



Gorgonzola

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IGOR S.r.l

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Iscritta al n. 148084 del REA di Novara



SUPPLIER CODE OF CONDUCT





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TABLE OF CONTENTS

1. Introduction	3
2. Recipients and Scope of Application	3
3. International Standards and References	4
4. Responsible Sourcing Practices	5
5. Dissemination of the Code.....	10



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1. Introduction

IGOR S.r.l. and its subsidiaries (hereinafter referred to as 'IGOR' or 'Group'), long-established in the production of Gorgonzola PDO, have incorporated ESG (Environmental, Social, and Governance) principles into their corporate policies. These include the **Responsible Sourcing Policy** for Suppliers, which is a complementary document to this **Supplier Code of Conduct** (hereinafter also referred to as the 'Code' or 'Document').

This Code of Conduct serves as a formal framework through which the Group extends to its suppliers its core ESG principles and values, requiring their acceptance and compliance.

The Code defines the standards of ethics, transparency and sustainability that suppliers are required to observe in order to maintain business relations with IGOR and ensure a responsible supply chain. IGOR requires these principles to be applied throughout the entire supply chain, promoting the protection of the environment, respect for human rights, the communities concerned and society as a whole, as well as the adoption of the highest standards of fairness and integrity in business practices.

Through this Document, IGOR establishes its expectations for suppliers and outlines **behavioural standards** to ensure alignment with the company's ESG principles.

2. Recipients and Scope of Application

The scope of application of this Supplier Code of Conduct includes all the IGOR Group's suppliers and all entities partnering with the Group in the supply chain. The Code applies to all natural persons and legal entities involved in the supply of goods and services, including supplier companies, subcontractors, cooperatives, direct producers and business partners with whom IGOR has commercial and/or strategic relations.



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In particular, the Recipients of this Code are:

- **Suppliers, Subcontractors, Cooperatives and Direct Manufacturers:** All parties supplying goods and services to IGOR, including, where possible and applicable, subcontractors involved in the production chain;
- **Commercial Partners:** Parties with whom IGOR has strategic business relations, such as distributors and other organisations that play a significant role in the implementation of responsible sourcing practices.

All stakeholders, including natural persons and legal entities, cooperatives, groups, organisations and business partners directly or indirectly connected with IGOR's activities, are collectively referred to as the 'Recipients' of the Supplier Code of Conduct.

Recipients are expected to adhere to the principles and practices outlined in this document, sharing responsibility for implementing fair business practices, ensuring human rights, environmental protection and promoting transparency throughout the supply chain.

3. International Standards and References

This Supplier Code of Conduct is inspired by a number of recognised national and international standards on environmental protection, human rights, ethics and governance. The reference standards used in drafting this Code include:

- **The United Nations Sustainable Development Goals (SDGs)**, with particular reference to goals such as SDG 3 (Health and Well-being), SDG 4 (Quality education), SDG 5 (Gender equality), SDG 6 (Clean water and sanitation), SDG 7 (Clean and affordable energy), SDG 8 (Decent Work and Economic Growth), SDG 9 (Industry, Innovation and Infrastructure), SDG 10 (Reducing Inequality), SDG 11 (Sustainable Cities and Communities), SDG 12 (Responsible Consumption and Production), SDG 13 (Climate Action), and SDG 15 (Life on Land), SDG 17 (Partnership for the Goals);¹

¹ UN Italy. The new 2030 Agenda for Sustainable Development



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- **The 10 Principles-UN Global Compact**, which provide a practical framework to guide companies in adopting responsible practices to manage their impact on the environment and society;²
- The international instruments (ILO Conventions, UN Declarations such as the **Universal Declaration of Human Rights**, International Covenants) referred to in the **SA8000:2014 Social Accountability Standard**;³
- **The ISO 50001 Guidelines**, which promote an energy management system to improve energy efficiency, optimise consumption and minimise its environmental impact;⁴
- Animal welfare standards such as **Classyfarm**, an assessment system that ensures responsible farm management and compliance with animal welfare conditions across the production chain;⁵
- The **BRC Food Safety** standard, a global standard for food safety, establishes strict procedures for quality and safety control in production processes, ensuring safe products that comply with legal requirements;⁶
- **Legislative Decree No. 81 of 9 April 2008** regulates health and safety in the workplace, establishing obligations for the protection of workers and the assessment of company risks⁷;
- **Legislative Decree 231/2001**, which establishes the administrative liability of employers and companies for offences committed by their employees or managers;⁸

4. Responsible Sourcing Practices

Through the promotion and implementation of best practices, IGOR is dedicated to building constructive partnerships with its suppliers, creating synergies that foster an ethical, transparent, and responsible supply chain that respects both human dignity and environmental sustainability. The principles and practices of responsible sourcing that suppliers are expected to observe are outlined below.

² [The Ten Principles | UN Global Compact](#)

³ [Social Accountability 8000 \(sa-intl.org\)](#)

⁴ [ISO - ISO 50001 - Energy management](#)

⁵ [Classyfarm](#)

⁶ [BRCGS Food Safety Global Standard](#)

⁷ [Official Gazette](#)

⁸ [Legislative Decree No. 231 of 8 June Official Gazette](#)



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Environmental Practices

Commitment to Animal Welfare throughout the Supply Chain

IGOR's suppliers, particularly those directly involved with animals, such as milk suppliers, must implement practices that ensure adherence to both ethical standards and regulatory requirements for animal welfare. It is necessary to ensure appropriate living conditions for animals, minimising stress and promoting responsible and respectful behaviour towards them.

Commitment to Climate Change Mitigation and Adaptation

Suppliers are required to actively contribute to climate change mitigation through specific measures aimed at reducing greenhouse gas emissions, including optimizing energy efficiency, utilizing renewable energy sources, and implementing responsible sourcing practices. When appropriate, they must also implement adaptation strategies to ensure the resilience of their operations to climate-related impacts.

Pollution Prevention and Reduction Across the Supply Chain

Suppliers must implement practices to prevent and minimize air, water, and soil pollution in accordance with their specific business operations and environmental context. This includes, where applicable, the responsible management of pollutants and the implementation of environmentally friendly and alternative solutions to minimise the environmental impact of their operations.

Shared Commitment to the Responsible Water Resource Management

Suppliers are required to practice responsible water management, reducing waste and optimising water efficiency. They must adopt practices to recycle and reuse water and implement technologies that minimise their environmental impact, contributing to sustainable use across the supply chain.

Biodiversity Conservation and Ecosystem Protection Across the Supply Chain

Suppliers must demonstrate commitment to minimizing adverse impacts on biodiversity, land use changes, and natural resource exploitation. They must adopt sustainable practices that protect local fauna, flora and ecosystems, actively contributing to the conservation of biodiversity.



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The Circular Economy and Resource Optimisation

Suppliers must promote the circular economy through reuse, recycling and waste reduction practices. Suppliers are required to utilize environmentally friendly materials, such as sustainable packaging, and implement responsible natural resource management wherever feasible, actively contributing to reducing the environmental impact throughout the product lifecycle.

Social Practices

Decent Working Conditions Across the Supply Chain

IGOR's suppliers must guarantee safe and decent working conditions for all workers across the value chain. Suppliers must uphold human rights, including workers' freedom of association, ensure fair compensation, maintain appropriate working hours, and implement comprehensive occupational health and safety measures. It is essential to create working environments based on dignity, equality and safety, protecting the physical and mental health of workers.

Non-Discrimination, Equal Treatment and Opportunity Across the Supply Chain

Suppliers must respect the principles of diversity, inclusion and equal treatment, regardless of ethnicity, sexual orientation, gender identity, disability or other personal characteristics. All forms of discrimination are prohibited. Recipients must ensure that professional advancement is based on merit, talent, and competence, while actively promoting gender equality and equal compensation for equivalent work. Furthermore, suppliers must support ongoing training initiatives to promote skill development and inclusivity throughout the supply chain.

Prohibition of Forced Labour, Child Labour and any Form of Violence

Suppliers must adopt strict policies to prevent forced and child labour and ensure a working environment that respects the dignity and freedom of individuals. They must prohibit all forms of violence, including physical, psychological, sexual or verbal harassment. Supply chain collaboration must be founded on protecting fundamental human rights, ensuring the complete elimination of exploitation and child labour.



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Protecting the Economic, Social and Cultural Rights of Communities along the Value Chain

Suppliers must adopt practices that contribute to the welfare of local communities, promoting social inclusion and respect for economic and cultural rights. Recipients are expected to support initiatives to improve access to decent work opportunities by fostering the economic self-sufficiency of the communities in which they operate and creating a positive and lasting impact.

Protecting the Civil and Political Rights of Communities Across the Supply Chain

Suppliers must respect and promote the civil and political rights of communities, including the right to freedom of expression, political participation and non-discrimination. Suppliers must conduct their operations in compliance with both local and international laws that protect fundamental human rights, while promoting social dialogue and civic engagement in the communities where they operate.

Governance Practices

Ethics, Transparency and Compliance along the Value Chain

IGOR suppliers must operate according to the highest ethical and transparency standards, fully complying with applicable local and international regulations, including those governing anti-corruption, labour rights and fair competition. Responsible business management is essential, ensuring traceability of supplies and the implementation of ethical business practices.

Respect for Privacy and Data Protection Across the Supply Chain

Suppliers must ensure the protection of privacy and the security of personal data by taking appropriate technical and organisational measures to prevent unauthorised access, loss or breach of data. They must treat all sensitive information with the utmost confidentiality, fully complying with current privacy and data security regulations.



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Whistle-blower Protection and Whistle-blower Management Across the Supply Chain

IGOR suppliers must adopt effective procedures to enable the safe and confidential reporting of any ethical, legal or regulatory violations that occurs across the supply chain. It is essential to ensure a whistle blowing system that protects whistle-blowers from any form of retaliation, discrimination or intimidation by fostering an environment where reports can be made freely and responsibly. Accordingly, suppliers are required to treat all reports with the utmost seriousness and implement appropriate measures to investigate and address reported misconduct or wrongdoing.



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5. Dissemination of the Code

This Code of Conduct for Suppliers is provided to all IGOR Recipients through the company's official channels, including the company website and, for direct suppliers, through targeted communications. The **Sourcing** function is responsible for its distribution and is committed to ensuring that each supplier reads the Code and fully understands the principles and practices contained therein.

Adoption of the Code is considered a fundamental requirement for establishing and maintaining business relations with the Group. IGOR therefore reserves the right to monitor and verify compliance with the provisions of the Code by its suppliers, including through the provisions of the Responsible Sourcing Policy. The Code of Conduct is communicated to all suppliers, both existing and new, so that they have a clear comprehension of the Group's expectations. Each supplier must acknowledge having read, understood and accepted the contents of the Code, and commit to adhering to these principles as a mandatory condition for maintaining their business relationship with IGOR.

This Document was approved by the IGOR Board of Directors on *15 November 2024* and is regularly updated to ensure its compliance with regulations and legal developments. Any revisions or amendments to the Code will be submitted to the Board for approval and be promptly communicated to suppliers in order to keep the content current and in line with industry best practices.

Signature


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15/11/2024