

CODICE ETICO

Che cosa è un codice etico?

Il Codice Etico è la carta fondamentale dei diritti e doveri morali che definisce la responsabilità etico – sociale di ogni componente dell'organizzazione aziendale

Il codice etico aziendale, detto anche codice di condotta, è un documento contenente una serie di regole sociali e morali redatte dall'azienda e alle quali tutti i membri della società devono attenersi

Perché è importante il codice etico?

Perché costituisce un mezzo efficace per prevenire comportamenti irresponsabili o eventualmente illeciti da parte di coloro che operano in nome e per conto dell'azienda in quanto introduce una definizione chiara ed esplicita delle responsabilità di ciascun operatore aziendale verso coloro che sono coinvolti direttamente o indirettamente nell'attività dell'azienda e cioè clienti, fornitori, soci, dipendenti, collaboratori, istituzioni pubbliche e chiunque altro sia interessato dall'attività dell'azienda

In sostanza il codice etico offre la possibilità a tutte le parti interessate, ovvero a tutti coloro che intrattengono relazioni con l'organizzazione impresa, di potere verificare se le loro aspettative e le loro legittime pretese sono state considerate attraverso un criterio di equità



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ETHICAL CODE

D. Lgs 231/2001

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PREMISE

This Code of Ethics governs the activities of **Az. Agr. Santo Stefano di Bernardini Michele** - (*hereinafter referred to as Company*) within the business of the company from the same turn, with reference to the offences "Assumption" referred to in D. Lgs. 231/2001 and s.m.i. and in general in relation to the performance of activities and relations with third parties.

The Company, in addition to respecting, in the performance of its activities, the laws and the regulations in force, intends to comply with high ethical standards, in the daily conduct of their work: such standards, and their principles inspired, are collected in this code of ethics (*hereinafter also referred to as Code*).

The Code is a supplement to the laws and regulations. In fact, the Company considers that business decisions and the are based on ethical rules, even in cases where they do not should be codified by specific regulations. The Code expresses the ethical commitments and responsibilities assumed by those various titles, collaborate in the achievement of the objectives of the Company, in comparisons of: owners, employees, collaborators, external consultants, suppliers, customers and other subjects, as bearers of interests related to the activity of the Agency.

In the various relationships with the Company, therefore, the same requires to be inspired by certaingeneral principles of an ethical nature. For these reasons, the Company has decided to adopt this Code, which is consists of three parts:

- Principles and Values: the ethical principles and values to which the Company is committed adheres to and to which all those who work there or who, in any capacity, maintain relations with it;
- Rules of Conduct: the criteria of conduct that must the activities of the Company and, in particular, the guidelines and standards of conduct to which those acting in the name and on behalf of the Company are called to comply to prevent the risk of commission of illegal or simply unethical behaviour
- Implementation, control and monitoring: the standards which describe the

methods of dissemination of the Code, as well as updating and implementation of the principles and rules of conduct in its content. The methods for managing any infringements and indicated the persons called to carry out a supervisory activity on correct application and observance of the same.

The Code is made available to customers, suppliers and other third parties interacting with the Company: in particular, it is brought aware (*also with computer systems or via website*) of third parties, which receive assignments from the Agency, or who have lasting relationships with it, inviting them to respect their principles and criteria of conduct, within the framework of relations that they have with the Body itself. And this also with possible declaration of liability of the same.

In addition, with the same methods or even with direct delivery, the Code is made known to all staff, as identified above, except forms of advertising provided by law for particular purposes (*e.g. art. 7 law 300/70*). Further actions for the dissemination and knowledge of this Code may contemplate formative moments or specific meetings, even through the system of *e-learning*.

ADDRESSEES AND SCOPE

The provisions of the Code apply to all employees, without any exception, to all those who directly or indirectly establish relationships with the Company, permanently or even temporarily, to administrators, collaborators, consultants, agents, prosecutors and anyone who operates in the name and on behalf of the Company.

Each employee, regardless of position or status, is responsible for its actions in accordance with this Code, the Company's policies and national regulations and current international.

In the cases foreseen by the company procedural system, the Company requires respect third parties (partners, customers, suppliers, professionals, consultants and other types of external subjects) with whom he establishes relationships or business relations.



PRINCIPLES AND VALUES

The following are the fundamental principles and values of the Company must refer to all recipients of the Code in the exercise of their activity.

1. *Legality*: Respect for laws is indispensable not only in Italy but also in other countries in which the Company operates. It is therefore not justified in no case a violation of this principle, even if in the name interests or for the benefit of the Company. In any case, even against different legislative areas, the Company undertakes to respect certain principles fundamental, in particular those contained in the most important internationally shared human rights and human rights documents of the environment and the fight against corruption: Universal Declaration of Human Rights; the Declaration of the International Labour Organization on principles and rights the Rio Declaration on the Environment and Development; the United Nations Convention against Corruption. The Company, in its possible activities abroad undertakes to inquire in advance of the applicable legal provisions, and procedures and practices to be followed, and also refuses involvement with persons engaged in illegal activities or financed by source capital illegal. The Company, in the performance of its activities, acts in the compliance with the laws and regulations in force in all the countries in which it operates and requests the recipients of this Code to respect this requirement and the keeping of conduct that does not affect the moral reliability and professional. The Company is committed to spreading a culture ethics and legality both within and outside the company, first ensuring consistent behaviour towards employees and collaborators.
2. *Centrality of Human Resources*: The Company undertakes to adopt a respectful behaviour both within the company and towards the outside. In terms of relationships within the company, compliance protection of the physical and moral integrity of and its enhancement as a key resource of competitiveness and success. Outwards, it means maintaining relationships professional with customers and suppliers and also with local institutions and with the media as interlocutors to consider, inform and involve. It also means operating in a manner

compatible with the surrounding environment, natural and human, in the interest of community. The Company is committed to ensuring professional development and of all its employees and collaborators, assesses their skills professional, relational and cultural and ensures that these characteristics are the basis for their evaluation and promotion.

3. *Environment and safety at work*: the Company is committed to ensuring safe and healthy working environments and to be a solidarity organization and responsible to the environment; also complies with the laws and environmental, safety and health regulations, and ensure that these rules are observed by all employees and employees. The Company is also committed to creating a safe and healthy for every employee, including and especially spreading the knowledge of legislation and the culture of safety at work. Every subject must comply with all the rules and procedures of safety. It is the obligation of each employee or collaborator to promptly communicate any dangerous situation generated as well as any discrepancies from the procedures implemented and distributed.
4. *Loyalty*: The Company requires all employees and collaborators a fair, diligent and contract-compliant behaviour; and of the company regulations. To work in accordance with procedures, comply with the Code and, for those with management responsibilities of people, to commit themselves to their collaborators and to their assistance in applying.
5. *Protection of Made in Italy*: Made in Italy is an important value for the characterization of company productions. The Company, well rooted in the culture and Italian agricultural tradition, transmits this heritage in all its products through the quality and innovation research of product and process.
6. *Flexibility*: The Company is committed to addressing problems without being conditioned by reference diagrams or preconceived closures, integrating all the available information in the research of the best solution. The Company is open to ideas from all employees and collaborators, including external employees, in order to reach objectives in the most efficient and correct manner, in compliance with principles of this Code.

7. *Fairness and integrity*. The Company undertakes to use the information in its possession, without prejudice to legal requirements, in the compliance with data protection legislation, and for purposes other than those foreseen. The Company is aware that the proper management of personal data subjects who in various ways come into contact with the same depends the identification of specific, clear and effective procedures for processing and storage of personal data, and the identification of subjects specifically identified for the data processing. Particular attention should be paid to data and personal information of employees, customers, and collaborators. The use of company information of external relevance may be carried out only by expressly authorized figures. It is excluded any survey on ideas, preferences, personal tastes and in general on the privacy of employees and external collaborators of the Company. Security policies and procedures include additional requirements for safeguard information and information systems. Employees must be aware of and comply with these requirements.
8. *Non-discrimination*. Within the framework of internal relations and in the relations with third parties, the Company recognizes and respects the principles of dignity and equality and does not discriminate on grounds of on age, racial and ethnic origin, nationality, political opinions and and union, religious beliefs, sexual orientation, identity of gender, physical and mental disabilities and any other characteristic personnel not related to the working sphere.
9. *Environmental protection*. The Company promotes respect for the environment, understood as a common resource to be safeguarded for the benefit of the community and of future generations with a view to sustainable development.
10. *Confidentiality*. The Company undertakes to use the information in its possession, subject to compliance with the Law, in compliance with data protection legislation, and in any case never for purposes other than those envisaged. The Company is aware that the correct management of personal data and subjects that in various ways come into contact with it depends on the identification of specific, clear and effective procedures for the treatment and the storage of personal data, as well as the identification of specifically identified for the processing of the

data. Detail attention should be given to the personal data and information of employees, customers, and collaborators. The use of company information having external relevance can be made only by the figures expressly authorized. Any investigation of ideas is excluded, personal and general preferences about the private life of employees and external collaborators. The company's policies and procedures security include additional requirements to safeguard information and IT systems. Employees must know these requirements and stick to it.

11. *Protection of competition*: As part of its business activities, the Company is inspired by the principles of legality, fairness and loyalty to the word, promises and covenants, and promotes acting with a sense of responsibility and in good faith in any activity or decision. The Firm recognizes free and fair competition in an economy of market as a decisive factor for growth, development and constant company improvement and believes that in this context develop its own message of product quality and relevance of the brand.
12. *Transparency and clarity*: Communication and dissemination towards the outside (*including through the media*) news, information and data relating to the Company is marked by respect for the right to information and is reserved exclusively for the company functions assigned to it; in case is allowed to disclose false or biased news or comments. Any communication activities respects the laws, rules and practices of professional conduct, and adheres to principles of clarity, transparency, timeliness and accuracy. The Company undertakes to adopt the maximum transparency in acting, communicating and informing, so as to guarantee reliability towards all subjects, internal and external, with which it is confronted. Business management must be clear and verifiable. Communication, in particular external communication, beyond to always have to follow the established procedures, it must be simple, timely and truthful and, if made public, easily understandable accessible to all.

RULES OF CONDUCT

Relations with employees

The Company supports a working environment aimed at the development of potential and talent, integrity and honesty, mutual respect and the protection of health of employees and collaborators.

Each manager and/or business manager must:

- act with objectivity and balance, with a view to enhancing and empowerment of its employees and collaborators;
- pay attention to the individual characteristics of the employees and and promote the development of potential and talent, recognising the value of initiative, collaboration and of innovation;
- ensure that within the working environment situations of distress, prejudice, disparagement or discrimination;
- promoting value-based relationships between employees and employees of loyalty, fairness, mutual respect and good manners;
- avoid situations that require employees and collaborators to act against the Code of Ethics or against the law;
- ensure that employees carry out their work in conditions safe and healthy in accordance with the laws in force in
- matter;
- promoting the integration and training of foreign workers in possession of a regular residence permit, avoiding undeclared work and illegal immigration.

Every employee or collaborator of the Company is obliged to:

- perform their performance with diligence, efficiency, fairness and honesty, using the best tools and time put to his
- disposition, assuming the responsibilities related to the required by their role and avoiding carrying out activities that they can, even only potentially, be in conflict of interest with the Company;

- the relationship with colleagues based on values of civil coexistence and respect, avoiding all forms of discrimination;
- carefully guard the company assets and have in daily a environmentally friendly behaviour, including from a ecological.

Relations with suppliers

The choice of suppliers and external collaborators (including consultants, agents, etc.) for the purchase of goods and services is based on assessments that allow rely on suppliers of proven quality, integrity, reliability and cost-effectiveness. Purchasing processes are based on respect for the principles and laws to protect competition, ensuring transparency and efficiency in the selection process. Fees and sums in any capacity paid to suppliers are in line with market conditions or however justified and verifiable.

Any Recipient of this Code who participates in such processes is bound to:

- act with objective and documentable criteria;
- not accept any form of personal advantage;
- verify, through appropriate documentation, that the parties involved have the means and resources appropriate to the needs and image of the firm
- ensure the traceability of choices by keeping documents that prove compliance with internal procedures and the purpose of the purchase;
- promptly report any potential behaviour contrary to the Principles and Values of the Code.

The Company interrupts the conclusion or continuation of any relationship in the event where there are suspicions of membership or facilitation of organisations criminal.

In its contractual relations with its suppliers, the Company requests the commitment to share and respect the principles set out in this Code. The violation of the principles laid down therein constitutes a breach of obligations such as to the resolution of the existing relationship.

Relations with customers

The company aims to meet the expectations of its customers by providing high quality products and/or services in compliance with the rules laid down to protect competition and the market and basing its conduct on values of fairness, honesty and professionalism.

In the context of customer relations, the Recipients, as far as they competence and in relation to the assignments assigned to them, undertake to not arbitrarily discriminate customers, comply with commitments and obligations assumptions, provide accurate, complete and truthful information, abide by the truth in advertising or other communications, avoiding the use of any deceptive, elusive or incorrect practice.

Relations with other forms of association

Also with a view to contributing to the economic and social development of the to which the Company operates, within the framework of its mission company, interacts with trade union, political and other forms of associations. Those who are delegated by the Company to relate to these subjects, are required to respect the laws avoiding any collusive or corruptive phenomenon.



Relations with the Public Administration

The Company's relations with the subjects representing the Public Administration, Public Officials or public service entities are based on principles of fairness, loyalty and maximum transparency, as well as on compliance with the provisions of law and regulation applicable.

In addition, such relations shall be maintained exclusively through authorized for the purpose, within the limits of the powers attributed to them by formal power of attorney or within and within the limits of its role and responsibility. In the context of relations with the Public Administration, the Public Officials or public service entities, the Recipients of this Code do not can offer, not even for interposed person, money, gifts or benefits of any kind to the public official concerned, his family members or subjects in any way connected to the same.

It is not allowed to search or establish relationships of favor, influence, interference with the aim of influencing its activities, directly or indirectly. These requirements cannot be circumvented by using different forms of contributions that, as sponsorships, assignments and consultancies and/or advertising, have the same purposes prohibited above.

Relations with the Supervisory Authorities

The Company undertakes to give full and scrupulous observance to the rules dictated by the Supervisory Authorities, as well as to guide relations with the these Authorities to the maximum cooperation, respecting their role. The European Council also stressed the importance of the European Union's external relations.

In particular, all Recipients are required to:

- operate in compliance with current laws and regulations;
- behave towards the Supervisory Authorities based on efficiency, collaboration and courtesy, complying with any request made in the course of their inspection duties; and collaborating in the relevant investigation procedures;
- provide accurate, complete and truthful information so that allow the Supervisory Authorities to acquire all the knowledge necessary for

decision making;

- not in any way hinder their work by omitting data and/or information requested directly and/or indirectly.

Relations with the Judicial Authority

The Company ensures and promotes correct, transparent and collaborating in relations with the Police Organs and with the Judicial Authority.

It is forbidden to use any form of conditioning against anyone's (*employee, collaborator or third party*) is called to make statements before the Judicial Authority, usable in a criminal proceedings.

Protection of industrial and intellectual property

The Addressees act in full respect of industrial property rights and legally owned by third parties and in accordance with provisions contained in laws, regulations and conventions to protect these rights.

To this end, all Recipients must abstain:

- any conduct that may constitute usurpation of securities industrial property, alteration or counterfeiting of distinctive signs of industrial products, or patents, industrial designs, or domestic and foreign, as well as from import, market anyway use or otherwise circulate industrial products with counterfeit or altered distinctive signs or made by usurping titles of industrial property;
- unlawful and/or improper use, in the interest of the company or of third parties, works of ingenuity, or parts thereof, protected by matters of copyright infringement.

Privacy

The Company undertakes to ensure that the personal information acquired is properly protected, according to the terms provided for by current

legislation, avoiding improper or unauthorised use to protect dignity, the image and confidentiality of any person who has relations with the Society.

The Company provides information about the type of data collected, the use that of them is intended to do and how interested parties can contact the same for information.

Personal information is collected and stored only if it is necessary for identified, explicit and legitimate purposes and are retained for the time strictly necessary for the use for which they were acquired.

Health and the environment

The Company counts among its primary values the principle of health protection and safety at work and to ensure its employees and employees safe, healthy and predictable working environments laws. The Company promotes the establishment of a safety culture and the health of workers within the workplace.

In carrying out the work activities, paths of training and education for workers in the field of occupational safety, to prevent the risks of occupational accidents.

The company respects the principle of environmental protection and contributes protection and safeguarding of the same, seeking the more suitable solutions to balance business needs with a use responsible for resources, a reduction in energy consumption and a better management of emissions into the atmosphere.

Prohibition of money laundering operations

The Company scrupulously follows the legislation aimed at preventing money laundering, self-laundering and financing of criminal activities.

To this end, the Addressees are called to:



- immediately report situations of potential anomaly referred to in are aware in order to facilitate the prevention and combating of recycling phenomena;
- accurately verify available counterparty information and avoid entering into or maintaining commercial or financial relations where there is reasonable doubt that counterparties may conduct which constitutes the commission of recycling;
- make and accept cash payments only within the limits and for amounts permitted by law;
- ensure appropriate cooperation with the competent authorities in prevention, combating and suppression of counterfeiting and falsification of banknotes, coins and any other means of payment.

In the management of financial flows it is forbidden to tolerate irregularities which, according to normal professional diligence, give rise to suspicion of legality and regularity of the origin of the money received.

External information and communications

The Addressees of the Code undertake not to divulge information relating to the Company that, if made public, may damage it. Any information learned by reason of the task or function performed must be kept confidential and is the exclusive property of the Company. All communication to the outside takes place in compliance with the regulations and company procedures. The Company establishes its relations with the operators in information systems and media and communication, media and advertising services in accordance with principles of this Code of Ethics.

Relations with competitors

The Company undertakes to protect the value of fair competition by refraining from misleading, collusive and abusive behaviour. Any person

acting, directly and/or indirectly, in the name and/or interest and/or for the benefit of the Company cannot:

- use names or distinguishing signs that may cause confusion with names or distinctive signs legitimately used by others, or slavishly imitate the products, services or activities of a competitor or other organisation generally, or by any other means to perform acts suitable to create confusion with the products, services or activity of a competitor or any other organisation in general;
- spreading news and appreciation about products, services or activities of a competitor or other organisation in general, suitable for determine the discrediting, or appropriation of the merits of the products, services or activity of a competitor or other organisation in gender;
- make direct or indirect use of any other non-conforming means the principles of professional correctness and capable of harming others organization;
- to commit acts of violence or threat against any person, particularly with regard to persons directly and/or indirectly linked to competing or other organisations.

IMPLEMENTATION, CONTROL AND MONITORING

Knowledge of the Code of Ethics

The Company undertakes to disclose this Code to all subjects interested, internal and external, timely and complete, using diverse and effective information channels.

In particular, it undertakes to ensure the understanding of this Code Ethics and the necessary clarifications to all employees and collaborators, so the Code is to be considered an integral part of the relationship of work, through a training plan aimed at promoting the knowledge of principles and rules contained therein and/or referred to.

Reports

All Recipients are required to respect the Code and to report any conduct that does not comply with the principles and rules contained therein.

Reports of violations or requests for clarification on the interpretation of Code may be addressed, in the case of employees, to the manager company, using the e-mail address of the Company or through specific channels that may be made available; may also be carried out anonymously.

Whatever communication channel is used by the reporting, the Company undertakes to process any report received with confidentiality and confidentiality, in line with the legal provisions in force, and to safeguard the anonymity of the complainant, ensuring that the complainant is not subject to any form of retaliation.

Sanction system

Compliance with the Code of Ethics is a contractual obligation both for the Company vis-à-vis employees and employees vis-à-vis the Company. With regard to third parties, the Company undertakes to review its business practices in such a way that compliance with this Code of Ethics is included as an essential obligation of any contract and the failure to comply with which can be considered grounds for the resolution of the contract.

Compliance with the provisions and rules of conduct laid down in this Code of Ethics constitutes compliance by the employees of obligations under art. 2104, paragraph 2, C.C., obligations of which the content of the same Code of Ethics is a substantial and integral part.

Infringement of the individual provisions and rules of conduct referred to in Model by employees always constitutes disciplinary offence, in the compliance with the procedures laid down in the Workers' Statute and the Collective bargaining. In particular, the violation of the rules of this Code of Ethics may result, especially in serious violations and/or repeated, the termination of the employment relationship for disciplinary reasons.

Against third parties, the violation of this Code of Ethics will be deemed serious default in order to terminate any contractual relationship in place, also with reference to contractual relationships not directly involved in the

violations.

In any case, the Company reserves the right to exercise the appropriate actions for compensation for any damage that the violation of the code had caused.

Disciplinary action

Compliance with the Code of Ethics is an integral part of contractual obligations of employees, collaborators and, more generally, of all the Recipients.

Any violation will render enforceable measures by the Company, modulated in relation to the severity and within the limits of the regulatory framework in force.

With regard to employees, non-compliance may lead to proceedings disciplinary and sanctioning up to the interruption of the employment relationship and, for the suspension or revocation of the office.

Non-compliance by external parties may result in resolution of the contract, assignment or in general of the existing relationship with the Company, as well as - *where the conditions are met* - damages.

Final provisions

The owner of the Company or person appointed by him approves the Code of Ethics, as well as any variation/ integration made to it, care update and, if necessary, review, and evaluate any proposals to modification/integration from those entitled.

This Code of Ethics is available on the Company's website.



Gestione intelligente dei dati - Vigneto e Vino

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