



Drinking at its best

O.D.L. SRL CODE OF CONDUCT

ESG (Environment — Social — Governance) management is an essential part of the corporate culture for ODL. Fundamental to the adoption of the Code is the awareness that the company, in all its activities, must act in full compliance with the laws, rules and regulations of the countries in which it operates.

Furthermore, the Code has the objective of going beyond mere legal compliance to progress in terms of social and environmental responsibility and corporate ethics.

The company therefore declares the following principles:

Ethical behavior

Our standard goes beyond the sole observance of laws and other binding regulations.

We expect our employees to behave ethically in their business activities and in all related situations.

Discrimination

We do not tolerate any type of discrimination regarding sex, age, race, nationality, disability, religion, political opinion, trade union affiliation, state of health, social origin and sexual orientation.

We also support equal opportunities.

Fair business practices

We achieve our market position through the excellent quality of our products and services as well as our performance. We do not apply any unfair commercial practices for the purpose of competition to the detriment of our competitors or other market participants.

Child labor

We condemn child labor and observe the legal regulations regarding the minimum age of all employees.

The minimum age for employment must not be less than the age of completing compulsory schooling and, in any case, not less than 15 years.

Any workers under the age of 18 (Young Workers) shall not carry out work activities that may compromise their health, safety or morality, including night shifts and overtime.

Forced labor and punishment

We condemn forced labor and physical punishment, threats of violence and harassment of employees.

Corruption

We condemn any kind of corruption.

In Italy Anti-Corruption concerns private-to-public bribery offenses. The Code of Public Contracts (Legislative decree n. 50/2016) concerns the supervision and regulation of public contracts, in order to ensure compliance with the principles of transparency, legitimacy and competition of the operators in the

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Capitale Sociale euro 180.000 int. versato
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public procurement market and prevent corruption and identifies private companies and/or entities which have to comply with this specific regulation.

O.D.L. is not involved in public contracts and therefore is not subject to this specific regulation.

Freedom of association

We recognize our employees' right to freedom of association. We collaborate proactively with employee union representatives.

Working and employment conditions

Wages, social contributions and working hours comply with the minimum local standards applicable by law. Employees benefit from adequate breaks while working.

Health & Safety

We protect our employees from risks in the workplace and support health promotion measures. Health and safety policies and procedures are established and followed.

Product safety and product quality

We are aware that the safety and reliability of our products are the basis of our success. Our standard is to offer our customers flawless, high-quality products.

Our quality management is, to this end, an integral part of all our operations. We comply with legal requirements for quality and safety and strive to exceed them.

Environmental Protection

We design our products, services and processes to be environmentally friendly while minimizing negative environmental impacts.

We comply with environmental requirements in all our operational areas and use natural resources responsibly, in the spirit of continuous improvement of environmental performance.

Data protection and security

The protection of the personal data of our employees, customers and suppliers is of great importance to us. Therefore, we collect, store or process personal data only for the purposes for which it was collected, in accordance with privacy regulations, including the GDPR.

We ensure that personal data is adequately protected.

Common well-being

We are aware that, as a company, we also have a responsibility for the common well-being. We want to help improve infrastructure, social conditions and quality of life on our sites.

Our business activities and products are designed to serve people's well-being and needs.

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