

SAMMONTANA GROUP POLICY

Ethical Marketing Policy



SAMMONTANA
ITALIA

Edition 2025 – 2026

1. Objective and Scope of Application

As a food company operating in the pleasure-led food market, Sammontana Group has always been aware of its corporate responsibilities and of the strength of its brands in influencing consumer choices, as consumers have placed their trust in Sammontana Group brands for nearly eighty years.

For this reason, the Group is committed not only to creating pleasurable experiences for everyone through high-quality food products, but also to using communication to encourage people to make increasingly informed and conscious choices.

This policy is inspired by the ethical values and principles of conduct defined in the Sammontana Group Code of Ethics, by the commitment to always provide complete, transparent, clear and accurate information, respectful of human dignity and protective of children.

2. Company Commitment

This Ethical Marketing Policy outlines 8 commitments of Sammontana Group:

- We commit to ensuring that all communication materials, whether written, audio, or visual, consistently represent product characteristics in terms of taste, size, and nutritional information;
- We commit to creating communications that are in no way misleading for consumers and to not portraying food products as meal replacements when they are not intended as such;
- We commit to rejecting vulgar, contradictory, uncertain or ambiguous, and discriminatory messages;
- We commit to supporting all nutritional information relating to marketed products with scientific data;
- We commit to presenting products in their real size and in an appropriate context, without ever encouraging excessive consumption of the product;
- We commit to not undermining the concept of a healthy and balanced diet or the importance of a healthy and active lifestyle;

- We commit to not attributing statistical validity to consumer preference tests unless supported by scientific evidence;
- We commit to accurately and transparently representing any environmental benefit of our products or processes, avoiding any form of greenwashing.

Responsible communication towards children

Regarding its product lines dedicated to children, Sammontana Group commits to:

- recognising the fundamental role of parents, or other reference figures, in guiding children's dietary choices and lifestyle;
- using responsible marketing techniques, avoiding the creation of a sense of urgency in children's purchasing decisions;
- representing food products fairly, accurately indicating nutritional content and product benefits;
- using testimonials, fictional characters, and cartoons in a responsible manner.
- adopting a responsible approach towards schools and the environments in which children experience their social life.

3. Regulations and codes of conduct referenced by Sammontana Group in its operational process:

- ICC Code (Advertising and Marketing Communications Code 2018)
- Consumer Code (Legislative Decree 06/09/2005 No. 206 – Legislative Decree 02/08/2007 No. 145)
- Protection of minors in the field of communication (Italian Authority for Childhood and Adolescence, 21 December 2017)
- Regulation on Commercial Communication relating to food and beverage products, for the protection of children and proper nutrition (Istituto dell'Autodisciplina Pubblicitaria, with the contribution of the UPA working group, 9 February 2021)
- IAP Digital Chart Regulation (Istituto dell'Autodisciplina Pubblicitaria)
- Directive (EU) 2024/825 (Legislative Decree 20 February 2026, No. 30)

4. Roles and Responsibilities

The implementation of this Policy is a shared responsibility across the entire organisation, carried out as follows:

<i>Marketing & Communication</i>	Ensures that communications are truthful, not misleading, and compliant with applicable regulations; guarantees the correct use of claims supported by adequate evidence; ensures consistency between messaging and actual product performance; monitors compliance with ethical standards by suppliers and partners; and manages any reports or complaints related to marketing activities.
<i>Sustainability</i>	Verifies environmental and social information used in communications, ensuring consistency with the Sustainability Report and official data; prevents forms of greenwashing or similar misrepresentations; and supports the definition of ethical guidelines for ESG-related claims.
<i>Legal Affairs / Regulatory Affairs</i>	Ensures regulatory compliance of communications and claims, verifying adherence to applicable laws, regulations, and self-regulatory codes.
<i>Board of Directors (BoD)</i>	The BoD approves this Policy and oversees its implementation at least on an annual basis.

5. Lack of Due Diligence

In the event of non-compliance with this policy, the assessment and management of any violations are the responsibility of the Legal Department.

Any violations of this Policy may be reported through the dedicated reporting channel available at the following link:

<https://www.sammontanaitalia.com/it/area-legal/segnalazioni-whistleblowing.html>

Empoli, November 3, 2025