

Viva Code of Conduct

Business with common sense

Viva Wine Groups goal is to be a leading wine group in Europe – a sustainable player with a strong focus on growth. We promote sustainable development from grape to glass which includes ethical, social and environmentally sustainable practices. It's about doing good business with common sense, based on honesty, respect, fairness and integrity.

Our Code of Conduct (“Code”) states the fundamental guidelines that describe the framework in Viva Wine Group AB (“the Company”) and its subsidiaries (the “Group” or “Viva Wine Group”) to ensure that all entities within Viva Wine Group is compliant with market conditions and applicable laws and regulations. The Code also serves to ensure that the Group’s values and desired ways of conducting business are communicated and applied throughout the entire organization.

The Code helps our employees to work with respect and integrity in practice. The Code serves as a compass for the employees and sets the foundation for how business shall be conducted in an ethical, social and environmentally sustainable manner while also ensuring a fair and equal treatment of one another.

- From Viva Code of Conduct



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2. Our Code

2.2. Scope

2.3 Responsibilities

2.4 We adhere to our Code

2.5 Whistleblowing

2.2. Scope

The Code of Conduct **applies to all entities**, including subsidiaries and all employees within the Group

2.3 Responsibilities

The responsibility of Viva Wine Group is to encourage an inclusive, transparent and entrepreneurial driven business culture with clear reporting channels to report on any deviations from this Code. It is Viva Wine Group's responsibility that no one shall be subject to any form of negative treatment because of highlighting a potential misconduct.

As an employee your responsibility is to read and understand these principles and apply them to your daily work and decision-making. If necessary:

- ✓ Seek further guidance or clarification from your manager or HR.
- ✓ Raise any concerns or misconduct to your manager and/or HR.
- ✓ Refrain from retaliating against anyone who raises a concern and cooperate in any potential investigations.

As a manager your responsibilities are (in addition as employee):

- ✓ Make the code known within your organisation, and to set a good example.
- ✓ Take proactive steps to reduce any potential risks within your team by regularly discuss actual topics and ensuring that employees feel comfortable raising any concerns they might have.



2.4 We adhere to our Code

We are expected to abide by applicable laws and the principles in this code. In unlikely instances where the code conflicts with the law, the law shall always prevail. In cases where the code sets higher standards than the law, the code shall apply. Each one of us bears the responsibility to adhere to the code and applicable laws.

Violations of our Code can lead to disciplinary action, including termination of employment – regardless of your position in the company. At the same time, we understand that people sometimes make honest mistakes despite good intentions. If that happens, or if you have a question or concern, be accountable, transparent, and speak up.

Keep in mind: Always use your best judgment and common sense. You may encounter difficult and ambiguous situations. In such cases, ask yourself the following questions:

- ✓ Is it compatible with our Code?
- ✓ Is it ethical?
- ✓ Is it legal?
- ✓ Is it beneficial for Viva Wine Group?
- ✓ Are we willing to stand up for our behaviour in public?

If the answer to any of these questions is 'no,' then you should not proceed with your action. If you are unsure, always consult with your superior manager.



2.5. Raising concerns

In case of incident or if something doesn't seem right, it is always best to address the situation directly with the person involved. We are aware that there may be situations where it can be uncomfortable. In such cases you should:

1. Speak with your immediate supervisor, or a higher-level manager, who is responsible for escalating the matter if needed.
2. Speak to HR department, who is responsible for escalating the matter if needed.
3. Contact the Viva Wine Group whistleblowing channel, where you as an employee can report matters anonymously through a third-party provider, for example Lantero.

Note: For more information see your company or group webpage.



For more guidance see:
Whistleblower procedure

3. Ethical Responsibility

3.1 We do not accept corruption

3.2 We disclose conflicts of interest

3.3 We care for fair competition

3.4 We do not misuse insider information

3.5 We protect our data and assets

3.6 We communicate responsibly

3.1 We do not accept corruption

We oppose all forms of corruption. Corruption involves the abuse of a position of trust for personal gain.

This can happen by giving or receiving inappropriate benefits. No employee may accept any form of compensation that can be perceived as corruption or bribery or influence on decisions.

Keep in mind that hospitality and gifts:

- ✓ must be appropriate and of modest value, regardless of the payer
- ✓ must have a clear legitimate business purpose, personal gifts should be avoided
- ✓ A good guardrail is to consider if the action can be publicly communicated without damaging the company's good name and reputation.
- ✓ facilitation payments and political donations are not permitted

In case of any uncertainty make sure to consult your superior manager or Legal for guidance.



3.2 We disclose conflicts of interest

Our business decisions should be based on objective grounds to ensure the best outcome for the Viva Wine Group. Decisions should never be based on subjective or personal relationships.

A conflict of interest occurs when something interferes with or effects an employee's judgment concerning Viva Wine Group's interests. Any engagements which could generate a conflict of interest or competition with Viva Wine Group must be reported to your superior manager. If in doubt, always consult with your superior manager.

We shall avoid situations which might result in a conflict of interest, these situations include but are not limited to:

- ✓ **Business opportunities:** taking advantage of business relations, suppliers or customers for personal gain
- ✓ **Personal relationships:** Be aware of potential conflicts of interest if a family member, relative or close friend is involved in a business activity.
- ✓ **Other assignments or ownership in external operations:**
You may not hold any other employment or engage in commercial work for others without written approval from Viva Wine Group. Involvement in various leisure-related side activities is viewed positively. However, they must not negatively effects work or conflict with Viva Wine Group's business interests or employees' rest and recovery.



For more guidance see:
Anti-Corruption and Related
Party Transaction Policy

3.3 We care for fair and lawful competition

We support free markets and effective competition, and we do not take part in any activities that hinder either of them.

We shall comply with applicable laws and regulations within the field of European competition law.

The regulations prohibit any form agreements or contracts with competitors that unlawfully limit competition, this include but is not limited to; market sharing, price fixing, customer allocation or abuse of dominant position.



For more guidance see:
Anti-Corruption Policy and
contact Head of Legal

3.4 We do not misuse insider information

As a publicly listed company Viva Wine Group are committed to comply with insider regulations. We are committed to disclose timely, complaint and accurate information to the public and to governmental regulators. Any material information which is not released to the public is classified as insider information and may not be used or passed on to any third party. The use or sharing of non-public / insider information is prohibited and considered illegal.

Employees that as part of their work task, learn of material information about any entity within Viva Wine Group shall be a part of the insider logbook. Material information is defined as any information that can influence the stock price and has not been released to the public.

Any abuse of insider trading laws may result in the termination of employment. Furthermore, all violation of insider trading laws will be reported to the police and could result in civil or criminal penalties, including fines or jail sentences.



For more guidance see:
Insider Policy

3.5 We protect our data and assets

We protect the groups information and data assets, including IT-related equipment, from unauthorized access or usage. All employees have a personal responsibility for their equipment and that it is used appropriately.

Keep in mind:

- ✓ **Confidentiality:** We never lend out our identity or password to anyone else.
- ✓ **Accessibility:** We protect our IT environments and systems against intrusions and negative impact.
- ✓ **Integrity:** We preserve the integrity of personal data and manage such with care and in line with GDPR

We also protect our **Intellectual assets**. Intellectual assets can be knowledge, methods, concepts, and ideas, which we develop and use in our professional practice. We protect and manage these assets in the interest of Viva Wine Group. Confidentiality continues to apply even after the employment or contract with Viva Wine Group has ended.

Keep in mind:

- ✓ We do not make company secrets or other critical information available to unauthorized individuals. If applicable, a signed confidentiality agreement from the other party is required.



For more guidance see:
Information Security Policy and User
Responsibility Guidelines

3.6 We communicate responsibly

Our reputation depends on the transparency, accuracy, and consistency of our public statements. While we promote freedom of expression, each of us is responsible and may be held accountable for social media posts or comments on internal platforms inconsistent with our values and our Code.

Keep in mind:

- ✓ Employees shall not give company statements or speak on the behalf of the group to the media or any government or governmental agency without prior authorization from closest responsible manager.
- ✓ Only designated spokesperson for Viva Wine Group may make official public statements concerning the Group.
- ✓ It is the responsibility of all employees to follow the same ethical standards on social media forums as shall be done in all other forms of interactions.



For more guidance see:
Information Policy and HR Policy

4. Social Responsibility

4.1 We promote equal conditions and opportunities

4.2 We invest in wellbeing

4.3 We respect Human rights

4.1 We promote equal conditions and opportunities

We are committed to treating people with respect, regardless of race, religion, gender, political opinion, age, nationality, sexual orientation, civil status, disability, or any other condition or affiliation.

- ✓ We aim to provide a workplace where people can feel comfortable to be themselves and can work free from harassment or bullying of any kind, whether physical, emotional, or sexual.
- ✓ All current and potential employees are evaluated based on their skills and have equal opportunities for employment and job advancement. The company is committed to providing equal pay for equal work.



For more guidance see:
HR Policy

4.2 We invest in wellbeing

We take measures to ensure work-life balance, that our workplace is safe, and that we follow relevant health and safety laws. We shall engage in our work environment and communicate any deficiencies to the responsible parties as soon as possible.

- ✓ No employee shall risk physical or psychological harm in their workplace.
- ✓ We promote a healthy work-life balance
- ✓ We promote a training and learning organization
- ✓ We expect our employees to exercise good judgment and use alcohol with restraint.
- ✓ Abuse of alcohol, drugs and tablets is not accepted at Viva Wine Group. Suspected abuse must be reported to management, and management is obliged to take immediate action on such
- ✓ suspicions to ensure any employee suffering from abuse is getting the necessary help and treatment.



4.3 We respect Human rights

We take responsibility to ensure that we do not infringe on human rights, this also includes human rights within the supply chain. We respect all internationally recognized human rights, including those outlined in the, UN Global Compact, the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work and the United Nations Principles on Business and Human Rights.

As member of amfori BSCI we are committed that together with our business partners exercise human rights due diligence and environmental protection in our global supply chain in line with these internationally recognized principles.

Viva Wine Group is a member of amfori BSCI and adheres to amfori BSCI Code of Conduct, Appendix I. It is a commitment that together with our business partners respect and exercise human rights due diligence and environmental protection in our global supply chain.

- You as an employee also commit to respect the principles in the amfori BSCI Code of Conduct, see appendix.
- Producers must commit to the amfori BSCI principles by signing the amfori BSCI Code of Conduct, or corresponding requirements
- Other suppliers should commit to the amfori BSCI principles by signing our Supplier Code of Conduct, or corresponding requirements.



For more guidance see:
Sustainability Policy and Human Rights Policy



5. Environmental Responsibility

5.1 We invest in environmental sustainability

5.1 We invest in environmental sustainability

Viva Wine Group shall strive to minimize its environmental impact on the planet, specifically addressing:

- Climate change
- Biodiversity
- Water scarcity
- Circularity.

We shall make informed decisions, strive for continuous improvements, and use our resources as efficiently as possible throughout the value chain.

We shall:

- ✓ Reduce the climate footprint from our own operations, cultivation, production, packaging and logistics.
- ✓ Increase biodiversity and reduce water usage by promoting organic and other sustainable farming practices.
- ✓ Increase circularity by use of recycled material and facilitate recycling to minimize environmental impact.



For more guidance see:
Sustainability Policy



6. Implementation

5.1 We invest in environmental sustainability

6.1 Communication and training

- ✓ Employees shall receive information about the Code of Conduct as a part of their employment or when starting at Viva as part of the onboarding procedure
- ✓ Viva employees shall comply with the Code of Conduct and the principles expressed therein.
- ✓ The Code is reviewed and potentially updated on an annual basis. Revisions will be communicated.

Dedicated trainings of employees in risk functions and of persons working in high-risk countries will be considered on a case-by-case basis.





VIVA WINE
GROUP

info@vivagroup.se | +46 8 21 83 88 | vivagroup.se

Viva Wine Group | Blasieholmsgatan 4A | Stockholm | Sweden