



## CODE OF ETHICS

**All documentation related to this code of ethics represents strictly confidential information and is the property of Agricola L. Rubino and should not be used for purposes other than those for which it was defined.**

### 1. INTRODUCTION

This Code of Ethics is the fundamental document outlining the moral rights and duties that define the ethical and social responsibility of every member of the organizational structure of Agricola Luigi Rubino.

It serves as an effective means to prevent irresponsible or potentially illicit behavior by those who operate on behalf of the company, providing a clear and explicit definition of the responsibilities of each company operator towards those directly or indirectly involved in the company's activities, including customers, suppliers, employees, collaborators, public institutions, and anyone else affected by the company's activities – all stakeholders.

When ethical reflection moves from individual action to a broader organizational and business context, the concept of individual responsibility and awareness inevitably ties to that of “Corporate Social Responsibility” or “Corporate Citizenship.”

The company's policy is to pursue consistently high ethical and deontological standards. It is the company's explicit will to confirm the ethicality of behaviors as a primary reference point for its activities and managerial choices, firmly believing that the pursuit of particular interests should never justify conduct not fully in line with these principles.

#### 1.1 What is Ethics?

“Ethics” represents the set of conduct rules – both public and private – followed by an individual or a group of people. It is a term used in many contexts, indicating a reflection on rules and principles to follow in practical life. The scope of ethics, therefore, while referring to an abstract universe of principles and values, is anything but theoretical: it concerns daily life and translates into behavioral norms. Using the words of philosopher Immanuel Kant, one can define as “ethical” the behavior of one who acts guided not by fears of punishment or opportunistic hopes of reward but by their reason “in a way of treating humanity, both in one's own person and in that of every other, always at the same time as an end, never merely as a means to achieve an end.”

#### 1.2 Mission

The mission of Agricola Luigi Rubino is the production of grapes and the processing and transformation of oenological products and derivatives for oenology. For Agricola Luigi Rubino, Corporate Social Responsibility is the ability to integrate its business activities with the respect and protection of the interests of all partners and individuals with whom it interacts, safeguarding environmental resources for future generations.

In other words, the company's action aims to pursue its business while considering respect for all living beings and the value of inanimate things as the end of its actions, not as a means to achieve profit.

The presence of Agricola L. Rubino in different markets, operations in different contexts, and the diversity of stakeholders make the management of relationships



between the company and stakeholders of paramount importance. Stakeholders include all public and private entities – individuals, groups, companies, consortia, institutions – that have any dealings with the company and/or have an interest in the activities that the company carries out. The company adheres to strict compliance with laws, market rules, and the guiding principles of fair competition. This Code (hereinafter referred to as the “Code of Ethics”) identifies the set of rights, duties, and responsibilities that all those operating in the company must adhere to in relationships with various interlocutors, with a preminent role given to Public Administration and public employees. It expresses the ethical commitments and responsibilities in conducting business and company activities assumed by all those who have relationships of any kind with Agricola L. Rubino.

### 1.3 Structure of the Code of Ethics

This Code of Ethics consists of:

- General principles on relations with stakeholders, abstractly defining the reference values in the activities of Agricola Luigi Rubino.
- Conduct criteria towards each class of stakeholders, specifically providing guidelines and rules that Collaborators of Agricola Luigi Rubino must adhere to for the respect of general principles and to prevent the risk of unethical behavior.
- Implementation mechanisms, describing the control system aimed at compliance with the Code of Ethics and its improvement.

## 2. OUR COMMITMENT

Agricola Luigi Rubino considers attention and respect for ethical and social responsibility good practices as fundamental. In particular, measures are implemented to:

- Ensure respect for workers’ rights.
- Allow workers the possibility to report or express suggestions anonymously.
- Avoid discrimination in hiring at the workplace.
- Establish regular employment contracts.
- Respect workers’ needs related to cultural or religious practices (clothing – subject to hygiene and safety measures – or food), with the possibility, considering business needs, to observe different religious holidays.
- Ensure equal opportunities and employment for young people, ensuring a distribution of operational and managerial tasks among employees of different genders and ages.
- Establish accident insurance.
- Plan staff training activities.
- Promote wine tourism initiatives aimed at enhancing the territory.

This document defines commitments and obligations in accordance with the “Equalitas” Standards. In particular, Agricola Luigi Rubino:

- Commits to applying the Equalitas standard in all its parts and ensuring compliance.
- Commits to conducting internal checks within the self-control system, anticipating inspections by private certification bodies, and providing applicants with all necessary data and documentation to verify compliance with what is declared in this document.
- Assumes full responsibility for the truthfulness of the information provided and the consequences of false statements. Measures will be taken against members who do not act in accordance with the above.

The company also declares:

- Not to be involved in legal proceedings related to disputes over mandatory regulations and violations of applicable laws concerning certification and its scope. **2.**



- Commitment to communicate any sanctions imposed by the public authority regarding the topics covered by this standard (e.g., workplace safety, ethics, financial aspects, etc.).
- Ensure full compliance with all environmental management, workplace safety, and employment contract regularity regulations.
- Be aware of and apply legal requirements for energy and fuel management, as well as for the management of water resources and waste.
- Preserve assessments related to biodiversity indicators and make them available.
- Implement improvement plans defined by the company.
- Participate in and promote seminars/courses organized by the company itself and of interest to the company.
- Take all necessary measures to allow the correct conduct of the assessment activities provided for in this regulation.
- Allow access to documentation and records for personnel appointed by the Certification Body (OdC), public administrations, and interested personnel.

### **3. RECIPIENTS AND SCOPE OF APPLICATION OF THE CODE OF ETHICS**

The Code of Ethics applies to Agricola Luigi Rubino and is consequently binding for its collaborators, who are required, without distinctions or exceptions, to observe and enforce the principles identified below. In no way can the belief in acting for the benefit of the Company justify the adoption of behaviors contrary to these principles.

The Code of Ethics is valid both in Italy and abroad, considering the cultural, social, economic, and regulatory diversity of the various countries where Agricola Luigi Rubino operates or may operate.

All recipients of this Code of Ethics are required to observe its contents and guiding principles in any situation and context within the scope of their specific functions, attributions, and activities. They are obliged to protect and preserve, through their behavior, the respectability and image of the company, as well as the integrity of its economic, social, and human heritage.

The Code of Ethics will be widely disseminated within the internal company structure and widely communicated externally, also through the company's website.

### **4. GENERAL PRINCIPLES**

#### **4.1 Legality**

Agricola Luigi Rubino operates in absolute compliance with the law and this Code. All recipients are therefore required to observe all applicable regulations and to keep constantly updated on legislative developments.

The company considers accounting transparency as a fundamental principle for carrying out its activities and protecting its reputation.

#### **4.2 Fairness and Ethical Behavior in Stakeholder Relationships**

Fairness and moral integrity are an unwavering duty for all stakeholders, who must not establish any privileged relationship with third parties resulting from external solicitations aimed at obtaining improper advantages. The company is committed to combating corruption, extortion, fraud, coercion, and embezzlement, considering such practices devastating for economic growth and a serious obstacle to sustainable development, as well as presenting serious legal and reputational risks. For this purpose, an internal control system has been adopted to prevent the possibility of fraudulent practices through the evaluation of ethical and integrity aspects, also in accordance with the United Nations Convention against Corruption (UNCAC) of 2005.



#### **4.3 Management of Relationships with Public Administrations and Private Entities**

The company ensures full transparency and fairness in contacts with public entities or individuals employed there, as well as with private entities, operating in compliance with current regulations and in accordance with the principles shared with the adoption of the Code of Ethics. With particular reference to operations related to contracts, authorizations, licenses, concessions, requests and/or management and use of funds of any kind from public (regional, national, and/or community) sources, relationships with supervisory authorities or other independent authorities, pension institutions, entities responsible for tax collection, bodies involved in bankruptcy, civil, criminal, or administrative procedures, and similar, any contact with third parties must be carried out by corporate bodies and individuals expressly delegated for this purpose, in line with corporate strategies. In addition, any sponsorships of events, exhibitions, meetings, and similar initiatives will be carried out in accordance with the law and the principles of fairness, correctness, transparency, and verifiability.

### **5. CONDUCT CRITERIA**

#### **5.1 Conduct Criteria in Customer Relations**

##### *5.1.1 Contracts and Communications with Customers*

Contracts and communications to customers of Agricola L. Rubino (including advertising messages) are:

- Clear and simple, formulated in language as close as possible to that normally used by the interlocutors.
  - In compliance with current regulations, without resorting to evasive or otherwise unethical practices.
  - Complete, so as not to overlook any relevant element for the customer's decision.
- The purposes and recipients of communications determine, from time to time, the choice of the most suitable contact channels for transmitting content without resorting to excessive pressures and solicitations, committing not to use deceptive or untrue advertising tools.

##### *5.1.2 Behavior Style of Collaborators*

The behavior style of Agricola L. Rubino towards customers is based on availability, respect, and courtesy, with the perspective of a collaborative and highly professional relationship. Each collaborator, therefore, must:

- Follow internal procedures for managing customer relations;
- Provide, efficiently and courteously, within the contractual provisions, products and services of a level that can meet customer expectations and needs;
- Provide accurate and comprehensive information about products and services so that the customer can make informed decisions.

##### *5.1.3 Customer Involvement*

Agricola L. Rubino is committed to always responding to suggestions and complaints from customers and their advocacy associations, using suitable and timely communication systems (e.g., call center services, email addresses). Agricola L. Rubino is responsible for informing customers of the receipt of their communications and the time required for responses, which, in any case, should be prompt.

#### **5.2 Gifts and Benefits**

In carrying out their activities, stakeholders are required not to accept donations or favors. It is forbidden to offer and provide money or other benefits (gifts, direct or indirect benefits, acts of courtesy and hospitality), even following illicit pressures, personally to public officials or persons entrusted with public service with the



aim of promoting or favoring the interests of the Company or with the purpose of inducing them to perform an act contrary to their duties of office, as well as to Private Entities (in the persons of their administrators, general managers, managers responsible for the preparation of corporate accounting documents, mayors and liquidators, and subjects subjected to their direction and/or supervision) aimed at influencing the choices of Private Entities or even just sensitizing their members. In relation to public administrations, this code of conduct cannot be circumvented by resorting to forms of donation that, with apparent different modalities (assignments, consultations, sponsorships, etc.), have the same purpose prohibited above. The Company allows reasonable and good-faith expenses to be incurred for a public official and/or a person entrusted with public service in the exercise of his functions or powers or for a private individual as provided for in this document. Gifts, in fact, must meet the dual requirement of “tenacity” (i.e., modest symbolic value) and “equality” (i.e., equal cost parity in the choice of the gift for all public and private clients).

Any reasonable and good-faith expense must not consist of a cash payment; it must be legitimate, must not be motivated by the desire to exert undue influence or the expectation of reciprocity; it must be reasonable under the circumstances and in accordance with generally accepted professional courtesy standards; it must also comply with applicable laws and regulations. However, any gift made on a personal initiative or using personal or social funds not previously allocated for this purpose is strictly prohibited. The exclusive power to decide the company policy on gifts and allocate related finances lies with the company management. Any conduct described above (or similar) carried out at the request of another entity, whether private or public, or the person entrusted with public service or their families, is always prohibited: in case of such a request (whether direct or indirect, explicit or implicit), company employees who receive such requests are required to immediately report them to management.

### **5.3 Contributions to Public Entities and Organizations**

Donations to administrative entities and bodies present the risk that funds or valuable goods may be diverted for personal use or the benefit of a public official and/or person entrusted with public service in the exercise of his functions or powers. Agricola Luigi Rubino does not provide any contribution, direct or indirect, in any form, to movements, parties, committees, and political and trade union organizations, their representatives and candidates, except as allowed and provided for by existing laws and regulations. It also refrains from any improper pressure, direct or indirect, towards political and trade union representatives. Considering participation in cultural and scientific research initiatives, the Company may make contributions or sponsor entities with regular statutes and deeds that have high cultural or charitable value, involve a significant number of citizens, and have among their objectives those related to progress and scientific research, teaching, environmental protection, and health. Contributions and sponsorships to associations that promote social projects, art, and sports are also allowed, but only if the very high quality and reputation of these organizations are proven. Any charitable contribution or donation made, as well as any sponsorship activity, must be formally approved by management and must be consistent with the approved budget. Payments to the beneficiary entity must be made exclusively to the account registered in the name of the entity itself; it is not allowed to make payments to encrypted or cash accounts, to a subject other than the beneficiary entity, or in a third country other than the country of the beneficiary entity. Contributions must be recorded truthfully and transparently in the Company’s books and records. The original documentation related to the approval of the contribution and checks for compliance with the relevant procedure must be kept as required by accounting record-keeping regulations.





#### **5.4 Personal Contacts with Public Administrations**

Commitments with Public Administrations are reserved exclusively for the executive body or, possibly, for the designated and authorized company functions. The Company ensures full transparency and completeness of information in the preparation of communications, statements, and notices directed to Public Administrations. It is absolutely forbidden to show false or altered documents to public officials or to withhold or omit the exhibition, if due, of documents, information, or data of any kind, or to conduct oneself in a manner tending to deceive Public Administrations. Any anomaly that may arise during one of the aforementioned contacts must be promptly reported to management.

#### **5.5 Request and Management of Contributions, Funding, Facilitated Loans, or Other Similar Disbursements, However Named, Granted or Provided by the State, Public Entities, or the European Union**

With regard to the disbursement of public funds, the company refrains from:

- Using statements attesting to untrue facts and information, or omitting information to obtain, for its own benefit or that of the Company, contributions, funding, or other disbursements granted, in any capacity, by Public Authorities;
- Using contributions, funding, and other disbursements granted by the Public Authority for purposes other than those for which they were assigned. Regarding negotiations with Public Authorities and participation in public tendering for obtaining funding, contributions, and public disbursements, each Recipient is required to:
  - Operate following the principles of correctness, transparency, and good faith;
  - Evaluate the appropriateness and feasibility of the services provided in the tender;
  - Maintain transparent and fair relations with Public Authority officials;
  - Fulfill contractual obligations diligently and promptly.

The management must be promptly informed of requests for contributions, financing, subsidized loans, or other similar disbursements, regardless of their denomination, through a specific informative note. The truthfulness of the self-certified information must be verified by preserving documentation supporting the self-certified data in the record.

In case of anomalies, the request process must be suspended, and the issue must be reported to the Company. In such cases, it is prohibited to proceed with the operation without the authorization of the PCA (Person in Charge of Administration).

If a financing is awarded, it is necessary to ensure the clear and correct execution of what is provided in the call for proposals and the diligent and punctual fulfillment of contractual obligations, also towards third parties involved.

The use of contributions, financing, subsidized loans, or other similar disbursements granted or provided by the State, other public entities, or the European Union must always and only occur for the purpose for which they were granted.

#### **5.6 Inspection Checks**

In the case of inspections, access, and/or checks by public entities, there is an obligation to notify and wait for the responsible person in the involved area or, if unavailable, the Management. In the presence of verbal requests by public officials, there is an obligation to request them to formalize the request in writing; a copy of the report and/or minutes possibly issued by public officials should also be requested. In the case of a written request or any activity beyond ordinary administration involving Public Entities, each Recipient is required to immediately communicate it to Management.



### 5.7 Collaboration Between Companies

The Company may be held responsible for corrupt activities carried out by its partners in business collaborations. Any procedure related to collaboration between companies must comply with the following provisions:

- Partners will only be entities or individuals well-known, reliable, and with an excellent reputation for honesty and fair business practices;
- Partners must declare that they have adopted an ethical code or an organizational and control model in line with the provisions of Legislative Decree 231/2001, or undertake to comply with those adopted by the Company.

### 5.8 Intermediaries and Consultants

Intermediaries and consultants must have an excellent reputation for honesty, fair business practices, and high ethical standards.

The brokerage or consultancy contract must include:

- Description of the service;
  - Currency and amount of the consideration, which must be proportionate to the contract's subject, experience, and the country where the service will be performed;
  - Terms for billing (or payment methods) and payment conditions;
  - Non-assignability clause of the contract, subject to approval by the Company;
  - Declaration by the intermediary or consultant that they are not a public official and/or a person entrusted with public service;
  - The Company's right to terminate the contract, suspend payment, and receive compensation for damages in the event of a breach of the obligations, statements, and warranties stated above and/or violation of anti-corruption legislation, extortion, and fraud;
  - The amount paid in accordance with the brokerage or consultancy contract must be recorded correctly and transparently in the Company's books and records.
- Payments are made exclusively under the condition that the service has been provided and/or the conditions stipulated in the contract regarding the payment of consideration have been met.

The original documentation related to the selection and approval of the intermediary and the brokerage contract, as well as the compliance checks with the relevant procedure, must be retained in accordance with the regulations regarding the keeping of accounting records.

### 5.9 Confidentiality

The company commits to ensuring the protection and confidentiality of the personal data of recipients and stakeholders, in compliance with all applicable regulations on personal data protection.

Recipients are required not to use confidential information learned in the course of their work for purposes unrelated to the exercise of that activity, and in any case, always act in accordance with the confidentiality obligations assumed.

In particular, recipients are obliged to maintain maximum confidentiality regarding documents revealing know-how, commercial information, and corporate operations.

### 5.10 Use of Company Assets

Every collaborator is obligated to operate diligently to protect company assets through responsible behaviors in line with established operational procedures, accurately documenting their use. In particular, each collaborator must:

- Use entrusted assets scrupulously and sparingly.
- Avoid improper uses of company assets that may cause damage or reduce efficiency, or that are contrary to the company's interests.

Every collaborator is responsible for the protection of the resources entrusted to them and has a duty to promptly inform the relevant company units of any threats



or events harmful to the agricultural company L. Rubino.

The company reserves the right to prevent misuse of its assets and infrastructure using every form of data detection and operational control system, as well as risk analysis and prevention, while respecting the provisions of current laws regarding information confidentiality (privacy law, workers' statute, etc.).

### **5.11 Use of Computer Systems**

Every employee is responsible for the security of the computer systems used, is subject to current regulatory provisions and license agreement conditions and is required to make the necessary effort to prevent the possible commission of offenses using computer tools. Except as provided by civil and criminal laws, the improper use of company assets includes using network connections for purposes other than those related to the employment relationship or sending offensive messages or messages that could damage the company's image.

In particular, each collaborator must:

- Adhere scrupulously to the company's security policies to avoid compromising the functionality and protection of computer systems.
- Not send threatening and offensive emails, refrain from using low-level language, and avoid making inappropriate comments that could offend individuals and/or harm the company's image.
- Not browse websites with indecent and offensive content.

## **6. ACCOUNTING AND INTERNAL CONTROLS**

Azienda Agricola Luigi Rubino maintains a system of internal controls related to financial information to provide reasonable assurance that:

- The accounting records are kept regularly and reflect the operations and disposition of the company's assets with reasonable detail, accurately, and correctly.
- Operations are carried out only with general or specific authorization from management.

### **6.1 Financial Flow Manager**

The Management is responsible for verifying financial flows and has access to all supporting accounting documents for all financial transactions, regardless of the payment method, and to contracts that give rise to payment obligations fulfilled. Management collaborates with all functions and structures of the company or external consultants, leveraging their respective skills and expertise.

### **6.2 Compliance with Copyright Laws**

The company commits to complying with current copyright laws. The use of copies and illegal duplication of software constitutes a crime that can have serious consequences for the company or the end user. Italian legislation protects software with appropriate laws, in line with technological evolution and European Union directives, which provide criminal and administrative penalties for those who violate these laws. Among other things, current law provides for decisive actions and pecuniary administrative sanctions for those who purchase non-original software. In these terms and based on current regulations, the company undertakes to always provide original software products or authorized copies, especially when they are third-party products necessary to complete a specific solution. These products must be accompanied by a user license. If third-party software components used are integrated into the offered solution, specific mention must be made.

### **6.3 Marketing Activities**

The communication of Azienda Agricola Luigi Rubino:

- Will always respect the centrality of the "individual" with their articulated system





of physical, psychological, cultural, and emotional needs: market logic should never hinder full informational transparency regarding product content and correct usage.

- Will reject vulgar, contradictory, uncertain, or ambiguous messages.
  - Will always be mindful of its responsibility in influencing people's choices, ensuring the quality of the relationship between the company and individuals.
- In marketing campaigns, Azienda Agricola Luigi Rubino commits to providing only information corresponding to reality. It also undertakes to comply with privacy laws.

## 7. EMPLOYMENT POLICIES

### 7.1 Fundamental Rights

Azienda Agricola Luigi Rubino conducts its business activities while respecting the fundamental rights of every individual, safeguarding their moral integrity, and ensuring equal opportunities. Internally, it aims to maintain a serene work environment where everyone can work in compliance with shared laws, principles, and values. The company strictly prohibits any form of isolation, exploitation, or harassment for any discriminatory reason, whether personal or work-related. Therefore, any discrimination based on race, language, color, faith and religion, political affiliation, nationality, ethnicity, age, gender and sexual orientation, marital status, disability, and physical appearance is expressly prohibited. Privileges linked to the aforementioned reasons are also prohibited, except as provided by current regulations.

Employees, collaborators, and company operators are essential factors for the success of the company. For this reason, the company protects and promotes the value of human resources to enhance and increase the skills of each individual. Azienda Agricola Luigi Rubino implements its principles with a commitment to continuous improvement, which is an essential factor for development and progress within its context. Recognition of achieved results, professional potential, and expressed skills are central moments in the professional development of personnel. Selection, training, management, and professional development are carried out without any discrimination, based on merit, competence, and professionalism. Pursuing these principles and rewarding, in line with the company's economic situation, exclusively according to these criteria, the company ensures the protection of the principle of equal opportunities and manages career advancements and remuneration on these bases. This is done in continuous and balanced comparison with the reference market, ensuring transparency, seriousness, fairness, and clarity on the evaluation methods applied, while also providing adequate tools and opportunities for professional growth to the staff. The company considers learning and training a model of permanent acquisition through which knowledge can be obtained, effectively understand and interpret change, acquire new ideas, improve productivity, and achieve individual and overall company growth.

Through this Code of Ethics, the company recognizes the value of the social dimension and believes that this is manifested only through individual responsibility. The company cannot be indifferent to the social fabric in the context in which it operates but is in continuous contact with the external environment.

### 7.2 Impartiality

In decisions that affect its relationships with stakeholders (employee selection and management, work organization, customer management, supplier selection and management, relationships with the surrounding community, and representing institutions), Azienda Agricola L. Rubino avoids any discrimination based on age,



sex, sexuality, health status, race, nationality, political opinions, and religious beliefs of its interlocutors.

### 7.3 Diligence and Loyalty

In carrying out activities and in relationships of any type and nature, Collaborators of Azienda Agricola L. Rubino are required to diligently respect current regulations, the Code of Ethics, and internal regulations.

The relationship between the company and its employees is based on mutual trust: employees are, therefore, required to operate to promote the interests of the company and its economic growth.

There is also a dedicated “box” for reports, where employees, anonymously or not, can make suggestions or file complaints that the company undertakes to consider and resolve, respecting anonymity and the principles of this code.

The company is committed to ensuring job protection, personal growth, and continuous training for employees, ensuring the existence of a equal and stimulating work environment.

In the conduct of any activity, situations where the individuals involved in transactions are or may appear to be in a conflict of interest should always be avoided. This includes cases where an employee pursues an interest divergent from the business mission and the balance of stakeholder interests or personally benefits from business opportunities. It also encompasses situations where representatives of clients, suppliers, or public institutions act in contradiction to the fiduciary duties associated with their position in their dealings with Azienda Agricola L. Rubino.

### 7.4 Compliance with International Labour Organization (ILO) Standards

This document outlines the international legal obligations aimed at promoting decent and productive work under conditions of freedom, equality, and safety. The company is committed to ensuring compliance with all applicable ILO conventions, particularly:

**Safety and Health of Workers:** The company is aware of all legal obligations regarding safety and health in the workplace and ensures full compliance. Upon request, the company provides evidence to the company or the certification body regarding the above statement.

**Management of Workers and Contracts:** The company is aware of all legal obligations regarding the management of workers and their contracts. Copies of contracts are available in the company for free consultation by workers.

#### *Child Labor:*

- Child labor is not used in the company.
- Documents and records related to all employed workers (identity, eligibility, age, and contractual conditions) are available in the company.
- In cases where adolescents are employed for educational purposes or professional training (school-work alternation), company tutors with demonstrable skills in health and safety are identified to oversee their program during the employment period.

#### *Forced and Compulsory Labor:*

- Effective measures are taken for the immediate and complete abolition of forced or compulsory labor.
- Regular employment contracts are applied based on the National Collective Labour Agreement (CCNL) “Agricultural Industry” for both workers and the clerical sector.
- Copies of employment contracts/hiring agreements for each worker, signed by both the employer and the worker, containing the minimum information required by law (identity of the parties, workplace, start date of employment, duration, classification, level, qualification, duties, and any reference to the



applicable CCNL) are available in the company.

- Wage records indicate that the entire salary amount is paid to the specific worker.
- No undue deductions from the salary or entitlements due to individual workers are made directly or indirectly, through other organizations providing labor.
- Workers are aware of the termination procedures of the employment relationship and, therefore, conscious of the freedom to resign if desired, as well as the compensations due upon termination.

*Freedom of Association and Collective Bargaining:*

- The company respects and guarantees the right of workers to join and/or form unions or to elect a representative for collective bargaining with the company. Evidence of any election/appointment of worker representatives and/or workers' councils with identification of the elected/nominated individuals is available.
- The company has informed workers of a specific procedure to allow them to make reports or express suggestions.
- The reporting procedure ensures the anonymity of the worker making the report/suggestion and specifies the figures involved in resolving the reports. The procedure also includes indications on how the company handles received reports/suggestions.

*Discrimination and Harassment/Violence:*

Azienda Agricola Luigi Rubino respects the dignity, privacy, and personal rights of every employee and commits to avoiding any incidents of discrimination and harassment in the workplace at every stage of the employment relationship (from hiring to retirement/termination, etc.).

The company's management personally commits to ensuring that no employee, in any capacity of employment or collaboration, engages in discrimination based on origin, nationality, religion, race, gender, or sexual orientation or exercises any form of verbal or physical harassment based on the aforementioned factors or other reasons.

The company respects the needs of workers related to cultural or religious practices (such as clothing – subject to hygiene and safety measures – or dietary requirements), with the possibility, considering business needs, to observe different religious holidays. Employees who believe that these principles are not respected in their workplace are encouraged to report it through the company's reporting system.

*Working Hours:*

- There is a transparent reporting system for working hours (including overtime) applicable to workers.
- Working hours, overtime, breaks, and rest days are documented and in line with the relevant National Collective Labour Agreement (CCNL).
- All staff is ensured at least twenty-four consecutive hours of rest during each seven-day period.

*Remuneration:*

- Salary and overtime payment are documented in payslips, in accordance with legal requirements and, if applicable, the CCNL, and consistent with actual working hours and overtime performed.
- Overtime payment is clearly expressed in the payslip, applying the relevant increases specified by the reference CCNL.
- Any absences (sickness, accidents, vacations) and related justification or salary deductions (contributions, insurance, etc.) are clearly stated in the payslip and in the attendance register.
- The company regularly pays salaries, which must correspond to the contractual clauses. Documents for at least the 24 months preceding the verification must show regular payments to all workers.
- The company ensures the application of the principle of equal pay for equal work



between male and female workers for work of equal value.

*Reporting Illegal or Non-compliant Behaviors:*

Employees and all stakeholders should report any practices or behaviors deemed non-compliant with the provisions of this Code, or even illegal, through the company's reporting system, confidentially or through communication channels activated on the website. All reports will be thoroughly investigated.

The company management personally commits to preventing any retaliation against any employee or third party making good-faith reports, while simultaneously protecting the rights of the individuals reported.

- Recognize maternity leave for every woman upon presentation of a medical certificate indicating the indicative date of delivery.
- Promote equality of opportunities and treatment in employment and profession to eliminate any form of discrimination in these areas.
- Ensure professional and occupational reintegration, with particular attention to disabled workers.
- Guarantee the equality of all workers in the field of social security (medical care, sickness benefits, maternity benefits, old-age benefits, family allowances).
- Ensure the protection and control of machinery to comply with regulations and national standards regarding occupational safety.
- Develop comprehensive professional training programs aimed at improving individuals' awareness of the work environment and the surrounding social context, influencing them both individually and collectively.
- Respect safety instructions for preventing occupational risks caused by air pollution, noise, and vibrations in the workplace, limiting them, and ensuring protection against such risks.
- Define, implement, and periodically review a consistent policy on worker health, safety, and the environment to prevent injuries and health damage.

## 8. NON-COMPLIANCE

By signing this document, the company assumes full responsibility for the accuracy of the information provided and the consequences arising from false statements. It is the responsibility of every employee or interested third party, including all actors involved in the supply chain, to ensure full compliance with all provisions contained in the Code of Ethics.

The company undertakes to take action against members of the supply chain who do not comply with this agreement. The Disciplinary System, in summary, identifies:

- The subjects involved;
- The relevant behaviors;
- General criteria for imposing sanctions;
- Applicable sanctions;
- Procedures for imposing disciplinary measures.

Violations committed by personnel are punished, depending on their severity, with disciplinary measures provided for in the sanctioning apparatus referred to in the National Collective Labor Agreement (CCNL) applied by the company, in compliance with the procedures outlined in the Workers' Statute. Specifically, the following measures may be imposed:

- Sanctioning measures;
- Verbal reprimand;
- Written reprimand;
- Suspension from service and economic treatment for a period not exceeding 10 days;
- Termination for significant non-compliance with the contractual obligations of the worker (justified reason);



- Termination for a fault so serious that it does not allow even temporary continuation of the relationship (just cause);
- Precautionary measures;
- Removal from service for precautionary reasons with the retention of economic treatment for workers subject to a criminal proceeding, even for offenses under Legislative Decree 231/2001;
- Temporary removal of the worker from service for the time strictly necessary, when required by the nature of the violation or the need for investigations, pending the final disciplinary measure.

Violations committed by managers, depending on their severity, may result not only in expulsion but also, according to jurisprudential interpretations, in conservative measures borrowed from those applicable to other employees. In particular, the same measures applicable to non-managerial personnel may be imposed.

**Reports can be sent to the email address: [info@tenuterubino.it](mailto:info@tenuterubino.it). Please note that reports not related to the principles protected by the Code of Ethics will not be considered in any way.**

Brindisi (BR), 15th September 2021

COMPANY REPRESENTATIVE





**TENUTE RUBINO**

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