



## CHIANTI CLASSICO

### CONSORZIO VINO CHIANTI CLASSICO CODE OF ETHICS

#### **Scope of Application and observance of the Code of Ethics**

The “Code of Ethics” adopted by the Consorzio Vino Chianti Classico by means of Board resolution dated April 12<sup>th</sup> 2013 is essentially a “Charter of Values” that guides company policy. By adopting and enforcing appropriate observance of the principles and rules set out in the Code of Ethics, the Consorzio seeks to defend and uphold its values.

The purpose of the Code of Ethics is to create within the Consorzio a value-based environment in which employees and associates are encouraged to work and act in a lawful and transparent way. The Code of Ethics shall be binding for all internal and external stakeholders. Suppliers not bound by a Code of Ethics shall be required, prior to assignment, to expressly agree to the principles and rules of the Consorzio Code of Ethics.

All agreements completed by the Consorzio with suppliers and associates must include an express termination clause that shall apply in the case of non-compliance with the Code of Ethics. Therefore, if a violation of the Code of Ethics committed by any supplier and/or associate should transpire at the outcome of a preliminary investigation by the Supervisory Body, said party shall be immediately charged for the violation and the Consorzio shall retain the right to take action for the early termination of the contract due to breach.

#### **General Principles**

The fundamental principle for the Consorzio is compliance with the laws and regulations in force in the countries in which it operates; none of its objectives may be pursued, nor achieved in breach of the laws. Accordingly, all Consorzio employees have the absolute duty and undertake to fully and diligently comply with the laws and regulations in force in Italy and in the foreign countries in which the Consorzio operates. Consequently, any activity entailing the infringement of a legal rule, which



## CHIANTI CLASSICO

in turn could lead to involvement by the Consorzio, must be immediately interrupted and communicated to the relevant Supervisory Body.

The Consorzio shall not initiate, nor continue any relationship with any third party not committed to comply with said principle, and requires that its collaborators, suppliers, clients and anyone in any way connected or associated with the Consorzio, now and in the future, commit to comply with said fundamental principle. In turn, the Consorzio undertakes to inform its employees of specific laws and to advise them of the necessary conduct to be held in each relevant case.

Therefore, the Consorzio encourages said employees to consult the Consorzio should they have any doubt on how to proceed.

Irrespective of incidental cases, the Consorzio shall implement an appropriate and regular training and awareness-raising program with regard to present and future issues related to the “Code of Ethics”. Every operation and transaction must be duly recorded, authorized, verifiable, legitimate, coherent and consistent. For this reason, the Consorzio has identified a series of business cycle-related procedures posing a potential crime risk that must be observed by all workforce, at all levels, and which will be outlined and updated in the Management and Control Organizational Model pursuant to Legislative Decree 231/2001.

### **Confidentiality**

In full compliance with applicable laws, the Consorzio undertakes to keep all information in its possession strictly confidential and to refrain from looking up confidential data, unless upon receiving express and informed authorization from the interested parties. In turn, all employees and associates shall ensure the highest level of confidentiality with regard to news and information pertaining to company records and assets, or concerning corporate activities, in accordance with applicable laws, regulations and internal procedures.

### **Human resources**



## CHIANTI CLASSICO

The Consorzio considers its employees and associates as the primary and essential resource for the achievement of its business purposes. For this reason, the Consorzio protects and promotes the value of its human resources, by ensuring that the experience and skill set of every individual in any way associated with its corporate structure is increased and enhanced.

### **Conflict of interests**

All employees and associates are required to avoid any situation that may potentially lead to a conflict of interests, and to refrain from taking personal advantage from any business opportunity that should come to their attention during the performance of their activities.

### **Communication**

The Consorzio undertakes to inform all recipients of the provisions and the implementation of the Code of Ethics, thus urging full compliance with it. In particular, it shall ensure:

- circulation of the Code of Ethics among its recipients;
- interpretation and clarification of its provisions;
- verification of effective compliance;
- updating of the provisions in relation to the needs that should emerge from time to time.

### **Sanctions**

All provisions within this Code (as well as all that shall follow) are an integral part of the contractual obligations undertaken by the Consorzio staff and by anyone entertaining business relations with the same Consorzio. Any failure to comply with the provisions of the Code may be considered as non-fulfillment of the contractual obligations, carrying with it all the legal consequences thus arising, including termination of contract or of the assignment and possible compensation of any damage suffered.

### **Ethical third-party relationships**



## CHIANTI CLASSICO

Individuals operating in the name and/or on behalf of the Consorzio must conduct themselves, regardless of the public or private nature of their stakeholder, in accordance with the principles of lawfulness, fairness, verifiability and transparency. It is forbidden to give or promise benefits in any form, even if the conduct is carried out in the Consorzio's interest, with the sole exception of gifts of modest value as is customary.

Relations with public employees must also comply with the standards, principles and provisions set forth in Decree of the Prime Minister 28 November 2000 (Code of Conduct for Public Administration Employees). All Consorzio employees and associates who receive offerings of all kinds from their stakeholders, whether public or private, are required to inform the Supervisory Body, should the magnitude of the gifts or gratuities exceed a modest value according to accepted practice. It is forbidden to establish personal relationships with public servants aimed at obtaining undue favors. Any financing of political parties, in Italy and abroad, shall be done in full compliance with the Consorzio Bylaws and current applicable legislation.

Individuals operating in the name and/or on behalf of the Consorzio Vino Chianti Classico must refrain from engaging in any behavior that may constitute, directly or indirectly, undue pressure on political or trade union officials. Any sponsoring activity of bodies and/or events, whether sporting, artistic or cultural must be carried out with the utmost transparency, so as to exclude any sort of corporate or personal conflict of interest.

Individuals operating in the name and on behalf of the Consorzio must engage in behaviors that ensure the transparency, fairness and diligence of the corporate conduct, not only in the performance of their duty, but also in the carrying out of negotiations. Irrespective of formal requirements, the Consorzio must solely take part in tenders in which the requested services are truly consistent with the technical and financial capabilities of the Consorzio, and the bid submitted to the contracting authority allows it to base its activity on the criteria of quality and on compliance with safety regulations.

The Consorzio shall turn to litigation only after having attempted to settle any dispute and, therefore, only as a last resort. With regard to its relations with suppliers, the Consorzio shall make



## CHIANTI CLASSICO

its selections with a view to obtaining the most competitive advantage, taking into consideration the quality/price ratio of the services offered, whilst avoiding any and all discriminatory treatment. Relations with suppliers must always be regulated by specific contracts. The Consorzio shall not deem as reliable those suppliers and subcontractors who avail themselves of staff that are in breach of social security, tax and insurance laws. For this reason, the Consorzio shall require suppliers not bound by a personal Code of Ethics to agree to its own Code, and likewise it will expect the same from the subcontractors employed by said suppliers in the performance of their service.

### **Ethical employee relationships**

Every Consorzio member must comply with national collective bargaining legislation for the sector and with social security, tax and insurance laws. All employees shall be hired under regular contract in accordance with national laws and collective bargaining legislation in the sector.

Recruitment and selection practices and staff placement within the corporate structure must be carried out in such way to avoid any form of discrimination, favoritism or partiality. Furthermore, the Consorzio undertakes to promote and enhance employee professional skills, also by implementing theoretical and practical training programs.

Additionally, the Consorzio will put in place every necessary or purely suitable measure aimed at ensuring that the working conditions safeguard the physical and moral integrity of its employees. It shall do so with the purpose of creating a safety-first work environment, in which staff is fully aware of the actual risks, and consequently, of the concrete and ongoing need for the use of accident-prevention, safety measures.

The Consorzio will take disciplinary action against any such conduct deemed to disregard the safety and security of employees. All employee information must be treated in such a way as to guarantee their confidentiality and integrity.

### **Ethical environmental conduct**

The Consorzio has set the following objectives for itself:



## CHIANTI CLASSICO

- to privilege, whenever possible, the recycling of inert waste over landfill;
- to encourage the market and disseminate a culture favoring the use of recycled material instead of natural material;
- to systematically determine the impact of any activity performed, recognizing the negative effects, identifying their causes and removing them;
- to promote, among collaborators and all associates who work for or on behalf of the Consorzio, a sense of responsibility towards the environment, by organizing training and informative activities;
- to be available to participate in the organization of locally-held environmental initiatives and projects designed to promote sustainable development and the enhancement of the environment and territory in which the Consorzio operates;
- to avoid initiatives that may be disruptive and unhealthy for the environment.