



DELAGE
COGNAC, FRANCE - 1941

Supplier Code of Conduct

Date of last review/update: March 12, 2025

In Procurement, our mission is to secure the finest natural materials while ensuring responsible and sustainable sourcing. Excellence in the spirits market depends on strong partnerships, ethical practices, and a deep understanding of quality. By working closely with our suppliers, we bridge industrial needs with environmental and social responsibility, driving both performance and innovation. Our commitment is not just to supply chains, but to shaping a future where heritage, expertise, and sustainability go hand in hand

Purchasing and procurement Team

The Code reflects Tapi Group's values and sets forth what is expected of its Suppliers with respect to the following topics:

1. ***Legal and Regulatory Compliance***
 - 1.1 Compliance with Laws
 - 1.2 International Trade Compliance
2. ***Labor and Human Rights***
 - 2.1 Child Labor
 - 2.2 Forced labor
 - 2.3 Human Trafficking
 - 2.4 Non-Discrimination
 - 2.5 Freedom of Association and Collective Bargaining
 - 2.6 Working Hours and Wages
3. ***Health and Safety***
 - 3.1 Workplace Safety
 - 3.2 Emergency Preparedness
 - 3.3 Occupational Health
4. ***Environmental Responsibility***
 - 4.1 Environmental Compliance
 - 4.2 Sustainable Practices
 - 4.3 Hazardous Materials
 - 4.4 Resource Management
5. ***Business Integrity***
 - 5.1 Anti-Corruption
 - 5.2 Conflict of Interest
 - 5.3 Fair Competition
 - 5.4 Intellectual Property
6. ***Monitoring and Compliance***
 - 6.1 Audit and Inspection

- 6.2 Corrective Actions
- 7. ***Reporting Concerns***
 - 7.1 Whistleblower Protection
 - 7.2 Communication
- 8. ***Product quality and safety***
 - 8.1 Quality standards
 - 8.2 Traceability

INDEX

Campodarsego (PD), March 12th, 2025

Supplier Code of Conduct

Introduction

Tapì Group is dedicated to fostering a culture of ethical behavior, integrity, and respect for human rights in our operations and throughout our supply chain. This Supplier Code of Conduct outlines the principles and standards we expect from our suppliers, the document will be updated according with evolving regulations and standards, reflecting our dedication to maintaining the highest levels of ethical conduct and social responsibility. These guidelines are designed to ensure that all business activities conducted on behalf of Tapì Group meet our expectations for ethical conduct, legal compliance, and social responsibility, also in alignment with the recent provisions introduced by the Corporate Sustainability Reporting Directive (CSRD) and Corporate Sustainability Due Diligence Directive (CSDDD).

Through this code of conduct, we wish to share our commitments with our partners and bring this approach to life together.

We encourage Suppliers to conduct regular training sessions to their employees on the principles and requirements contained in the present document.

1. Legal and Regulatory Compliance

1.1 Compliance with Laws: Suppliers must comply with all applicable local, national, and international laws, regulations, and standards. This includes, but is not limited to, laws relating to labor, health and safety, environmental protection, anti-corruption and as well as to consumer protection.

1.2 Suppliers are also expected to adhere to industry standards and best practices. A particular attention is requested in monitoring and applying the CSRD and CSDDD provisions.

In this context, we encourage our suppliers to establish a formal process for documenting and, when necessary, reporting their compliance with specific laws, regulations, and standards.

1.2 International Trade Compliance: Suppliers must comply with all applicable import and export control laws, sanctions, and trade embargoes. This includes obtaining necessary licenses and permits for the import and export of goods and services.

2. Labor and Human Rights

2.1 Supplier acknowledge and respect everything contained in the Tapi Code of Ethics (<https://tapigroup.com/corporate-policies-certifications/>) and the ETI code (<https://www.ethicaltrade.org/eti-base-code>) in particular:

- **Child Labor:** Suppliers shall not employ individuals below the legal age for employment as defined by local law and must comply with all applicable child labor laws. Suppliers must ensure that workers under the age of 18 do not perform hazardous work. Suppliers should conduct age verification activities and are encouraged to support local educational activities for children, especially along its value chain and in consideration of non-EU countries.
- **Forced Labor:** Suppliers shall not engage in or support the use of forced labor, including but not limited to prison labor, indentured labor, bonded labor, or any other form of forced labor. All employment must be voluntary, and workers must be free to leave employment or terminate their contracts with reasonable notice.
- **Human Trafficking:** Suppliers shall not engage in or support any form of human trafficking. Suppliers must implement policies and procedures to prevent trafficking and to protect workers from exploitation. Suppliers must prohibit human trafficking in all its forms, including the recruitment, transportation, transfer, harbouring or reception of people by means of the threat or use of force or other forms of coercion, fraud or deception.
- **Non-Discrimination:** Suppliers shall provide a work environment free of harassment and discrimination. Employment decisions, including hiring, compensation, promotion, and termination, should be based on an individual's ability and qualifications without regard to race, color, religion, gender, gender identity, sexual orientation, ethnicity, disability, age, marital status, or any other status protected by law.
- **Freedom of Association and Collective Bargaining:** Suppliers must respect the rights of workers to freely associate, join labor unions, seek representation, and participate in collective bargaining in accordance with local laws.
- **Working Hours and Wages:** Suppliers must pay fair wages and provide benefits in accordance with local laws, including legal minimum wages, paid overtime and social benefits.

Suppliers must comply with local laws regarding working hours, including overtime, and ensure that employees do not work beyond legal limits unless mutually agreed in accordance with the law.

- **Illegal, clandestine and undeclared work:** Suppliers must prohibit illegal, clandestine and undeclared work. All employees must be legally entitled to work in accordance with applicable laws and regulations.
- **Harassment and abuse:** Suppliers shall prohibit all forms of harassment, abuse and mistreatment, including sexual, physical, verbal or psychological harassment.

2.2 Human Rights Due Diligence: we encourage our Suppliers to conduct specific Human Rights Due Diligence activities, whether applicable in compliance with the CSDDD. This activity should include the identification, prevention, mitigation, and accounting how impacts on human rights are addressed.

Tapi Group undertakes to respect the same rules, any internal or external complaint to Tapi Group can also be raised anonymously via the following link http://bit.ly/Whistleblowing_Tap%C3%AC_SpA

3. *Health and Safety*

3.1 Workplace Safety: Suppliers must provide a safe and healthy work environment for their employees. This includes implementing effective health and safety policies, providing necessary protective equipment, and conducting regular training and assessments to prevent workplace accidents and injuries.

3.2 Emergency Preparedness: Suppliers must have effective emergency response plans and procedures in place. These plans should cover a wide range of potential emergencies, including natural disasters, industrial accidents, and fire, and should be regularly reviewed and tested.

3.3 Occupational Health: Suppliers must take proactive measures to prevent occupational health hazards and to promote the physical and mental well-being of their employees. This includes regular health screenings and access to medical services.

3.4 Mental Health and well-being: Suppliers are encouraged to implement comprehensive mental health support programs and conduct regular mental well-being assessments to monitor and address employees' needs, including mental health support, and using the results to develop actionable improvement plans.

3.5 Health and Safety third party audits: Suppliers are encouraged to conduct regular third-party safety audits to ensure compliance with Health and Safety standards.

4. *Environmental Responsibility*

4.1 Environmental Compliance: Suppliers must comply with all applicable environmental laws and regulations. This includes obtaining and maintaining all required environmental permits and registrations.

4.2 Sustainable Practices: Suppliers are encouraged to adopt sustainable practices that minimize environmental impact. This includes reducing waste, conserving

energy and water, minimizing emissions, and promoting the recycling and reuse of materials.

4.3 Hazardous Materials: Suppliers must identify and manage chemicals and other hazardous materials in a way that ensures their safe handling, movement, storage, recycling, reuse, and disposal.

4.4 Resource Management: Suppliers should strive to use resources efficiently and responsibly. This includes the use of recyclable and biodegradable materials, promoting the sustainable sourcing of raw materials and reducing the environmental footprint of their operations. Suppliers are encouraged to use certified materials, such as FSC or PEFC certified wood.

4.5 Environmental data monitoring and planning: Suppliers are encouraged to report according to CSRD framework or applicable reporting standards and to develop internal tracking systems for environmental data monitoring. Suppliers are also advised to develop measures to mitigate climate change impacts.

5. *Business Integrity*

5.1 Anti-Corruption and anti-bribery: Suppliers shall not engage in any form of corruption, extortion, embezzlement, or bribery. Suppliers must conduct all business dealings transparently and ethically, maintaining accurate and complete records of all transactions. Suppliers shall provide anti-corruption and anti-bribery training for their employees.

5.2 Conflict of Interest: Suppliers must avoid conflicts of interest that may compromise their business relationship with Tapi Group. Any situation that presents a potential or actual conflict of interest must be disclosed promptly. Suppliers are also encouraged to publicly disclose their ownership structures and any potential conflicts of interest.

5.3 Fair Competition: Suppliers must conduct their business in accordance with fair competition and antitrust laws. This includes avoiding practices that restrict competition, such as price fixing, market allocation, and bid rigging.

5.4 Intellectual Property: Suppliers must respect intellectual property rights and safeguard Tapi Group's confidential information. Unauthorized use or disclosure of proprietary information is strictly prohibited.

6. *Monitoring and Compliance*

6.1 Audit and Inspection: Tapi Group reserves the right to audit suppliers' compliance with this Code of Conduct. Audits may include on-site inspections, document

reviews, and interviews with workers. Suppliers are expected to cooperate fully and provide access to relevant information.

6.2 Corrective Actions: If non-compliance with this Code of Conduct is identified, suppliers must take prompt corrective actions to remedy the situation. Tapi Group may provide guidance on necessary improvements and monitor the implementation of corrective measures.

7. Reporting Concerns

7.1 Whistleblower Protection: Suppliers should establish mechanisms for their employees to report concerns or violations of this Code of Conduct without fear of retaliation. Reports should be investigated promptly and confidentially. Suppliers are also encouraged to provide anonymous reporting mechanisms for their stakeholders.

7.2 Communication: Suppliers must communicate the principles of this Code of Conduct to their employees, agents, and subcontractors. Suppliers should ensure that these parties understand and comply with the expectations set forth.

7.3 Ethical Sourcing: Suppliers are encouraged to promote ethical behavior throughout their supply chain, ensuring that their own suppliers and subcontractors adhere to similar standards of conduct.

8. Product quality and safety

8.1 Quality standards: Suppliers must ensure that all products provided comply with the quality and safety standards required by our company and applicable regulations.

8.2 Traceability: Suppliers must ensure the traceability of their products and materials to guarantee their compliance and certified origin.

Conclusion

Adherence to this Supplier Code of Conduct is essential for maintaining a business relationship with Tapi Group. We expect our suppliers to uphold these standards and continuously strive for improvement. Failure to comply with this Code may result in the termination of the business relationship.

Sustainability and ethical conduct are a journey, and we regularly review and update the present document to ensure ongoing alignment with regulatory requirements. This process includes periodic assessments and consultations with stakeholders to

adapt to evolving standards and best practices, reinforcing our dedication to responsible and sustainable business operations.

We value our partnerships with suppliers and believe that by working together, we can create a sustainable, ethical, and responsible supply chain that benefits all stakeholders.

Certification

We, the undersigned, hereby certify that we have read, understood, and agreed to comply with the Supplier Code of Conduct of Tapi Group. We are committed to implementing the principles and practices outlined in this code and promoting them within our organization and supply chain.

Company Name: _____

Name and Title of Signatory: _____

Signature: _____

Date: _____

Tapi Group
March 12th, 2025

Kind regards,

Tapi Group