

## **Ethical Code**

### **Introduction**

Badia a Coltibuono, with its lands and activities, is a place that conveys the value and prestige of what has been created, transformed, and preserved by men and women—mostly unknown—over generations through the centuries. This Ethical Code expresses the ethical commitments and responsibilities in conducting business and activities undertaken by the collaborators of "La Badia S.r.l. a Socio Unico," hereinafter abbreviated as "Badia," in respect of the legitimate interests of associates, collaborators, clients, partners, and the communities in the regions where it operates.

The main core business of the company is the commercialization of wines and oils under the Badia a Coltibuono, Coltibuono, and Cultusboni brands.

The Stucchi family, now in its sixth generation, has managed the property with passion and respect for its roots and extraordinary history. This commitment is not only for the benefit of Badia itself but, in a broader sense, for the entire beautiful Chianti region that surrounds it, with its people, traditions, and places—a form of active and sensitive participation in preservation, understood in the most respectful and modern sense.

Through this code, Badia Coltibuono aims to guide behavior consistent with the highest international and national ethical standards in the conduct of its activities and business management. The code also includes and recognizes as fundamental the principles of sustainability to direct corporate strategy and to have a positive impact on the future of the planet and society, with an awareness that considering social and environmental issues also helps minimize exposure to risks and strengthens reputation.

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### **Mission**

The company ensures stable employment for its employees, facilitating their personal and professional development. It is also considered fundamentally important that employees and collaborators perform their professional duties according to principles of diligence, competence, professionalism and efficiency, honesty, and loyalty. Contact with customers is encouraged, fostering relationships based on respect, courtesy, correctness, and clarity.

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### **Scope of Application**

This Ethical Code and each of its updates are approved by the Board of Directors and brought to the attention of the competent bodies of the companies affiliated with La Badia S.r.l. Badia is committed to disseminating the values and principles of the code also within its affiliated companies.

The Code is addressed to the corporate administration and control bodies, to all members of Badia Coltibuono, and to any third party involved in contractual relationships, even occasional or temporary, who act, operate, and collaborate in any capacity with Badia Coltibuono. These individuals and entities are identified as "target recipients" and are required to respect the provisions whenever they operate in Italy or abroad, on behalf of, in favor of, and in the interest of La Badia S.r.l. or any of its affiliated companies.

All target recipients are expressly requested to commit to respecting the principles contained in the Code and to apply them consistently, respecting their activities and professional duties.

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## Principles and Values

- **Integrity:** We pursue our goals with honesty, fairness, and responsibility, fully and substantially respecting the rules, professional ethics, and the spirit of the agreements signed, as well as the directives concerning the production of wine and food products in general.
- **Excellence:** We aim for continuous improvement, looking ahead, anticipating challenges, fostering widespread creativity aimed at innovation, and valuing merit.
- **Transparency:** Transparency underlies all our actions, processes, communications, and contracts to ensure that anyone interacting with us is fully aware of the product they are purchasing.
- **Respect for Specificities:** We strive to combine large-scale operations with territorial rootedness, being a company that can think big while placing people, the land, and communities at the center.
- **Fairness and Inclusion:** We commit to avoiding any discrimination in our conduct and to respecting differences in gender, gender identity and/or expression, sexual orientation, marital status and family situation, age, ethnicity, religious beliefs, political and union affiliation, socioeconomic status, nationality, language, cultural background, physical and mental conditions, or any other personal characteristic, including those related to freedom of expression.
- **Value of the Person:** The inherent value of each person guides our way of acting: we adopt listening and dialogue as levers for continuous improvement in relationships. We care for the health and safety of individuals to ensure a professional experience that respects physical and psychological well-being.
- **Environmental Protection:** We promote the efficient and conscious use of all resources, avoiding waste and always favoring sustainable choices over time. We commit to combating climate change, protecting nature and biodiversity, and supporting the transition towards a sustainable, green, and circular economy.
- **Workplace Safety:** Badia Coltibuono guarantees working conditions that respect individual dignity and ensures safe and healthy work environments, in compliance with current accident prevention legislation.

We promote the dissemination of a safety culture and awareness of the risks associated with work activities, requiring responsible and respectful behaviors towards the adopted safety system and company procedures at all levels to contribute to maintaining our own safety and that of others.

The company's objective is to protect human resources by constantly engaging not only internally but also in relationships with third parties involved in the company's activities, as required by current legislation, with an eye towards the continuous improvement of health and safety management at work. To this end, the company, through the competent corporate functions, stays attentive to the evolution of applicable mandatory regulations and organizational structure, and proposes interventions accordingly:

- **Continuous risk and criticality analysis** of processes and resources to be protected;
- **Reporting of incidents and near-misses;**

- **Conducting training and communication interventions.**
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### **Principles of Conduct in Relations with Stakeholders**

Badia Coltibuono recognizes as stakeholders any subject, internal or external, directly or indirectly involved or impacted by the company's business activities. Each stakeholder contributes to achieving the company mission through the activities carried out. Stakeholders include clients, Badia Coltibuono personnel, collaborators, suppliers, the community, and the environment — the latter also concerning responsibility toward present and future generations.

In its dealings with stakeholders and, more broadly, in its operations, Badia Coltibuono acts respecting human rights and current laws in all the countries where it operates, and it is committed to keeping abreast of regulatory and legislative developments. In this context, Badia Coltibuono also strictly complies with all regulations concerning anti-money laundering, counter-terrorism financing, embargoes, antitrust, fairness in customer relations, conflict of interest management, and observes principles of integrity in handling tax matters.

Badia Coltibuono is also committed to fighting counterfeiting and the misuse of registered trademarks, applying a "zero tolerance" policy and adhering to maximum consistency and transparency in corporate behavior, preventing risky situations wherever possible.

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### **Principles of Conduct in Relations with Clients and Consumers**

In client relations, Badia commits to building trust-based relationships, paying the utmost attention to listening and meeting clients' expectations through the development of products and services of high quality standards.

Badia Coltibuono is active in national and international markets, offering excellence products while respecting competition laws. Every target recipient, in client relations and in compliance with internal procedures, should act in a manner aimed at maximizing customer satisfaction, providing, among other things, comprehensive and accurate information on the products supplied, to facilitate informed choices. Badia Coltibuono does not place adulterated, counterfeit, or manipulated products on the market, nor those with alterations or tampering not permitted by law. It is committed to providing high-quality, safe, and genuine products, in compliance with applicable laws. Product quality will never be, especially for wines protected by quality designations, below the minimum requirements set forth in applicable production regulations.

Product labeling and advertising campaigns, regardless of the medium used, must comply with legal provisions and applicable self-regulatory codes.

Relations that Badia Coltibuono maintains directly with consumers (e.g., direct sales of its products, complaint procedures, information requests, etc.) must be based on principles of availability, courtesy, correctness, and timeliness. It is ethically appropriate to prepare specific procedures to assist consumers in lodging complaints.

The values and traditions of Badia S.r.l. are also passed on through the hospitality activities carried out by its sister company, Tenuta di Coltibuono s.a.g.r.l. Unip., which offers guests and visitors experiences that allow them to fully understand its connection to the land and the surrounding environment.

To this end, Badia Coltibuono is committed to consistently respecting the following principles:

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## **Listening and Interaction with Clients**

Continuous dialogue with clients is fundamental for Badia Coltibuono to understand their actual expectations and impressions of the products. Therefore, the company commits to:

- Activating systematic tools for dialogue, to gather suggestions from clients, consumer associations, and associations representing specific categories of clients;
- Ensuring prompt response to queries and complaints, aiming for a substantive rather than formal resolution of any issues that may arise.

## **Fairness and Inclusion**

Badia Coltibuono is committed to making its services and products accessible to all. Therefore, it undertakes to:

- Not discriminate against clients based on gender, gender identity and/or expression, sexual orientation, marital and family status, age, ethnicity, religious beliefs, political and union affiliation, socioeconomic status, nationality, language, cultural background, physical and mental conditions, or any other personal characteristic, including those related to freedom of expression;
- Implement a pricing policy that reflects the characteristics and quality of the service offered;
- Develop multichannel approaches to facilitate access to products and services;
- Facilitate access to products and services for people with disabilities, removing any architectural barriers in branches and simplifying the use of online services.

## **Customer Safety**

The protection of customer safety is the foundation of the relationship of trust that Badia Coltibuono seeks to develop over time. To this end, Badia Coltibuono, in constant compliance with legal provisions, is committed to respecting each individual production specification for its products, integrating protections and guarantees for consumers whenever possible, constantly adhering to transparency in informing clients of their privacy rights and the ways their personal information is managed.

## **Environmental, Social, and Governance (ESG) Factors Assessment**

Badia Coltibuono fully acknowledges that its activities must consider, among other things, the socio-environmental risks generated or experienced by its operations, as well as their ability to create social and/or environmental value, in addition to economic value. For this reason, Badia Coltibuono undertakes to:

- Adhere to national and international standards for compliance with social and environmental protection norms;
- Promote peaceful coexistence, avoiding financial support to economic activities that might jeopardize it;
- Prioritize projects with high social and environmental value to support the transition towards a fair and sustainable economy;
- Prioritize projects aimed at protecting historical, artistic, cultural, and natural heritage.

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## **Principles of Conduct in Relations with Suppliers**

In the supply of goods and services, Badia Coltibuono operates in compliance with regulations and the principles of this Code. Employees handling relations with suppliers and service providers must select and manage these relationships impartially and fairly, avoiding potential conflicts of interest, and reporting any such situations to the Company.

In line with its strategies and objectives, Badia Coltibuono establishes relationships with suppliers that prioritize ethical, social, and environmental responsibility. It favors long-term commercial relationships based on trust and transparency.

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## **Listening and Dialogue**

With the goal of creating mutual value, Badia Coltibuono bases its relationships with suppliers on continuous dialogue and consultation. To this end, it commits to:

- Promoting a trust-based approach that involves suppliers in a proactive role, encouraging them to promptly report issues that require a shared solution;
- Engaging in dialogue with suppliers to identify areas for improvement, especially regarding communication and adherence to contractual terms.

## **Transparency**

Badia Coltibuono adopts a clear and transparent approach to maintain a solid relationship with suppliers over time, recognizing integrity as an essential prerequisite. To this end, it commits to:

- Establishing contractual agreements and selecting suppliers based on clear and documentable criteria, including environmental, social, and governance (ESG) factors, through an objective and transparent procedure;
- Conducting relations with maximum fairness, especially in the management and conclusion of contracts, avoiding any conflicts of interest, including potential ones;
- Basing its choices in professional consultations on criteria of professionalism and competence, avoiding conflicts of interest, including potential ones;
- Communicating Badia Coltibuono's responsible supply chain management policies externally.

## **Fairness and Inclusion**

For Badia Coltibuono, it is essential to manage its contractual strength equitably and responsibly. Therefore, it commits to:

- Ensuring equal opportunities in the selection of suppliers, avoiding any form of discrimination;
- Ensuring that contracts with suppliers are based on the principle of fairness, particularly regarding payment terms and administrative obligations.

## **Supply Chain Responsibility**

Badia Coltibuono is aware that the quality of relationships with suppliers and purchasing policies can create conditions that favor economic development while protecting the environment and respecting human rights. To this end, it commits to:

- Contributing to environmental protection throughout the supply chain;
  - Ensuring the right to health and safety, avoiding commercial relationships with suppliers involved in violations of relevant regulations.
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### **Principles of Conduct towards the Environment**

Given its activities, Badia Coltibuono inevitably has both direct and indirect environmental impacts. Beyond managing its environmental footprint, Badia Coltibuono can also influence clients' and suppliers' activities and behaviors through its business choices in the short and long term to promote an environmentally friendly economy.

Badia Coltibuono considers environmental protection a constant focus in planning and conducting its production activities. It strictly adheres to policies aimed at reducing pollution, promotes efficiency and energy savings, and respects the surrounding landscape, cooperating fully with public authorities responsible for environmental oversight and protection. The use of pesticides and other chemical and biological products that may harm the environment must comply with legal requirements and minimize ecosystem impact.

Thus, Badia Coltibuono is committed to the following principles:

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### **Listening and Dialogue**

In all relationships, Badia Coltibuono acknowledges that listening to and dialoguing with those involved in reducing negative environmental impacts are essential elements for responsible management. To this end, it commits to:

- Ensuring and promoting constant dialogue with all stakeholders representing the "voice" of the environment, seeking constructive engagement with them;
- Raising awareness among communities and businesses about best practices to adopt;
- Disseminating environmental values, promoting the involvement of company personnel, suppliers, and clients in applying responsible environmental practices.

### **Transparency**

Badia Coltibuono promotes clear and transparent behavior that allows all stakeholders to understand its environmental performance. To this end, it commits to:

- Making information about its environmental strategies and performance accessible to the public through available communication channels;
- Ensuring maximum accuracy and transparency in sustainability reporting.

### **Fairness and Inclusion**

It is essential to engage every part of the value chain on environmental issues, including climate change, to protect even those without a "voice" and future generations.

### **Responsible Management of Direct Environmental Impacts**

The environmental policy principles of Badia Coltibuono focus on reducing waste, progressively improving energy efficiency and performance, considering the environmental and social

consequences of its choices, and protecting nature and biodiversity. In addition to fully complying with environmental regulations, Badia Coltibuono is committed to pursuing conscious resource consumption, including by implementing an environmental impact management system, and to promoting progressive improvements in energy and water efficiency.

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### **Compliance with Production Standards and Enological Practices**

Badia Coltibuono commits to cultivating its vineyards in a regenerative and climate-positive way, achieving a high level of biodiversity to make agricultural areas, by themselves, ecological compensation zones.

In production, Badia Coltibuono commits to adhering to the set of rules (production standards, parameters, and required characteristics) to guarantee product quality while also ensuring consumer and producer protection in line with the interests of the wine sector.

Protected denominations of origin and geographical indications are safeguarded at the EU level against unauthorized use that exploits the reputation of these products. Badia Coltibuono strongly believes in balancing tradition and innovation and sees new technologies as sometimes necessary tools for achieving better and more sustainable products.

The ultimate goal of cultivation must be to enhance the territory rather than consume it.