



CASTEL DEL CHIANTI S.p.a. Unico Socio

Via del Chianti, 35 50028 Tavarnelle Val di Pesa (FI)

Telefono 055/805131 - 8050465 Fax 055/8050447

C.F./P.I. 04284760487

Capitale Sociale I.V. Euro 2.600.000 R.e.a. FI nr. 436653 - Reg. Impr.FI 017-58871

Società soggetta all'attività di direzione e coordinamento da parte di Matteo S.r.l. - C.F. 04277680288

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Premise

The introduction of an “ethical code” as an instrument of corporate professional ethics, today clearly represents the key to the development of competitiveness and the success of every entrepreneurial entity. CASTEL DEL CHIANTI S.P.A. Unico Socio makes reference to this code, the fruit of the experience in the oil producing sector of its founder, Mario Fusi, who began his business way back in 1946, a tradition carried on by his sons and nephews and nieces who continue to base themselves on the fundamental elements of growth such as honesty, integrity, correctness, passion and compliance with strict principles, standing out for their sense of responsibility, reliability and professionalism: characteristics that are the main objective of the “company mission” for obtaining the approval of the clientele, their own personnel and public opinion. In compliance with these values, the company has undertaken to draw up this “Ethical Code” (attached to the Organization and Management Model pursuant to Art. 6 of Italian Legislative Decree 231/2001) with the aim of continuing to disseminate the principles and standards of behaviour in order that they may represent the foundations of the company’s activities. These elements find their concrete application in all the relationships that the company entertains with third parties, including employees, external associates, clients and suppliers.

An ethical code which is not exclusively motivated by an adherence to existing regulations but, above all, a moral responsibility towards a professional tradition handed down over the years, coherence towards human resources and respect for the environment. The impact that ensues on a social level determines the company’s reputation which, by exceeding the confines of the commercial sphere, expresses socio-cultural characteristics such as added value within the community to which it belongs.

Coherently with the aims established, the **CASTEL DEL CHIANTI S.P.A. Unico Socio** Ethical Code has been divided into five chapters:

- *one chapter dedicated to the “general principles of behaviour” which provides the general principles to be adhered to by the Employees, Company Bodies, Commercial Agents, Consultants, External Associates and Partners of **CASTEL DEL CHIANTI S.P.A. Unico Socio**;*
- *three chapters (“Prevention of crimes in relations with General Government Bodies”, “Prevention of company crimes” and “Prevention of crimes against Individual Personalities”) dedicated to the specific behaviours requested from the Employees, Company Bodies, Commercial Agents, Consultants, External Associates and Partners of **CASTEL DEL CHIANTI S.P.A. Unico Socio** in order to avoid becoming involved in the types of penal crimes:*
 - covered by Italian Legislative Decree no. 231/2001;
 - in relation to which the existence has been ascertained of theoretical/potential areas of risk according to the preparatory analyses carried out for the introduction of the Model for the organization, management and control of activities pursuant to Italian Legislative Decree no. 231/2001, of which the Ethical Code constitutes an integral part;
- *one chapter related to the methods of implementation of the Ethical Code.*

Finally, it should be emphasized that this Ethical Code is inspired by an ideal of cooperation in view of the mutual advantages for the parties involved, with respect for the role of each of the same. Therefore **CASTEL DEL CHIANTI S.p.a Unico socio** requests every stakeholder to act with regard to the same in accordance with principles and rules that conform to a similar ethical conduct.



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1. General principles

1.1. Honesty

An essential principle of **CASTEL DEL CHIANTI S.P.A. Unico Socio** is a **respect for the laws and regulations that are currently in force**. Consequently, within the sphere of their professional activities, the Employees and Company Bodies of **CASTEL DEL CHIANTI S.p.a Unico Socio**, as well as its Commercial Agents, Consultants, External Associates and Partners, suppliers and clients and anyone who has any relations with the same, shall be obliged to diligently comply with all current laws and regulations. Under no circumstances may the pursuit of the interests of **CASTEL DEL CHIANTI S.P.A. Unico Socio** justify conduct which is dishonest according to the provisions of this paragraph.

CASTEL DEL CHIANTI S.P.A. Unico Socio shall not initiate or continue any relationship that does not intend to align itself with this principle. The Employees and Company Bodies of **CASTEL DEL CHIANTI S.P.A. Unico Socio** should be informed about the laws and consequent behaviours; in the event of any doubts about how to proceed within the sphere of their activities, they may request clarification from the **Supervisory Body** (odv@casteldelchianti.it) which shall promptly undertake to suitably inform the persons concerned.

1.2. Fairness in the case of potential conflicts of interest

Situations of **conflict of interest**, even of a potential nature, should always be avoided In the exercising of every activity, i.e. situations in which an Employee, a member of the Company Bodies, a Commercial Agent, a Consultant, an External Associate or a Partner pursues interests other than those of **CASTEL DEL CHIANTI S.P.A. Unico Socio** and the balancing of the interests of the stakeholders, or draws a personal advantage from the company's business opportunities.

1.3. Confidentiality

CASTEL DEL CHIANTI S.P.A. Unico Socio guarantees the **confidentiality of the information in its possession** and shall refrain from carrying out searches of reserved data, except for cases in which it has received express and informed authorization and the searches are carried out in compliance with the legal rules in force.

In particular, the Employees, Company Bodies, Commercial Agents, Consultants, External Associates and Partners of **CASTEL DEL CHIANTI S.p.a. Unico Socio** shall be forbidden from using any reserved information acquired in relation to the activities of **CASTEL DEL CHIANTI S.P.A. Unico Socio** for purposes that are unconnected to the exercising of their own actions.



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1.4. Value of human resources

CASTEL DEL CHIANTI S.P.A. Unico Socio considers its Employees and External Associates to be a decisive element of its success and, as a consequence, it shall protect and promote the **value of its human resources** in order to increase and improve the patrimony and the competitiveness of the expertise of each associate or employee whilst respecting the conditions of health and safety in the workplace according to the provisions of the MOG [Organizational, Management and Control Model] system.

1.5. Value of the environment

CASTEL DEL CHIANTI S.P.A. Unico Socio. considers respect for the Environment to be decisive for its growth within the context in which it operates and, consequently, it shall protect and promote the **minimizing of its environmental impact** for the purpose of increasing and improving the awareness of each associate or employee regarding compliance with the procedures defined by the MOG system.

1.6. Equity of authority

CASTEL DEL CHIANTI S.P.A. Unico Socio shall undertake to ensure that the exercising of authority within the hierarchical relationships is always inspired by criteria of **equity and fairness** and does not involve abuses of any kind. In particular, **CASTEL DEL CHIANTI S.P.A. Unico Socio.** shall ensure that the authority is not transformed into the exercising of power that is detrimental to the dignity and autonomy of the Employee or the External Associate and that the work organization choices safeguard the value of the Employees or External Associates.

1.7. Integrity and protection of persons

CASTEL DEL CHIANTI S.P.A. Unico Socio shall undertake to protect the **moral integrity** of its Employees or External Associates guaranteeing their right to working conditions which respect personal dignity. For this reason it shall undertake to safeguard workers from acts of psychological violence and oppose any attitudes or behaviours that are discriminatory or detrimental to the person and the convictions and preferences of the same (for example, insults threats, isolation or excessive intrusiveness, professional restrictions).

Sexual harassment shall not be permitted and behaviour and comments which may disturb a person's sensitivity should be avoided (for example, the displaying of images with explicit sexual references, insistent and continuous allusions).

The Employee or External Associate of **CASTEL DEL CHIANTI S.P.A. Unico Socio** who believes to have been the subject of harassment or to have been discriminated against for reasons connected to age, sex, sexuality, race, state of health, nationality, political opinions and religious beliefs, etc. may notify the **President of the BOD** and the **Supervisory Body** pursuant to Italian Legislative Decree no. 231/2001 of any such occurrence and the same shall assess the effective breach of the Ethical Code.

1.8. Transparency, comprehensiveness and truth of the information



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The Employees or External Associates of **CASTEL DEL CHIANTI S.P.A. Unico Socio** shall be obliged to provide **complete, transparent, truthful, comprehensible and accurate information**, in such a way that, in establishing their relations with the company, the stakeholders and anyone else who comes into contact with the company, is able to take decisions which are autonomous and fully informed of the interests involved, the possible alternatives and the significant implications. In particular, in the formulation of any contracts, **CASTEL DEL CHIANTI S.P.A. Unico Socio** shall take care to clearly and comprehensibly specify to the contracting party the behaviours to be adopted in all the possible circumstances, respecting the criteria established by the MOG management system.

1.9. Execution and renegotiation of contracts

Work contracts and assignments should be carried out in agreement with the provisions intentionally established by the parties.

In this regard, it should be emphasized that **CASTEL DEL CHIANTI S.P.A. Unico Socio** shall undertake:

- *not to exploit any conditions of ignorance or incapacity (even only temporary) of the opposite parties;*
- *to avoid, in existing relationships, that anyone operates in their own name or on their own behalf, or attempts to obtain an advantage from any contractual lapses or unforeseen events in order to renegotiate the contract with the sole aim of exploiting the position of dependency or weakness of the interlocutor.*

1.10. Quality and safety policy

CASTEL DEL CHIANTI S.P.A. Unico Socio is convinced that the success of its organization is strictly related to the integrated management of the processes necessary in order to satisfy the Clients' requisites both in terms of product compliance as well as service and respect for the health and safety of its employees.

The primary objectives are:

1. *client satisfaction*: the key to success lies in the complete satisfaction of the Client to satisfy Clients as much as possible in terms of the product as well as the service;
2. *professional integrity*: loyalty and fairness in relationships and the full sharing of the company's objectives; improving the sensitivity, the spirit of collaboration and the attention of all personnel with regard to the aspects of quality;
3. *respect for the law*: to respect the laws, rules, regulations, commitments signed which are applicable to the product/service, Health and Safety in the Workplace and the Environment;
4. *reduction of accidents*: the objective is to reach zero accidents and zero professional illnesses with a focus on prevention thanks to the definition of a Health and Safety Management System and an Organization and Management Model which is suitable for having a dispensatory effect in terms of administrative responsibility pursuant to Italian Legislative Decree no. 231 dated 08/06/01 as subsequently amended and modified.
5. *containment of costs*: to seek the optimization of company processes in order to reach the maximum level of effectiveness and efficiency;
6. *ongoing improvement*: the ongoing improvement of processes and products in order to maintain a high level of Competitiveness.



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CASTEL DEL CHIANTI S.P.A. Unico Socio considers quality to be correspondence with the Client's demands, seen as an integral part of an indissoluble combination that for the sector is translated into the conformity and reliability of the product and the promptness of the service and the pre- and post-sales assistance. The involvement and training of personnel, the availability of adequate resources (installations, test equipment and materials), the selection and expansion of qualified suppliers are the strong points required for achieving the quality objectives.

CASTEL DEL CHIANTI S.P.A. Unico Socio believes the health and safety of its employees to be the first commitment it undertakes in the management of its activities: this objective shall be pursued by complying with current legislation and applicable regulations and through the definition of procedures and improvement plans aimed at preventing the possible occurrence of undesired events such as accidents and professional illnesses.

CASTEL DEL CHIANTI S.P.A. Unico Socio is aware of the importance of preventing environmental crimes that involve administrative responsibility within the sphere of application of Italian Legislative Decree 231/01 which can be summarized for explanatory purposes in offenses regarding the following:

1. *drain waters and emissions into the atmosphere;*
2. *pollution of the soil, subsoil, surface waters or subterranean waters;*
3. *collection, transport, recovery, disposal, sale and brokerage of refuse;*
4. *waste management;*
5. *management of substances that damage the ozone;*
6. *commerce of protected species (flora and fauna);*
7. *deterioration of habitats.*

applying risk analysis or a risk-assessment in order to promptly identify the potential existence of individual environmental crimes and assess the risk of their being committed. The assessment is carried out through the analysis of company processes. Where necessary, the support of specialist external personnel is utilized.

The commitments regarding Quality, Health and Safety and the environment shall be translated into annual plans of objectives and measurable indicators, assigned to the various levels of the organizational structure.

The Policy for Quality, Health and Safety shall be implemented daily by all personnel under the constant attention and supervision of the Quality, Health and Safety Management Manager; periodically (ref. "Management Re-examination" procedure and "Training and Instruction" procedure) the Management will organize meetings in order to circulate information about the principles, objectives and commitments linked to the Company's handling of these aspects. The Management will promote the application, improvement and development of the system and undertake to ensure that the contents of the manual, the Procedures and the Instructions are divulged, understood and shared by all the employees and associates.

1.11. Respect for health and safety in the workplace

The Company takes care to adopt the necessary measures for ensuring the best possible protection of health and safety in the workplace and the prevention of all potential forms of risk. Moreover it shall define a policy for ensuring the best possible protection of health, safety in the workplace and the prevention of all potential forms of risk within the sphere of the Company's objective of ongoing improvement.



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This policy shall be applied without distinction by its own employees and by the employees of external companies within the sphere of the interventions carried out by the latter on the Company's sites.

In order to develop and monitor respect for the management of Health and Safety, the Company shall avail itself of an implemented system based on the Document of Risk Assessment and the Policy for Quality, Environment and Safety.

In order to develop and monitor respect for the management of Health and Safety, the Company shall avail itself of a structured system that involves:

- 1. a targeted company organization that identifies the level of responsibility, the division of duties and the level of autonomy of each organizational position;*
- 2. a Quality, Safety and Environment Body which, together with the General Management, establishes itself as a centre of competence capable of creating the right conditions for obtaining results which share and correspond with the company's ethical values. It handles the managerial aspects by 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 connected to Health and Safety, and with the Entities involved.*
- 3. a system of managerial procedures mentioned above, derived from the Document of Risk Assessment, that specifies the risks and indicates the operational modalities;*
- 4. a system of operational instructions, derived from the system of managerial procedures, that indicates, in detail – where necessary – the working modalities carried out in a safe manner;*
- 5. a system of paper and computer registration, derived from the system of managerial procedures and operational instructions, that provides objective evidence of the activities carried out and the results achieved.*

All employees, associates and third parties shall be obliged to scrupulously comply with all the measures required by the procedures and internal regulations of **CASTEL DEL CHIANTI S.P.A. Unico Socio** regarding Health and Safety in the workplace, drawn up and updated in compliance with current legislation and, in particular, each one of them shall be required to pass on any comments regarding dysfunctions or possible improvements to their direct superior.

1.12 Fair competition

CASTEL DEL CHIANTI S.P.A. Unico Socio aims to protect the value of **fair competition** and shall therefore refrain from behaviours of a collusive, predatory nature or characterized by the abuse of a position of dominance.

1.13 Utilization of the company's Internet access



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CASTEL DEL CHIANTI S.P.A. Unico Socio shall undertake to avoid using the company's Internet access for reasons not strictly pertinent to work matters and, in particular, shall prohibit the use of the same for gaining possession of or distributing pornographic material (particularly where related to minors aged under 18). Consequently, also in order to avoid damaging the company's image:

- *procedures may be implemented which, by means of special "filters", block access to the Employees of **CASTEL DEL CHIANTI S.P.A. Unico Socio** to Internet websites that display pornographic material;*
- *the Employees of **CASTEL DEL CHIANTI S.P.A. Unico Socio** shall be strongly advised not to access Internet websites that display pornographic material.*

14. Activities of a terroristic nature or which are subversive to democratic order

CASTEL DEL CHIANTI S.p.a. Unico Socio is opposed to any form of activity realized for the purposes of terrorism or the subversion of democratic order. Therefore, also in order to avoid damaging the image of the company:

- *the Employees, members of the Company Bodies, Commercial Agents, Consultants, External Associates and Partners of **CASTEL DEL CHIANTI S.p.a. Unico Socio** shall be prohibited from carrying out any type of activity aimed at terrorism or the subversion of democratic order;*
- *any Employee of **CASTEL DEL CHIANTI S.P.A. Unico Socio** with a justified suspicion that his or her colleague is carrying out activities aimed at terrorism or the subversion of democratic order should immediately inform the police as well as the BOD and the Supervisory Body pursuant to Italian Legislative Decree no. 231/2001, which shall adopt every initiative in order to actively collaborate with the aforementioned authorities.*

15. Documentation of operations and transactions

Each operation and transaction carried out by **CASTEL DEL CHIANTI S.P.A. Unico Socio** shall be correctly registered, authorized, be verifiable, legitimate, coherent and congruous. For this purpose, all the actions and operations of **CASTEL DEL CHIANTI S.P.A. Unico Socio** should be suitably registered and it should be possible to verify the process of decision, authorization and execution. Therefore suitable documentary support should be prepared for each operation in order to be able, at any moment, to carry out checks that attest to the characteristics and the motivations of the operation and identify the person who authorized, executed, registered and verified the operation in question.

16. Financing of public or political structures

CASTEL DEL CHIANTI S.P.A. Unico Socio undertakes to respect current regulations and not to carry out activities for financing political parties, committees, public organizations or political candidates which could arouse suspicions of a conflict of interests. **CASTEL DEL CHIANTI S.P.A. Unico Socio** shall, in any case, exclude any and every form of financing or contribution to the aforementioned subjects in the event that the same should pursue, even legitimately, aims, purposes or ideas that are in contrast with the principles of this Ethical Code and, ore in general, with those solemnly stated in the Universal Declaration of Human Rights.



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17. Whistleblowing and data minimisation

CASTEL DEL CHIANTI S.P.A. Unico Socio undertakes to pay particular attention to the facts reported through the professional alert systems established by its own initiative, in reception of the directive so-called WHISTLEBLOWING by making available to its own employees tools suitable for reporting possible wrongs found in the business management allowing in the same time to keep anonymity.

The processing manager will have to make sure that only the data necessary for appropriate treatment purpose are processed. In the reporting systems but the reports are able to assess the volume and the nature of the transmitted informations it is the responsibility 's duty, therefore reminding the authors of the reports that the informations communicated within a WISTLEBLOWING system must remain factual and have a direct connection with the subject of the report.



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Via del Chianti, 35 50028 Tavarnelle Val di Pesa (FI)

Telefono 055/805131 - 8050465 Fax 055/8050447

C.F./P.I. 04284760487

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2. Prevention of crimes in relations with Government Bodies

1. General rules

CASTEL DEL CHIANTI S.P.A. Unico Socio, in order to prevent every behaviour in violation of laws and/or regulations, will oversee on the actions or on the documents not compliant to their own Ethical Code such as:

- *offering money or gifts to executives, officials or employees of Government Bodies or to their relatives, either Italian or from other countries;*
- *offering any object, service, benefit or favour of value in order to obtain more advantageous treatment regarding any relationship with Government Bodies;*
- *attempting to improperly influence the decisions of the opposite party, including those of the officials that are negotiating and making decisions on behalf of the Government Body during any business negotiations, requests or relationships with Government Bodies;*

CASTEL DEL CHIANTI SPA SOCIO UNICO also engages to guarantee that the operations carried out and related to its management are carried out in compliance with tributary, fiscal and customs regulations in force, and that its partners are also reliable from this point of view.

For precautionary purposes, **CASTEL DEL CHIANTI S.P.A. Unico Socio** shall undertake to:

- *select its Partners from among the subjects which, in terms of market share, specific technical expertise or the lengthy duration of their presence on the market, are recognized as leaders of or are at the highest levels of the reference market;*

Check the registration of own partners in the VIES list, check the regularity of the DURC and DURF as well as the correct economic treatment of the workers of any contractor companies who provide their work at their own locals.

- *the Sole Director and the Supervisory Body pursuant to Italian Legislative Decree no. 231/2001 should be promptly notified of any (actual or potential) breach of the rules of conduct set down in this paragraph committed by personnel of **CASTEL DEL CHIANTI S.P.A. Unico Socio** or by third parties.*



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2. Requests for public funds from the State/European Union/other public bodies and management of the same

In relation to requests for public funds from the State/European Union/other public bodies and their utilization, **CASTEL DEL CHIANTI S.P.A. Unico Socio** undertakes to proceed in the process for obtaining funds and in the utilization of the same in a correct manner, in compliance with the law, the rules of this Ethical Code and internal procedures, also in order to avoid possible damage to the company's image. Therefore, the Employees, Company Bodies and Associates of **CASTEL DEL CHIANTI S.P.A. Unico Socio** shall be prohibited from:

- *public official corruption,*
- *false statements and relative documents, ect.*

3. Participation in tender procedures called by Government Bodies

In the case of participation in tender procedures called by Government Bodies, **CASTEL DEL CHIANTI S.P.A. Unico Socio** undertakes to take part in the process for participation in the tender procedure in a correct manner, in compliance with the law, the rules of this Ethical Code and the internal procedures, also in order to avoid possible damage to the company's image. Therefore, the Employees, Company Bodies and Associates of **CASTEL DEL CHIANTI S.P.A. Unico Socio** shall be prohibited from:

- *promising/giving a Public Official, personally or for a third party, an unwarranted payment in cash, or using another facility, in exchange for a necessary official action of the same for the advancement of **CASTEL DEL CHIANTI S.P.A. Unico Socio** in the tender procedure;*
- *promising/giving a Public Official, personally or for a third party, a sum of cash, or using another facility, in order to make the same omit/delay an official action or carry out an action contrary to the official duties of the same for the purpose of favouring the advancement of **CASTEL DEL CHIANTI S.P.A. Unico Socio** in the tender procedure;*
- *mislead, by means of artifices or deception, the State/other public body for the purpose of favouring the advancement of **CASTEL DEL CHIANTI S.P.A. Unico Socio** in the tender procedure;*

3. Prevention of company crimes



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3.1. Collaboration with control bodies and other public authority.

CASTEL DEL CHIANTI S.P.A. Unico Socio. is strongly convinced of the need to establish a relationship with the auditors and other control bodies (that carry out the control/auditing activities legally attributed to the shareholders, to other company bodies or the auditors) characterized by loyalty, compliance with the law and mutual collaboration in order to ensure the respect of the interests of the stakeholders and guarantee the correct and complete carrying out of the control and auditing activities. For this purpose:

- *the Directors of **CASTEL DEL CHIANTI S.P.A. Unico Socio** shall be prohibited from concealing documents or using any other artifices for preventing or obstructing the carrying out of the control and auditing activities legally attributed to the shareholders, to other company bodies or the auditors;*
- *the Employees of **CASTEL DEL CHIANTI S.P.A. Unico Socio** shall be prohibited from collaborating with any illicit conduct by the person responsible for auditing for the purpose of making false statements or concealing information regarding the economic, patrimonial and financial situation of the company.*

3.2. Formation of the capital

In order to preserve the integrity of the corporate assets and guarantee the respect of the law as well as the interests of the stakeholders, the Directors of **CASTEL DEL CHIANTI S.P.A. Unico Socio** and its shareholders shall be prohibited from effecting, even partially, the fictitious formation of the share capital or the fictitious increase of the same by means of:

- *attributions of shares or quotas in an amount which, overall, is higher than the share capital;*
- *the mutual underwriting of shares or quotas; the significant overvaluation of the allotment of assets in kind, of credits or the corporate assets in the event of a company transformation.*

3.3. Market rigging

CASTEL DEL CHIANTI S.P.A. Unico Socio shall undertake to prevent market rigging phenomena by its Employees (particularly by the Directors) even where the aim is to generate an advantage or profit for **CASTEL DEL CHIANTI S.P.A. Unico Socio** itself in relation to financial instruments which may also not be pertinent to the same; for this purpose, the Employees of **CASTEL DEL CHIANTI S.P.A. Unico Socio** shall be prohibited from circulating false information or carrying out simulated operations or other artifices capable of causing a considerable alteration of the price of listed and unlisted financial instruments or to significantly affect public trust in the patrimonial stability of banks and banking groups .



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4. Prevention of crimes against Individual Personalities

4.1. Juvenile pornography and possession of pornographic material

In order to avoid Employees, members of Company Bodies and Associates of **CASTEL DEL CHIANTI S.P.A. Unico Socio** becoming involved in crimes of juvenile pornography (art. 600-ter Italian criminal code) and possession pornographic of material (art. 600-quater Italian criminal code) and thus damage the image of **CASTEL DEL CHIANTI S.P.A. Unico Socio**, they shall be prohibited from:

- *exploiting minors under the age of 18 for the realization of pornographic displays or the production of pornographic material;*
- *trade in the aforementioned pornographic material;*
- *distribute, circulate, publicize the aforementioned pornographic material using any method, even electronically;*
- *distribute or circulate news/information aimed at the grooming or sexual exploitation of minors under the age of 18;*
- *knowingly give, even free of charge, pornographic material produced through the sexual exploitation of minors under the age of 18;*
- *knowingly procure for themselves or use pornographic material produced through the sexual exploitation of minors under the age of 18.*

4.2. Tourism initiatives aimed at the exploitation of juvenile prostitution

CASTEL DEL CHIANTI S.P.A. Unico Socio is strongly committed to avoiding that its Employees, members of Company Bodies or Associates become involved in crimes regarding tourism initiatives aimed at the exploitation of juvenile prostitution (art. 600-quinquies Italian criminal code) and thus damage the image of **CASTEL DEL CHIANTI S.P.A. Unico Socio**. Therefore the Employees, members of Company Bodies and Associates of **CASTEL DEL CHIANTI S.P.A. Unico Socio** shall be prohibited from organizing or publicizing trips aimed at the exploitation of activities of prostitution to the detriment of minors or in any case that include such activities.

4.3. Extension of the prohibitions in points 4.1 and 4.2 to pornography and prostitution involving adults

CASTEL DEL CHIANTI S.P.A. Unico Socio hereby declares to also extend the prohibitions in points 4.1 and 4.2 above to every other type of pornographic activity as well as every form of prostitution even where this involves consenting adults.



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5. Duties of the Supervisory Body with regard to the implementation and respect of the Ethical Code

In order to guarantee the effective implementation and respect of this Ethical Code, the following duties shall be assigned to the Supervisory Body pursuant to Italian Legislative Decree no.231/2001:

- *to supervise the communication and training activities in the Ethical Code;*
- *to receive and analyze the stakeholders' notifications regarding breaches of the Ethical Code;*
- *to draw up half-yearly reports for the use of the Shareholders' Meeting;*
- *to draw up a yearly report (to be inserted in a special chapter in the Report on the Financial Statements) on the activities carried out during the year in relation to the verification of the respect of the Ethical Code.*

5.1. Communication and training

The Ethical Code shall be made known to the internal and external stakeholders by means of the following specific communication activities:

- *the consignment of a copy of the Code to all the Employees of **CASTEL DEL CHIANTI S.P.A. Unico Socio**;*
- *a formal declaration of commitment to the Ethical Code under the disciplinary profile for all Employees by means of an internal circular and the posting of the same in areas where company activities take place in a position that is accessible to all;*
- *the preparation of sections dedicated to the same on the company Intranet;*
- *the insertion in all **CASTEL DEL CHIANTI S.P.A. Unico Socio** contracts of an information note related to the adoption of the Code;*
- *the publication of the same on the **CASTEL DEL CHIANTI S.P.A. Unico Socio** Internet website;*
- *the insertion of express cancellation clauses in the supply or collaboration contracts (agency, partnership,) that make explicit reference to the respect of the provisions of the Ethical Code;*
- *a yearly report on the activities carried out by the Supervisory Body to be published on the occasion of the Shareholders' Meeting for the approval of the Financial Statements (with the insertion of a special chapter in the Report on the Financial Statements related to the activities carried out by the Supervisory Body).*



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In order to ensure the correct comprehension of the Ethical Code by all new Employees and Associates of **CASTEL DEL CHIANTI S.P.A. Unico Socio** the Supervisory Body pursuant to Italian Legislative Decree no. 231/2001 shall prepare and carry out, by the end of the first quarter after the initiation of a new collaboration relationship and also in consideration of the instructions of the Sole Director, differentiated training initiatives according to the role and the responsibilities of the Employees or Associates.

5.2. Stakeholder notifications

All the stakeholders of **CASTEL DEL CHIANTI S.P.A. Unico Socio** may notify the Supervisory Body pursuant to Italian Legislative Decree no. 231/2001 in writing and in a non-anonymous form (odv@castelchianti.it), of any breaches or suspected breaches of the Ethical Code and the same shall undertake to investigate any such occurrences, possibly hearing the notifier and the person responsible for the alleged breach. With regard to such notifications, the Supervisory Body shall act in order to:

- *guarantee the notifier against any type of reprisal (i.e. directed towards any form of penalization or discrimination);*
- *ensure the confidentiality of the identity of the notifier, barring the obligations required by law.*

5.3. Half-yearly reporting by the Supervisory Body

At the end of each half-year period, the Supervisory Body pursuant to Italian Legislative Decree no. 231/2001 shall draw up a report for the Shareholders' Meeting containing:

- *a list of the communication and training activities carried out in the course of the reference half year period and, in particular, an indication of the training activities regarding the Ethical Code carried out for any new Employees or Associates; any breaches of the Ethical Code discovered in the course of the half-year and the consequent suggestions for the adoption of measures against the person responsible for the breach;*
- *any proposals for the rectification and supplementation of the Ethical Code necessary in order to keep the same effective and up to date.*



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5.4. Annual report of the Supervisory Body

On the occasion of the Shareholders' Meeting to approve the Financial Statements, the Supervisory Body pursuant to Italian Legislative Decree no. 231/2001 shall draw up a report containing:

- *a summary of all the activities carried out during the year and the controls and inspections executed;*
- *any updates to the Ethical Code;*
- *any other topics of particular importance;*
- *an annual plan of the activities scheduled for the following year.*