

CANTINA TOLLO

CODE OF ETHICS

This Code of Ethics was approved by the Partners' Meeting by resolution of July 27th, 2023

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INTRODUCTION

Purpose of this Code of Ethics

This Code of Ethics (hereinafter, “**Code of Ethics**” or “**Code**”) was developed by “SOCIETA COOPERATIVA AGRICOLA CANTINA SOCIALE TOLLO OVVERO “C.S.T.S.C.A.” O CANTINA TOLLO S.C.A O FEUDO ANCTICO C.T.S.C.A. O TENUTA GIGLIO C.T.S.C.A. O BORGO VENNA C.T.S.C.A. O TOLLO VINI S.C.A. O T.V.S.C.A” hereinafter “CANTINA TOLLO,” headquartered in Tollo (CH) Via Garibaldi n. 68, legally registered in the Register of Companies of Chieti Pescara with the registration number/tax code 00090180696 (“**Cantina Tollo**” or “**Cooperative**”) to ensure that the general principles, values, and conduct at the core of the Cooperative’s business culture are clearly defined and constitute the standard of behaviour of all Recipients, as defined below, in the conduct of their respective activities.

Regardless of mandatory regulations, the Code of Ethics is binding in the same way as an internal regulation, and non-compliance exposes to possible sanctions as described in paragraph 7 below.

Recipients and purposes

First and foremost, it should be noted that Cantina Tollo recognizes and promotes the respect for the principle set forth in Article 41 of the Italian Constitution, according to which private economic initiative “*may not be carried out in conflict with social utility or in such a way as to be detrimental to security, freedom, and human dignity*”.

The ethical principles on which the Code is based are consistent with Cantina Tollo’s mutualistic purpose and cooperative spirit.

The recipients of the Code of Ethics are all “stakeholders” of the Cooperative including employees and collaborators, all categories of members envisaged by Cantina Tollo’s statute, administrators, end-consumer customers, client customers, business partners, consultants suppliers and the public administration, the community and all those involved, directly and/or indirectly, in the activities carried out by the Cooperative, as well as for all those who work and collaborate, permanently or on a temporary basis, on behalf of the Cooperative (hereinafter, the “Recipients” or individually “Recipient”).

Recipients are required to comply with the prescriptions contained in the Code of Ethics, which, therefore, constitutes the useful reference for assessing the proper conduct by also helping to identify any ethical and social responsibilities in the occurrence of violations committed by the Recipients against the Cooperative and vice versa.

The Code will be widely disseminated within the internal structure, and widely communicated externally, including through its website.

Cantina Tollo also undertakes to adopt any further provision so that the principles and prescriptions of the Code can be timely disclosed and applied.

Mission, ethical vision and mutualistic purpose of Cantina Tollo

Cantina Tollo's objective is therefore to pursue excellence in the market in which it operates, through sustainable development, safeguarding the environment and the safety of the people involved through the consistency of behaviour that respects social ethics, aimed at achieving satisfaction and ensuring added value for the employee, the customer and, more broadly, the community.

This Code of Ethics represents for Cantina Tollo a distinctive and identifying element in relation to the market and third parties, the knowledge and sharing of which, required of all those who work in the Cooperative or collaborate with it, are the indispensable requirement to ensure the preservation of a strong reputational capital in the socio-economic context in which the Cooperative operates.

In carrying out its activities, Cantina Tollo is inspired by the following values as the foundations of the implemented policies:

- i. control of the delivered product in order to ensure high quality standards;
- ii. development, promotion and enhancement of the appellations of the territory;
- iii. a market offering of typical wines that enhance the characteristics of excellence of the area of origin, both through the efficient use of production facilities and through a consistent relationship with the contributing members in order to receive grapes of excellent quality;
- iv. strengthening winemaking cooperation to establish a brand policy aimed at obtaining quality wines, distributed through various sales channels in Italy and abroad.

Structure

The Code of Ethics consists of the following parts:

- 1) General Ethical Principles;
- 2) Ethical Principles of the Mutual Purpose;
- 3) Ethical Principles and Criteria of Conduct in Internal Relations;
- 4) Ethical Principles and Criteria of Conduct in Relationships with Third Parties;
- 5) Ethical Principles and Criteria of Conduct in Relations with Public Administration;
- 6) Implementation of the Code of Ethics and Internal Control System;
- 7) Sanctions System.

1. GENERAL ETHICAL PRINCIPLES

The conduct of Recipients at all levels of the company is guided by the following principles.

1.1. *Principle of legality*

Cantina Tollo operates in absolute respect of the principle of legality by promoting compliance with the laws, rules and regulations in force in each of the countries in which it operates.

The Recipients are required to strictly comply with all national and EU regulatory obligations and those in force in each of the countries in which the Cooperative operates as well as with company regulations, procedures and instructions.

The Cooperative may not initiate, entertain or continue relations of any kind with parties that do not comply with this principle.

1.2. *Honesty, fairness and impartiality*

It is the unswerving duty of Cantina Tollo and, consequently, of each Recipient, to respect the principles of honesty, fairness and moral integrity. Each Recipient is therefore required:

- i. to assume a correct, cooperative, loyal, respectful and honest attitude both in the performance of their own activities and in their relations with other Recipients;
- ii. to avoid pursuing illicit or illegitimate purposes in order to procure an undue advantage for the Cooperative, for themselves or for third parties. In no case may the interest or advantage of the Cooperative induce or justify behaviour contrary to these principles;
- iii. to comply with the ethical and professional rules applicable to him/her in relation to the activities carried out towards the Cooperative;
- v. to act in such a way that the Cooperative operates impartially, avoiding in all circumstances favourable treatment that may compromise its independence of judgment;
- vi. to refuse any form of gift, gratuity, money, donation, favour or utility of any kind (except for objects of modest value or commercial courtesy gifts authorized by the Company), even if only promised, that may be understood as exceeding normal business practices or courtesy or aimed at acquiring favourable treatment in the conduct of any activity of the Cooperative
- vii. not to make donations of money or goods to third parties or in any way offer unlawful benefits or favours of any kind (except for objects of modest value or commercial courtesy gifts authorized by the Company) in

connection with the activity they perform in favour of Cantina Tollo;

- viii. not to establish any privileged relationship with third parties that is the result of external solicitations aimed at obtaining improper advantages.

Recipients are in no way exempted from the obligation to punctually observe the rules and principles of the Code even if in the intrinsic belief that they are acting in the interest of the Cooperative.

Recipients are also prohibited from:

- i. maintaining relations with subjects linked to criminal organizations and/or involved in illegal activities such as, including but not limited to, trafficking in arms and drugs, handling of stolen goods, money laundering, use of money, goods or utilities of illicit origin, terrorism and, in any case, with subjects lacking the necessary requirements of seriousness and commercial reliability;
- ii. maintaining financial relations with entities that, even indirectly, hinder human development and contribute to the violation of fundamental human rights (e.g., exploiting child labour, promoting sex tourism, etc.);
- iv. altering in any way the functioning of a computer or telematic system or illegally intervene in any way on data, information and programs contained in it or pertaining to it;
- v. using trademarks, patents, models, distinctive or identifying marks of others by counterfeiting their characteristics or usurping the rights claimed by third parties.

Without prejudice to the provisions of Article 7 below (Sanction System), in the event that a Recipient is reached by a notice of indictment and in case of indictment, the Board of Directors, upon the opinion of the Supervisory Body (SB), as defined below, may take the appropriate measures by reason of the offenses charged and their impact in the implementation of the principles of Cantina Tollo up to the suspension of all possible relations of any nature with the Cooperative for the entire period of the investigation or trial.

In the event that the Recipient suffers a final conviction, for any offense, the provisions of Article 7 (*Penalty System*) below shall apply.

1.3. Transparency, completeness and confidentiality of information

Cantina Tollo recognizes the fundamental value of the correct flow of information to be established with shareholders, competent public bodies and functions, with regard to significant facts concerning corporate management. In no way does it justify actions by Recipients that may prevent communication that is easily and immediately understood by the person to whom the information is directed.

All information available to the Cooperative is treated with respect for the

confidentiality and privacy of the subjects concerned in accordance with and in compliance with GDPR Reg. EU 2016/679.

The collection and dissemination of economic data inherent to the Cooperative are managed with the support of external bodies such as the board of statutory auditors and/or the auditing company, where required by the legislation for the time being in force.

Recipients, therefore, are required:

- i. to provide clear, complete and relevant information in compliance with the transparency of information;
- ii. to avoid misleading situations in the implementation of the operations performed towards or on behalf of the Cooperative;
- iii. to comply with the requirements regarding the content and methods of transmission of information contained in regulations, procedures and corporate instructions;
- iv. to verify in advance that the information communicated outside and inside the Cooperative is clear, truthful, correct, accurate and complete, also in relation to economic, financial and accounting data and transactions
- v. to ensure the utmost confidentiality of the information known during the activities carried out on behalf of the Cooperative;
- vi. to process company data and information, or relating to any Recipient, exclusively within the scope and for the purposes of their own work activities and, in any case, not to disclose, communicate, disseminate or publish in any way sensitive information without the explicit consent of those concerned and confidential information without the authorization of the Cooperative.

1.4. Prevention and management of conflicts of interest

The Cooperative prevents any conflicts of interest, even if only prospective, that may involve the Cooperative in relations with other Recipients and with the Public Administration. The members of the Board of Directors, managers and those who in any case perform management and representative roles, also with reference to companies controlled by or somehow connected to Cantina Tollo, must refrain from carrying out activities, assuming conducts or having relations that assume economic relevance with suppliers and clients of the Cooperative.

Within the scope of the respective activities carried out and at the request of the Cooperative, the Receivers will be required to sign and transmit to the SB, as defined below, an appropriate statement that excludes the presence of conditions of conflict of interest with the Cooperative as well as with clients and suppliers with whom the Cooperative holds business relations, or, if not, that clarifies the nature of such conditions.

Anyone who becomes aware of situations or conditions of conflict of interest must promptly notify the SB, as defined below.

1.5. Name protection

Recipients shall not commit any actions that may undermine or compromise the values, image and good name of the Cooperative and its purposes.

2. ETHICAL PRINCIPLES OF MUTUAL PURPOSE

2.1. Mutuality, solidarity and democracy

Basic principles of cooperation are: mutuality, solidarity and democracy.

Cantina Tollo in its operations promotes respect for these principles.

All actions put in place by the Cooperative, including through the actions of the Recipients, must be driven by respect for the mentioned principles.

2.2. Social responsibility, regard for the local area and product quality and safety

Cantina Tollo is aware of the effects of its activities on the context of reference, on economic and social development and on the general welfare of the community.

Also through the actions of the Recipients, the Cooperative is committed to operating by seeking a constant balance between economic development, social and community well-being, respect for the environment, and a culture of safety and risk prevention. Of particular importance for Cantina Tollo are issues related to the environment, operating in full compliance with national and EU regulations in force at every stage of production.

The Cooperative interacts with social enterprises and the third sector with a view to the values of the social economy, the promotion of the person and the improvement of the quality of life in the territories in which it operates, committing itself to offer quality services or products, on competitive terms and in compliance with all mandatory regulations.

Towards customers, the Cooperative is inspired by the values of helpfulness, respect and courtesy, with a view to a collaborative and highly professional relationship. In particular, in its communication with clients, it ensures completeness, correctness and clarity of all information concerning the characteristics, contents, nature and origin of the products by striving to place on the market services or products that comply with the relevant national and EU laws, upon implementation of all the necessary tests to guarantee consumers safety and quality.

3. ETHICAL PRINCIPLES AND CRITERIA OF CONDUCT IN INTERNAL RELATIONS

3.1. Board of Directors

Code of Ethics - Cantina Tollo

Cantina Tollo's Board of Directors (BoD) must act and deliberate exclusively in pursuit of the corporate purpose set out in the statute and of the cooperative's mutual purpose in compliance with the principles of legality, mutuality, solidarity and democracy.

Board members must be appointed through the adoption of clear and transparent procedures.

Governance and the criteria for assigning mandates and proxies of attorney must be clear and transparent, and based on principles of competence and capability, sincerity and trust in relations with shareholders, avoiding any conflict of interest, even if only prospective.

Accordingly, the members of the Board of Directors, managers and all those who in any case perform management and representation roles, including companies controlled by or in any way connected with Cantina Tollo, are individually required to:

- i. respect the general ethical principles mentioned in paragraph 1 above and those of the mutualistic purpose mentioned in paragraph 2 above;
- ii. perform their duties with seriousness and professionalism, thus enabling the Cooperative to derive a mutualistic benefit from their respective competences;
- iii. attend the meetings and express their vote with full knowledge of the facts, in full autonomy and with independence of judgement;
- iv. as recalled in paragraph 1.4 above, abstain from performing activities, engaging in conduct or maintaining relations that are economically significant with suppliers and clients of the Cooperative;
- v. guarantee the utmost transparency in the management of the operations in which they have special interests, in compliance with the law, the regulations and the company procedures;
- vi. operate faithfully and efficiently, collaborating loyally inside and outside the Cooperative.

3.2. Members

The Cooperative promotes transparency and information towards its members, in compliance with the laws and regulations in force, encouraging their conscious and informed participation in the life of the Cooperative. The interests of all members are promoted and protected, rejecting any individual interest.

Each member, also in the context of the activities of the Assembly:

- i. must comply with the general ethical principles referred to in paragraph 1 above and those of the mutual purpose referred to in paragraph 2 above;
- ii. must act and pass resolutions exclusively pursuing the corporate purpose set forth in the bylaws;
- iii. must abstain from carrying out activities that may be in conflict with the

interests of the Cooperative.

3.3. Employees

Without prejudice to the compliance with article 3.3.1 below, the Cooperative recognises the centrality of the employees and the importance of establishing and maintaining relations based on loyalty and mutual trust, enhancing as much as possible the aspirations and capacities of each individual. It also promotes the information and continuous training of the employees in order for them to acquire and preserve the adequate skills to perform the assigned tasks.

The Cooperative guarantees at all times working conditions respectful of individual dignity and free from discrimination or harassment, and does not tolerate any conduct liable to create a hostile or unfavourable environment in the workplace. The working environment shall be arranged in compliance with the legislation and labour contracts in force.

In the management of hierarchical and disciplinary relations, authority shall be exercised with fairness, impartiality and correctness, avoiding any abuse that may harm the dignity and professionalism of the person.

Any form of favouritism, clientelism or nepotism is prohibited, both in the management and selection of personnel, which must be chosen taking into account only the company's needs and professional profile.

In the selection and management of personnel as well as in the organisation of work, Cantina Tollo rejects any discrimination on grounds of age, sex, race, sexual orientation, state of health, political opinions and trade union affiliations, religion, culture and nationality of its interlocutors, favouring integration, promoting intercultural dialogue and protecting the rights of minorities and the weak.

The working environment must be serene, avoiding any form of physical or psychological harassment of workers (so-called mobbing). Cantina Tollo does not accept sexual harassment¹.

3.3.1. Employee Duties

Without prejudice to the provisions of Article 3.3. above, anyone who has an employment relationship with Cantina Tollo is required to comply with the law and the Code of Ethics. Employees are required:

- i. in their relations with colleagues, to behave in a correct, loyal and collaborative manner, refraining from any form of discrimination and/or harassment;
- ii. to actively engage in training initiatives organised by the employer;

¹ Sexual harassment being understood to mean those activities that subordinate decisions relevant to the addressee's working life to the performance of sexual acts and/or proposals for private interpersonal relations, offered despite an express or reasonably evident unwillingness of the person concerned, which have the capacity, in relation to the specificity of the situation, to disturb the serenity of the addressee with objective implications for his/her work performance.

- iii. to comply with the instructions received in order to protect their own health and that of their colleagues, taking into account their training and the applicable legal regulations;
- iv. to report without delay and without any fear any and all breaches of workplace safety obligations to the internal prevention and protection service manager and to the workers' safety representative, or to superiors, management or supervisory bodies as the case may be;
- v. to responsibly safeguard and use the company assets (tangible and intangible) that are instrumental to the carried out activity and to operate with the necessary diligence to protect the company resources, through responsible behaviours and in line with the operating procedures established to regulate the use of the resources themselves, avoiding improper uses that may cause damage or reduction of efficiency or, at any rate, in contrast with the company interest. Similarly, Employees are responsible not only for protecting such assets, but also for preventing their fraudulent or improper use, to their advantage, to the advantage of third parties or even of the Cooperative itself;
- vi. to act in compliance with the principles of truthfulness, accuracy, reliability, integrity and transparency, so that Cantina Tollo's reputation is protected both within the Cooperative and externally. These principles must also be respected in carrying out the accounting management activity in order to allow the correct planning of its operational strategies based on its real economic and patrimonial situation;
- vii. in compliance with the maximum transparency of the information inherent to all the actions and operations of the Cooperative, to prepare an adequate verification of the decision-making, authorization and performance process, avoiding any form of omission, falsification and/or irregularity.

Cantina Tollo believes that management efficiency is an indispensable element for achieving its objectives. The Cooperative has internal rules, procedures and instructions that contribute to improving the efficiency and effectiveness of company processes and to containing the risks of company operations.

Employees, aware of the existence of this internal organisation, are required to strictly comply with it and, within the scope of their functions, are responsible for its implementation and correct functioning.

4. ETHICAL PRINCIPLES AND CRITERIA OF CONDUCT IN RELATIONS WITH THIRD PARTIES

4.1. *Customers and Suppliers*

Suppliers are selected on the basis of their capabilities, and preference must be given

to those who guarantee high standards of reliability, in order to make relations between the supplier company and Cantina Tollo more efficient, and to facilitate the management of any critical issues (such as, for example, product recalls or withdrawals, extraordinary and urgent requests for the supply of products or services, etc.).

Cantina Tollo has neither direct nor indirect relations with parties suspected of belonging to criminal organisations or in any case operating outside the law. Suppliers:

- i. must be contractually bound to ethical conduct;
- ii. if they do not have their own code of ethics, they must expressly accept the provisions of Cantina Tollo's code of ethics;
- iii. before establishing business relations, they must adequately provide the available information, including legal and financial information, in order to verify their respectability and legitimacy in relation to the type of proposed transaction;
- iv. they must ensure compliance with the safety, hygiene and quality standards established by the applicable legal provisions and production specifications;
- v. they must receive, within the terms of the law, a congruous consideration for the raw materials, products, services requested, taking into account not only the current market price, but also the minimum costs of production or supply of the services and making themselves a diligent part in the sustainability project of the supply chain. More generally, it is possible to refer to guidelines or other documents containing good practices in the food supply chain;
- vi. they shall refrain from offering money or other benefits or pressuring or flattering to obtain undue or privileged treatment;
- vii. contracts with suppliers may contain an express termination clause in the event of non-compliance with the Code of Ethics;
- viii. are required to refrain from any form of unfair or deceptive behaviour that could induce customers or other suppliers to rely on unfounded facts or circumstances;
- ix. are required to make constant efforts to offer punctual and high quality services, seeking to limit any form of disservice or delay in order to maximise customer satisfaction.

The above also applies to relations with external consultants and outsourcers.

4.2. *Political and trade union organisation*

The Cooperative, in providing possible contributions to parties, movements, committees and political and trade union organisations, to their representatives and candidates, adopts procedures and forms that are documented, traceable and compliant with the regulations in force.

These possible contributions are in any case free from any interest, direct or indirect,

of the Cooperative, intended to obtain facilitations or favourable treatments, or to constitute a disturbance of free competition. Under no circumstances may such contributions be made with a view to reciprocity, thus excluding any form of political exchange.

Recipients are required to refrain from any form of direct, indirect or boastful pressure towards politicians or trade union representatives.

5. ETHICAL PRINCIPLES AND CRITERIA OF CONDUCT IN RELATIONS WITH THE PUBLIC ADMINISTRATION

5.1. Government and Public Administration

Relations with the Government and the Public Administration must be characterised by the utmost clarity, transparency and collaboration, in full compliance with the law and according to the highest moral and professional standards. Each Addressee must therefore refrain from any form of pressure, explicit or veiled, aimed at obtaining any undue advantage for themselves or for Cantina Tollo.

The relations entertained by the Cooperative with public officials or persons in charge of a public service, with the judiciary, with the public supervisory authorities and with other independent authorities, as well as with private partners who are concessionaires of a public service, must be undertaken and managed in absolute and rigorous compliance with the principles set out in the Code of Ethics, so as not to compromise the integrity and reputation of both parties.

The Cooperative implements measures to counter the phenomena of corruption, extortion and embezzlement.

Therefore, the Addressees:

- i. will have to represent the interests and positions of the Cooperative in a transparent, rigorous and coherent manner, avoiding to adopt attitudes of a collusive nature. Every relationship with the Public Administration must be exclusively ascribable to forms of communication aimed at explaining the activity of the Cooperative or must be aimed at responding to inspection requests or acts, or even at disclosing the Cooperative's position on aspects inherent to the evolution of its activity;
- ii. counter and avoid falsification and/or alteration of accounts or documentary data in order to obtain undue advantages or any other benefit;
- iii. operate by avoiding the allocation of public funds for purposes other than those for which they are obtained;
- iv. perform scrupulous control of the data contained in the declarations addressed to public bodies;
- v. pursue full compliance with the conditions and timeframes provided for in

- contracts stipulated with the Public Administration;
- vi. undertake any commitments with the Public Administration and Public Institutions within the scope of the functions assigned in due compliance with the rules and principles of the Code of Ethics and, more generally, with the directives issued by Cantina Tollo's management;
 - vii. refuse to accept, promise or offer, even indirectly, money, gifts, goods, services or undue favours (also in terms of employment opportunities) with regard to relations with public officials, persons in charge of a Public Service or, in general, employees of the Public Administration or other Public Institutions or private entities traceable to public bodies, in order to influence their decisions, with a view to more favourable treatment or undue services or for any other purpose.

6. IMPLEMENTATION OF THE CODE OF ETHICS AND INTERNAL CONTROL SYSTEM

Compliance with the prescriptions of this Code is entrusted to the prudent, reasonable and careful supervision of each of the Receivers, within the scope of their respective roles and functions within the Cooperative. Each Receiver is responsible for the definition and the correct functioning of the control system. The exercise of this control must take on a positive connotation, for the contribution it makes to the improvement of the management effectiveness and efficiency.

6.1. *Supervisory Body (SB)*

A Supervisory Board is established and entrusted with the following tasks regarding the implementation of the Code of Ethics:

- i. monitor the application of the Code by the Receivers, through the application of specific programmes and welcoming any reports made by the Receivers and by the internal and external stakeholders of the Cooperative;
- ii. implementing the stages of the process of reporting and ascertaining the violation of the prescriptions contained in the Code of Ethics;
- iii. report, upon request of the Board of Directors, on the results of the activities carried out, pointing out any significant violations of the Code;
- iv. express opinions on the revision of the most relevant policies and procedures, in order to ensure their consistency with the Code;
- v. provide, where necessary, for the suggested periodic review of the Code.

6.1.1. *Composition and Appointment of the SB*

The SB is a collegial body consisting of three members appointed by the administrative body, the CEO or the General Manager of Cantina Tollo from the following categories of professionals registered in special registers: (i) lawyers; (ii) accountants; (iii) labour consultants. The SB remains in office until revoked. The Code of Ethics - Cantina Tollo

appointment does not provide for any remuneration.

6.2. Reports

This procedure regulates the methods of communication and management of reports concerning alleged findings, irregularities, reprehensible facts and, more generally, any critical issue or matter deemed worthy of investigation, in order to ensure that all appropriate action is taken and all measures are put in place to avoid their perpetuation.

All Addressees must report conduct that may lead to a breach of the Code of Ethics. Reports may concern situations of proven or suspected violations of the principles contained in the Code of Ethics.

This procedure governs the methods for using the information channels that allow for the submission, in order to protect the integrity of the entity, of circumstantiated reports of unlawful conduct based on precise and concordant factual elements, of which the reporting persons have become aware by virtue of their functions.

These channels guarantee the confidentiality of the identity of the reporter in the management of the report.

In particular, it is forbidden to retaliate or discriminate, directly or indirectly, against the reporting person for reasons connected, directly or indirectly, to the reporting. The retaliatory or discriminatory dismissal of the reporting person is regulated, and is expressly qualified as 'null and void'. The change of duties pursuant to Article 2103 of the Civil Code, as well as any other retaliatory or discriminatory measure taken against the reporting person, are also indicated as null and void. In the event of disputes relating to the imposition of disciplinary sanctions, demotions, dismissals, transfers or subjecting the reporting person to other organisational measures with negative effects on working conditions, it is up to the employer to prove that such measures were adopted on the basis of reasons unrelated to the reporting. The adoption of discriminatory measures against the reporting person may be reported to the Labour Inspectorate, for the measures falling within its competence, not only by the reporting person, but also by the trade union organisation indicated by the latter.

The internal handling process of suspicious violation reports consists of the following steps:

1. reporting;
2. filing;
3. preliminary analysis;
4. assessment of the reported violation and communication of assessment results;
5. confidentiality and protections.

6.2.1. Stages in the process of reporting and investigation of violations

Stages	Description
1. Reporting	<p>Reports must be made in writing, also anonymously, and sent by e-mail to the President of the SB ods@cantinatollo.it, specifying in the object “STRICTLY CONFIDENTIAL”, in order to ensure the utmost confidentiality of the reporter and the report itself.</p> <p>On the other hand, in order to protect the reported person, anonymous reports will also be properly assessed to avoid discrimination or any unfounded defamatory behaviour.</p> <p>Reports must be accurate, not vague, and must describe in detail the facts and individuals that are the subject of the report.</p> <p>Verbal and/or telephone communications that are not</p>
2. Filing	<p>The Chairperson of the SB assigns a protocol number to each report received and, in order to ensure the confidentiality of the identity of the reporter, makes all subsequent communications indicating only the protocol number (and not the name of the reporter, without prejudice to the legal obligations and the protection of the rights indicated below).</p> <p>The Chairperson shall record each report in a special document (hard or soft copy) called the “Report Dossier”, including the information relating to each report (e.g. registration number, date of receipt of the report, method of receipt, indication as to whether the report is anonymous or not, subject of the report, outcome of the report, etc.).</p> <p>The paper and/or digital documentation should be properly filed.</p>

3. Preliminary analysis

The Chairperson of the SB promptly informs the SB of the report received. The SB carries out a preliminary examination of whether or not the report received is well-founded and whether or not an investigation should be initiated on the basis of the information available.

The preliminary examination may be carried out by adopting the utmost discretion and confidentiality in handling the information. Following this examination, the SB promptly draws up a preliminary report on the warning, indicating its outcome.

In particular, the report indicates:

- i. if the report is possibly grounded, the reasons suggesting the initiation of subsequent verification activities and, if already conceivable, the circumstances that made it possible to identify the event, the economic elements underlying the event (if known), an initial assessment of the identified control deficiencies, etc;
- ii. if the report is unfounded, the decision not to proceed with further checks. In this case, the SB archives the file, indicating the relevant outcome in the Register of Reports. In any case, the SB sends the preliminary assessment report to the Chairman of the Board of Directors and to the Chairman of the Board of

<p>4. Assessment of the reported violation and communication of assessment's results</p>	<p>As described above, in the event that the report is well-founded, the SB initiates the verification process.</p> <p>The eventual notification to the head of the Department/Function involved must be carefully assessed on a case-by-case basis by the SB in order not to jeopardise or damage the best course of the ongoing investigations.</p> <p>Should support of a specialised nature (technical, legal, etc.) be required, this activity may also be performed with the involvement of an external consultant, identified by the SB. In this case, the Consultant, subject to a commitment to professional confidentiality, may be sent all the useful documentation to carry out the preliminary investigation.</p> <p>The information gathered in the course of the audit must be handled with due discretion and confidentiality, complying with the duty of secrecy.</p> <p>At the end of the activity, the SB draws up a final assessment report on the violation, with the possible cooperation of the persons involved, including external ones.</p> <p>This report shall indicate the results of the audit, any ascertained violation of the Code of Ethics, any deficiencies in the internal control system, proposals for improvement actions to be taken, the economic elements underlying the event, etc.</p> <p>The SB, without prejudice to further legal obligations, sends the final report to:</p> <ul style="list-style-type: none"> ▪ Board of Directors; ▪ Board of Auditors; ▪ CEO. <p>Without prejudice, however, to the application of the sanctions referred to in paragraph 7 below (<i>Sanctions System</i>), the Board of Directors and the CEO define the improvement actions to be taken to further strengthen the internal control system in place, through the involvement of the competent Departments/Functions.</p> <p>The SB verifies ex post the effective adoption of</p>
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5. Confidentiality and protections	As previously indicated, the reporting parties, acting in good faith, are guaranteed against any form of retaliation, discrimination or penalisation and in all cases the confidentiality of the reporting party's identity is ensured, without prejudice to the legal obligations and the protection of the rights of the Cooperative or of the persons wrongly and/or maliciously accused.
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7. SANCTIONS SYSTEM AND PROCEDURE

Without prejudice to what is set forth in article 1.2. above concerning the initiation of possible criminal proceedings, the application of the sanctions set forth in this article are taken by the Cooperative in full autonomy and independently of the type of criminal offence that the violation of the Code of Ethics determines.

7.1. *Measures towards employees*

Any conduct by employees in breach of the rules of conduct contained in the Code of Ethics is to be considered a disciplinary offence.

The Board of Directors, or the person delegated to exercise the disciplinary power, will take the appropriate actions, proceeding, in the event of a serious and/or repeated violation, to impose the relevant sanctions, graded according to the seriousness of the violation itself, in compliance with the procedures set forth in Law no. 300 of 30 May 1970 (Workers' Statute) and/or any special applicable regulations and the National Collective Labour Contract applicable to the Cooperative.

7.2. *Measures towards Directors*

In the event of an ascertained violation of the Code of Ethics by members of the Board of Directors, executives and those who in any case perform management and representation roles, including Cantina Tollo's subsidiaries or in any case associated companies, the Board of Directors will take the appropriate initiatives provided for by current legislation and by the Articles of Association, proceeding, in the event of serious and/or repeated violation, to convene the Shareholders' Meeting to resolve on the revocation of the mandate.

7.3. *Measures towards members*

In the event of an ascertained violation of the Code of Ethics by the members of the Cooperative, the Administrative Body will take the appropriate actions envisaged by the regulations in force and by the Articles of Association, proceeding, in the event of a serious and/or repeated violation and in compliance with the statutory provisions,

for the termination of the social relationship with the Cooperative and the loss of the status of member.

7.4. Measures towards External Employees and Partners

In the event of an ascertained violation of the Code of Ethics by external collaborators, partners or persons falling within the category of Addressees not included in paragraphs 7.1., 7.2 and 7.3 above, the Board of Directors may decide, in relation to the contractual clauses contained in the agreements made, the seriousness and/or repetition of the violation and without prejudice to any claim for damages, as follows:

- i. suspension of the contract;
- ii. application of penalties;
- iii. termination of contracts.

The Governing Body, with the support of the SB, shall ensure that specific contractual clauses are drafted, updated and included in letters of assignment or, more generally, in the agreements with external collaborators, partners and other third parties.