

## THE BUSINESS MANAGEMENT MODEL

Vetreteria di Borgonovo S.p.A. has adopted a Management Model in accordance with Legislative Decree 231/2001, known as “Regulation 231”. The definition and application of this “Model Rules”, “Organizational Model”, “Model 231” or “Exemption Model” have a strong impact both on the company organization and on the behavior of the people who are part of the company or interact with it.

### **Purpose of the Management Model**

The main objective of the Management Model is to encourage the Company and its staff to increase the culture of prevention and responsibility through:

- The formalization of tasks.
- The precise definition of responsibilities.
- The promotion of functional (within the same department/service) and cross-functional (between different departments/services) relationships.
- The definition and dissemination of a system of procedures that formally establishes the procedures for carrying out activities, controls and the division of tasks.

### **Staff Training and Information**

Vetreteria di Borgonovo, through the Safety Management Service, organizes training and information meetings to ensure adequate dissemination of the contents and principles of the model. The fundamental objective of the training activity is to provide practical information that guarantees compliance with the principles laid down at legislative and company level, with the aim of preventing accidents and crimes.

### **Communication and Sharing of the Model**

To ensure the effectiveness, adequacy and continuous improvement of the Model, it is essential that it is communicated and understood by all. Dissemination takes place through:

- Illustration of the Model as a whole and on specific topics, through targeted meetings with staff.
- Placement of the documentation on the [www.borgonovo.it](http://www.borgonovo.it) website.
- Posting of the documentation on company bulletin boards.
- Availability of paper and electronic documentation at the reception desk and at numerous company workstations.
- Involvement of external stakeholders.
- Inclusion in contracts with third parties of the clause for termination of the relationship for non-compliance with the rules laid down.

## Characteristics of the Management Model

The Management Model is open, dynamic and subject to continuous changes both due to regulatory developments and the need for constant and continuous adaptation to the operating context of reference. To manage this situation, Vetreria di Borgonovo has set up a Supervisory Body (SB), a new corporate body with the function of verifying and controlling the effectiveness of the model implemented with respect to the set objectives. The SB reports to the top management of the company, has free access to all company functions and documentation and is equipped with adequate financial resources.

## Duties of the Supervisory Body (SB)

The SB has the task of supervising the correct application and functionality of the Model, reporting to the Company Management any inadequacies found and must be informed, through specific reports, by all company subjects required to comply with Model 231 in the event of alleged inadequacies. Reports to the SB can be sent by ordinary mail to:

**Supervisory Body c/o Vetreria di Borgonovo**

Via Pianello, 75, 29011 Borgonovo Val Tidone, Italy

By e-mail to:

[organo.vigilanza@borgonovo.it](mailto:organo.vigilanza@borgonovo.it) By fax: 0523 865332

The Management Model provides for the application of fines in the event of violation of the established rules, as provided for by the company's disciplinary system. The adoption of the disciplinary measures will be carried out in compliance with national legislation and the sector's Collective Bargaining Agreement.

The Chairman



**VETRERIA di BORGONOVO S.p.A.**  
IL RAPPRESENTANTE LEGALE  
Pierfrancesco Piccioni