

RINOMATA CANTINA
TOMBACCO
fondata nel
1919



COMPANY ETHICS CODE



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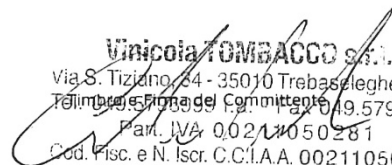


Code of Ethics Approval

Cristian Tombacco, as legal representative of Vinicola Tombacco S.r.l., on 20/04/2022, verified and approved this current edition of the company code of ethics.

Place and date: Trebaseleghe, 20/04/2022

For verification and approval


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Il legale rappresentante

1 The company

1.1 Company profile

For three generations the Tombacco family has been producing and bottling Italian wines in the best winemaking tradition of our country. We work to create different types of products to satisfy a demanding Italian and foreign market capable of choosing quality wines at competitive prices. The core business is divided into the marketing of wine in bottles and tanks.

There is an important dual aspect to our work as a winery: on the one hand it is closely linked to tradition and the entire production system is managed as it once was. This is why we have chosen to remain a small company, with 30 specialized employees who are passionate about their work and pay great attention to detail.

On the other hand, we are constantly evolving, continuously in search of qualitative and technical improvement. Product certifications, totally organic vines, attention to sustainability and energy saving are the main aspects that animate our business.

Every day our hearts and minds are committed to increasing the value and quality of our wines, so that our customers can savour all the goodness of tradition. Aromas, sensations, flavours that arise from the essence of our grapes and from the scrupulous selection of ancient vines to be rediscovered in regions throughout Italy.



This is our mission: to bring to light once more the culture and tradition of good Italian wines. For this reason, our logo, a symbol of our deepest identity, bears the date 1919, because today as then, tradition, the value of know-how, the love for simple things allow us to produce quality Italian wines.

1.2 Ethical values

We all have an interest in satisfying our customers; only in this way can we guarantee continuous job opportunities and satisfy the needs of our internal and external stakeholders. Achieving and maintaining a firm position in our markets also allows us to practice the ethical values that inspire us with continuity and effectiveness.

Our internal relationships are based on mutual trust and loyalty, we continuously seek unity of purpose and together we pursue pre-established interests and objectives. We are committed to managing our processes in compliance with the principles of fairness and impartiality, without distinction or discrimination and we strive to enhance our human resources while respecting their personality and specificity. Equally, in relationships with outside people and organizations we base our relationships on mutual trust and loyalty with zero tolerance of collusive or corrupt acts.

We know that every human activity involves the use of resources, produces waste and, inevitably, impacts the ecosystem. We are aware of being an active part of this ecosystem and we feel committed to reducing the impacts produced by our activities.

The territory in which we operate and the communities we deal with are part of a context that has a thousand-year history; we willingly commit ourselves to preserving the history and culture of the lands that host us, therefore, within the limits of our possibilities, we want to support projects of historical-cultural interest or projects which, in any case, benefit the communities established within the territory.

Each activity is aimed at satisfying customers and other interested parties and is carried out in a correct and transparent manner, respectful of mandatory rules and business practices in the exclusive interest of all stakeholders. Consistent with the ethical principles that inspire us, we refuse to cooperate, in any way, with people or organizations that engage in activities that are illegal and / or disrespectful to human, animal and environmental rights. We like to think that every activity is undertaken for our customers, our suppliers, ourselves and for any other interested party; a profitable exchange that leads to the achievement of the ethical objectives that we have set ourselves.



2 Mandatory regulations

Vinicola Tombacco S.r.l. scrupulously and punctually complies with all applicable mandatory regulations and is committed to ensuring constant updating on legislative matters.

3 Elements of the process

3.1 Code of Ethics

The Code of Ethics (COE) sets out the framework of the commitments to Corporate Social Responsibility (CSR) undertaken by Vinicola Tombacco S.r.l. of Trebaseleghe (PD) and is the result of the work carried out by the entire organization, shared by all its members, verified and approved by the management. The COE describes the reality of the organization and represents our response to the issue of Corporate Social Responsibility (CSR).

A copy of the COE is distributed to all our partners, our collaborators and other interested parties who request it.

The COE is entrusted with the understanding and dissemination of the ethical values of Vinicola Tombacco S.r.l.; it sets out the commitments and responsibilities assumed towards all the interested parties, concretely translated into principles and rules of conduct; it also represents a fundamental tool for managing relationships and company strategies.

What is stated in the COE has binding value, without exception, for the Directors and for all women and men who work with Vinicola Tombacco S.r.l.; it follows that all members of the organization are required to apply and comply with the COE and in particular are required to:

- behave in accordance with the COE;
- prevent possible violations of the COE and report them to the Management without delay
- engage in the improvement of practices and methods in use for the implementation of the principles set out in the COE;
- undertake to spread the ethical values contained in the COE also outside the professional sphere and to operate consistently with them.

3.2 Effectiveness analysis

Vinicola Tombacco S.r.l. interprets effectiveness analysis as a process with its inputs and outputs and has established that it should:

- a. be carried out annually;



- b. be consistent with the criticality of the outputs of previous analyses, with ongoing development programs and with the significant changes in the organization.

The elements considered for the execution of the effectiveness analysis are:

1. status of achievement of the previously defined improvement objectives;
2. information deriving from company indicators;
3. customer feedback;
4. operational, managerial and administrative process performance;
5. reference market and competitors' performance assessments;
6. information provided by suppliers;
7. information about technological innovation;
8. training needs assessments;
9. problems related to improving the quality of work and life of staff;
10. reports relating to special needs (disabilities, etc.);
11. indications about significant environmental aspects on which to intervene.

The effectiveness analysis is conducted by the Management in collaboration with the quality team.

3.3 Improvement

The outcome of the effectiveness analysis is a crucial element for the development of business strategies; the Company Management undertakes to lead the decision-making phase that results in the definition of the *Improvement Plan*.

3.4 Communication

Vinicola Tombacco s.r.l. communicates its values and its commitment to achieve them by delivering a copy of the company code of ethics to the main interested parties and by publishing the COE itself on its website www.rinomatatombacco.it.

The principal stakeholders in Vinicola Tombacco S.r.l. are:

- shareholders
- employees
- suppliers
- customers
- Public bodies and institutions (Province of Padova, Province of...)



- communities
- associations
- banks / financial institutions

4 Areas of intervention

4.1 Work

4.1.1 Socially responsible work management

The directorship of Vinicola Tombacco S.r.l. in addition to ensuring full compliance with the applicable mandatory requirements, undertakes:

1. to inquire about the scholastic courses followed by its employees under the age of 18 and, in the event that they have not completed the compulsory study cycles, urges them to resume them and plans their working hours so that the commitment required, calculated by adding up working hours and school hours, does not exceed 8 hours;
2. to ensure a working time that, added to the time dedicated to training, does not exceed 10 hours per day for all those workers engaged in study;
3. to guarantee all workers the right of association and collective bargaining;
4. to ensure fair pay and the absence of any form of bonded or child labour;
5. to clarify to newly hired workers the main elements that make up the employment relationship. In particular, the following aspects will be addressed:
 - company policies;
 - the company organisation;
 - their respective roles and responsibilities;
 - the structure of their remuneration and payment methods;
 - the use of holidays and leave permits;
 - communication in case of absence due to illness, maternity, accidents;
 - union representation;
 - code of conduct.
6. not to engage in behaviour that may be physically or psychologically threatening, offensive or coercive and to sensitize their collaborators so that such behaviour is banned not simply because it is punishable but because it is intrinsically wrong. In the event that situations of unacceptable behaviour arise, the Management will summon the interested parties and help them to conclude any dispute in an acceptable way;



7. to immediately evaluate and resolve any discriminatory action or attitude that may occur within the workplace and to identify the professional profiles useful for carrying out operational, managerial and administrative activities in order to guarantee the selection of workers based exclusively on their ability to satisfy the characteristics of the professional profiles of reference;
8. to act to solve quickly any accessibility problem in the workplace, with particular reference to mobility for disabled workers;
9. to repudiate and hinder any form of corruption, extortion or embezzlement;
10. to organize, on an annual basis, a meeting with all staff in order to increase their degree of sensitivity towards health and safety issues;
11. to resort to overtime work in cases of particular need, such as during the harvest period, and to inform workers well in advance, choosing, from those who are available, those who have not worked overtime for the longest time, while assessing in advance the levels of risk inherent including possible stressful situations due to prolonged working hours, repetitiveness of gestures / activities, etc. During the harvest period, seasonal workers are also hired;
12. to stay up-to-date on regulatory innovations and on any other opportunity that may arise in order to better protect the workforce, customers and the territory through continuous relationships with the Sedac studio.

4.1.2 The organisation

To ensure the application of the applicable mandatory and voluntary requirements, policies, strategies and the achievement of objectives, the Management of Vinicola Tombacco S.r.l.:

- defines its organizational structure, defining the tasks and responsibilities of all company roles, according to the processes identified;
- provides for a plan of monthly coordination meetings between the managers, to create the system documentation and the strengthening of the internal IT network;
- undertakes to organize annual meetings with staff to increase the degree of participation and commitment so that continuous improvement of strategies and results can be achieved;
- organizes two-yearly meetings with its collaborators, aimed at increasing the levels of sensitivity towards CSR issues;
- arranges collection points for opinions and suggestions.



4.1.3 Enhancement of Human Resources

The Management of Vinicola Tombacco S.r.l.:

- a. establishes, for each job relevant to quality, the professional and training requirements that the personnel must possess and adapts the selection system and the personnel training system accordingly;
- b. plans training activities annually and evaluates their effectiveness through methods related to the type of interventions;
- c. reports all the training activities carried out, recording any problems encountered, the results obtained as well as the overall effectiveness of the activities;
- d. evaluates the problems that emerge in the course of the daily relationships with its staff, with a view to possibly improving the quality of work and life of such staff, and takes every feasible action to ensure their resolution.

4.2 Market

4.2.1 Customers and consumers

Vinicola Tombacco S.r.l. intends to maintain a constant dialogue with the customer, to monitor their needs and the degree of satisfaction, prevent or resolve non-compliance situations, provide assistance aimed at improving the methods of using the services and products offered.

To this end:

- a. the generation of a new sales price list, the general conditions of sale or the launch of an advertising campaign are the result of an in-depth assessment (carried out by the General Management with the contribution of the Sales Service) of the market conditions of individual products or single types of the same, of the statistical sales data provided by the Sales Service and of the production and technical data of the product masses that will be used for the production of the finished product. The material prepared is evaluated in order to guarantee the truthfulness, clarity and completeness of the information contained therein;
- b. the communication to customers of the material prepared is carried out according to traditional communication channels (email, fax, post etc.) and in any case always in line with the customer's needs;
- c. the request for the development of a new product can come from an internal source within the company or from a specific customer by means of verbal or written contact



- with our sales area. Following the request the Quality Committee in its first appropriate meeting establishes the feasibility of the proposed new product;
- d. once the feasibility has been ascertained by the Quality Committee, the phases and times for the design, development and production of the product are defined. The responsibilities for the review, verification and validation activities are also defined and finally the Sales Manager formalizes the order confirmation to be sent to the customer;
 - e. the contracts are subject to systematic review in order to define the requirements that must be observed in a timely manner. In particular the company undertakes to verify the effective ability to satisfy the request before accepting it and to clearly define the responsibilities. In addition, the company undertakes to interface with the customer and to promptly resolve misunderstandings or discrepancies between offers and orders.

4.2.2 Production process

To ensure compliance with the commitments undertaken towards the customers of Vinicola Tombacco S.r.l. the task of constantly monitoring the production process and the product on the basis of the requirements set out in the self-inspection plan is entrusted to the Quality Manager and the related operators.

Furthermore, Vinicola Tombacco S.r.l. maintains control of the production process through preventive analysis and planning of operating cycles which define, albeit informally (in case there are no traces of the production planning and control activities), in each significant phase:

- a. Tasks, responsibilities and resources;
- b. methods of managing information flow relating to the product;
- c. documented instructions specifying how to operate, if any exist;
- d. the best and most suitable use of operating methods, management and production activities and the most suitable work environment;
- e. methods of monitoring compliance with applicable contractual and regulatory requirements;
- f. adequate devices for monitoring and measuring process parameters and product characteristics;
- g. the rules for the use of the vehicles and equipment / instruments used;
- h. the adequate maintenance of vehicles, equipment and instruments, to ensure the processes have a lasting and continuous capacity.



4.2.3 Relations with suppliers

The activities of Vinicola Tombacco S.r.l. can be divided into "procurement of grapes and finished wines" and "procurement of all other materials". In both cases:

- a. all purchasing activities are conducted by the company in a documented form;
- b. in the acceptance phase, all purchased materials undergo a qualitative and quantitative correspondence check with respect to the order;
- c. all suppliers of materials and services are subject to careful evaluation by the company;
- d. with regard to "the procurement of grapes and finished wines", the controls on these processes / products are both planned and strictly observed.

In order to increase the sensitivity of its suppliers on CSR issues, Vinicola Tombacco S.r.l. undertakes to:

- a. send them a communication about the commitments undertaken in terms of CSR, inviting them to consult our website where the above-mentioned documents are available
- b. favour the selection of suppliers based on the following criteria:
 1. transparency and correctness of their behaviour with regard to relations with their staff and collaborators, environmental issues, any beneficial actions carried out for the community;
 2. the quality of the business relationship;
 3. quality/price ratio of the products/services offered;
 4. trend of previous supplies with particular reference to conformity of products / services and compliance with established deadlines. All suppliers are included in a list of qualified suppliers and undergo a dynamic assessment process annually.

4.3 Environment

4.3.1 Environmental aspects check

During the periodic effectiveness analyses the Management of Vinicola Tombacco S.r.l.:

- a. performs an analysis on the significant environmental aspects and identifies in which of these it can actually intervene;
- b. in line with the results of the analyses referred to in point a) above, it defines environmental improvement objectives and includes them in the Improvement Plan.



4.3.2 Environmental sensitivity

On a two-yearly basis, Vinicola Tombacco S.r.l. internally promotes activities aimed at increasing the level of sensitivity of its members on environmental issues.

4.4 Community

4.4.1 Beneficial actions for the community

Vinicola Tombacco S.r.l. directors are committed to:

1. inquiring about the social projects promoted in the area by public bodies or private associations and, compatibly with the capability of intervention by the organization, evaluating the possibility of supporting those that it considers most interesting by making available to the promoter the resources it has;
2. spreading the culture of CSR, giving due emphasis, on its website, to the company Code of Ethics and adopting any other possible tool useful for the purpose;
3. evaluating the hiring of people with disabilities or those belonging to categories of disadvantage in the case of new hires, without prejudice to the possession of the professional requisites indispensable for carrying out the role in question;
4. supporting initiatives in the field of research and innovation.