



## Business Management Model

Vetreteria di Borgonovo S.p.A. has implemented a Management Model in compliance with Italian Legislative Decree 231/2001, often referred to as "Regulation 231".

The definition and application of this "Rule model", "Organisational model", "Model 231" or "Absolving model" has a very strong impact on both the business organisation as well as on the behaviour of each individual person who is part of the organisation or has relations with the latter.

**The purpose of a Management Model is to push the Company and its personnel to grow jointly the culture of prevention and responsibility**, by means of:

- The formalising of tasks;
- The specific definition of responsibilities;
- The promotion of functional relations (within the same department/service) and inter-functional relations (between several departments/services);
- The definition and dissemination of a system of procedures that formally defines the method of performing activities, checks and the distribution of tasks.

**Vetreteria di Borgonovo, via the Safety Management Service, performs training and information meetings for personnel to ensure the appropriate dissemination of the contents and principles of the model.** The basic objective of the training activity is to provide practical information to ensure compliance with the principles envisaged at legislative and at company level and whose objective is the prevention of accidents and crimes.

**The Management Model must be disclosed and shared because only accurate information and understanding on the part of everyone can guarantee the effectiveness, the appropriateness and the continuous improvement of the Model itself.**

Dissemination is achieved by means of:

- Illustration of the Model on the whole and its specific topics, in the form of targeted meetings with personnel;
- Placement of the document part on the [www.borgonovo.it](http://www.borgonovo.it) website;
- Posting of the documentation on company noticeboards;
- Availability of hard-copy and electronic documentation at the porter's lodge and in multiple company workstations;
- Involvement of external speakers, too;
- Insertion, in contracts with third parties, of the employment termination clause in case of non-compliance with the rules envisaged.

**The Management model is an open, dynamic model subject to continuous changes both due to the evolution of regulations as well as to the need for a systematic and continuous upkeep with the reference operating context.**

To address this situation, Vetreteria di Borgonovo has equipped itself with a **Supervisory Body (SB)**, a new company body whose function is to verify and check the effectiveness of the model implemented with respect to the objectives set, the references of which are displayed in the safety organisation chart. The **SB** refers to the uppermost ranks of the company, has free access to all Company departments, to company documentation and it can rely on suitable financial resources. The **SB** has the task of supervising the correct application and functionality of the Model and referring to the company Management any inadequacy encountered. The **SB** must be informed, by means of dedicated reports, by all company entities obliged to observe Model 231, in the event of presumed inadequacies.

Reports to the SB can be sent by ordinary post to:

**Organismo di Vigilanza (Supervisory Body) c/o Vetreteria di Borgonovo  
Via Pianello, 75, 29011 Borgonovo Val Tidone**

By email to: [organo.vigilanza@borgonovo.it](mailto:organo.vigilanza@borgonovo.it); By fax: +39 0523 865337

**All the rules and provisions of the Management Model envisage the application of sanctions, in the event of breach, as envisaged by the company disciplinary System.** The implementation of disciplinary procedures shall be effected in compliance with the national regulations and the industry-specific National Collective Employment Contract.

The Chairman