



Introduction

Company Mission

The Librandi Antonio and Nicodemo Spa¹ was founded on the basis of social, environmental and economical sustainability, above all, on origin understood not as a geographical boundary, but as a territory, with all its traditions, its history, its customs, the conformation of its landscape. Our farmland vineyards are to be a symbol of the value, commitment and time that the family has dedicated to their work, becoming the first to pave the way for quality levels in Calabrian wine-growing and research, laying the foundations for future work."

Company Vision

Librandi identifies itself with the potential of the Calabrian territory, whose wine-growing heritage and environment it wants to interpret and enhance in an authoritative, sustainable and responsible way, transferring the characteristics of the grapes, soils and microclimates of its estates to the wine.

Company Structure

Librandi Spa is part of a complex of interconnected companies² made up as follows:

LIBRANDI SPA

It deals with the production and marketing of wines and oil, with an annual production of about 2,500,000 bottles, of which 45% is exported and 55% is destined for the Italian market.

LIBRANDI SOCIETÀ AGRICOLA PA

It deals with the management of about 232 hectares of vineyards and 80 of olive groves with an attached olive-press.

LIBRANDI SVILUPPO SOCIETÀ AGRICOLA A R.L.

It manages projects of research and experimentation as well as the promotional activities of the Librandi Group.

Regulatory Premise

The Librandi Code of Ethics defines the set of values and procedures that Librandi company, its employees and all direct stakeholders undertake to observe, implement and promote. The document acts as a charter of moral rights and duties that defines the

¹ Henceforth abbreviated to "Librandi Spa" or simply "The Company"



ethical and social responsibility of each participant in the business organization, in compliance with the Equalitas standard.

The company, in fact:

- Is committed to applying the Equalitas standard in all its parts and to guaranteeing its compliance;
- Is committed to carrying out the internal controls foreseen in the self-control system, to foreseeing controls by private certification bodies and to providing applicants with all the data and documentation necessary to ensure compliance with what is declared via the stipulation of this document;
- Takes full responsibility for the truthfulness of the information provided;
- Is committed to keeping all documentation for at least 10 years, except as defined for individual documents in the company documentation.

The company also declares:

- Not to have legal proceedings in progress relating to disputes with respect to mandatory rules and violations of applicable laws in relation to the certification and its field of application;
- To undertake to communicate any sanctions imposed by the public authority in relation to the issues referred to in this standard (e.g. safety in the workplace, environment, ethics, financial aspects etc.);
- To guarantee full compliance with all regulations on environmental management, safety in the workplace, regularity of employment contracts;
- To be aware of and apply the legal requirements for the management of energy and fuels as well as for the management of water resources and waste;
- To keep the assessments of the indicators of biodiversity and to make them available;
- To apply the plans for improvement defined by the company;
- To participate in seminars/training courses promoted by the company;
- To take all the necessary measures to allow the proper conduct of the assessment activities foreseen in this regulation
- To allow the personnel appointed by the product certification body and the personnel concerned to access the documentation and records.

Recipients

All recipients of this Code of Ethics are required to observe its contents and inspiring principles, in every situation and context, within the realm of their specific functions, powers and activities.

The managers of the company must comply with it, in proposing and implementing projects, actions and investments useful for increasing the economic value of the company and the well-being of its employees, customers and suppliers in the long term; the managers of the sector must take on the responsibilities internally and externally,



strengthening trust, cohesion and the team spirit; the employees of the company must commit themselves to complying with the laws and regulations in force in the national territory and, in the presence of doubts and perplexities on how to proceed, to requesting the necessary directives and operational information.

Each recipient of this Code of Ethics is expressly required to know its contents, to actively contribute to its implementation and to report any deficiencies and violations.

General Principles

Legality

Librandi Spa operates in full compliance with the law and this Code. All recipients are therefore required to observe all applicable legislation and to keep constantly up-to-date on legislative changes.

The company considers the transparency of financial statements and accounting a fundamental principle for the exercise of its business and for the protection of its reputation.

Non-discrimination

In its relations with the stakeholders and in particular in the selection and management of personnel, in the organization of the work, in the choice, selection and management of suppliers, as well as in relations with Bodies and Institutions, Librandi Spa avoids and repudiates any discrimination concerning age, sex, race, sexual orientation, state of health, political and trade union opinions, religion, culture and nationality of its interlocutors.

At the same time, the company favors integration, promoting intercultural dialogue, the protection of the rights of minorities and vulnerable individuals.

Confidentiality

Librandi Spa is committed to guaranteeing the protection and confidentiality of the personal data of recipients and stakeholders, in compliance with all applicable legislation regarding the protection of personal data.

The recipients are required not to use confidential information, obtained as a result of their work, for purposes unrelated to the exercise of this activity, and in any case to always act in compliance with the obligations of confidentiality that have been assumed.

In particular, the recipients are required to maintain the utmost confidentiality concerning documents that can disclose know-how, commercial information and company transactions.



Diligence and Loyalty

The relationship between the company and its employees is based on mutual trust: the employees are, therefore, oriented towards operating so as to favor the interests of the company and its economic growth; the company, in return, is committed to guaranteeing the protection of jobs, personal growth and continuous training of its employees, guaranteeing the existence of an equal and stimulating work environment.

In cases where the possibility of the existence of a conflict of interest might emerge, the company encourages direct confrontation and the search for a way to solve it that can guarantee a mutual positive result.

There is also a special "box" for reports, in which employees, anonymously or otherwise, can submit suggestions or make complaints that the company undertakes to take into consideration and resolve, in compliance with anonymity and the principles of this code.

Distinguishing Principles

Social Commitment and Associationism

The company firmly believes in investing in social activities and in the free union in associations to support the growth of the territory.

In order to keep the interest in the world of wine alive and to make Cirò's image grow, Librandi created the "*Associazione Vignaioli del Cirò*" made up of habitual winery owners who are given free advice and training as well as study trips in the most renowned wine-growing areas.

Librandi is also at the forefront regarding participation in the "Consortium for the Protection and Enhancement of Cirò and Melissa D.O.C Wines". Raffaele Librandi, president of the Consortium, is actively engaged in the objectives of protecting, safeguarding and promoting the denomination of controlled origin, and with the aim of guaranteeing consumers greater safety regarding the methods of growing grapes and producing wines.

Within the company complex there is also the cultural center "*A Casedda*", conceived of and founded by the company in 1998 with the aim of promoting the area, its traditions and its culture. Inside this complex, events are regularly organized, giving space to young talents from the area, offering them the opportunity to make themselves known to a wider qualified audience. There is also a strong synergy with the "*Le Donne del Vino*" association and in particular with the delegation from Calabria.



Protection of Biodiversity

Environmental sustainability is a guideline of the company that has always been attentive to the care of the territory and to the protection of biodiversity. *Tenuta Rosaneti* is a tangible example of the enhancement of the territory, 155 hectares of vineyards and 80 hectares of olive groves, all surrounded by flourishing Mediterranean scrub. Reclamation, drainage and containers for the recovery of water to be utilized in drip irrigation were then carried out, with significant water savings. The varietal garden, which it contains, preserves more than 200 native grapevines from extinction.

Respect for the Environment

The company has always been careful in the use of pesticides and treatments. It has fully adopted integrated pest management and keeps a keen eye on organic wine-growing.

The wine cellar is also equipped with a large photovoltaic system that provides about 25-30% of the energy needs of the machinery, with significant energy savings and a consequent low impact on the environment.

Support for Research

The Company has always invested a lot of resources in research, aimed specifically at the rediscovery and protection of varieties that are native to Calabria. The results obtained were made available to the territory via scientific conferences, seminars and publications.

The demanding work performed was carried out by Librandi company in close collaboration with distinguished scientific personalities. Among these: Prof. Attilio Scienza, of the State University of Milan; Professor Donato Lanati, professor of enology at the University of Turin and founder of the "Enosis Meraviglia" workshop; Dora Marchi, his collaborator; Franco Mannini and Anna Schneider of the CNR (the Italian National Research Center) of Grugliasco (TO); Professor Mario Fregoni, full professor of viticulture at the Catholic University of Piacenza and honorary president of the OIV; Stella Grando of the Agricultural Institute of San Michele all'Adige; Professor Vito Teti of the University of Calabria.



Labor Policies

FUNDAMENTAL RIGHTS

In its business activities, Librandi company acts in full respect of the fundamental rights of each individual, protecting his/her moral integrity and ensuring equal opportunities.

The company guarantees the maintenance of a serene work environment, in compliance with shared values. It has absolutely no tolerance of any form of isolation, discrimination and forms of exploitation or harassment.

Any kind of discrimination based on the diversity of race, language, color, faith and religion, political affiliation, nationality, ethnicity, age, sex and sexual orientation, marital status, disability and physical appearance, economic and social condition is therefore prohibited; concessions of any privileges linked to the reasons listed above are also prohibited, except for the provisions of current regulations.

The company ensures, in accordance with these principles, the protection of the principle of equal opportunities and manages any career advancements and salaries, according to the company's economic situation, depending on the market and context of reference, guaranteeing transparency, fairness, clarity and loyalty.

Librandi Spa protects and enhances its human resources, investing in the selection, training and professional growth of workers and committing itself to maintaining the conditions constant that are necessary for the professional growth, knowledge and skills of each person, carrying out the appropriate training for professional growth and any initiative aimed at pursuing this purpose.

The company encourages the participation of workers in the life of the company, providing the means for participation that are capable of collecting the opinion and suggestions of workers, thus ensuring their greatest participation.

COMPLIANCE WITH THE RULES OF THE INTERNATIONAL LABOR ORGANIZATION (ILO)

In fact, the company undertakes to guarantee compliance with all applicable ILO conventions, in particular:

The Health and Safety of Workers

The company is aware of all legal obligations regarding safety and health in the workplace and guarantees its full compliance.

The Management of Workers and Contracts



All employees of Librandi Spa are regularly hired on the basis of the Food Industry's CCNL (Collective agreement).

The company is aware of all legal obligations regarding the management of workers and related contracts. A copy of the contracts is available at the company for free consultation by workers. There are documents and records in the company relating to all workers employed (identity, suitability, age and the conditions of their contracts).

Forced and Compulsory Labor

Librandi Spa does not employ personnel who work against their will or who are not free to interrupt their employment relationship, if they express their will to do so.

In this perspective, the company does not employ staff who are subject to legal restrictions in their freedom to sever their work commitment (documents seized by the company, salaries not paid or paid partially with respect to the paycheck).

Freedom of Association and Right to Collective Negotiation

The Company respects the right of workers and all staff to organize themselves and join trade unions and to make collective negotiations, if employees express these wishes. Freedom of association is ensured without exerting pressure on those who adhere to these systems, and without any discrimination regarding the career growth within the organization.

Child Labor

Child labor is not exercised in the company. In the event that adolescents are employed for educational reasons or for professional training (work experience alternating with school learning), company tutors are identified who will take care of their path, who have demonstrable skills also in the field of health and safety and who present a clear program of training for the period of the employment relationship.

Discrimination

The company respects the needs of workers related to cultural or religious practices (clothing - without prejudice to health and safety measures and safety at work - food, etc.), with the possibility of observing the various religious holidays, while taking into account company needs.

The company is firmly committed to combating episodes of mobbing, stalking, psychological violence and any behavior that is discriminatory or harmful to the dignity of the person inside and outside the company premises.

Relations among employees must be carried out with loyalty, fairness and mutual respect, in compliance with the values of civil coexistence and people's freedom.

Disciplinary Actions



Librandi Spa manages the relations with its collaborators with forms of respect and dignity, no disciplinary measures are applied internally that are contrary to the dignity of and respect for the person. Any disciplinary measures are those provided for by current legislation and by the relevant national collective bargaining agreement.

Working Hours

The Company complies with the provisions of the relevant national collective bargaining agreement. The working hours and any extra working hours are in line with the provisions of the relevant national collective bargaining agreement.

Librandi plans the conduct of its activities carefully, trying to rationalize the processes according to the staff required.

Salary

Librandi Spa guarantees its workers a remuneration that complies with the provisions of the relevant national collective bargaining agreement and that is in accordance with current legislation and which is not lower than the minimum remuneration established by legislation. Payroll accounting is guaranteed and remuneration is in full compliance with all applicable laws.

Training Periods

The company is open to training opportunities and encourages them. In any case, a company tutor is identified who takes care of their growth and support path, and who has demonstrable skills in the specific sector, in support of the proposed training program.

Relations with the Outside World

Communication

The company makes available to all stakeholders suitable means of communication through which they can interact with the company to forward requests, ask for clarifications or make complaints, promoting effective company communication capable of putting the company in contact with society, in order to acknowledge the demands and needs of the community and to spread the company's values and mission.

The means consist of: telephone number, email address, postal address, social network (Facebook, Instagram, Twitter) and website.

The information disclosed to stakeholders is complete and accurate so that the recipients are allowed to make correct and informed decisions.

Promotional advertising respects the ethical values, repudiating vulgar, offensive and discriminatory messages.

Suppliers and Customers



Work relationships, upstream with suppliers and downstream of the supply chain with customers, are established by principles of loyalty and correctness of commercial practices.

Relations with suppliers are based on loyalty, correctness and transparency. The choice of suppliers is made, among other things, on the basis of objective criteria of economy, opportunity and efficiency and compliance with those same principles.

Librandi Spa - Rev.1 of June 30, 2021

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A handwritten signature in black ink, appearing to read 'Giacca', located in the lower right quadrant of the page.