



## **CODE OF ETHICS**

### **ORGANISATIONAL, MANAGEMENT AND CONTROL MODEL According to Legislative Decree no. 231 of 8 June 2001**

**Text approved on 7 September 2012**

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## **1. Introduction**

This Code of Ethics is an official document describing the commitments and the moral responsibilities in relation to the activities taken on by the members of Consortium bodies, its employees and anyone carrying out one or more of the activities identified as entailing risks. This includes persons acting for or on behalf of the Consortium, working on a Consortium project, providing professional services or doing an internship (hereinafter, "external staff").

The Code of Ethics contains a series of principles, rights and duties on which all the activity is based and the conduct to be observed by virtue of any and all applicable provisions. For the Consortium, the adoption of ethical principles in order to prevent the offences mentioned in Legislative Decree no. 231/01 is an essential part of the preventive control system.

### **1.1 The mission of the "Prosciutto di San Daniele" Consortium**

In the framework of its activities, the "Prosciutto di San Daniele" Consortium pursues the primary goal of protecting, defending and promoting the "Prosciutto di San Daniele" PDO by managing and safeguarding the production rules, the economic policy of the industry in question and the applicable provisions of law.



Pursuit of this aim is ensured by the commitment that the Consortium puts into protecting the designation “Prosciutto di San Daniele” and the collective trademark identifying the “Prosciutto di San Daniele” PDO, as described in detail in the Quality Manual.

## **1.2 Aims of the Code of Ethics**

In its Code of Ethics, the Consortium has defined clearly and unequivocally the set of values it recognises, accepts and shares and the responsibilities it takes both within the Consortium and in respect of outside parties. Indeed, the Board of Directors approved this Code of Ethics so that it would be observed and applied by its recipients, since this is essential for the performance, reliability and reputation of the Consortium itself.

Correctness, fairness, integrity, loyalty and strictness are the values underlying correct conduct to be maintained both within the Consortium and in relations with outside parties. Indeed, constant ethical behaviour is essential in relations between the Consortium and its members.

For this reason, it is important that both employees and external staff acknowledge the principles set forth here and contribute actively towards applying them, reporting any incongruities when appropriate.

On the other hand, any conduct contrary to the spirit of this document will be punished in accordance with the provisions of the Code of Ethics, of the Organisational, Management and Control Model according to Legislative Decree no. 231/2001 and/or of the clauses of the contracts entered into with consultants and/or any external staff.

Any amendments to be made to this Code of Ethics must be approved by the Board of Directors and signed by the Chairperson.

## **1.3 Recipients and field of application of the Code of Ethics**

The following are considered obligated recipients of this Code of Ethics and may be punished if they breach its provisions:

- All members of the Consortiums management bodies;
  - Meeting of ham-manufacturing members;
  - The Board of Directors;
  - The Executive Committee;
  - The Chairperson of the Consortium and of the Board of Directors, who is the legal representative of the Consortium;
  - two Deputy Chairpersons of the Board of Directors, the oldest of whom has the power to replace the Chairperson;
  - the General Manager, appointed by the Board of Directors, who supervises the activity of the Consortium, puts the decisions of the Board of Directors and of the Executive Committee into practice, and is also the Personnel Manager;
  - the Board of Auditors;
  - the Consortium Commission consisting of representatives of the categories of manufacturers, of the pig farmers and of the slaughterhouses on an equal footing;
- all in-house personnel;
- any external staff;



- any party exercising management and control of the Consortium, regardless of their legal or formal capacity;
- consultants, suppliers, partners and anyone carrying on activities for and on behalf of the Consortium or under its control.

The contents of this document must be complied with both in Italy and abroad.

#### **1.4 Contract status of the Code of Ethics**

Compliance with the provisions referred to in this Code of Ethics must be considered an integral part of the contract obligations of the Consortium personnel, pursuant to and for the effects of Article 2104 of the Italian Civil Code and of the applicable National Collective Employment Contract.

#### **1.5 Disciplinary measures**

##### **1.5.1 System of sanctions applicable to employees and members of the Consortium bodies**

Failure on the part of employees to observe the rules of conduct indicated in the Code of Ethics and breaches thereof by the latter are considered non-fulfilments of contract obligations and failure to carry out the duties specified in document DQ503 "Job Description". This entails application of disciplinary measures. These will be applied observing the appropriate provisions of law and of the Collective Employment Contract and will be proportional to the seriousness and to the nature of the facts.

Investigation of any such breaches, management of the disciplinary procedures and application of the disciplinary measures are the responsibility of the functions in charge of such matters and to which they are delegated. Any breaches of this Code of Ethics must be notified to the Supervisory Body and to the Board of Directors, who will take the appropriate action in accordance with the law.

##### **1.5.2 System of sanctions applicable to external staff, consultants, etc.**

In the case of external staff, consultants or other parties who have entered into contracts with the Consortium, on the other hand, any breaches of this Code of Ethics may lead not only to termination of such contracts, but also to possible claims for damages if their behaviour caused any prejudice.

## **2. General principles**

The principles and basic values underlying this document, shared and acknowledged by all the Consortium functions, are the following:

**Legality:** Compliance with the applicable laws and regulations is the fundamental principle on which performance of all the activities of the Consortium are based. In performing their duties, all recipients of this Code of Ethics are bound to comply with the relevant applicable rules. This principle of legality must also be complied with for activities carried on abroad.



**Protection and promotion of PDO status:** The Consortium undertakes to promote application of the Product Specifications of the “Prosciutto di San Daniele” PDO and to improve the quality characteristics that validated the designation on domestic and foreign markets. It also undertakes to safeguard, promote, endorse and take care of the general interests of the “Prosciutto di San Daniele” PDO also through consumer information.

**Integrity and impartiality:** All conduct must be characterised by moral integrity, transparency and the values of honesty, correct behaviour and good faith. The Consortium condemns any form of discrimination based on sexual orientation, race, nationality, class, language, religion, political opinions, age, state of health or sympathy for political or trade union associations, except as specifically defined by the applicable regulations.

**Trust:** Without trust it is not possible to establish appropriate and effective working relations either within or outside one’s own office.

The Consortium maintains and develops relationships of trust and an on-going dialogue with all stakeholders, seeking, wherever possible, to inform them and involve them in the issues concerning them.

**Respect** for the work carried out, the rights and the merits of others, for the importance and moral and cultural values of the people with whom one works.

**Sharing** of information, of knowledge, of experiences and of professional skills both within and outside one’s own department is of fundamental importance for the performance of the services provided to Consortium members.

**Teamwork** so as to achieve common goals, together with sharing, are essential for carrying out the services provided.

**Transparency and completeness of information** in carrying out institutional activities, in drafting all sorts of circulars and/or notices, in managing the financial resources used and in reporting same and in making entries in the accounts.

**Responsibilities:** Taking one’s responsibilities while carrying out one’s activities must constitute a constant and continuous approach. This applies also to compliance with the Highway Code.

**Protection and safeguarding of the environment and of public health:** In the framework of its activity, the Consortium takes care to comply with all the provisions concerning the environment and health and safety at places of work.

The Consortium promotes social and economic development and employment in line with the accepted standards and international rights with regard to the protection of basic rights, non-discrimination, the protection of children, the banning of forced labour, the protection of trade union rights, health and safety at the workplace, working hours and wages.

**Ban on pornographic material:** It is strictly forbidden to possess pornographic material, whether on IT media or hardcopy, at any of the offices of the Consortium or any other place connected with them, as well as to circulate such pornographic material by means of the Consortium’s web site or any publications taken care of or promoted by the Consortium.



**Personnel policy:** Creating a serene work environment makes it possible to work in accordance with the laws and the shared principles and ethical values. The Consortium endeavours to enhance the professional skills of its employees, supporting training for them and encouraging growth of their specific skills.

**Discretion:** The Consortium ensures and requires its employees and external staff to keep all information confidential and takes care to ensure that they behave and are treated with dignity and respect in the framework of the applicable provisions of law and amendments thereto.

Furthermore, the Consortium:

- **Does not tolerate** any form of isolation, exploitation or molesting due to any cause of discrimination, for personal reasons or reasons connected with work, on the part of any employee or staff against any other employee or staff member;
- **Does not allow** any disciplinary measures in respect of employees or members of the external staff who have rightly refused to carry out work unduly demanded of them by any party connected with the Consortium;
- **Punishes** severely any type of sexual harassment, even by terminating the culprit's employment or work contract;
- **Is definitely against** any type of discrimination based on diversity of race, language, colour, faith or religion, political opinion or affiliation, ethnic origin, age, sex, sexual orientation, marital status, invalidity or physical appearance, social or economic status, and the granting of any privilege whatsoever in connection with the same reasons;
- **Is against employment "off the books"**, child labour and the employment of foreigners who do not have residency permits, and any other conduct constituting illegal behaviour against an individual. Employees and external staff members are employed under proper contracts/assignments signed by both parties. All employees and members of staff are informed correctly and in full of their rights, duties and obligations arising out of the stipulation of a contract and/or assignment as an external staff member.



### **3. Provisions for implementation**

In order to ensure full compliance with the principles stated above, the Consortium undertakes to circulate them and provide proper knowledge thereof. In order to ensure that this is applied uniformly, it will arrange:

- To carry out checks upon receipt of information of breaches of this Code of Ethics;
- To apply punishments in the event of a breach thereof in accordance with the applicable rules;
- To prevent and repress any form of retaliation against parties contributing towards implementing this Code of Ethics;
- To update this document regularly on the basis of the needs arising from time to time also in the light of the activities indicated above.

All recipients of this Code of Ethics are bound to co-operate towards implementing it, within the limits of their skills and functions.

#### **3.2 Supervisory Body**

With regard to checking compliance with and implementation of this Code of Ethics, the Consortium assigns to the Supervisory Body the powers, tasks and duties called for in the “Organisational, Management and Control Model pursuant to Legislative Decree no. 231/2001”, to which reference should be made.

Subject to every type of protection envisaged in the regulations or in the applicable collective contracts, and without prejudice to any obligations according to the law, the Supervisory Body is entitled to receive requests for explanations, complaints or news of potential or actual breaches of this Code of Ethics. Any such requests for explanations, complaints or information will be kept strictly confidential in accordance with the applicable provisions of law.



#### 4. Relations with the Public Administration and comparable parties

Only those functions responsible for entering into commitments and managing relations of any kind with the Public Administration and public officials (including public servants – regardless of whether they are charged or otherwise with a public service – and the holders of public service concessions – and authorised personnel are entitled to do so.

Any type whatsoever of relationship or negotiations with the Public Administration or similar parties must take place in a legal and transparent manner. Relations with public officials, too, must be based on transparency, loyalty and correct conduct. The Consortium does not intend to give rise to the slightest suspicion of wanting to influence such parties unduly in order to obtain benefits by illegal means. For this reason, any behaviour that could constitute corruption, even if inspired by a misjudged social interest, is strictly forbidden. Similarly, all employees must report to the Supervisory Body any attempted extortion or malfeasance by a public official. Any business relations or economic activities undertaken on a personal basis with public officials must be notified promptly.

It is therefore **forbidden**:

- To give or promise gifts, money or other benefits to such parties so as to influence the impartiality of their professional opinions; donations only of a limited value and gifts by way of courtesy are permitted, provided they are approved by the management and remain within customary limits, and so long as they are such that they do not prejudice the image of the Consortium;
- To send faked or specifically formulated documents, to certify the existence of non-existent requisites or to provide assurances concerning untrue facts;
- To procure unduly any type of benefit (licences, authorisations, relief from charges including social security contributions, etc.) with means constituting trickery or deception (e.g. by sending fake documents or certifying things that are not true);
- To undertake economic activities, grant professional assignments, give or promise gifts, money or other benefits such as, by way of example only, hiring or promising to hire them – to public officers or civil servants involved in administrative procedures that could entail advantages for the Consortium;
- To alter in any way the operation of an ICT system of the Public Administration or to interfere in any way with data, information or programmes contained in any such systems without any right to do so;
- To receive unduly contributions, funding, low-interest loans or other payments of the same type however they may be called, granted or provided by Public Administration bodies, through the use or submission of fake or untrue documents or by omitting information that should be provided;
- To use contributions, subsidies or loans for purposes other than those for which they are granted.





Conduct that is considered an offence constitutes a breach of the Consortium's institutional policy, even when displayed in foreign countries in which such conduct is not punished or otherwise banned.

Lastly, with regard to the Consortium's promotional activities, donations, payment of contributions in cash and the stipulation of free loan agreements shall be made:

- Out of generosity and in the framework of overall projects of objective interest and definitely relating to the interests of the Consortium and of its Members;
- Following a formal application by the public body concerned and following a formal decision by the latter to accept such acts of generosity;
- Observing the principles of congruity (understood to mean that the contribution requested must be proportional to the aim for which it is given) and relevance (understood to mean that it must be relevant to the interests pursued by the Consortium).

#### **4.1 Judicial authorities and the Supervisory Body**

In performing its activity, the Consortium acts in accordance with the applicable regulations, lawfully and correctly, co-operating with the judicial authorities, with the police and with any public official having powers of inspection and investigating the Consortium.

The Consortium reiterates that it disapproves of any behaviour that might constitute corruption. Its employees and any external staff must report to the Supervisory Body any attempted extortion or malfeasance by a public official or by a person appointed to carry on a public service of which they may be the recipients or coming to their knowledge.

In this respect, it is required that all employees and any external staff be as helpful as possible and cooperate in full with anyone – public officials or Supervisory Authorities – carrying out inspections and checks on the work of the Consortium.

No-one may destroy or alter records, reports, book-keeping entries or any other type of document, lie or make false statements to the competent authorities in anticipation of legal procedures, enquires or inspections by the Public Administration or the Supervisory Authority. It is forbidden to attempt to persuade others to give the competent authorities false or misleading information or to undertake economic activities, make professional assignments, give or promise gifts, money or other benefits to parties carrying out investigations or inspections, or to the competent authorities.

#### **4.2 Institutions/ Public Bodies**

All relations with domestic or international public institutions shall take place by means of the forms of communication envisaged in the applicable regulations. That is to say, they shall be aimed at assessing the implications of legislative and administrative activities on the Consortium, at responding to informal requests and to the activities of inspection bodies (questioning, queries, etc.) or, in any case, at taking a stand on issues of significance for the Consortium offices. To this end, the Consortium undertakes:



- To set up, without discrimination of any kind, communication channels with all institutional counterparts at international, Community and local level;
- To represent the interests and the positions of its Members in a transparent, strict and consistent manner, avoiding attitudes of a collusive nature.

In order to guarantee the utmost clarity in relations with institutional counterparts, contacts with them will take place solely through persons appointed specifically for this purpose.

#### **4.3 Political parties and organisations**

The Consortium may not pay political contributions of any kind. Political contributions are understood to mean any type of payment, loan or donations made to any political party and/or political or trade union organisation or any of their members, as well as to independent candidates (whether they hold public offices or are candidates in an election).

It is therefore strictly forbidden to make political contributions, even through third parties, using funds, property, services or other resources belonging to the Consortium.

The Consortium does not refund political contributions made personally by employees, external staff, directors or any other party connected with the Consortium.



## **5. Relations with the media**

The Consortium manages relations with the media, through the persons appointed for this purpose, applying the principle of transparency and undertakes to keep all the players involved either directly or indirectly in its activities constantly informed.

All recipients of the Code of Ethics must, furthermore, abstain from circulating false or misleading information that could deceive the outside community and from using confidential information in order to unduly accumulate personal wealth.

## **6. Relations with Consortium members**

Relations with Consortium members are governed by the by-laws and are based on the utmost co-operation and on the principles listed under point 2. The purpose of the Consortium is to carry on its activities in the interest of Consortium Members and to protect, promote and enhance the value of San Daniele PDO ham.

In the field of assistance and technical support, the Consortium aims to raise awareness among its Members with regard to the issue of administrative responsibility of enterprises, with particular reference to compliance with the ethical principles illustrated in this document, promoting adaptation thereof to the requirements of the Decree and possible updates.

## **7. Relations with external staff, consultants, etc.**

Relations with external staff, consultants and other parties to contracts with the Consortium based on criteria of professionalism, correctness and respect.

Contracts and assignments agreed to between the Consortium and any external staff, consultants etc. must always be based on objective parameters of quality, convenience, skill and efficiency, avoiding agreements with parties whose reputation is doubtful, by way of example only, in the fields of environment-friendliness, conditions at work and/or other human rights.

In this respect, the Consortium itself expects from its counterparts that they:

- Exhibit behaviour in accordance with the principles contained in this Code of Ethics and do not receive any illegal pressure to provide services, the contents and/or terms of which are not envisaged in their contracts.
- Behave in a legal and ethical manner and in line with the internationally accepted standards in matters of treatment of their employees and external staff, with regard, in particular, to the principles of protection of fundamental rights, non-discrimination, protection of children, banning of forced labour, protection of trade-union rights, health and safety at the workplace, working hours and remuneration.



Behaviour differing from the above may be considered a serious breach of the duty to behave correctly and in good faith in performing under the contract, and as good reason for prejudicing the relationship of trust, and a just cause for terminating the contract.

## **8. Relations with partners in promotional activities**

Behaviour differing from the above may be considered a serious breach of the duty to behave correctly and in good faith in performing under the contract, and as good reason for prejudicing the relationship of trust, and a just cause for terminating the contract.

## **9. The Consortium's assets and notification obligations**

### **9.1 Corporate notices and book-keeping**

All the book-keeping activities are carried out with a view to transparency, according to principles of truth, completeness, clarity, precision, accuracy and conformity with the applicable regulations. All the book-keeping transactions are kept on record with suitable supporting documentation, so as to make it easy to enter them in the books, to reconstruct the transaction and the identification of any responsibilities, as specified in the documents. The activities carried on at administrative level are formalised by means of specific forms broken down according to subjects. This is essential for enabling efficient checking. The Consortium drafts financial statements illustrating its economic situation, assets and liabilities and financial position in a truthful, clear and complete manner.

### **9.2 Other obligations relating to administration**

The assets of the Consortium are managed correctly and irreprehensibly and, therefore, all the parties under the obligation to comply with this Code of Ethics contribute towards protecting its integrity, respecting the aims of the Consortium itself. The members of the Board of Directors (or anyone acting as such) must not prevent or hamper in any way the checks by the Board of Auditors.

In the light of the above:

- The wealth, the assets, the receivables and the shares must be valued correctly, not assigning to them values higher or lower than the actual values;
- No transactions may be carried out on the capital of the Consortium, nor any other type of transaction using profit that has not been distributed or reserves that are mandatory according to the law;
- The capital of the Consortium may not be reduced, except in the presence of losses or a devaluation;
- The purposes according to the by-laws must be pursued;
- The assets must be managed in a manner consistent with the nature and purposes of the Consortium.



It is strictly forbidden for anyone to influence the proper activity and the decisions of the Consortium boards, prevaricating or misleading their members.

### **9.3 Conflict of interests**

The Consortium takes care to ensure that its employees, any external staff and the Members of the Consortium bodies do not find themselves in conditions of conflicts of interests. Unless expressly authorised to do so, internal personnel may not do business or carry on other professional activities competing with the interests of the Consortium or with the aims pursued by it, as indicated in the by-laws and referred to in this Code of Ethics.

The external staff must, on the other hand, inform the Consortium in the event of professional activities completing with the interests of the Consortium and with the aims pursued by it, indicated in the by-laws and referred to in this Code of Ethics.

In any case, it is a fundamental duty of all employees, external staff and members of the Consortium bodies to avoid and prevent any type of conflict of interests. Anyone to whose knowledge even only the possibility of a conflict of interests comes must inform the Supervisory Body immediately.

In order to respect the principle of correctness and transparency, as well as to guarantee trust on the part of the community and the beneficiaries of its actions, the Consortium makes sure that all the mandatory recipients of this Code of Ethics do not find themselves in conditions of conflict of interests.

## **10. External relations**

Relations with the press, with television channels and, generally speaking, with the mass media, whether domestic or foreign, are maintained solely by those representatives of the Consortium who are authorised to do so and by the in-house functions to which such duties are assigned.

To protect its image and the correctness of the information circulated, the Consortium requires that no employees or staff members give interviews or make any kind of statement or release any information concerning the Consortium to outside parties not qualified in this respect or to accredited journalists.

Any requests for statements or information about the Consortium made by outside parties who are not qualified or by accredited journalists must be notified to the appropriate bodies.

## **11. Collection, payments and similar activities**

The Consortium works observing in full the applicable currency regulations and money-laundering rules also for its activities carried on in other countries, considering the provisions issued by the appropriate Authorities.

To this end, the Consortium personnel and any external staff must avoid carrying out any transactions that might arouse suspicion from the point of view of their correctness and



transparency. In particular, its employees and external staff undertake to check for preventive purposes the available information concerning parties with whom they do business so as to assess their respectability and the legitimacy of their activities. They also undertake to work in such a way as to avoid involvement in transactions that are even only potentially liable to promote the laundering of money originating from unlawful or criminal activities, complying in full with the regulations against primary and secondary money-laundering.

In order to avoid making or receiving undue payments or similar activities, the in-house personnel and any external staff must, in all their negotiations, observe the following principles concerning the documentation and keeping of records:

- All payments and other transfers made by or to the Consortium must be recorded accurately and in full in the books and in the compulsory records (as specified in the IQ702 “Management of payables”);
- All payments must be made solely to the proper recipients and for the activities formalised and/or decided upon on the basis of contracts;
- No false, incomplete or misleading entries may be made and no hidden or unrecorded reserves may be established, nor may any sums of money be deposited in personal accounts or not belonging to the Consortium;
- No unauthorised use may be made of the Consortium’s funds or resources.

## **12. Safety and hygiene at the workplace**

The Consortium has always been committed to guaranteeing health and safety, to circulating and upgrading a culture of safety, developing awareness of risks and promoting responsible behaviour on the part of all personnel, both in-house and outside.

For this reason, all the activities of the Consortium, whether in-house or outside, are conducted complying in full with the applicable regulations concerning prevention and protection, by means of the following tools:

- Risk analysis and analysis of the critical aspects of the processes and of the resources to be protected;
- Adoption of the best technology for preventing the occurrence of risks relating to the safety and/or health of the workers;
- Checking and updating of working methods;
- Holding of training and communication activities.

## **13. Use of IT systems**

The Consortium, complying in full with the Italian Privacy Code, forbids the recipients of this Code of Ethics to alter in any way whatsoever the functioning of any ICT system or to



interfere wrongfully and in any way with data, information or programmes contained in any of the aforesaid systems.

Specifically, all employees are bound:

- To comply with all in-house provisions mentioned in the document “IQ723 Regolamento aziendale per l’utilizzo del sistema informatico” (Regulations for using the IT system) and the conditions of the user licence contracts signed;
- To behave correctly and transparently in using any IT means or system;
- To abstain from any activity that might cause the alteration, suppression or fraudulent creation of public or private IT documents that might have the value of proof and, in any case, to abstain from wrongfully accessing the Consortium’s ICT system in order to alter or suppress data, documents or information preserved therein;
- To abstain from any activity that might cause damage to or the interruption of an ICT system provided by third parties, whether public or private, and from circulating IT equipment, devices or programmes aimed at damaging or interrupting an ICT system;
- To abstain from any unlawful activity of intercepting, impeding or interrupting ICT communications, and from installing equipment capable of intercepting, impeding or interrupting ICT communications;
- To abstain from any activity that could cause damage to information, data or IT programmes of third parties, whether public or private;
- To report any instances of linking to the server from remote sites (and outside the Consortium’s computers);
- To report to the Supervisory Body at all times any and all breaches concerning access to or the use of IT systems.

#### **14. Management and safeguarding of the “Prosciutto di San Daniele” PDO status**

The recipients of this Code of Ethics must undertake to observe the provisions of law concerning use of the “Prosciutto di San Daniele” PDO, undertaking not to alter or counterfeit the trademark and thus to protect the quality of San Daniele ham. The Consortium strictly forbids references by the recipients of this Code of Ethics to the Prosciutto di San Daniele PDO for purposes that are contrary to the applicable provisions according to the law.