

2) POLICY

The Policy below includes the need to integrate business management systems, and in particular the SA8000 standard.

The policy has therefore been adjusted over the years following the renunciation of the ISO 9001 certification and the adoption of the management Modello 231:

COMPANY POLICY CASA VINICOLA SARTORI SPA

Casa Vinicola Sartori SPA bases its commercial success on its products and the stakeholder satisfaction.

With this statement, the Management intends to establish the fundamental principles that lead to achieving these objectives fully, respecting the current norms. We will monitor and evaluate the degree of stakeholder satisfaction, both internally and externally, by identifying areas of improvement, and by ensuring over time the expected level of satisfaction.

The Company has also decided to adopt, since 2013, a management model conforming to D.Lgs 231/01, in order to avoid the crimes that involve administrative liability; in particular the prevention of crimes relating to health and safety at work (Art. 25) and crimes relating to environment protection (art 25) with the related sanctions.

In addition to employee training and information, changes to documents, actions on plants and infrastructures, the Company has adopted an Ethic Code and a disciplinary regulation (under a Supervisory external body).

The implementation of an Integrated Management System has been essential:
conforming to the standards:

- GSFS Global Standards for Food Safety and IFS International Food Standards (health and hygiene risk management system)
- SA 8000: 2014 (social performance for workers' conditions, corporate management and the supply chain)
- AEO (Authorised Economic Operator, standard to enhance international supply chain security)

Complies with the regulations on:

- consumer and hygiene safety in agro-food production, based on HACCP system, (following national and international legislation);
- Safety of workers by following and updating the company's own system based on prevention and protection laws;
- Protection of privacy
- Environmental protection
- ISO 14001: 2015: requirements for an effective environmental management system
- OHSAS 18001: requirements for an effective health and safety management system for workers

In addition, the Management is committed to respect and satisfy specific food regulations:

- All requirements of the standards (ISO 9001, BRC and IFS, SA 8000, UNI INAIL Guidelines and BS OH SAS 18001)
- food industry standards
- Conventions and Recommendations of the International Labor Organization (ILO)
- the Universal Declaration of Human Rights
- United Nations Convention on the Children's Rights and to eliminate all forms of discrimination against women
- all National and International Labor Law, including D.Lgs. 81/08 (Safety at Work) and D.Lgs 196/03 (Privacy of Person Data), TU Ambiente (with specific delegations for the safety parts)

If different sources contain different predictions for the same subject, the most favorable standard for workers will be applied.

The real implementation of an integrated system and the continuous improvement of the company are only possible if Casa Vinicola Sartori:

1. shares content and is involved in the practical implementation of what is stated in this Policy;
2. clearly defines the roles and lines of communication between the various function managers;
3. ensures the involvement of suppliers, contractors and sub-suppliers:
 - a) requiring a formal commitment to respect and promote the values of the SA8000 standard;
 - monitoring the qualitative characteristics of raw materials, materials and services purchased;

And the Management, in particular, should:

1. choose a representative to delegate the implementation of the full integrated management system; maintenance, verification and continuous improvement, including operational documents and their records;
2. maintain a good company climate, with:
 - the constant maintenance and improvement of working environment conditions, respect of hygiene health and safety requirement;
 - the supply of all material and training resources to collaborators;
3. implement and monitor procedure efficiency for the safety of the production site, the product, through a "food defense" and "supply chain security" program, guaranteeing the authenticity and legality of the product;
4. identify the primary processes to support and achieve performance goals, established by identifying appropriate indicators.

In addition to these points, the Management will set the targets for:

1. external party requests;
2. the results of Management System performance analysis carried out during the review;
3. current regulations;
4. the updating of plans or new project development;
5. the results of internal and external audits;
6. market (and consumer) requests;
7. the code of conduct and business reference values

The Management also undertakes, during the annual review of the integrated system to:

1. Assess adequacy and possible evolutionary opportunities, to ensure that the Company is able to maintain, through constant innovation and new product development, a primary role on the international scene;
2. Review this Policy to ensure its continuity and improvement.

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