of situations potentially exposed to risks of corruption, so that any problems can be dealt effectively and promptly.

### Reporting

Reporting whenever you suspect someone is engaging in illegal or unethical conduct. It's the right thing to do, for you, for the Group, for everyone.

### Asking for support

This Policy, as well as any local operating procedures, does not regulate all situations that could arise in everyday professional life. For this reason, if in doubt about the conduct to adopt, it is advisable to adhere to the values of the Lavazza Group and act in compliance with them.

For any doubt, you can contact: *Human Resources and Legal, Corporate & Compliance* departments at headquarter (Luigi Lavazza S.p.A.)

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## GLOSSARY

For the purposes of this Policy, these definitions shall apply:

### **Code of Ethics**

The Code of Ethics of the Lavazza Group, published and maintained on the corporate website [www.lavazzagroup.com](http://www.lavazzagroup.com)

### **Suppliers Code of Conduct**

The Suppliers Code of Conduct of the Lavazza Group, published and maintained on the corporate website [www.lavazzagroup.com](http://www.lavazzagroup.com)

### **Corruption, Active / Passive Corruption**

The terms "Corruption, Active and Passive Corruption are defined under *Section III Definitions and Recipients* of this Policy

### **Recipients**

The term "Recipients" is defined under *Section III Definitions and Recipients* of this Policy

### **Corporate Recipients**

Means the Recipients who are also directors or employees or contractors of a Lavazza Group company.

### **Lavazza HQ**

Luigi Lavazza S.p.A., a company incorporated and existing under the Italian law and having registered office at Via Bologna 32, 10152 Torino, Italy (Tax ID 00470550013, REA Torino 257143).

### **Lavazza, Lavazza Group or Group**

Lavazza HQ all the companies directly and indirectly controlled by Lavazza HQ, including those directed and managed by Lavazza HQ (*direzione e coordinamento*).

### **Anti-Corruption laws**

The most relevant and recognized national and international laws against Corruption, including without this being limitative: (i) the Italian *Legislative Decree no. 231/2001* ("Decreto 231"), (ii) the USA *Foreign Corrupt Practises Act* ("FCPA"), (iii) the *Bribery Act 2010* of the United Kingdom (the "Bribery Act"), (iv) the French law no. 2016-1691 also known as "Loi Sapin II", (v) the anti-corruption international treaties such as the *OCSE Convention on Combating Bribery of Foreign Public Officials in International Business Transactions* and the *UN Convention Against Corruption*

### **Commercial Partners**

Third parties having commercial relations with Lavazza Group, including without limitations agents and distributors.

A decorative graphic in the top left corner consisting of a yellow circle, a grey textured circle, and a yellow line.

## Policy

Means this Anti-corruption Policy

## Public Officer

(a) anyone who has been designated to exercise a legislative, judicial or administrative function;

(b) anyone who acts, in an official capacity, on behalf of (i) a national, regional or local public administration, (ii) an agency, office or body of the European Union or of a public administration (national or foreign, regional or local), (iii) an enterprise controlled or owned by the government, (iv) a public international organization, or (v) a political party, a member of a political party or a candidate for a political office;

(c) any person in charge of a public service and, consequently, anyone who performs a public service (where by public service we mean any activity which, although governed by the same provisions applicable to public functions, does not imply the use of the powers proper to a function public).

## Other Benefits

Means any form of convenience or advantage offered, requested, promised, given to or received by any person or entity for the benefit or advantage of that person or any other person or entity, including, without limitation: (i) cash and equivalents, including loans, gifts or prizes; (ii) any form of deferred payment in cash or cash equivalents, including, but not limited to, derivatives and securities; (iii) offers or promises of employment or future employment; (iv) favorable terms in relation to a product or service, including product discounts; (v) entertainment/hospitality expenses which are outside the scope of the permitted payments set out in this Policy (including payment of travel, food and lodging, subsistence expenses or travel expenses or accommodation); (vi) discounted or complimentary event tickets.

## Red Flag

Red Flag is defined in *Section VI Definitions and Recipients* of this Policy

## Private Subjects

Any individual or legal entity other than the Lavazza Group