

CODE OF ETHICS

The Wine People SRL

R.02

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Approved by the Legal Representative

Introduction

The company shapes its internal and external activities in accordance with the principles outlined in the Code of Ethics and Equalitas SOPD, firmly believing that ethics in business conduct should be pursued in conjunction with the success of the enterprise.

One of the primary objectives of TWP SRL is the enhancement of the value of the company itself, while simultaneously honouring the expectations of its customers and safeguarding the work of its employees. To this end, the company directs its business strategies and subsequent operational behaviours towards the efficient use of resources.

In pursuing this objective, the company adheres to the following general principles of conduct: respect for laws and regulations, fairness and honesty, impartiality, professionalism and respect for human resources, confidentiality, transparency, and completeness of information, protection of health and the environment, diligence, and trust.

The Code of Ethics represents a set of fundamental guidelines that inspires the activities of the company and guides the behaviours of its employees, collaborators, and administrators (hereinafter referred to as "Subjects") for the proper functioning, reliability, and image of the company. In particular, by way of example:

- the company's administrators also take into account the principles and values of the Code of Ethics when setting corporate objectives;
- employees and collaborators adjust their actions and behaviours to reflect the principles, values, objectives, and commitments outlined in the Code of Ethics.

Within the company's management system, there are a series of procedures and behavioural rules that the company, especially administrators, employees, collaborators, and anyone acting on behalf of the company, must adhere to in their interactions with various stakeholders. These stakeholders include Italian and foreign public administrations, entities of a public nature, or those performing public functions, public employees, and those entrusted with a public service or function (hereinafter referred to as Public Administration).

General principles

1.1 Compliance with laws and regulations

The company considers respect for existing laws and regulations, as well as international ILO conventions and recommendations related to human rights, a fundamental principle. Every employee of the company is therefore obligated to abide by current laws and regulations.

This undertaking must also apply to consultants, suppliers, customers, and anyone who has dealings with the company. The company will not initiate or continue any relationship with anyone who does not intend to align themselves with this principle. Therefore, the individuals involved must be aware of the laws and the resulting behaviours. In case of any doubt, or need for further clarification, they should consult their immediate superiors.

1.2. Fairness and Honesty

The company operates in accordance with professional ethics and internal regulations. The pursuit of the company's interest can never justify conduct contrary to the principles of fairness and honesty. For this reason, any form of benefit or gift, received or offered, that could be perceived as a means to influence the independence of judgment and conduct of the parties involved will be rejected.

Gifts of modest value and other ordinary and reasonable expenses are allowed, provided they are within limits that do not compromise the integrity, ethical and professional correctness of the parties and are considered appropriate for the occasion.

1.3. Impartiality

In dealings with all counterparts, the company avoids any discrimination based on age, racial and ethnic origin, nationality, political opinions, union membership, marital and family status, religious beliefs, gender, sexual orientation, or the health status of all parties.

1.4. Professionalism and Enhancement of Human Resources

The company ensures an appropriate level of professionalism in the execution of tasks assigned to its collaborators.

1.5. Confidentiality

The company ensures, in accordance with legal provisions, the confidentiality of information in its possession. Employees of the company are prohibited from using confidential information for purposes unrelated to the carrying out of their professional activities. In particular, the information, data, and knowledge acquired, processed, and managed by the individuals in the course of their professional activities must remain strictly confidential and appropriately protected. It cannot be used, communicated, or disclosed, both within and outside the company, except in compliance with applicable regulations and company procedures.

Confidential information includes:

- a. Company plans, strategic, economic/financial, accounting, commercial, managerial, and operational information.
- b. Projects and investments.
- c. Data related to personnel, customers, suppliers, and, in general, all data defined as personal by Legislative Decree no. 196/03, with particular attention to data that the law itself defines as sensitive.
- d. Company performance and productivity parameters.
- e. Company agreements, commercial agreements, and contracts, as well as company documents.
- f. Know-how related to the production, development, and marketing of services.

When handling such data and information, individuals must exercise the utmost care and confidentiality. In particular, employees must:

- a. Keep confidential the news and information learned while carrying out their functions, that are not subject to transparency in accordance with the law and regulations.
- b. Observe the duty of confidentiality even after termination of service.
- c. Consult only the documents they are authorized to access, using them in accordance with their duties, and allowing access only to those who are entitled to it, and in accordance with the instructions given.
- d. Prevent the potential loss of data by observing the security measures provided, keeping documents in an orderly and careful manner, and avoiding making unnecessary copies.

1.6 Conflicts of Interest

In the course of any activity, the company works to avoid conflicts of interest, whether actual or potential. Among the scenarios of "conflict of interest," in addition to those defined by law, it also applies where a party operates to fulfil an interest different from that of the company and its shareholders in order to gain an advantage for itself or a third party. All parties must report

immediately to the company any relationship or situation relevant to the company's activities, in which personal interests, or those of related individuals (such as family members, friends, acquaintances) are involved.

1.7 Transparency and Completeness of Information

The information disseminated by the company is truthful, comprehensive, transparent, and comprehensible. It is documented in a manner that allows recipients to make informed decisions regarding their relationships with the company.

1.8 Health Protection

Employees and collaborators, whose physical and moral integrity is considered a primary value of the company, are ensured working conditions that respect individual dignity in safe and healthy work environments.

1.9 Environmental Protection

The company is committed to safeguarding the environment as a primary priority. To this end, it directs its choices to ensure compatibility between economic initiatives and environmental needs. The company rejects behaviours that deviate from these principles.

1.10 Diligence and Good Faith

Every employee and/or collaborator must act honestly and in good faith, respecting the contractually agreed-upon obligations and ensuring achievement of the required performance. They must also be familiar with and adhere to the content of this Code of Ethics, guiding their conduct based on respect, cooperation, and mutual collaboration.

1.11 Documentation of Activities

All activities, actions, transactions, and operations of the company must:

- a) be carried out in accordance with current regulations, the highest level of managerial correctness, completeness and transparency of information, and both formal and substantive legitimacy;
- b) be conducted in accordance with instructions and procedures, within the limits of received delegations and approved budgets, as well as being legitimate, consistent, and appropriate. Individuals who become aware of any omissions, alterations, or falsifications of accounting records, as well as their supporting documents, are obligated to promptly inform their superior. The superior will then take action according to the Code's procedures outlined.

Appliance areas

Section 1 – Customer Relations

Customers represent the fundamental wealth of the company.

1. Contractual relationships with customers

Contractual relationships and communications to customers by the company are guided by principles of fairness and honesty, professionalism, transparency, always maintaining a high level of collaboration.

2. Customer satisfaction

The company considers it essential to maintain high quality standards of service and maximize customer satisfaction. The internal procedures employed support these objectives, including continuous monitoring of the customer base.

Section 2 – Relationships with stakeholders

It is a top priority for the company to safeguard the investment of its shareholders by implementing a corporate strategy that assures them, over time, an adequate financial return through the optimization of available resources, as well as the increase of competitiveness and financial strength.

Section 3 – Relationships with the staff

People are the key resource of the company: it is only thanks to the staff that the maximum customer satisfaction and, consequently, the safeguarding and enhancement of the shareholders' investment can be achieved. The company is therefore committed to selecting and retaining well qualified personnel.

1. Management of Human Resources

The reference for workers is represented by the ILO (International Labour Organization) conventions that address the following requirements. The model below aims at achieving continuous improvement in working conditions:

1. Child labour: the use and support of child labour is excluded.
2. Forced labour: where neither the use nor the support of forced labour is employed, and personnel are not required to provide "deposits" in the form

of money or identity documents at the beginning of the employment relationship with the company.

3. Health and safety: The company ensures a work environment compliant with current health and safety regulations through monitoring, management, and prevention of risks associated with the performance of activities in the workplace.

4. Freedom of association and the right to collective negotiation: where the worker's right to join any form of trade union is respected, and as a result, the exercise of collective negotiation is acknowledged.

5. Discrimination: the company does not allow any form of discrimination, whether in the selection process, access to training, promotion, retirement, or dismissal based on the criteria defined earlier.

6. Disciplinary practices: the following are not employed in the company: the use or support of corporal punishment, mental or physical coercion, or verbal abuse.

7. Working hours: all provisions stipulated by the National Collective Negotiating Agreement (CCNL) and the supplementary contract are respected.

8. Compensation: all provisions stipulated by the CCNL Agreement and the supplementary contract are respected.

2. The Use of Time and Company Assets

Employees and collaborators of the company are not allowed to engage in activities unrelated to their duties or organizational responsibilities during working hours.

All work tools provided to personnel must be used with the utmost diligence to avoid any damage. Their use, including, for example, that of the Internet and electronic mail, must be dedicated to carrying out company activities and in compliance with established safety procedures.

In particular, it is prohibited to duplicate or possess unauthorized copies of software in violation of their respective license agreements. It is also forbidden to use personal computers containing illegally copied software within the company premises.

Section IV – Relationships with Contractual Partners

The contractual partners of the company, through their collaboration, make the daily fulfilment of business activity possible. The company acknowledges their significant contribution, commits to treating them on equal terms with mutual respect, and recognizes their legitimate expectation to receive clear instructions regarding the nature of the assignment as well as accurate adjustments of what is expected.

The selection of contractual partners is carried out through clear, assured, and non-discriminatory procedures. The company focuses on the objective

competitiveness of the services and products offered, as well as their quality. Quality is also assumed as the supplier's adhere to the ethical parameters expressed in the Code of Ethics.

Section V - Relationships with Public Institutions and Other External Entities

1. Public Administrations and Independent Authorities

All relationships between the company and the Public Administration, as specified in the preamble of the Code of Ethics, are guided by principles of fairness, transparency, collaboration, and non-interference, respecting each other's roles and are limited to functions expressly delegated by the administrators. In particular, it is strictly prohibited to provide or promise payments or compensation, in any form, directly or through intermediaries, to induce, facilitate, or remunerate a decision or the performance of an official act contrary to official duties within the Public Administration.

Employees and collaborators of the company, upon receiving explicit or implicit requests for benefits of any kind from the Public Administration or from individuals or legal entities acting on its behalf, must immediately suspend all relationships and inform the legal representative. The provisions contained in this article must not be circumvented by resorting to different forms of aid or contributions, such as sponsorships, appointments, consultations, advertising, or discounts.

2. Political Parties, Trade Unions, and Associations

The company does not support events or initiatives that have an exclusively or predominantly political purpose. It refrains from any direct or indirect pressure on political figures and does not provide contributions to trade unions or associations with which a conflict of interest may be identified.

3. Social Initiatives

TWP SRL acknowledges, as a matter of principle, its moral responsibility to contribute to the improvement of the community in which the company operates. This contribution involves providing cultural stimuli, promoting sports activities, and, above all, paying attention to those working in the local area.

Section VI – Relationships with the press and external communications

The company acknowledges the fundamental informative role played by the media towards the public. To this end, it commits to collaborating fully with all media outlets without discrimination, respecting each other's roles and the needs of commercial confidentiality. This collaboration aims to respond promptly, comprehensively, and transparently regarding information requirements.

It adopts a policy of communication that is honest, truthful, documented, and, in general, in line with the principles of the International Chamber of Commerce (ICC) Consolidated Code of Advertising and Marketing Communications Practice.

Both the institutional and product advertising of the company adheres to the fundamental ethical values of the civil society in which it is disseminated, always maintaining truthful content and rejecting the use of vulgar or offensive messages, or any content potentially injurious to common sensibilities. Company personnel are not authorized to provide information to the media without approval.

Implementation methods

1. Adoption and Dissemination

The Code of Ethics and any future updates are defined and approved by the Board of Directors of the company. A copy of this code is provided to all employees upon being hired, and is made available on the company's website.

2. Duty to inform

In the event that individuals become aware, even through third parties, of illegal or ethically improper situations, or situations that are potentially conducive to illegal or improper activities, they must immediately inform the legal representative. Reports can be submitted in written, oral, or electronic form.

The legal representative will act to ensure that those reporting are protected against any form of retaliation, discrimination, or penalty, also ensuring the confidentiality of their identity, except for any legal obligation. The rights of individuals wrongly and/or maliciously accused are also protected. Failure to comply with the duty to inform may result in sanctions.

3. Violations

In the event of violations of the Code of Ethics, the company implements a system of sanctions against those responsible for the violations, where deemed necessary for the protection of corporate interests and in accordance with the regulatory framework, specifically the Legislative Decree 300/70 and the National Collective Labour Agreement (CCNL). Disciplinary measures may be issued, including the possibility of removing the individuals responsible from the company.





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