



CODE OF ETHICS

SENSI VIGNE E VINI SRL

CODE OF ETHICS

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1. PREMISE

Undoubtedly today the introduction of a “code of ethics” as an instrument of corporate professional ethics represents the key for the development of competitiveness and success of every entrepreneurial endeavour. **Sensi Vigne & Vini s.r.l.**, a family concern that produces, bottles and sells wine according to wine making tradition, refers to this Code. The Sensi family actively participates in every aspect of running the business and collaborates with its employees for their mutual benefit. Company management is geared towards development and innovation and the aim is to combine these aspects with the wine making tradition of both the Sensi Family and the region of Tuscany. **Sensi Vigne & Vini s.r.l.**, strives to observe the following standards/laws:

- *national laws and regulations (hereby refer to the individual chapters of this section);*
- *the national labour collective agreement that applies to the employees of the business;*
- *the regulations of the state agencies that govern employment contracts.*

The purpose of the code of ethics is to guide the employees and the ownership towards maintaining a conduct, in internal and external activities, that promote the image of their work as a concrete example of fairness and professionalism in the world, favouring the company’s good name and attracting the trust of operators and therefore favouring the Company’s development to the benefit of everyone involved.

For this purpose it is necessary to understand how conduct, if not aligned with this set of rules, can cause serious and crucial damage to the Company which said company cannot afford and does not wish to be subjected to. Plus it is important to understand that in a world where communication seems very easy, it is actually a very delicate aspect and regardless of the means that we all have at our disposal, it is necessary to be very careful of how we communicate and what we communicate. In sum: the first product that a company sells is trust and its first form of communication is conduct. Therefore all collaborators are asked to understand and follow the requirements of this code and make them part of their own fundamental principles so that they become the very pillars of all conduct, given that Sensi’s reputation stems from the actions of the company’s collaborators.

Sensi does not tolerate offending conduct nor the failure to observe the principles of this code and every violation will entail due decisions.

2. THE OBJECTIVE

The company's objective in writing this code of ethics is to emphasize employee, consumer and stakeholder expectations in relation to correct conduct, in terms of moral integrity in work relations, including trade practices with customers and suppliers, for the purpose of guaranteeing correct ethical conduct.

In observance of these values the company proceeded to write this "Code of Ethics", as attached to the **Organisation and Management Model pursuant to Art. 6 Lgs.D. 231/2001** (in Italian 'M.O.G') with the objective of continuing to spread the principles and standards to conduct so that they represent the pillars of the company's business. These elements are concretely implemented in every relation that the company holds with third parties, including employees, external collaborators, customers and suppliers.

The Code of ethics that is not motivated exclusively by the observance of a regulation in force, but especially a moral responsibility towards a professional tradition handed down over the years, fairness towards human resources and respect for the environment. Consistently with the pre-established purposes, the **Sensi Vigne & Vini s.r.l.** Code of Ethics was organised into five chapters:

- *one chapter dedicated to the "general principles of conduct", which provides the general principles of conduct that **Sensi Vigne & Vini s.r.l.** Employees, Social Agencies, Sales Agents, Consultants, External Collaborators and Partners are required to observe;*
- *three chapters ("Prevention of crimes in relations with the Public Administration", "Corporate crime prevention", and "Prevention of offences against the individual") dedicated to the specific conduct required of **Sensi Vigne & Vini s.r.l.** Employees, Social Agencies, Sales Agents, Consultants, External Collaborators and Partners to avoid criminal charges:
 - > *set forth by Lgs.D. No. 231/2001;*
 - > *in reference to which the prerequisite analysis for the introduction of the Organisation, management and control model of the activities pursuant to Lgs.D. 231/2001, that the Code of Ethics is an integral part of, has illustrated that there are theoretical/potential areas of risk;**
- *a chapter on how the Code of Ethics is implemented.*

Lastly it is necessary to underline that this Code of Ethics is based on an ideal of cooperation in view of the mutual benefit of the involved parties, with respect towards the role of each. Accordingly, **Sensi Vigne & Vini s.r.l.**, requires each involved subject to conduct him/herself in relation to the company in keeping with the principles and rules of ethical conduct.

3. GENERAL PRINCIPLES

3.1 Honesty

The essential principle at **Sensi Vigne & Vini s.r.l.** is the observance of the laws and regulations in force. Therefore, within the scope of their professional activities, the Employees and Social Agencies of **Sensi Vigne & Vini s.r.l.**, as well as its Sales Agents, Consultants, External Collaborators, Partners, suppliers and customers, and anyone holding relations with them, are required to diligently observe the laws and regulations in force. Under no circumstance can the pursuit of **Sensi Vigne & Vini s.r.l.**'s interests justify dishonest conduct, pursuant to this paragraph.

Sensi Vigne & Vini s.r.l. will not begin nor continue any relation with anyone who does not intend to maintain this principle. The Employees and Corporate Bodies of **Sensi Vigne & Vini s.r.l.** must be familiar with the laws and relative conduct; when in doubt on how to proceed within the scope of their activities, they can ask for explanations from the **Supervisory Board** odvsensi@sensivini.com which will promptly duly inform the interested parties.

3.2 Fairness in potential conflicts of interest

The running of a business must always avoid, including potential, situations of **conflict of interest**, namely situations where an Employee, a member of a Corporate Body, a Sales Agent, a Consultant, and External Collaborator or a Partner pursues an interest that does not pertain to **Sensi Vigne & Vini s.r.l.** and the balancing of interests of involved subjected or achieves personal gain from the company's business deals.

3.3 Confidentiality

Sensi Vigne & Vini s.r.l. guarantees the **confidentiality of the information in its possession** and abstains from performing searches of confidential data, except for cases where it has received express and conscientious authorisation and the searches are conducted in compliance with the legal standards in force. In particular, **Sensi Vigne & Vini s.r.l.** Employees, Corporate Agencies, Sales Agents, Consultants, External Collaborators and Partners are required to not use confidential information acquired in relation to the **Sensi Vigne & Vini s.r.l.** business for aims that are not connected to the performance of their activities.

3.4 Value of human resources and labour-specific regulatory aspects

Sensi Vigne & Vini s.r.l. considers Employees and External Collaborators as a crucial factor to its success and, therefore, protects and promotes the **value of its human resources** with the aim of increasing and improving the assets and the competitiveness of the competencies of each collaborator or employee in observance of the health and safety conditions in the workplace according to the M.O.G. (*Italian acronym for Organisation

and Management Model) system.

3.4.1 Child labour

Sensi Vigne & Vini s.r.l. does not allow the use of child labour and agrees to employ only staff over 18 years of age. It is the responsibility of the human resources Manager to monitor the staff selection and recruitment stage so that each new hire is over the age of 18. **Sensi** also strives to create awareness among its suppliers so they too avoid child labour and to guarantee any youth between the ages of 16 and 18 compatible work conditions for their physical and mental development.

Reference legislation

- UN Convention on the Rights of the Child
- “Minimum Age” (L. 157/81)
- “Worst forms of child labour” (L. 148/00)

3.4.2 Forced labour

Sensi Vigne & Vini s.r.l. strives to avoid: to use of any form of coercion towards its staff. For its staff the company applies all of the regulations set forth by the regulation in force and by the National Labour Collective Agreement. In order to make work activities fully voluntary, Sensi informs all workers of their rights and duties deriving from the National Labour Collective Agreement and other applicable legal regulations (ex. the Statute of Labourers), making the regulation available to anyone wishing to consult it. The company's RLS also identifies the worker who has the duty to inform and assist workers in relation to occupational safety. Workers are free to leave the workplace at the end of their work shift. The company does not use guards or other manners of controlling workers. Private security is only used for the purpose of night surveillance of the company facility. Workers are familiar with the rules pertaining to the necessary notice period to receive the last pay cheque (as stated in the reference National Labour Collective Agreement). The company does not require whatsoever its staff to provide the following at the beginning of their work contract:

- > *deposits of any kind, in money or in kind;*
- > *originals of documents, except for those required by law.*

Sensi Vigne & Vini s.r.l. the use of undeclared employment, the gang-master system or any contractual form that violates or avoids the legal requirements. All workers are hired with contract in accordance with the regulations in force. The human resources Manager has the task of observing the regulation in force, checking and ensuring the correct application of the duties required by the laws on established employment contracts.

Reference legislation

- “Forced labour” (L. 274/34)
- “Abolition of forced labour” (L. 447/67)
- L. 300/70 – Statute of Labourers
- National Collective Labour Agreement

3.4.3 Collective contracts and freedom of association

Sensi Vigne & Vini s.r.l. guarantees all workers the right to join any trade union and the possibility of electing union representatives, guaranteeing all of the rights set forth in the C.C.N.L. (Italian acronym for National Labour Collective Agreement) regulations in force. The company guarantees the collective contract through the full application of the C.C.N.L. (Italian acronym for National Labour Collective Agreement). If exceptions need to be made to the C.C.N.L. (Italian acronym for National Labour Collective Agreement), the company agrees on these exceptions with the trade union representatives.

The company guarantees the free election of union representatives, ensuring them with the possibility of communicating with the members at the workplace, participation in general meetings and meetings.

The company prevents every form of discrimination towards union members or representatives. The staff manager has the task of checking observance of the pertaining regulation in force, to ensure the correct application of the duties stemming from the laws on relations with union representatives and the application of the collective contract.

Reference legislation

- “Trade union freedom and protection of trade union law” (L. 367/58)
- “Right to collective organisation and negotiation” (L. 367/58)
- “Workers’ Representatives” (L. 157/81)
- L. 300/70 – Statute of Labourers
- National Collective Labour Agreement

3.4.4 Discrimination

Sensi Vigne & Vini s.r.l. refutes every form of discrimination and guarantees equal opportunities and equal treatment to all workers, regardless of **race, class, national origin, religion, disability, gender, sexual orientation, trade union and political affiliation, age**. Accordingly the company:

- *makes the selection taking into exclusive consideration objective elements such as ability, experience and*

education in relation to the positions to be filled

- *pays each worker a salary based on the tasks that they perform in accordance with the C.C.N.L. (Italian acronym for National Labour Collective Agreement)*
- *guarantees instruction and training to everyone based on personal needs and the company's organisational and management needs.*
- *promotes individuals based on their abilities and the company's organisational and management needs*
- *places people in retirement according to the pertaining regulations in force*
- *only fires employees for cases allowed by the law and in any case never for discriminatory reasons.*

The company also favours the recruitment of women workers, also through the application of forms of support to maternity, as set forth by the law and the collective agreement.

The company guarantees, when requested by the worker, the possibility to avail of holidays and leave and to schedule work shifts based on production needs, also in consideration of particular religious needs.

The company is aware of the differences between cultures and religions and guarantees each worker that his/her principles, faith and opinions of any kind will be respected as long as they do not breach the regulations in force.

The company does not accept the use of physical or verbal behaviours that represent any form of physical or moral violence towards any worker.

The Staff manager monitors observance of the regulation, so as to guarantee that no form of discrimination occurs in the work relations.

To allow anyone subjected to discrimination to defend them-self and report the discrimination, **Sensi Vigne & Vini s.r.l.** has set up due procedures, responsibilities and channels of communication as described in paragraph 7.2.

Reference legislation

- “Pay equality” (L. 741/56)
- “Discrimination (occupation and profession)” (L. 405/63)
- “Professional reintegration and occupation (disabled individuals)”
- UN Convention to eliminate all forms of discrimination against women
- Lgs. D. 151/01 – Consolidation Act of regulation on the protection of and support to maternity and paternity
- National Collective Labour Agreement

3.4.5 Disciplinary procedures

Sensi Vigne & Vini s.r.l. does not allow the use of any disciplinary practice outside of the law and the National Collective Labour Agreement and especially any practice (whether corporal punishment, mental and physical coercion, verbal abuse) that can damage the physical and moral integrity of its employees.

Sensi Vigne & Vini s.r.l. allows the use of disciplinary sanctions with the aim of maintaining good relations between workers, which includes their supervisors and towards customers. Availing of disciplinary procedures is implemented in accordance with the Statute of labourers (Law 300/70), laws 604/66 and 108/90 and the articles of the National Collective Labour Agreement applied in companies relative to the “Disciplinary Code”.

The human resources Manager ensures that the regulation governing the application of disciplinary procedures is observed, ensuring that no sanction is issued unless it is in observance of the law and the applied National Collective Labour Agreement.

Reference legislation

- “Forced labour” (L. 274/34)
- Regulations on individual dismissal (L. 604/66 as amended – L. 108/90)
- Statute of labourers – Disciplinary power and disciplinary dismissals (L. 300/70)
- National Collective Labour Agreement

3.4.6 Work schedule

Sensi Vigne & Vini s.r.l. applies the work schedule established by the national labour collective agreement which is currently a maximum of 40 hours per week, with at least two out of 7 days off while any extra hours are voluntary.

Extra hours, which must not in any case exceed the limits set forth in the regulation, and work carried out on bank holidays are/is paid more than regular work hours, as set forth in the national labour collective agreement.

Reference legislation

- “Convention on the right to collective organisation and negotiation”
- National Collective Labour Agreement

3.4.7 Pay

Sensi Vigne & Vini s.r.l. guarantees all of its employees fair, dignified pay that fulfils the requirements of the national labour collective agreement. The company also provides forms of integration at the minimum levels set by the national labour collective agreement based on capability and professionalism. To assist its employees, the company also follows their processes that concern: the request to receive family allowance cheques, deductions and other forms of integration to the minimum wages set in the national labour collective agreement and, in case of need, provides advances and loans to its workers. Only for this purpose, at the time of hiring, the company asks the worker for information concerning the income of his/her spouse and the number of dependent children.

No amounts of wages are withheld for disciplinary reasons: any amounts withheld are only for tax purposes. Pay cheques expressly indicate all of the entries relative to amounts due and amounts withheld: the personnel office is also available for any relative explanations.

Wages are paid monthly by the 15th of the following month, as required by the national labour collective agreement (if this day is a holiday the pay cheque will be available on the first business day thereafter). Wages will be paid through bank transfer.

The company acknowledges the value and use of internship, apprenticeship and job training contracts for training purposes as stated by the legislation, within the restrictions set forth by the law.

Reference legislation

- c 100 “Convention concerning Equal Remuneration for. Men and Women Workers for Work of Equal Value” - 1951
- l. 300/70 – Statute of Labourers
- National Labour Collective Agreement

3.5 The value of the environment

Sensi Vigne & Vini s.r.l. considers respect for the environment as crucial for its growth in the field it works in and, therefore, the company protects and promotes minimising the impact on the environment with the aim of increasing and improving the awareness of each collaborator or employee on respecting the procedures defined by the M.O.G. (*Italian acronym for Organisation and Management Model) system, also bottling products in bio or vegan lines.

3.6 Fairness of authority

Sensi Vigne & Vini s.r.l. is committed to ensuring that authority is always exercised within hierarchical relations based on criteria of equality and fairness and does not imply the occurrence of abuse of any kind. In particular, **Sensi Vigne & Vini s.r.l.** ensures that authority does not turn into the exercise of power that damages the dignity and independence of the Employee or External Collaborator and that work organisation choices are made whilst protecting the value of the Employees or External Collaborators.

3.7 Integrity and protection of the individual

Sensi Vigne & Vini s.r.l. agrees to protect the moral integrity of its Employees or External Collaborators, guaranteeing the right to work conditions that are respectful of personal dignity. For this reason the company protects workers against acts of mental violence, and fights any attitude or discriminatory or harmful conduct against the individual, of his/her beliefs and preferences (for example, insults, threats, isolation or excessive intrusion, professional limitations). Sexual misconduct is not admitted and it is necessary to avoid conduct and dialogue that could offend personal sensitivity (for example, exposure to images containing explicit sexual references, insistent and persistent allusions). **Sensi Vigne & Vini s.r.l.** Employees or External Collaborators who feel they have been subject to sexual misconduct or discriminated against for reasons concerning age, gender, sexuality, race, health conditions, nationality, political opinions and religious beliefs etc, can report the incident to the Chairman of the Board of Directors and to the Supervisory Board pursuant to Lgs. D. No. 231/2001, who will assess whether the Code of Ethics was violated.

3.8 Transparency, completeness and truth of information

Sensi Vigne & Vini s.r.l. Employees or External Collaborators are required to provide complete, transparent, truthful, comprehensible and accurate information, so that, when establishing relations with the company, the involved subjects and anyone coming into contact with the company, are/is able to make independent and conscientious decisions on the involved interests, on possible alternatives and significant implications. In particular, when preparing any contracts, **Sensi Vigne & Vini s.r.l.** is required to specify to the contracting party what conduct he/she must adopt in all possible circumstances, in a clear and understandable manner, in respect of the criteria established in the M.O.G. (*Italian acronym for Organisation and Management Model).

3.9 Contract fulfilment and re-negotiation

Contracts and work appointments must be fulfilled in accordance with what is voluntarily agreed by the parties. To this regard it is necessary to highlight that **Sensi Vigne & Vini s.r.l.** agrees:

- *not to exploit circumstances of ignorance or inability (including temporary) of its counterparties;*

- *to avoid, in existing relations, anyone working in its name or on its behalf from trying to take advantage of contractual loopholes or unforeseen events, to re-negotiate the contract with the aim of exploiting the position of dependence or weakness that the other party finds him/herself in.*

3.10 Quality, safety and environmental policy

Sensi Vigne & Vini s.r.l. believes that the company's success is strictly connected to the integrated management of processes required to provide what Customers ask for, in terms of product and service conformity and respect for the health and safety of its employees. The primary objectives are:

- 1. Customer Satisfaction:* the key to success is in complete Customer Satisfaction, to fulfil the Customer in terms of product and service;
- 2. Professional integrity:* loyalty and fairness in relations and fully sharing corporate objectives; improving sensitivity, the spirit of collaboration and the entire staff's attention to quality aspects;
- 3. Observance of the law:* observing laws, standards, regulations, undersigned commitments applicable to the product/service, to Health and Safety in the Workplace and to the Environment;
- 4. Injury reduction:* the objective to reach zero injuries and zero occupational diseases within an approach of prevention, thanks to the definition of a Health and Safety Management System and an Organisation and Management Model that exempts administrative responsibility, as per Lgs. D. No. 231 of 08/06/01 as amended.
- 5. Cost containment:* streamlining corporate processes for the purpose of reaching the maximum level of efficacy and efficiency;
- 6. Continuous improvement:* the continuous improvement of processes and products, for the purpose of maintaining high Competitiveness.

Sensi Vigne & Vini s.r.l. considers quality as fulfilling Customer needs, as seen as an integral part of an inseparable combination which, for the industry, translates into compliance and reliability of the product and promptness of the service and before and after sales assistance. Involving and training staff, the availability of suitable resources (systems, testing equipment and materials), the selection and growth of qualified suppliers represent the winning criteria for reaching quality-related objectives.

Sensi Vigne & Vini s.r.l. believes that the health and safety of its employees is the top priority in the management of its activities: this objective is pursued through observance of the legislation in force and the applicable regulations and thanks to the definition of improvement procedures and plans that prevent undesirable events such as injuries and occupational diseases from occurring.

Sensi Vigne & Vini s.r.l. appointed the Prevention Protection Service Manager with the task of monitoring all aspects connected to occupational Health and Safety by identifying and monitoring the risk factors,

identifying all of the preventive and protective measures for the health and safety of the workers and providing the workers with information and training. The company has also given workers the possibility to elect a safety representative, with the function of controlling and interacting with the Prevention Protection Service Manager on all identified risk factors, and checking that the Manager effectively implements the corrective actions. All staff is given suitable information material and periodic training is conducted on the required fulfilments. The Prevention Protection Service Manager provides the following either directly or through specialised instructors:

- *general and specific information courses for particularly risky activities,*
- *training courses for new hires and for workers who may have changed their professional duties,*
- *training courses for appointed fire emergency and first aid persons.*

The company has identified, purchased and provided free of charge to its employees the **Personal Protective Equipment** necessary for the health and safety of their work: the Prevention Protection Service Manager and the supervisors constantly monitor actual use and periodically inspect the state of wear and adequacy.

In case of wear or inadequacy, the Production Manager immediately replaces the PPE.

The Prevention Protection Service Manager constantly monitors all the risk factors that may affect the safety and health of workers and, in collaboration with top management, periodically inspects maintenance activities to ensure that the safety equipment and devices are working correctly.

The Prevention Protection Service Manager provides and coordinates with the company's Quality Manager (Italian acronym RQ) to guarantee the availability of all the technical data sheets of the equipment and the safety data sheets of the chemical products at the facility and accessibility to all workers.

Reference legislation

- *Lgs. D. 81/2008 as amended - Consolidated Act on worker health and safety*
- *Risk assessment documents and their attachments*

Sensi Vigne & Vini s.r.l. is aware of the importance of preventing environmental crimes that entail administrative responsibility within the application of Lgs.D. 231/01, which briefly refer to the following:

1. *Water sewers systems;*
2. *Pollution of the soil, subsoil, surface water or ground water;*
3. *Collection, transport, recovery, disposal, trade and intermediation of waste;*
4. *Waste management;*
5. *Ozone depleting substance management;*
6. *Habitat depletion*

Sensi Vigne & Vini s.r.l. applies the Risk-Assessment to promptly identify the subsistence of the individual crimes, including environmental, and to assess the risk of them being committed. The assessment is carried out by analysing company processes. If necessary, the support of a specialised external professional is called upon.

The commitments for Quality, Health and Safety and for the Environment translate into annual plans of objectives and measurable indicators, assigned to the various levels of the corporate structure.

The Quality, Health and Safety Policy is implemented daily by all staff and under the constant attention and supervision of the Quality Manager and the RSPP (Italian acronym for Protection Prevention Service Manager); periodically (see “Management Review” procedure and the “Instruction and Training” procedure) the Management organises meetings to spread the principles, objectives and commitments for the corporate management of these aspects. Management promotes the application, improvement and development of the system and makes sure that the contents of the manual, the Procedures and the Instructions are disseminated, understood and shared by all employees and collaborators.

3.11 Respect for health and safety in the workplace

Sensi Vigne & Vini s.r.l. implements the necessary measures to ensure the best possible protection of health and safety in the workplace and the prevention of all potential forms of risk. It also defines a policy to ensure the best possible protection for health and safety in the workplace and prevention against all potential forms of risk with a view towards the continuous improvement that the company sets for itself. This policy applies equally to the company’s own employees as well as the staff of external companies, within the scope of their activities at the Company’s sites. To develop and control the observance of the management of Health and Safety, the Company avails of an implemented system, founded on the Risk Assessment Document and its own Quality, Environment and Safety Policy. To develop and control the observance of the management of Health and Safety, the Company avails of an articulated system which involves:

- 1. a targeted corporate organisation that identifies the level of responsibility, the division of tasks and the level of independence of each position in the organisation;*
- 2. the Quality, Safety and Environment agency which, alongside Management, represents the competent centre to create the conditions to achieve shared results that fulfil the company’s ethical values. It is in charge of the management aspects, developing the necessary documentation for the Integrated Quality, Safety Management System (manual, procedures, instructions, forms) in collaboration with the Prevention and Protection Service, for the aspects relating to Health and Safety, and with the involved Agencies.*
- 3. a management system for the aforementioned procedures, stemming from the Risk Assessment Document, which specifies the risks and indicates the operating modes;*
- 4. a system of operational instructions, stemming from the management procedures system, which indicates, in detail - if necessary - how work is carried out safely.*

5. a system of printed and electronic records, stemming from the operational instructions system, which provides objective evidence of the completed activities and the obtained results

All employees, collaborators and third parties are required to strictly observe all of the measures requested by the **Sensi Vigne & Vini s.r.l.** procedures and internal regulations, in relation to Health and Safety in the workplace, elaborated and updated in compliance with the legislation in force. In particular, each individual is asked to report any observations relative to dysfunctions or possible improvements to his/her supervisor.

3.12 Fair competition

Sensi Vigne & Vini s.r.l. intends to protect the value of fair competition and accordingly abstains from conduct that is deceitful, predatory or characteristic of abuse of dominant position.

3.13 Use of company access to the Internet

Sensi Vigne & Vini s.r.l. strives to avoid the use of company access to the Internet for reasons that are not strictly pertinent to work activities and, in particular, forbids its use to come into possession of and distribute pornographic material (especially when relating to individuals under the age of 18). Subsequently, in order to avoid harming the company's image:

- *procedures may be implemented through the use of "filters" to prevent **Sensi Vigne & Vini s.r.l.** Employee access to Internet sites that display pornographic material;*
- ***Sensi Vigne & Vini s.r.l.** employees are nevertheless strongly advised to avoid accessing Internet sites that display pornographic material.*

3.14 Prohibition against activities that are terroristic or subversive to the democratic order

Sensi Vigne & Vini s.r.l. is against any form of activity carried out for the purpose of terrorism or subversion to the democratic order. Accordingly, in order to avoid harming the company's image:

- ***Sensi Vigne & Vini s.r.l.** Employees, members of the Social Agencies, Sales Agents, Consultants, External Collaborators and Partners are forbidden from performing any form of activity with the intention of terrorism or subversion to the democratic order;*
- *any **Sensi Vigne & Vini s.r.l.** Employee with the founded suspicion that one of his/her co-workers is conducting activities with terroristic or subversive intentions must immediately inform the public safety authorities as well as the Board of Directors and the Supervisory Board pursuant to Lgs. D. No. 231/2001, who will take every initiative to actively collaborate with the aforementioned authority.*

4. PREVENTION OF CRIMES IN RELATIONS WITH THE PUBLIC ADMINISTRATION

In order to prevent conduct that could violate the law and regulations, if there are relations with the public administration **Sensi Vigne & Vini s.r.l.** will endeavour to avoid conduct considered as foul and contrary to the professional ethics and therefore the company's ethics, which includes:

- *offering money or gifts to executives, officers or employees of the Public Administration or their relatives, both Italian and foreign;*
- *offering any object, service, competence or favour of value to obtain preferential treatment in any relation with the Public Administration;*
- *when any business negotiation, request or relationship with the Public Administration are in progress, trying to inappropriately sway the decisions of the counterparty including officers who partake in or make decisions on behalf of the Public Administration;*

Lastly, for precautionary purposes, **Sensi Vigne & Vini s.r.l.** agrees to:

- *select its Partners from subjects who, by market share, by specific technical skills or by long duration of their standing on the market, are acknowledged as leaders or at the highest levels in the reference market.*
- *Any violation (effective or potential) of the rule of conduct included in this paragraph, committed by **Sensi Vigne & Vini s.r.l.** staff or third parties, must be promptly reported to the Board of Directors and the Supervisory Board pursuant to Lgs. D. No. 231/2001.*

5. CORPORATE CRIME PREVENTION

Sensi Vigne & Vini s.r.l. firmly believes in the need to establish relationships with audit firms, other control bodies and public vigilance authorities (that carry out control/review activities legally attributed to shareholders, to other corporate bodies or to auditing companies) based on loyalty, observance of the law and mutual collaboration in order to ensure compliance with the interests of the involved parties and ensure the correct and complete performance of control and auditing activities. For this purpose it is forbidden:

- *for **Sensi Vigne & Vini s.r.l.** Administrators to withhold documents or use other suitable devices to prevent or obstruct control or revision activities legally attributed to shareholders, to other corporate bodies or to auditing companies from being conducted;*
- *for **Sensi Vigne & Vini s.r.l.** Employees from collaborating in any illicit conduct of the revision manager*

aimed at attesting falsehoods or withholding information on the company's economic, asset-related and financial situation.

6. PREVENTION OF OFFENCES AGAINST THE INDIVIDUAL

6.1 Prohibition of child pornography and detention of pornographic material

To avoid **Sensi Vigne & Vini s.r.l.** Employees, members of Corporate Bodies and Collaborators from committing child pornography crimes (art. 600-ter of the Italian criminal code) and the detention of pornographic material (art. 600-quater of the Italian criminal code) and thereby damage **Sensi Vigne & Vini s.r.l.**'s image, they are forbidden from:

- *exploiting children under 18 for the production of pornographic performances or the production of pornographic material and the sale of the aforementioned pornographic material;*
- *distributing, disclosing, advertising the aforementioned pornographic material through any means, including electronic;*
- *distributing or disseminating news/information aimed at sexually grooming or exploiting children under 18;*
- *knowingly obtaining or disposing of pornographic material produced through the sexual exploitation of children under the age of 18.*

Sensi Vigne & Vini s.r.l. is strongly committed to preventing its Employees, members of the Corporate Bodies or Collaborators from committing crimes of tourism-related initiatives aimed at the exploitation of child prostitution (art. 600-quinquies of the Italian criminal code) and thus damage the image of **Sensi Vigne & Vini s.r.l.** It is therefore forbidden for **Sensi Vigne & Vini s.r.l.** Employees, members of the Corporate Bodies and Collaborators to organise or engage in propaganda for trips aimed to participate in prostitution activities to the detriment of minors or in any case involving such activities. **Sensi Vigne & Vini s.r.l.** declares to extend the prohibitions referred to in the above paragraphs to every kind of pornographic activity as well as every form of prostitution even when involving consenting adults.

7. THE DUTIES OF THE SUPERVISORY BOARD IN RELATION TO THE IMPLEMENTATION AND OBSERVANCE OF THE CODE OF ETHICS

In order to guarantee the effective implementation and observance of this Code of Ethics, pursuant to Lgs. D.No. 231/2001, the following tasks are assigned to the Supervisory Board:

- *overseeing the communication and training activities of the Code Of Ethics;*
- *receiving and analysing reports from subjects relating to violations of the Code of Ethics;*
- *preparing annual reports for the use of the Shareholder's Meeting;*
- *preparing an annual report (to be inserted in a specific chapter of the Financial Statements Report) on the activity carried out during the relative year in relation to compliance with the Code of Ethics*

7.1 Communication and training

The Code of Ethics is shared with the involved internal and external subjects through the following specific communication activities:

- *delivering a copy of the Code to every **Sensi Vigne & Vini s.r.l.** Employee;*
- *formally declaring that the Code of Ethics is binding for all Employees, from a disciplinary point of view, shared through internal circular and by posting said notice in the premises where corporate activities are conducted and accessible to everyone;*
- *providing dedicated sections on the company Intranet;*
- *requiring **Sensi Vigne & Vini s.r.l.** trade management to implement the Code;*
- *publishing it on the **Sensi Vigne & Vini s.r.l.** website;*
- *including express termination clauses in supply or collaboration contracts (agency, partnership, ...) that explicitly refer to compliance with the provisions of the Code of Ethics;*
- *preparing an annual report on the activity carried out by the Supervisory Board to be published for the Shareholders' Meeting for the approval of the Financial Statements (with the inclusion of a specific chapter in the Financial Statement Report on the activity of the Supervisory body).*

In order to ensure a correct understanding of the Code of Ethics to all new Employees and Collaborators at **Sensi Vigne & Vini s.r.l.**, the Supervisory Body pursuant to Legislative Decree No. 231/2001 prepares and conducts, within the first quarter of the new collaboration, also considering the indications of the Chairman of the Board of Directors, various training initiatives according to the role and responsibility of the Employees or Collaborators.

7.2 Reports from involved subjects

All involved **Sensi Vigne & Vini s.r.l.** subjects may report, in writing, also in anonymous form (odvsensi@sensivini.com), any violation or suspected violation of the Code of Ethics to the Supervisory Body pursuant to Lgs.D. No. 231/2001, or by contacting the Body by phone at the numbers on the bulletin board, whereby said Body will investigate the report, possibly hearing the author and the person responsible for the alleged violation. For events that may involve employees, the specific procedure P.MOG.02 shall apply. With regards to these reports, the Supervisory Board will do the following:

- *protect the authors of the reports against any form of retaliation (i.e. aimed at creating a form of punishment or discrimination);*
- *ensure the confidentiality of the identity of the author of the report, unless otherwise required by law.*

7.3 Annual report of the Supervisory Board

At least annually, pursuant to Lgs. D. No. 231/2001, the Supervisory Board shall prepare a report for the Shareholder's Meeting, containing:

- *the list of communication and training activities carried out during the relative semester, and in particular the indication of training activities regarding the Code of Ethics provided to any new Employees or Collaborators; violations of the Code of Ethics occurring during the quarter and any*
- *suggestions on the implementation of provisions against the author of the violation;*
- *suggestions for duly amending and integrating the Code of Ethics to keep it effective and up-to-date.*

Pursuant to Lgs. D. No. 231/2001, at the Shareholder's Meeting for the approval of the Financial Statement, the Supervisory Board prepares a report with:

- *a summary of all the activities, controls and inspections carried out over the course of the year;*
- *any update to the Code of Ethics;*
- *other relevant topics;*
- *annual plan of activities for the following year.*