



# SUPPLIER CODE OF CONDUCT

GRUPPO LUNELLI

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## INTRODUCTION

Gruppo Lunelli represents the excellence of Italian beverage on the global stage. Our brands are recognized and admired for their relentless pursuit of quality, innate elegance, and deep-rooted connection to the land.

Over the years, we have embraced a **business model built on harmony with both people and nature**—one that honors and safeguards the land where our grapes are cultivated, and values the individuals who work alongside us. As a company, we recognize our responsibility to society, the environment, and future generations.

These values are embedded in our vision and history. However, bringing them to life requires the **active collaboration of our Suppliers**, who are not merely service providers but true business partners. Together, we strive to craft products of the highest quality and contribute to the ecological transition and the development of a more sustainable, human-centered economy.

**We expect our partners to embrace these principles** and join us in investing in the future across the entire value chain. For this reason, we have developed this Supplier Code of Conduct (hereinafter also referred to as the “Code”), which all collaborating entities are required to observe.

This Code outlines a set of principles and practical standards relating to labor rights and social responsibility, environmental protection, business ethics, and corporate integrity. **As our Suppliers, you are expected to uphold these values in your operations** and to ensure that any subcontractors or sub-suppliers do the same. The aim is to promote ethical, responsible, and sustainable practices throughout the supply chain, minimizing environmental and social impact.

**Adherence to the principles of this Code is essential** to maintaining a business relationship with Gruppo Lunelli and to building a long-term, trust-based partnership that delivers mutual value. To this end, Gruppo Lunelli reserves the right to monitor and assess Suppliers’ compliance in order to identify potential areas for improvement and foster responsible collaboration that generates positive social and environmental outcomes.

We trust that this Code will serve as the foundation for a fruitful and enduring partnership—one that creates shared value and contributes to the well-being of our communities and the planet we all share.

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## PRINCIPLES, STANDARDS AND REFERENCE FRAMEWORKS

In drafting our Supplier Code of Conduct, we have drawn inspiration from the main international standards on sustainability and human rights, including:

- **The Universal Declaration of Human Rights of the United Nations;**
- **The ILO Core Conventions**, to promote decent work;
- The UN Guiding Principles on Business and Human Rights and **the Ten Principles of the United Nations Global Compact**;
- **The OECD Guidelines for Multinational Enterprises** on social and environmental responsibility;
- **The CEO Guide to Human Rights by the World Business Council for Sustainable Development (WBCSD)**, a guide to help develop human rights-respecting business practices;
- **The United Nations Sustainable Development Goals (SDGs)**, aimed at promoting inclusive and equitable development that leaves no one behind;
- **The Paris Climate Agreement**, to reduce emissions and combat climate change.

This Code is also an integral part of the **Gruppo Lunelli Code of Ethics** (available in its latest version on our corporate website). That document brings together a set of principles and rules whose observance is of fundamental importance for the effective operation, reliability, and reputation of the Group. The Code of Ethics promotes fairness, integrity, loyalty, and professional rigor in all operations, behaviors, and ways of working—both within the Group and in its external relationships. It places strong emphasis on compliance with the laws and regulations of the countries in which the Group operates, as well as with internal corporate procedures.

**Compliance with the Gruppo Lunelli's Code of Ethics is essential for Suppliers and constitutes a fundamental prerequisite for engaging in business with any company within the Group.**

In particular, paragraph 2.6 of the Code outlines specific principles and provisions that apply directly to relationships with Suppliers.

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## HUMAN RIGHTS AND SOCIAL PRACTICES

### Child Labor

**Child labor is strictly prohibited throughout our value chain.** Suppliers must ensure that all employees meet the minimum legal working age and are employed voluntarily. Individuals under the age of 18 must not perform overtime, hazardous work, or night shifts. Students may only participate under legitimate, well-regulated internship or apprenticeship programs.

### Forced, Illegal, or Undeclared Labor

Our business partners are expected to take all necessary measures to prevent illegal, undeclared, or off-the-books employment. **Gruppo Lunelli maintains a zero-tolerance policy toward any form of labor involving abuse or illegality.** All forms of forced labor are strictly prohibited, including the retention of identity or work documents and the imposition of financial deposits. Every worker has the right to freely enter into and terminate their employment, in compliance with applicable laws and national collective labor agreements.

### Harassment and Abuse

All workers must be treated with dignity and respect. Our business partners are required to **prevent and strictly prohibit any form of intimidation, humiliation, threats, abuse, violence, corporal punishment, or harassment**—whether physical, psychological, sexual, verbal, or moral.

### Combating Discrimination and Promoting Diversity

We expect our Suppliers to cultivate an inclusive and respectful work environment where all individuals are treated equitably. **Discrimination of any kind is strictly forbidden**, including—but not limited to—that based on ethnicity, nationality, social or cultural background, gender, sexual orientation, disability, age, family status, religion, political beliefs, or union affiliation. None of these characteristics may influence decisions regarding hiring, compensation, paid leave, parental rights, workplace safety, job assignments, performance evaluations, training, or opportunities for advancement.

### Wages and Benefits

Suppliers **must uphold fair and equitable compensation practices** and ensure the full and timely payment of wages. Compensation must enable workers to **earn a decent standard of living and, at a minimum, comply with applicable laws and collective bargaining agreements**. In addition, Suppliers must provide all legally mandated and contractually agreed-upon benefits—whether established by labor laws, collective labor agreements, or company-level contracts negotiated with employee representatives.

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## Working Hours

Suppliers are required to comply with legal limits on working hours, which must under no circumstances exceed the maximums set by the International Labour Organization (ILO) and relevant collective agreements. Workers must be granted adequate rest periods and all breaks mandated by law.

## Freedom of Association

**Workers have the right to freely associate, organize, and engage in collective bargaining, in accordance with applicable laws.** Gruppo Lunelli expects its Suppliers to fully respect this right, ensuring that employees can join or form unions without fear of retaliation or discrimination. **Any form of intimidation, threats, or discriminatory actions against worker representatives is strictly prohibited.**

## Health and Safety

Gruppo Lunelli requires its Suppliers to provide a safe and healthy working environment where the well-being of employees and collaborators is a clear priority. Suppliers must actively work to prevent accidents, injuries, and exposure to occupational hazards, in full compliance with applicable safety regulations. They must implement all necessary protective measures based on the nature of the work, best practices, and available experience, **in order to safeguard the physical and moral integrity of workers.** This includes establishing preventive procedures, supplying appropriate personal protective equipment (PPE), and delivering adequate training to all personnel.

## Supporting Local Communities

Every business has the potential to contribute positively to the communities in which it operates. Accordingly, we encourage our Suppliers to support the well-being and economic development of their local areas, creating meaningful and lasting social impact.

# ENVIRONMENTAL PROTECTION AND BIODIVERSITY

Gruppo Lunelli is committed to protecting the environment, biodiversity, and ecosystems for the benefit of future generations. Accordingly, we encourage our Suppliers to reduce the environmental footprint of their operations by implementing best practices and adhering to the highest sustainability standards across the supply chain.

## Compliance with Environmental Regulations

Suppliers are required to **fully comply with all applicable local, national, and international** environmental laws, including those governing waste management. They must obtain and maintain all necessary permits and authorizations to operate lawfully.

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## **Safeguarding Biodiversity and Natural Ecosystems**

Gruppo Lunelli promotes agricultural and vineyard management practices that respect the environment, biodiversity, and soil health. Environmental protection is a strategic priority, and we therefore expect our Suppliers **to adopt the best available techniques and standards to preserve natural ecosystems and the planet's biodiversity.**

## **Resource Management**

Recognizing the importance of responsible resource use, Gruppo Lunelli asks its Suppliers to **minimize waste and foster recycling initiatives**. Resources should be used efficiently and responsibly to support the transition toward a circular economy, where waste reduction is aligned with increased recovery and reuse.

## **Emission Reduction**

Sustainable energy use and emissions management represent a key challenge for Gruppo Lunelli, given the impact of greenhouse gas emissions on global warming. We therefore ask our Suppliers to actively contribute to climate change mitigation by reducing their emissions and prioritizing renewable energy sources whenever feasible.

## **Fostering a Sustainability Culture**

Gruppo Lunelli expects its Suppliers to raise environmental awareness among their workforce and to provide relevant training on sustainable practices. Employees should be empowered and equipped to take meaningful action to protect the environment as part of their daily activities.

# **BUSINESS INTEGRITY**

## **Integrity and Legal Compliance**

Gruppo Lunelli expects its Suppliers to operate with **integrity and responsibility**, in full compliance with all applicable laws and regulations relevant to their activities. The objective is to lead by example and foster an ethical, transparent working environment.

## **Prohibition of All Forms of Corruption**

Gruppo Lunelli maintains a **zero-tolerance policy toward corruption and influence peddling**. Suppliers are expected to implement effective systems to prevent, detect, and address any form of corrupt behavior within their operations. Full transparency must be ensured in all transactions. Facilitation payments or any benefits offered to public officials to accelerate or influence decisions are strictly prohibited.

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Suppliers must not solicit or accept payments intended to gain an improper advantage, nor permit others to act in this way on their behalf. Similarly, Suppliers must not offer, accept, or request gifts, entertainment, or hospitality that could reasonably be interpreted as attempts to improperly influence business decisions or compromise professional judgment.

#### **Conflict of Interest Prevention**

Suppliers must take all necessary steps **to avoid situations that may give rise to actual or perceived conflicts of interest** in their business dealings with Gruppo Lunelli. Any actual or potential conflict must be promptly and transparently disclosed.

#### **Anti-Money Laundering**

Suppliers must take all necessary measures to ensure that their operations are not used, intentionally or unintentionally, as channels for money laundering or the financing of illicit activities.

#### **Confidentiality and Personal Data Protection**

Suppliers are required to safeguard the confidentiality of information concerning Gruppo Lunelli, its clients, and its employees. They must adopt the highest security standards **to prevent unauthorized disclosure of confidential or proprietary information**.

Additionally, Suppliers must comply with all applicable laws and regulations regarding the collection, processing, storage, and management of personal and sensitive data.

#### **Public Statements**

Gruppo Lunelli expects its Suppliers to exercise caution when making public statements in any form of media, including traditional outlets, digital platforms, and social media. Professional, commercial, and industrial secrets must be protected at all times. No public declarations may be made on behalf of Gruppo Lunelli, its shareholders, directors, or employees without prior written authorization.

#### **Information Transparency**

Suppliers are obligated to provide clear, truthful, and timely information regarding their operations, methods, resources, and the features of their products or services. Any form of false, deceptive, or misleading communication is strictly prohibited.

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## SUBCONTRACTING AND THIRD PARTIES

Suppliers are expected to fulfill their contractual obligations with the utmost professionalism and diligence. They must promptly provide any documentation requested by Gruppo Lunelli to verify compliance—both in terms of their conduct and the conformity of their products or services.

Suppliers **may not subcontract** any of the obligations or activities undertaken on behalf of Gruppo Lunelli without obtaining prior written authorization. Where subcontracting is permitted, Suppliers are responsible for ensuring that **all subcontractors fully adhere to the principles outlined in this Code**.

## MANAGEMENT SYSTEM AND REPORTING OF VIOLATIONS

To ensure compliance with this Code, Gruppo Lunelli requires its Suppliers **to establish and maintain a management system capable of**:

- Adopting policies and procedures that align the organization with the ethical, social, and environmental principles outlined in this Code;
- Developing, where not already in place, management frameworks designed to prevent unlawful conduct;
- Ensuring that the standards set forth in this Code are effectively implemented and upheld throughout the entire supply chain;
- Establishing an internal reporting mechanism that enables employees to raise concerns or report suspected violations of this Code in good faith, without fear of retaliation or disciplinary action.

### Gruppo Lunelli's reporting system

Gruppo Lunelli recognizes the importance of effective reporting mechanisms in safeguarding the integrity of its companies and **ensuring compliance with the principles of legality, fairness, and transparency in all interactions with third parties**. To this end, internal whistleblowing channels have been established in accordance with Legislative Decree 24/2023, which transposes EU Directive 2019/1937 into Italian law.

These channels can be accessed through the Group's corporate websites or directly via the following URL: <https://gruppolunelli.parrotwb.app>, in accordance with the Whistleblowing Procedure available on the same platforms and also at: <https://www.gruppolunelli.it/etica-e-condotta-aziendale>.

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**The system allows for the reporting of actions, omissions, or conduct that may harm the public interest or the integrity of any company within Gruppo Lunelli, provided such conduct is discovered within a professional context.**

These channels are designed to guarantee the confidentiality of the whistleblower's identity, as well as that of any individuals named in the report and of the report's content and related documentation, in full compliance with legal requirements.

**Reports that fall outside the scope of Legislative Decree 24/2023 may still be reviewed at the discretion of the relevant Gruppo Lunelli companies**, which may choose to handle them through standard internal procedures. However, in such cases, the specific protections and guarantees provided by the Decree will not apply.

## SUPPLIER DUE DILIGENCE

Gruppo Lunelli reserves the right to verify that its Suppliers comply with the principles set forth in this Code. Verification methods may include:

- **Self-assessment questionnaires** provided by Gruppo Lunelli to evaluate the Supplier's practices in key areas such as ethics, environmental sustainability, human rights, and overall adherence to this Code;
- **Participation in ESG (Environmental, Social, and Governance) assessment platforms**, which offer independent evaluations of a Supplier's environmental and social performance;
- **On-site audits** at Supplier facilities to confirm the effective implementation of the requirements outlined in this Code of Conduct. These audits may be conducted by Gruppo Lunelli personnel or by independent third-party firms specializing in ESG assessments.

When required, Suppliers must also complete any accreditation processes specified by Gruppo Lunelli, including the use of designated digital platforms.

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## REMEDIATION OF NON-CONFORMITIES

Suppliers are expected to make ongoing efforts to address and rectify any deficiencies or non-conformities identified. To support this path of continuous improvement, Gruppo Lunelli collaborates with its Suppliers to define the most appropriate corrective actions, including:

- Developing improvement plans within a reasonable timeframe;
- Monitoring progress toward the agreed objectives, with periodic reviews to evaluate the effectiveness of the actions taken.

Gruppo Lunelli expects its Suppliers to demonstrate consistent and responsible commitment to the implementation of the principles outlined in this Code. In the absence of such commitment, the Group reserves the right to take the following measures:

- **Temporary suspension of purchases**, and rejection of new deliveries until the identified issues are fully resolved—during which time Gruppo Lunelli's related obligations may also be suspended;
- **Termination of the commercial relationship**: In the most serious cases—where a Supplier demonstrates no willingness to improve or fails to comply with the core principles and prohibitions of this Code—Gruppo Lunelli may immediately terminate the business relationship, without prejudice to any other rights or remedies available under applicable law.

### Transparency and Ongoing Dialogue

Gruppo Lunelli values open and transparent communication with its Suppliers, **recognizing that trust and dialogue are the foundation of a strong partnership**. We encourage Suppliers to promptly inform us of any difficulties or obstacles that may affect their compliance with this Code, so that we can work together to identify solutions and promote the continuous improvement of practices and standards.

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## ACKNOWLEDGEMENT AND CONFIRMATION

In order to establish or maintain a business relationship with Gruppo Lunelli, the undersigned Supplier hereby undertakes to comply with the principles and provisions set forth in this Code of Conduct.

Signed on:

..... (day) ..... (month) ..... (year)

Company name: .....

Address: .....

Name and position of representative: .....

Signature of representative: .....

Stamp (if applicable)

The duly signed document has to be sent to the pec address [fornitori@pec.gruppolunelli.it](mailto:fornitori@pec.gruppolunelli.it). If you do not have the pec address, the document has to be sent to the e-mail address [ffornitori@cantineferrari.it](mailto:ffornitori@cantineferrari.it).

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