

Supplier Code
of
Business Conduct

for



DELICATO
Family Wines

Delicato Vineyards, LLC
Supplier Code of Business Conduct

Introduction

Delicato Family Wines (“Delicato”) is a family-owned company with a rich history spanning 100 years, and portfolio of powerful brands. The family is proud to lead a focused and innovative organization. Effectively combining our future with our past is the key to our unique culture. As Delicato grows, we will continually face the challenge of moving to the next level of competition and meeting the expectations of a broader spectrum of people from customers to vendors to consumers. It is essential to think and act within the framework of our family philosophy of trust, honesty, approachability, and open mindedness, all of which make our company a great place to work.

Together with the management team, the family is committed to providing an environment of fairness, safety, and professional enrichment for all our employees. As we work together to build and grow a High-Performance Constructive Culture, please keep the values which have guided our family business and fostered our success in mind:

- **High Moral Standards,**
- **Innovation and Continuous Evolution,**
- **Trust in Team, Continuous Improvement, and**
- **Sustainable Relationships.**

Our company culture is a key component to Delicato’s continued success and growth. Though we celebrate our accomplishments, we do not rest on our past. The goal is to create a work environment based on principles of continuous improvement, based on the respect of all people and where everyone succeeds. Together we can build on our solid foundation, achieve anything and compete as a world-class winery, ever mindful of our enduring values and the rich legacy that guides us.

Delicato Culture Statement

High Moral Standards

We are a family-owned company and believe it is important to maintain a family-style work environment, especially as the organization expands. The family philosophy includes trust, honesty, approachability and open-mindedness, which together make our Company a great place to work, and gives us the ability to make decisions in an expedient manner. We live up to our commitments and honor the obligations we have made even when it does not result in financial rewards for the Company.

Innovation and Continuous Evolution

Embracing change and fostering creativity within a highly entrepreneurial environment has brought us to where we are today. We reward those who overachieve and take calculated risks to make the Company more successful.

Trust in Team

Management stands behind the efforts and calculated risks our employees take with the ultimate goal of improving our products and services. Everyone shares in the success of the Company because we recognize that it takes a team to deliver the highest quality products at the greatest value to our customers. Clear communication, collaboration and commitment to teamwork is everyone's responsibility and critical in a competitive environment.

Continuous Improvement

For us to win in a competitive environment, we must retain and develop the critical talent within the organization. We remain vigilant in our search for the most talented, highly-motivated, knowledgeable, and skilled individuals globally to enhance our efforts. This talent gives us our competitive edge and is what makes us successful. We reward individuals for continuously expanding their knowledge and skills and encourage them to take pride in their personal growth and to be passionate in what they do.

Sustainable relationships

It is our reputation for developing and maintaining meaningful relationships with customers and suppliers that makes our Company strong and gives us the ability to provide exemplary customer service worldwide. We maintain stable and trusting relationships within our local and global communities and strive to minimize the Company's impact on the environment through fiscally prudent practices that foster quality improvement.

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1. Applicability

- A.** The Supplier Code is aligned with the International Bill of Human Rights, the ILO Declaration of Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights (UNGPs) and the Ten Principles of the UN Global Compact.

Delicato requires all Suppliers and business partners to comply with this Supplier Code. “Suppliers” refers to any third party that provides goods or services to Delicato for compensation including, but not limited to, our direct and indirect Suppliers, growers, co-manufacturers and co-packers, labor providers, logistic providers, distributors and licensees including their parent, subsidiary or affiliate entities. Sub-contractors of Suppliers are also expected to adhere to the Supplier Code.

We require our Suppliers to abide by all applicable national, state and local laws/regulations in the markets where they operate; however, where local laws or standards differ from this Supplier Code, we expect our Suppliers to comply with the more stringent standards and principles.

- B.** In the spirit of continuous improvement, Delicato is committed to working with and supporting our Suppliers to meet, and when possible, exceed, the requirements in this Supplier Code. By its acceptance of any purchase order from Delicato, the Supplier acknowledges its acceptance of the Supplier Code and intention to comply with its requirements.
- C.** Delicato and its affiliates (“Delicato” or “We”) strive to conduct business in accordance with all applicable laws and regulations and believe in adherence to the highest ethical standards. Delicato also seeks to develop a mutually valuable relationship and open and frank business dealings with every company that provides products or services to Delicato anywhere in the world (“Supplier” or “You”).

2. Compliance with Laws, Regulations, and Business Conduct Practices

- A.** Delicato expects that at all times you will comply with all laws and regulations applicable to your business, wherever conducted. In addition, Delicato expects that you will conduct business in a way that recognizes your ethical responsibilities and fulfills them. Where local laws are less restrictive than this Code, Delicato expects you to comply with the Code, even if your conduct would otherwise be legal.

B. Improper Payments

- 1)** You must comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, and other applicable anticorruption laws. In general, these laws prohibit promising, offering, or providing, or attempting to provide any direct or indirect kind of inducements to any person (including a government official) to act, or fail to act, improperly in the performance of their duties.
- a)** An “inducement” can be anything of value. It would cover any gratuity, gift, favor, entertainment, loan, or service. It could be offered to a third party and not to the government official or other person directly.
- b)** A “government official” is any officer, employee or consultant of a government or governmental department or agency, officer or employee of a state-owned enterprise or

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partially state-owned enterprise, political party or official, candidate for political office, officer or employee of a public international organization, member of a royal family or immediate family member of any of the persons mentioned above (“government official”).

- 2) These requirements mean, among other things, that you must not provide, attempt to provide, offer, or solicit a kickback, directly or indirectly, to obtain or reward favorable treatment in connection with any transaction. You also must not give or offer, either directly or indirectly, any gratuity, gift, favor, entertainment, loan, or anything of value to any government official or non-government commercial person except as may be permitted by applicable law.
- 3) To comply with these requirements, Delicato expects you to have appropriate internal controls over and advance approval of mechanisms for any such inducements to government officials or other persons.

C. Lobbying of Government Officials

- 1) Lobbying is generally any activity that attempts to influence laws, regulations, policies, and rules. In certain jurisdictions, however, the legal definition of “lobbying” can also cover procurement and business development activity.
- 2) You must not lobby any government on behalf of Delicato unless you are specifically retained by Delicato for that purpose through a written agreement. If it chooses to engage in any lobbying efforts, Delicato will lobby and retain its own firms directly for government relations or lobbying on Delicato matters. You must not permit government relations consultants/lobbyists retained by you to be used by Delicato unless those consultants/lobbyists have a separate contract with Delicato, nor may you use Delicato’s consultants/lobbyists for lobbying purposes unless you have a separate contract of your own with them.

D. Conflicts of Interest

- 1) The term “conflict of interest” describes any circumstances that could cast doubt on your ability to act with total objectivity with regard to Delicato’s interests. Delicato believes that its business relationship with its Suppliers must be free from any conflicts of interests or even the appearance of conflict of interest. Conflict of interest situations may arise in many ways.
- 2) If you feel that you have an actual or potential conflict of interest with Delicato or any of its employees, you must disclose all pertinent details to Delicato.

E. Conflicts of Interest for Delicato Employees

- 1) Employees should avoid and not engage in situations that result in actual or even potential conflicts of interest. Personal, social and economic relationships with competitors, suppliers, customers or co-workers that may impair an employee’s ability to exercise good judgment on behalf of the Company or which give the appearance of such impairment create an actual or potential conflict of interest. For example, romantic or personal relationships between employees in the same reporting line or with an HR Business Partner and their client group can lead to supervisory problems, claims of harassment and morale problems.
- 2) Any employee involved in such situations or relationships must immediately and fully disclose the nature of the situation or relationship to the HR Department, so a determination can be

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made as to whether an actual or potential conflict exists, and if so, whether it is possible to and how to alter the situation to eliminate the actual or potential conflict.

3. Worker Involvement and Protection

A. Equal Employment Opportunity

- 1) Delicato is an equal opportunity employer and makes employment decisions on the basis of merit. We want to have the best available persons in every job. Company policy prohibits discrimination based on age, genetic information, marital status, medical condition (including cancer/genetic characteristics and AIDS/HIV status), mental or physical disability, national origin or ancestry (including language use and possession of a driver's license under Vehicle Code section 12801.9), pregnancy (including childbirth, breastfeeding and related medical conditions), race, color, religion, sex (including gender identity, gender expression, or transgender status), sexual orientation, military or veteran status, or any other consideration made unlawful by federal, state, or local laws. It also prohibits discrimination based on the perception that anyone has any of those characteristics or is associated with a person who has or is perceived as having any of those characteristics.
- 2) The Company is committed to compliance with all applicable laws providing equal employment opportunities, including laws related to fair pay. This commitment applies to all persons involved in Company operations and prohibits discrimination by any employee of the Company, including supervisors and coworkers.
- 3) To comply with applicable laws ensuring equal employment opportunities to qualified individuals with a disability, the Company will engage in the interactive process and make reasonable accommodations for the known physical or mental limitations of an otherwise qualified individual with a disability unless undue hardship to the Company would result.
- 4) Any employee who requires an accommodation in order to perform the essential functions of the job should contact the HR Department and request such an accommodation. The individual with the disability should specify what accommodation(s) they need to perform the job, and be prepared to work collaboratively with HR through the interactive process.

4. The Rights of Freedom of Association and Collective Bargaining

- A. Delicato respects the rights of employees to freedom of association and collective bargaining. Workers have the right to form, join or not join trade unions or other organizations should they elect to do so, and collectively bargain without fear of discrimination, retaliation, harassment or intimidation. In cases where freedom of association is restricted by local law, alternative means of freedom of association will not be obstructed.
- B. **Grievance Systems:** Supplier shall ensure that workers have an effective mechanism to report grievances and that facilitates open communication between management and workers.

5. No Discrimination

A. Prohibited Harassment

- 1) Delicato maintains a strict policy prohibiting harassment. The Company policy prohibits sexual harassment and harassment based on age, genetic information, marital status, medical condition (including cancer/genetic characteristics and AIDS/HIV status), mental or physical disability, national origin or ancestry (including language use and possession of a driver's license under Vehicle Code section 12801.9), pregnancy (including childbirth, breastfeeding and related medical conditions), race, color, religion, sex, gender (including gender expression and transgender status), sexual orientation, military or veteran status or any other basis protected by federal, state, or local law. The Company's anti-harassment policy applies to all persons involved in the operation of the Company and prohibits harassment by any employee of the Company, including supervisor and managers, as well as vendors, customers, independent contractors and any other persons doing business with or for the Company. It also prohibits harassment based on the perception that anyone has any of those characteristics. Prohibited harassment may have occurred even if you have not lost a job or some other economic benefit. However, only harassment that unreasonably interferes with your work performance or creates an intimidating, hostile, or offensive work environment is unlawful. Prohibited harassment will not be tolerated, whether or not it rises to the level of unlawful conduct.
- 2) Delicato also does not tolerate any form of discrimination in the workplace. We are committed to diversity and inclusion in the work environment. Hiring and employment decisions, including those relating to compensation, benefits, promotion, training and development, discipline, and termination are based solely on the Company's legitimate business needs and the worker's skill, ability, experience and performance. Delicato does not tolerate any form of disparate treatment in the workplace. All workers will be treated with dignity and respect and will not be subject to any form of unethical treatment, threats of violence, or other forms of physical, mental, or sexual harassment. Disciplinary policies and procedures in support of these requirements are clearly defined and communicated to all workers.

6. Fair Remuneration

- A. Delicato expects Supplier to pay at least the applicable minimum wage and provide any benefits required by law and/or contract, compensate workers for overtime hours at the legal premium rate, and communicate pay structure and pay periods to all workers in a manner which workers will understand. Supplier shall meet all legal requirements relating to wages and benefits, paying accurate wages in a timely manner, and wage deductions shall not be used as a disciplinary measure unless specifically authorized by applicable law. All use of temporary and outsourced labor shall be within the limits of applicable law.

7. Decent Working Hours

- A. Workers shall have the opportunity to take at least one (1) day off in each workweek, except in emergencies or unusual situations. Regular workweeks shall not exceed forty-eight (48) hours. Supplier shall follow all applicable laws and regulations with respect to working hours, days of rest, rest periods during the workday, and overtime. To the utmost extent practicable, Supplier shall endeavor to utilize voluntary overtime as well as ensure that overtime opportunities are fairly distributed and do not pose an unreasonable demand on its employees.

8. Occupational Health and Safety Management

- A.** Worker health, safety, and well-being is important to Delicato. Supplier shall comply with all Occupational Health and Safety (OHS) regulations; where OHS regulations do not apply, international standards shall apply. Supplier shall provide and maintain a safe work environment and integrate sound health and safety management practices into its business. Workers shall have the right to refuse unsafe work and to report unhealthy working conditions without threat of retaliation.
- B.** Supplier shall identify, evaluate, and manage occupational health and safety hazards through a prioritized process of hazard elimination, substitution, engineering controls, administrative controls, and/or personal protective equipment.
- C. Emergency Preparedness and Response:**
 - 1) Supplier shall identify and assess potential emergency situations. For each situation, Supplier shall develop and implement emergency plans and response procedures that will minimize harm to life, environment, and property.
- D. Health and Safety Communication:**
 - 1) Supplier shall provide workers with appropriate workplace health and safety training in their primary language. Health and safety related information shall be clearly posted in the facility.
 - 2) Supplier shall have a system for workers to report health and safety incidents and near-misses, as well as a system to investigate, track, and manage such reports. Supplier shall implement corrective action plans to mitigate risks, provide necessary medical treatment, and facilitate workers' return to work.

9. No Child Labor

- A.** Delicato does not tolerate any form of child labor in our supply chain. We are committed to the elimination of the “worst forms of child labor,” as defined by ILO Convention 138 & 182. Delicato expects our Suppliers to prevent child labor in their operations and encourages our Suppliers to participate in industry efforts aimed at the elimination of such practices wherever they exist in the supply chain.
 - 1) No individuals are hired under 15 years of age, or 14 years of age where local law allows, and such exception is consistent with ILO Convention No. 138 & 182, or under the legal minimum age for employment in the country, whichever is greatest.
 - 2) Any employment of workers under the age of 18 does not interfere with schooling or vocational education or expose children to risks that can harm physical, mental or emotional development.
- B.** In keeping with the UNGP framework, where national law and international human rights standards differ, we follow the higher standard. Where they are in conflict, we respect national law, while seeking to respect the principles of internationally recognized human rights.

10. Special Protections for Young Workers

A. Third Party Employment Agencies

- 1) Supplier shall ensure that the third-party employment agencies it uses are compliant with the provisions of this Code and the law.

B. Prevention of Underage Labor

- 1) Supplier shall employ only workers who are at least 15 years of age, the applicable minimum legal age for employment, or the applicable age for completion of compulsory education, whichever is highest. Supplier may provide legitimate workplace apprenticeship programs for educational benefit that are consistent with Article 6 of ILO Minimum Age Convention No. 138 or light work consistent with Article 7 of ILO Minimum Age Convention No. 138.

C. Juvenile Worker Protections

- 1) Supplier may employ juveniles who are older than the applicable legal minimum age but are younger than 18 years of age, provided they do not perform work that might jeopardize their health, safety, or morals, consistent with ILO Minimum Age Convention No. 138. Supplier shall not require juvenile workers to work overtime or perform nighttime work.

D. Student Worker Protections

- 1) Supplier shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. Supplier shall provide appropriate support and training to all student workers.

11. No Precarious Employment

- A.** Supplier shall ensure that all work is voluntary. Supplier shall not traffic persons or use any form of slave, forced, bonded, indentured, or prison labor. This includes the transportation, harboring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation.
- B.** Supplier shall not withhold Worker's original government-issued identification and travel documents. Supplier shall ensure that Worker's contracts clearly convey the conditions of employment in a language understood by the Workers. Supplier shall not impose unreasonable movement restrictions within the workplace or upon entering or exiting company-provided facilities.
- C.** Workers shall not be required to pay employers' or their agents' fees for their recruiting and/or ongoing employment. This includes recruitment, application, recommendation, hiring, placement, processing, renewals, and/or recurring fees of any kind. If such fees are found to have been paid by Workers, such fees shall be repaid to the Worker.
- D.** Delicato does not tolerate any form of violence, including but not limited to, that which is related to threats, harassment, abuse, intimidation, and physical or sexual assaults. Delicato requires that Supplier maintains a secure workplace for its employees at all times, including:

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- 1) Provide reasonable accommodations for any employee who is a victim of sexual assault, domestic violence, or stalking, in order to increase the employee's security while at work.
- 2) Require identification of entrants onto its premises and monitor premises for any suspicious persons or activities.
- 3) Investigate and address any reports of workplace safety concerns, violence, or threats of violence.

12. No Bonded Labor, Forced Labor, or Human Trafficking

- A. Delicato does not tolerate any form of abusive or illegal labor in our supply chain such as forced labor or human trafficking. Delicato requires that all labor in its supply chain be voluntary and that workers are allowed freedom of movement. All forms of forced labor and human trafficking are prohibited including, but not limited to, any form of prison, slave, bonded or forced indentured labor.
 - 1) The recruitment, transportation, transfer, harboring or receipt of persons, by means of threat or use of force, coercion or other means, for the purpose of exploiting them is prohibited.
 - a) In advance of employment, workers are provided accurate and understandable information about the basic terms of their employment clearly stating their rights and responsibilities as well as information on wages, hours and holidays.
 - b) Workers are free to leave work and terminate their employment upon reasonable notice without penalty and employers must not retain any personal identification, travel documents or wages as conditions of employment.
 - c) Job seekers and current employees are not charged or required to pay fees or deposits in order to gain or maintain their employment.

13. Protection of the Environment

- A. Delicato is committed to reducing our environmental impact across our supply chain and to supporting sustainable operational and agricultural production practices. We work with our Suppliers who are critical partners in our efforts to responsibly and sustainably source our ingredients, packaging materials and other goods and services in a way that will help reduce our impact on air, land and water. Our operations comply with all federal and local environmental laws and regulations, including those related to waste disposal, hazardous waste, greenhouse gas emissions, wastewater and toxic substances. All required environmental permits are obtained, maintained and kept current and any operational, registration and reporting requirements are followed.
- B. Suppliers are expected to comply with all applicable environmental laws and regulations. Suppliers should implement a process- and risk-based environmental due diligence management system in their business practices, adjusted to the business model of the company. Operational impacts should be identified and measured, and adequate actions to prevent, mitigate, and remediate any identified adverse impacts should be implemented.

14. Ethical Business and Behavior

A. Business and Employment Relationships

- 1) Delicato expects you to provide a work environment that is in full compliance with all applicable laws governing employment practices and employee relations, including but not limited to laws prohibiting discrimination, harassment and retaliation. In general, Delicato expects you will treat your workers with dignity and respect, providing equal opportunities and fair treatment to all workers with respect to hiring, employment, promotions, training, compensation, and benefits.

B. Business Courtesies That May Be Extended to Delicato

- 1) Delicato and its employees and representatives do not offer or accept kickbacks, bribes, or other improper inducements. Delicato and its employees and representatives do not accept gifts, services, sports tickets, entertainment and travel, transportation, favors, hospitality, or anything of value from anyone doing business with or trying to secure business with Delicato. Token gifts of minimal value, such as a box of candy, calendars, pencils, and advertising materials, do not constitute a violation of this Code.
- 2) You must use discretion and care to ensure that expenditures on Delicato employees or representatives are reasonable and in the ordinary and proper course of business. You must ensure that such expenditures could not reasonably be construed as bribes or improper inducements or otherwise violate applicable laws and/or regulations.

C. Business Courtesies That May Be Received from Delicato

- 1) You are responsible for ensuring that the acceptance of any business courtesies, gifts, or entertainment by you or your employees or representatives is proper and could not reasonably be construed as an attempt to secure favorable treatment or otherwise violate applicable laws and/or regulations. Suppliers may not accept or request such unlawful payments or inducements.

D. Intellectual Property and Obligations of Confidentiality

- 1) Delicato respects the intellectual property rights of others and expects other companies to respect Delicato's intellectual property rights. You are responsible for protecting Delicato's intellectual property rights. An important element of such protection is maintaining the confidentiality of Delicato's trade secrets and proprietary information. You must respect the intellectual property of Delicato and not use Delicato's trademarks, documentation, or other materials without written permission. In the course of working with or for Delicato, you must not use proprietary information, documentation, or other materials of third parties without authorization.
- 2) You must safeguard confidential information by not transferring, publishing, using, or disclosing it other than as necessary in the ordinary course of business or as directed or authorized by Delicato. You must observe applicable data privacy standards. Materials that contain confidential information or that are protected by privacy standards should be stored securely and shared only internally with those employees with a need to know. For example, confidential information may include, but is not limited to: inventions or developments (regardless of the stage or development) developed or licensed by Delicato, marketing and sales plans, competitive analyses, product development plans, non-public pricing, potential contracts or acquisitions, business and financial plans or forecasts, internal business processes and practices, and prospect, customer, and employee information.

E. Protection of Confidential Information

- 1) You must protect confidential information (which includes “personal information”) to which you have access in connection with your services to Delicato. The Delicato Supplier/Contract Security Standards identify the security standards and procedures that must be followed when accessing Delicato confidential information or Delicato networks. You are required to abide by these policies when collecting or processing the relevant confidential information.

F. Foreign Corrupt Practices Act

- 1) Establishing and maintaining a global presence is one of the keys to Delicato’s continued growth and success. Conducting business internationally requires an ongoing commitment to high moral standards. Delicato adheres with the U.S. Foreign Corrupt Practices Act (FCPA), which makes it illegal for U.S. citizens and companies, their officers, directors, employees and agents, and any stockholders acting on their behalf, to bribe foreign officials. The FCPA also requires U.S. companies to keep accurate and complete books and records and to maintain proper internal accounting controls.
- 2) All Company personnel are expected to conduct Company business legally and ethically. Improper gifts, payments or offerings of anything of value to foreign officials could jeopardize Delicato’s growth and reputation. The use of Company funds or assets for any unlawful, improper or unethical purpose is also prohibited. Specifically, it is Delicato’s Policy to comply fully with the FCPA. To ensure compliance, Delicato provides FCPA training to all officers of the Company and other individuals based on their role and responsibilities.

G. News Media Contacts

- 1) If a member of the media contacts you, please try and determine if the person is seeking information or comment for a story (editorial) or merely wishes to sell us advertising space or broadcast time. You can do this by asking the caller, “Which area does this fit into: advertising or editorial?” If it is determined to be a true media request, one that seeks information about our wineries, vineyards, wine brands or personnel, please refer the journalist to our Director of Corporate Communications.

H. Compliance with Export Laws

- 1) United States Export Control Laws govern all exports, re-export, and use of U.S.-origin commodities and technical data, wherever located. You are responsible for understanding how the Export Control Laws apply and for conforming to these laws to ensure no data, program and/or materials from services (or direct product thereof) will be exported, directly or indirectly, in violation of these laws, or will be used for any purpose prohibited by these laws.

I. Audits and Assessments

- 1) Delicato reserves the right to verify compliance with this Supplier Code through internal and external assessment mechanisms, such as self-assessment questionnaires, on-site independent third-party audits, and worker well-being surveys. Such audits may inspect Suppliers’ facilities, operations, books and records, and supplier-provided housing, and may include confidential worker interviews. If non-compliances are observed, the supplier will be required to take corrective actions. To the extent practicable and in compliance with governing law, Delicato will

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strictly maintain the confidentiality of any non-public and private information discovered during such audit, except in situations where any violation of law or this Supplier Code permits or requires reporting of such conduct to a governmental agency or enforcement body.

- 2) Audits and Assessments Supplier shall perform periodic evaluations of its facilities and operations, and the facilities and operations of its subcontractors and sub-tier suppliers that provide goods or services to Delicato to ensure compliance with this Code and the law. Supplier will permit Delicato, or a third party designated by Delicato to periodically evaluate Supplier's facilities and operations to assess Supplier's compliance with the applicable principles and requirements of the Code, and those of its subcontractors and sub-tier suppliers providing goods or services to Delicato, for Delicato's benefit, or for use in Delicato products. Supplier shall not have manufacturing operations in, recruit labor directly or indirectly from, or source materials, products, or services directly or indirectly from, regions where Delicato and third parties cannot access and conduct a comprehensive, independent evaluation of Supplier's compliance with this Code.
- 3) Delicato expects Supplier to report to Delicato any conduct, including conduct of any Delicato employee, that Supplier believes in good faith to be an actual, apparent, or potential violation of this Code. Reporting of a violation should be prompt and timely. Reports will be managed as confidentially as possible. Reporting should be directed to: COC.Support@delicato.com (there is an "_" between the words).