

CODE OF ETHICS

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Foreword

Since 1877, Barilla has been manufacturing food products, offering a nutritionally balanced diet to consumers all over the world.

Honesty, transparency, innovation, social and environmental responsibility are the values in which Barilla reflects itself, as results of a strong and widely recognized cultural identity. This identity, as an outgrowth of the founders' entrepreneurial style, has been progressively reinforced over 125 years of traditions, experience and actions, becoming one of the firm's fundamental resources.

Nowadays, due to the growth of business, Barilla operates in many environments in constant and rapid development. Therefore, due to the complexity of this scenario, it is essential to clearly define the corporate values that Barilla accepts, acknowledges and shares, as well as the responsibilities assumed by Barilla, both within and outside the Group.

For this reason the present Code of Ethics (hereinafter called the "Code") has been adopted, as an essential instrument to share and clarify Barilla's principles and values.

Introduction

1.1 What is “Ethics”?

“Ethics” includes the whole set of rules of conduct - whether public or private – followed by individuals or groups.

This term, generally used in a number of different contexts, refers to all rules and principles, which should be followed in everyday human life. Although based upon an abstract concept (composed of principles and ideals), the application of ethics is anything but theoretical: it is strictly related to everyday life and transferred into concrete codes of practice.

According to the words of the German philosopher, Immanuel Kant, “ethical behavior” is that of an individual inspired not by fears of punishment or by opportunistic hope of rewards, but rather by his own conscience, “in such a way as to treat mankind, either in himself or in others, always together as an end, and never as a mere means to achieve an end”.

1.2 Business ethics

When considerations about ethics apply to the broader field of business, rather than to individuals’ acts, concepts of responsibility and individual awareness shall be bound up to the concepts of “Company Social Responsibility” and “Corporate citizenship”.

For Barilla, Social Responsibility means the ability to perform its business activities in full respect of the legitimate interests of its partners and customers, as well as in protecting and preserving environmental resources for future

generations.

In other words, Barilla, when performing its business activities, gives due respect for all living creatures and considers the value of inanimate things, doing this as its own action's end, rather than a strategy to achieve mere profit.

1.3 The Code of Ethics

Within the context of business activities, unethical conduct could lead to "potentially opportunistic" behaviors, dictated by the erroneous conviction that one is acting in the Company's favor.

Therefore, the Code of Ethics is of paramount importance in reaffirming that the conviction that one is acting in favor of or to the advantage of Barilla can never, in any way, justify acts or behaviors that conflict with these accepted and shared principles.

The following document is not intended to improve compliance with the law or enhance Barilla's reputation, due to the fact that legal responsibility, full respect of the law and fairness – as well as the high quality of the products – are already essential prerequisites for the very existence of Barilla and therefore these concepts cannot be considered as the objectives of a Code of Ethics.

Therefore, the first and foremost objective of the present Code of Ethics is to share and divulge the values Barilla acknowledges and accepts, at all levels, in order to remind all Barilla's employees to perform their actions and decisions and consider and respect their own interests, rights and duties, as well as those of everyone else.

In other words, everyone shall be aware that the welfare and respect of all must always be expressly considered in everyday activities.

1.4 The Barilla “style”

Style, as Pietro Barilla used to say, is a behavior, which “involves many little things”. Today, it is essential to collect all those “little things”, in order to clarify Barilla’s way towards the future as well as to ensure fair competition in the present industrial marketplace, which is much more responsible and mature.

Therefore, this means performing business activities well and with dignity, in strict compliance with the rules, and most of all it involves conforming Barilla’s behavior to shared principles and values, which inspire spontaneous consent, far from mere obedience and duty.

Through the sharing and application of the principles set forth in this document, Barilla clearly defines its “style”.

1.5 Sharing the Code of Ethics

Therefore, this document aims to be a rational incentive in determining when a behavior is fair and correct, as well as the reason for it.

The primary objective is to introduce an ethical evaluation both in deciding one’s own appropriate behavior and in evaluating someone else’s actions, integrating, in this way, the moral and the business sphere, individual and corporate responsibility, and the personal sphere to the Group’s one: this operation will allow reasoning to be translated into real ethical action.

This document shall be consequently a “moral contract”, subscribed to by all Barilla’s Personnel¹, from external collaborators to suppliers. It is intended to be a personal

¹ The term Company Personnel refers to Administrators, Auditors, Executive Officers and all other employees.

moral pledge. It will not directly enhance Barilla's competitive position, but it will certainly have an indirect influence as long as it will be able to encourage everyone to adopt an ethical point of view and a shared culture of values.

Our commitment

Through “our commitment”, Barilla intends to declare the purposes and shared objectives of everyone who works within the Group, as well as of those who maintain external relations on behalf of Barilla, either individual or groups.

Our commitment

Barilla commits itself to be a quality-focused provider of food products of superior quality and excellent flavor, which can contribute to a nutritionally balanced diet, while enhancing the full respect for environment and the dignity of people.

Barilla intends to focus mainly on two areas of its business:

- Italian first courses
- Bakery products

People

People are Barilla’s activities’ main and constant point of reference.

Our products’ consumers shall have four basic rights: right to safety; right to be informed; right to choose; and right to be listened to.

Barilla’s human resources

Barilla’s human resources (such as the Company’s employees, etc.) represent our central resource towards development and success.

Barilla recognizes cultural and skills diversity as an essential value in the company’s life and intends to attract and develop leadership potential, passion for food products and

the intellectual curiosity of each employee.

Fairness, transparency and respect must inspire every decision and action, in a context of mutual trust and interdependence.

Products

Products represent our daily commitment and all our efforts are aimed at their improvement.

Barilla seeks to concentrate its activities in innovation, in order to obtain top-quality products, perceived as distinctive by its customers and consumers.

Brands

Barilla's brands constitute the company's identity.

Coherence of products and quality of communication will guarantee continuous support for all our brands.

Environmental policy

Barilla is committed to carrying out its activities in full respect of the environment and human health, being aware of its social and ethical responsibilities towards the communities where it operates and from which it draws resources.

Customers

Barilla considers its Customers as partners in pursuing business success.

With this in mind, Barilla promotes collaboration with them, as far as possible, in order to improve business categories and commercial practice, in further respect of all customers.

Competitors

Barilla perceives the role of its Competitors as a constructive challenge and benchmark, in aiming for excellence.

Barilla seeks to compete with fairness, towards the continuous improvement of its business activities.

Profit

Profit represents one of the basic indicators of the company's health and has a crucial role in fostering development and welfare.

3
Values

The Barilla Group has been managed by the same family for four generations and this explains the reason why it has such a strong identity, which has been always based on human and professional “style”, while characterized by fairness, integrity and the ability to strike a fair balance between respect for communities and its basic interests.

Business practices may change over the years, but the coherence with those values has always been Barilla’s primary presentation. Barilla “style” is based on human and professional reciprocal development of its employees and it will last into the future as long as every employee will continue to respect those basic values.

In this respect, Barilla reaffirms its commitments to operate within the framework of the United Nations Universal Declaration of Human Rights, the Fundamental Conventions and Recommendations of the ILO (International Labor Organization), the Earth Charter published by the Earth Council and the United Nations Global Compact proposal.

3.1 Honesty and Transparency

Honesty constitutes the fundamental principle in performing all of Barilla’s activities and affairs, its various initiatives, its products, its information and communication strategies, while constituting an essential part of the company’s management policy.

All of Barilla’s relations with stakeholders² are carried out, at all

² Stakeholders are those individuals, groups, as well as organizations and institutions representing them, whose interests are directly or indirectly affected by the activities of

levels, with fairness, integrity, loyalty and mutual respect, in the belief that a clear, transparent and timely dialogue constitutes a fundamental asset for the Company.

3.2 Social responsibility

Barilla firmly believes that, in order to qualify its business activities as ethical, it shall operate in respecting and safeguarding human rights, Earth's regenerative capability and the welfare of the community, while promoting sustainable human development.

Barilla is furthermore aware that social and ethical responsibility also refers to all communities, in particular to those of developing countries that produce basic materials for some of Barilla's products.

3.3 The centrality of people – Diversity and Inclusion (D&I)

In coherence with its ethical vision, Barilla intends to enhance the value of each person, by respecting physical, cultural and moral integrity and the right to interact and associate with others.

Barilla seeks to pay attention to all the needs in people's lives, given that human life inspires all the company's activities. Barilla supports and respects human rights in its activities and in the sphere of its influence, offers equal opportunities for the development of its people, and protects their privacy. Barilla believes that doing the right thing is also good for business and that respecting diversity and promoting inclusion can be a source of competitive advantage, by creating a more engaged work force that makes better decisions based on a superior understanding of the persons who purchase and consume the

company's products around the world. Barilla does not tolerate any form of discrimination or exclusion in relation to, amongst other characteristics, age, culture, ethnicity, nationality, religious faith, race, political opinions, family status, pregnancy, veteran status, gender, sexual orientation, gender identity, and/or expression, genetic information, health or disability.

3.4 Employees' rights

Barilla guarantees its employees' freedom of association and recognizes the right to collective bargaining. The Company commits itself never to taking advantage, even indirectly, of either forced and obligatory labor, or child labor. Barilla avoids all forms of discrimination against its employees, whether based on age, sex, sexual orientation, health status, race, nationality, political ideas or religious beliefs; it strongly repudiates any form of discrimination in the areas of recruitment and human resource management. Barilla is firmly committed to prevent any form of mobbing or work exploitation, whether direct or indirect. Barilla is furthermore committed to adopt only criteria of merit, work performance and professionalism in all decisions concerning employees' career development.

3.5 Environment preservation and Animal Welfare

Barilla's commitment towards the Earth aims to safeguard its nature and beauties, for present and future generations, thus transmitting values and traditions that can preserve a long-term development of mankind and the environment.

Barilla commits itself to adopting, in every activity, criteria of caution – the "Precautionary Principle"³ – and to implementing a

³ The "Precautionary Principle" is a principle according to which, in case of doubt

preventive approach towards environment and biodiversity; furthermore, Barilla deems to promote initiatives designed to foster greater environmental responsibility of the company and to encourage the promotion of technologies to protect the environment.

From the selection of raw materials to the distribution of finished products, Barilla actively contributes to respecting the principle of “Food Sovereignty”⁴, in the belief that the concept of ethical and social responsibility shall include all those communities producing raw materials.

Moreover, Barilla’s commitment of caring for the present and future wellbeing of the People and the Planet includes animal welfare.

Barilla does not test its products or raw materials on animals, nor funds, commissions, co-authors or otherwise directly or indirectly supports animal testing, unless strictly required by Authorities for safety or regulatory purposes.

related to a product’s or production procedure’s safety towards the environment or human health, the burden of proof regarding the harmlessness of the above-mentioned product or procedures lies solely with the manufacturer.

⁴ Food Sovereignty shall mean people’s right to make their own choice in the fields of food production and distribution, while respecting criteria of sustainable environmental, cultural, and social development, in order to guarantee everyone’s right to an adequate and healthy diet. Right to food is a basic human right, a principle that is firmly established by International law. The Charter of the United Nations implicitly mentions it and it has been reaffirmed and further developed in various international declarations, including the Universal Declaration of Human Rights (article 25) and many other regional or universal international conventions. The principle of Food Sovereignty proceeds in parallel, promoting the economic, political, and cultural sovereignty of Countries.

The Company discourages its suppliers to use animal testing and strongly supports alternative methods.

3.6 Compliance with enforced laws, codes and regulations.

Barilla considers compliance with national and international law as essential in performing all of its activities. Therefore, Barilla commits itself to adjusting its conduct so as to prevent crimes and to conform to the principles of general practice.

Moreover, its general conduct and any decision made by Barilla shall be inspired by the law's possible evolution.

Rules and code of behavior

4.1 Relations with stakeholders

Barilla aims to maintain and develop a relationship of trust with its stakeholders, at all levels, characterized by fairness, collaboration and mutual respect. With the term stakeholder, Barilla means the following categories: stockholders, investors, Company Personnel, external contractors, customers, suppliers, competitors, public administrations, local and national communities, and the media.

4.2 Marketing and Communication

Barilla has the duty to ensure all necessary conditions to contribute to a nutritionally well-balanced diet with its products. Nutrition, however, is not only a biological fact, but is also strictly related to individual's cultural identity; this explains why all marketing activities shall respect everybody's different values, customs and practices in food production and distribution.

Therefore, Barilla considers its consumers as interlocutors: they have the right to be fully informed in order to make their conscious choice at the moment of purchase, rather than

treating them as anonymous “consumers” of products.

Barilla, in fulfilling company’s targets, shall:

- guarantee a relationship of trust and loyalty with its consumers;
- take into consideration the higher order of intellectual and cognitive needs that naturally cause people to consider what they are eating, rather than focusing exclusively on biological needs.

Barilla’s communication activities:

- will always be respectful of the centrality of human being, with their complex mix of physical, psychological, cultural and emotional needs: marketing considerations shall never prevent full transparency of the content and proper use of products;
- will avoid vulgar, contradictory, uncertain or ambiguous messages;
- will always consider its own responsibility in influencing people’s choices, while guaranteeing a fair relationship between Barilla and its consumers.

4.3 Information and accounting records

Barilla’s information and relations with stakeholders shall be governed by principles of transparency, fairness, timeliness and coherence, in compliance with the right to information.

Each employee shall cooperate to ensure accounting transparency, based on the use of true, accurate and complete information for construing entries in accounts.

Each employee shall also collaborate in order to have

transactions properly and timely authorized, coherent, legitimate, verifiable, adequate and registered in the books of accounts through accurate filing, according to logical criteria, in order to make sure that each operation can be easily traced.

No false or misrepresented data may be registered in the Company's (or Group's) books of accounts, for any reason whatsoever.

No employee may be engaged in this sort of criminal activity, even if asked to by a superior.

4.4 Internal Audit

One of the key points of Barilla's policy is represented by internal audit, which includes any necessary or useful procedures, spread to all its employees, directed at maximizing Company's targets, ensuring respect of corporate laws and procedures, protecting corporate assets and providing precise, fair and complete accounting information.

Therefore, Barilla has created and developed proper tools and procedures for addressing, managing and checking activities inside its organization.

Fully aware that a positive attitude towards controls is to be achieved in order to increase its efficiency, it is Barilla's policy to disseminate and improve, at every level of the organization, a culture characterized by awareness of the importance of controls.

The responsibility for building and updating an efficient internal audit system rests on all Barilla's employees. Therefore, managers shall be requested to become fully involved in the company's system of internal auditing in their respective functions and share the values and tools of internal controls with all their colleagues.

Each employee shall be held responsible for tangible or intangible corporate assets and their proper use. No

employee can make, or let others make, improper use of assets and equipment belonging to Barilla.

4.5 Bribery and misappropriation

Barilla commits itself to taking all necessary measures to prevent and avoid bribery and misappropriation.

Any form of payment, in any way aimed at obtaining favorable treatment, whether directly or indirectly, in the pursuit of any activity tied to Barilla, is prohibited. In particular, each employee shall refrain from all forms of gifts, which exceeds or be construed as exceeding normal commercial practices or courtesy received by third parties.

This rule, to which there shall be no exceptions, shall apply both when the employee is pursuing its own advantage, and when diverging from the company's interests.

4.6 Diligence and fairness in contracts

Contracts and work assignments shall be performed according to that established by the parties.

In order to ensure proper and fair management of contractual relations, Barilla refrains from taking any advantage of its dominant position, with regard to contractors; furthermore, Barilla commits itself in providing accurate and exhaustive information to each employee and third parties involved in the above-mentioned contracts.

Implementation and control procedures

Paragraphs 5 and 6 below shall specifically apply to the Group's companies whose legal headquarters and principal activities are based in Italy.

5.1 Scope of implementation of the Code of Ethics

This Code of Ethics is addressed to each and every Barilla Stakeholder without exception and to all those who, directly or indirectly or on a permanent or temporary basis, enter into relationships or transactions with Barilla and work toward the Company's objectives.

The Code of Ethics is binding for each and every Barilla employee, external collaborator, consultant, supplier and customer; each of them shall explicitly accept and respect the present Code.

Furthermore, suppliers are required to always act in a manner consistent with the general principles of the present Code, in order to pursue an ethically responsible manufacturing model.

All Barilla employees are expected be familiar with the provisions of this Code, to refrain from conduct that is contrary to its provisions, to consult their superior or the Internal Control Committee for clarifications and to report violations, cooperate with the departments responsible for investigating violations and avoid any behavior that could prevent their counterparts from becoming cognizant of the existence of this Code of Ethics. In all business transactions, the counterparts must be informed of this Code's rules of conduct, which they are expected to abide by.

Compliance with the Code is also required by existing law as

an essential part of the contractual obligations of all employees, within the meaning of and for the purposes of article 2104 of the Italian Civil Code⁵.

Barilla is committed to actively and fully cooperate with public Authorities, through its employees, in fostering the enhancement of a corporate culture characterized by an awareness of the existence of controls and a control-oriented mentality.

Barilla is also committed to expand and update this Code in order to make it consistent with changes in civil society and in the statutes that have relevance for the Code.

More specifically, Barilla's management is required to comply with the rules of the Code when it proposes or carries out projects, activities or investments on behalf of the Company, and the members of the Board of Directors must also bear in mind the principles contained in the Code, in defining the Company's objectives. Those who occupy positions of responsibility within Barilla (so called top management) are expected to act as an example for the employees, to encourage them to abide by the Code and to foster compliance with its rules of conduct.

In addition, they are required to communicate to the Internal Control Committee all useful information about control failures, suspect behavior, etc., and change their department's control systems in accordance with the instructions provided by the Internal Control Committee.

⁵ "Art. 2104: *diligence of workers*. Workers are expected to render diligently the services expected from them according to the nature of such services, the interests of the company and the higher interests of national production.

They must also comply with the rules for work execution and discipline as set down by their employers and the superiors to whom they report".

5.2 Establishment of the Internal Control Committee with monitoring responsibility

Barilla is committed to complying with or causing others to comply with the provisions of the Code, through the establishment of an Internal Control Committee (hereinafter the "Committee"), to which it has delegated the task of overseeing and monitoring the implementation of the Code of Ethics. This Committee is specifically responsible for:

- monitoring on an ongoing basis the implementation of the Code by the affected parties, including through the collection of violation reports and suggestions;
- reporting any relevant and serious violations of the Code;
- expressing binding opinions regarding the need to revise the Code and significant Company policies and procedures, in order to make them consistent with the Code.

5.3 Reporting of violations of the Code of Ethics

The Committee reports violations of the Code committed by employees or external collaborators and suggests the measures to be taken to the corporate departments designated. It is also expected to report violations committed by company Executives and Managers to the Board of Directors and to the Board of Auditors.

Barilla must establish appropriate channels of communication that can be used by affected parties to communicate remarks about the implementation of the Code and report violations of its rules of conduct.

As an alternative option, all interested parties can report, in writing and anonymously, all violations or suspected violations of the Code of Ethics to the Committee with oversight authority over the implementation of the Code, which will then:

- review the violation report, interviewing, if necessary, the author of the report and the person charged with the alleged violation;
- take all actions necessary to shield the person who reports violations from any kind of retaliation or action that could even remotely be construed as a form of discrimination or retribution;
- ensure that the name of the person who reports a violation is kept confidential, unless the law requires otherwise;
- in case of ascertained violation of the Code, the Committee will transmit the violation report and any appropriate suggestions either to the Company's top management or to the department affected by the violation, depending on the seriousness of the violation;
- the Departments responsible for handling violations, taking into account the applicable law and the Company's system of disciplinary actions, will then define the applicable sanctions, implement them and report to the Committee with oversight authority over the implementation of the Code.

5.4 Communication and dissemination of the Code of Ethics

Barilla is committed to foster and ensure an appropriate

understanding of the Code and to disseminate its knowledge among all interested parties, through proper communication activities.

In order to help Company Stakeholders make their conduct consistent with this Code, Barilla will provide an effective training program and will strive on an ongoing basis to enhance awareness of the values and principles of ethics contained in the Code.

Appendix of details
as per Italian Decree 231/2001

The reference below to specific articles of statutes or regulations of the Italian legal system is due to the fact that the Code of Ethics has been included as an element of the general mechanism of controls defined and formally set forth as per Italian Decree n. 231/01, in compliance with which a specific Internal Control Committee has also been established (§ 5.2.).

In this regard, Barilla is fully aware that integrity and ethical values are essential elements of the control mechanism of its own organization and that these ideals have a big impact in terms of planning, management and everyday operations of its own business.

In order to ensure that Barilla Personnel have a correct understanding of the provisions of the Code of Ethics they are requested to comply with, Barilla is committed to organizing communication and training activities on an ongoing basis, designed to make sure the Code will be effectively assimilated as an integral part of the company's control mechanism and culture and come to serve as a common legacy, shared and disseminated at all levels.

6.1 Protecting the Company's Capital, Creditors and the Market

One of the central factors distinguishing Barilla's conduct is its respect for high standards of behavior, values and ideals that are intended to guarantee the integrity of the company's capital, as well as protecting creditors and third parties who conduct business with the Company.

These values are also protected by legal provisions which are contained in Italian Decree 231/01: this Decree introduced to the Italian legal system a novel form of liability for Companies that benefit from criminal activity, including those mentioned above, if perpetrated in their interest and for their benefit⁶.

Company Stakeholders may therefore not engage in, cooperate in or cause others to engage in unlawful conduct, particularly actions that could give rise to the criminal violations listed in Article 25^{ter} of Legislative Decree 231/01 or conduct that, while not capable by itself of causing one of the criminal violations listed above, has the potential of doing so or could be conducive to the occurrence of such criminal violations. Therefore, Company Personnel are expressly forbidden from carrying out, collaborating or supporting activities that in any way constitute a crime according to the provisions of art 25^{ter} of Italian Decree 231/01 or carrying out, collaborating or supporting activities that, although they prove not to be of a nature that could be construed as crimes according to the provisions of the above mentioned Decree, could potentially become such, i.e. activities that could assist and abet

⁶ The list below contains some corporate crimes, in order to provide some examples of the most significant corporate crimes contained in article 25 *ter* of Legislative Decree No. 231/2001:

- False corporate communications (art 2621 of the Civil Code)
- False corporate communications to the detriment of stockholders and creditors (art 2622 sub-sections 1 and 3 of the Civil Code)
- Fraudulent financial statements (art 2623, sub-sections 1 and 2 of the Civil Code)
- Preventing controls (art 2625, sub-section 2 of the Civil Code)
- Fictitious capital formation (art 2632 of the Civil Code)
- Unlawful refunding of capital contributions (art 2626 of the Civil Code)
- Unlawful appropriation of earnings and reserves (art 2627 of the Civil Code)
- Illicit operations concerning shares or stock of holding companies (art 2628 of the Civil Code)
- Actions prejudicial to creditors (art 2629 of the Civil Code)
- Undue influence over the Stockholder's meeting (art 2636 of the Civil Code)
- Stock manipulation (art 2637 of the Civil Code)
- Preventing the public regulatory authorities from performing their functions (art. 2638, sub-sections 1 and 2 of the Civil Code).

the commission of the previously stated crimes.

All Company Personnel, in performing their duties and functions, are responsible for the definition and proper functioning of the control system and they are expected to communicate in written form to their superior and the Committee any accounting omissions, falsifications or irregularities that come to their attention.

6.2 Relations with Public Institutions

Relations with Local, National, European and International Public Institutions are to be maintained only by departments and persons specifically appointed to do so. Therefore, each document regarding modalities through which Barilla has established relations with the various institutions, shall be collected and kept. All relations with Local, National, European and International Public Institutions are exclusively limited to forms of communication intended to explain Barilla's activities, to respond to informal requests or accounting audits (queries, questions); in other words, efforts to explain the company's position regarding relevant issues.

It is absolutely forbidden to:

- consider or propose employment and/or business opportunities that could personally benefit employees of the Public Institutions;
- offer or in any way provide gifts or any other form of benefits or gratuities;
- solicit or obtain confidential information.

Moreover, it is forbidden for Company Personnel, outside contractors, consultants working for the Group's companies and third parties to:

- falsify and/or in any way alter reports in order to obtain undue advantage or any other benefit for the Company or

- the Group;
- falsify and/or in any way alter documents in order to obtain support or approval for a project that does not meet the standards of applicable laws and regulations;
 - utilize public funds for purposes other than those for which they were obtained and earmarked.

6.3 Conflict of interest

Within the context of their professional activities, Barilla employees are required to avoid situations in which the parties involved in the transactions, such as Authorities employees or any member of their families, have a conflict of interest.

Barilla employees are all required to report any situations in which they have or supposed to have a personal interest or represent an interest on behalf of a third party, conflicting with those of Barilla.

This report shall be addressed either to their immediate superior, the Board of Directors, the Board of Auditors and/or the Internal Control Committee, whichever is appropriate and accordingly to the Italian Civil Code specific laws and regulations.

More specifically, all Company employees and all other people or entities having an objective opportunity to influence the decisions of the Company must absolutely refrain from using their position and power to influence, even implicitly, Company decisions in a manner that would benefit themselves or work to the advantage of members of their own family, their friends or acquaintances for personal reason whatsoever.

6.4 Gifts, presents and other forms of benefits

Within the framework of their duties, Barilla Personnel shall

never accept, not even on special occasions, gifts or other benefits related to their professional activities; such gifts are allowed only when the values is small⁷.

In any case, any Barilla employee receiving, either directly or indirectly, requests or offers of gifts or benefits exceeding the recommended value, must always be authorized by the designated manager or by its superior, if subordinate, and shall give notice to the Internal Control Committee.

Barilla's Personnel shall never request or accept gifts or other benefits for themselves or others, from their subordinates or any member of their subordinates' families. Each subordinate shall never offer gifts or other benefits to its superior, its superior's relatives or cohabitants, save for the exception of gifts of a modest amount.

In any case, Barilla's Personnel shall refrain from practices prohibited either by law or commercial practices or Code of Ethics adopted by the companies or entities with which they have business relationship.

⁷ The recommended limit: 50,00 Euro