CAVIT

CORPORATE POLICY

Cavit S.C., a limited-liability cooperative Consortium comprising ten wine-making cooperatives located in the Trentino region, was founded in 1950 as a second-tier organization for the purpose of coordinating the winemaking policies of its member wineries. Since the early 1970s, the Consortium has provided its members with technical assistance, as well as bottling and marketing the wine supplied by each grower. In addition, Cavit blends and processes base wines to create sparkling and Spumante wines for the world market. The philosophy of the Consortium hinges on the following principles:

- quality, represented by the company's capacity to provide its clients with wines that can satisfy their
 implicit and explicit requirements, is a strategic factor for competitiveness and for ensuring the success
 of the member growers on the domestic and worldwide markets;
- the safeguarding of the environment and reduction of our environmental impact, especially in such an ecologically sensitive region as Trentino, are strategic factors for the future growth of the company;
- health and safety in the workplace, as well as the prevention of accidents, are crucial in any organization that relies on people and their skills for its future development;
- today's "global quality" culture requires the pro-active participation of the organization as a whole, in an
 ongoing effort to improve processing and product quality, keep up with ever-changing market needs and
 continuously improve the production processes, with a view to reducing our environmental impact and
 minimising health and safety risks;
- full compliance with all applicable safety and environmental laws and regulations is the cornerstone of all strategic policies in this sector,
- successful business thanks to people working within the company;

With these principles in mind, Cavit has introduced an integrated quality, healthy/safety, environmental management system, ethical position as well as the biological production conforming to the models described in UNI EN standard ISO 9001 and BRC/IFS international standards for quality, UNI EN standard ISO 14001 concerning the environment, and OHSAS safety standard 18001 and confirming to the relevant sector law. In addition, independent audits carried out in compliance with the systems and standards specified by the customer are taken into consideration and represent a management tool that can be used to improving our business objectives.

At Cavit, we are wholeheartedly committed to maintaining and constantly improving our integrated management system and further integrating it with other management tools that we have put in place (such as our HACCP, management analysis and IT systems, treatment of personal data), all of this in close relationship with the analysis of the context and of the business risk systematically operated in order to figure out business strategies, business risks and consequent mitigation actions.

To this end, we have established the following objectives:

- 1. Clear and precise definition of the quality standards we strive to uphold for each of our products. Our quality standards are based on our strict compliance with the legislation in force in Italy and in the other countries to which we export our products, the implementation of stringent preventive measures aimed at ensuring the highest possible level of safety and hygiene of our products, and compliance with the ethical principles set out by the United Nations (Declaration of the Rights of the Child, Universal Declaration of Human Rights).
- 2. The planning and accurate documentation of all processing and management activities that might affect the maintenance of our strict quality standards, in order to provide our customers and members with the full assurance that we never accept lower-than-promised quality and that we carry out all our activities efficiently, measuring them against the appropriate benchmarks.
- 3. Planning and effective management of all activities having or liable to have an impact on the environment and/or representing a health and safety risk, with a view to minimising our environmental impact, reducing risks and preventing situations of emergency that might affect safety and the environment, by assessing the effectiveness of the measures introduced against the appropriate benchmarks.
- 4. constant commitment to guarantee personnel management policies that protect their rights and expectations, in compliance with the ethical principles aimed at safeguarding the dignity of the person; implementing policies that guarantee the protection of equal opportunities, that counteract the establishment of any action of discrimination, linked to aspects such as, for example, political beliefs, religious orientation, ethnic or gender groups belonging, and have as their goal the maintenance of general relationships within the company that ensure the psychophysical well-being of employees;

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- 5. Maximum transparency in the definition of all roles and responsibilities, so as to ensure effective communication between the various units, guarantee of an adequate wage and working time in compliance with the Collective National Agreement, involvement and feedback from the employees; freedom of association and collective bargaining; ongoing commitment to the training of all employees engaged in implementing, carrying out and monitoring the activities that affect quality and the environment at all levels. The aim of this approach is to ensure that our human resources have the necessary qualifications, skills and experience to effectively carry out production operations and successfully address the technical, processing and management developments and innovations introduced by the company. In this way, they are able to overcome the challenges posed by today's global markets, being aware of the possible risks posed by the company's activities to the environment and their own health and safety, but at the same time being in a position to carry out their work in a responsible and informed manner.
- 6. The need for the involvement of our contractors and other third parties in adopting methods aimed at safeguarding the health and safety of their employees, while ensuring that they are aware and in possession of the code of conduct concerning the environment and the specific safety risks which exist within Cavit.
- 7. Maintaining a constant partnership with the suppliers who supply those products or services in close relation with Cavit's final products.
- 8. Constant measurement of customer satisfaction, using the most effective tools available (customer complaints and feedback, market surveys and other marketing tools), in order to enhance their trust and acquire new business, on both the European and the new international markets. At Cavit we are unswervingly committed to researching new products and to the continuous improvement of our current products; in addition, we are convinced of the fundamental importance of constantly redefining our quality standards, a goal we are constantly striving to achieve by upgrading and improving our production facilities.
- 9. Identification of the most appropriate methods of monitoring our integrated management system.
- 10. Constant improvement of the effectiveness of our integrated management system.
- 11. Continuous reduction our environmental impact, especially with regard to:
 - wastewater discharge: we constantly monitor the efficiency of our wastewater treatment plant.
 Our improvement objectives are a further cut our pollution output and a reduction in the quantity of wastewater produced;
 - waste reduction: our measures designed to optimize separate waste collection are based on a twofold approach: (i) cutting the overall quantity of waste produced by enhancing the effectiveness of preventive controls of incoming material, and (ii) increasing the proportion of waste collected for recycling, compared to overall waste quantities;
 - water consumption: optimizing our cleaning operations and cutting down on waste are the cornerstones of our policy for reducing consumption of such an important natural resource as water. Ultimately, reduced water consumption means reduced wastewater output.
- 12. Continuous reduction of residual risks, especially as regards:
 - The prevention of accidents and injuries to employees, with continuous improvement of health and safety in the workplace;
 - A reduction in investment risks relative to innovations in plant and structures.
- 13. In order to prevent any possible conditions of danger to the employees, the consumption of alcohol or psychotropic substances during working hours is strictly prohibited.
- 14. Child or forced labour, as well as any form of worker discrimination, is prohibited in the most absolute terms; the company is at all times committed to providing a safe and healthy workplace for its employees.

The General Manager Enrico Zanoni

The Employer Renzo Forti

February 2019