

HR Policy

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1. Document update and version history

Version	Owner	Date of Review	Date of Approval	Valid from date
1.0	Group HR Manager	05/02/2025	23/05/2025	23/05/2025

2. Background and purpose

This policy 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 policy also serves to ensure that the Group’s values and desired ways of conducting business are communicated and applied throughout the entire organization.

Viva Wine Group HR Policy is the governing document for HR across all Viva Wine Group geographies and business lines. The purpose of this document is to document the common standards that we have for HR.

3. Scope

The policy applies to all entities including subsidiaries and all employees within the Group

4. Exceptions

There are no exceptions to this policy. Any need of exceptions to this policy must be clearly defined and documented. All deviations shall be approved by the Board of Directors of Viva Wine Group AB. Violation of this policy may result in disciplinary actions such as termination of contract, legal action or indemnification.

5. Leadership and employeeship

5.1 Leadership

Leadership is a cornerstone of Viva Wine Groups success. We believe in cultivating leaders who are collaborative, empathetic, and committed to the development of their teams. Leaders at all levels are expected to exemplify the company’s values, motivate their teams, and drive innovation and performance through clear communication, delegation, and continuous feedback.

Leaders shall align their actions with the organization’s mission, vision, and core values. They should communicate the vision clearly and inspire others to contribute toward achieving it.

Leaders should also invest in the growth and development of their team members. They mentor, coach, and provide opportunities for skill development and career advancement. Leaders are also accountable for the performance of their team. They ensure that goals are met and take responsibility for both successes and failures.

5.2 Employeehip

Employees at Viva Wine Group are expected to follow the organization's policies and guidelines and workplace ethics. An employee is expected to carry out the specific tasks and responsibilities associated with their role, work effectively with colleagues, participating in team projects, and offering support where needed.

6. Development and Performance

Viva Wine Group are dedicated to the ongoing development of all employees through training and career advancement opportunities.

Development opportunities must always be based on competence, experience and ability to perform according to our high standards.

We encourage employees to expand their skills and knowledge in line with both personal goals and the evolving needs of the company.

Regular performance reviews will be conducted to identify areas of growth and to tailor individual development plans.

7. Equality and inclusion

Viva Wine Group shall work to promote equality, diversity, and inclusion within the workplace.

Viva Wine Group aims to ensure that all employees, regardless of background, are treated fairly, with dignity and respect. There shall be a strive to create a working environment where everyone feels welcome, valued, and respected and we embrace differences in backgrounds, perspectives, and experiences within the workforce.

Viva Wine Groups objectives are to:

- Foster an inclusive culture that values diversity.
- Ensure equal access to employment opportunities, career progression, and training for all employees.

8. Recruitment

Recruitment at all levels is a strategic and critical process in order for Viva Wine Group to achieve our objectives. In every recruitment process it is of utmost importance that we ensure a fair, transparent and efficient recruitment process that attracts qualified candidates. This is applicable to all departments and levels of the organization for both internal and external recruitment.

Viva Wine Group commits to providing equal employment opportunities regardless of gender, ethnicity, religion or other belief, sexual orientation, gender identity or expression, disability or age. All recruitment processes shall be based on the skills, qualifications, and fit of the candidate with the job requirements.

Viva Wine Group ensure the privacy of candidates and that their personal data is handled according to data protection laws as well as adherence to local labour laws and employment standards. At Viva Wine Group employment and development opportunities must always be based on competence, experience

and ability to perform according to our high standards and the expectations of our customers and partners.

8.1 Attracting Talent

Viva Wine Group is committed to recruiting the best talent by fostering an inclusive and diverse workplace where every individual has the opportunity to grow and succeed. We aim to create an attractive and competitive employer brand through transparent communication, fair recruitment practices, and equal opportunity for all.

9. Onboarding & Offboarding

Onboarding refers to series of steps and activities that helps new employees get familiar with Viva Wine Group. The onboarding process ensures that every employee has the necessary information, tools, and support to succeed in their new role. Each subsidiary shall have a defined onboarding process in place.

There shall be a defined offboarding process in place for all subsidiaries to ensure that all terminations are handled in a correct and secure manner. The offboarding process aims to ensure that there is a secure transfer of knowledge from the employee to the organisation.

For more guidance, please refer to local employee handbooks.

10. Employee handbook

Viva Wine Group has developed local employee handbooks which outline the Group's policies, procedures, expectations, and benefits. The handbook serves as a guide for employees on how to conduct themselves, what is expected of them, and how various situations will be handled in the workplace.

For more guidance, please refer to local employee handbooks

11. Compensation and benefits

Viva Wine Groups compensation and benefits are means to achieve established goals.

Salaries and benefits shall be adjusted to conditions on each market and follow the requirements of local laws, regulations and collective agreements at the local market.

Compensation packages should ensure that we are able to recruit, retain and develop skilled employees so that we can successfully operate and develop the company.

All salaries are individual and differentiated and shall reflect the employee's skills, experience, performance, and complexity of the job, and encourage good performance and skills development.

Our salary-setting factors and principles should be unbiased. All employees regardless of sex, age, ethnical background, etc. should be treated with respect and in a similar manner and given the same opportunities in accordance with section 5, Equality and inclusion.

12. Health, safety and well-being

12.1 Work environment

At Viva Wine Group, we apply high workplace environment standards to ensure prevention of accidents, incidents, stress and sick leave.

Managers are responsible for ensuring the well-being of the employees, including a reasonable workload. Health and safety issues should be treated with openness and care. Risks must be identified and analysed, and when necessary, measures shall be taken immediately.

As part of the yearly employee reporting, sick leave is being measured and monitored.

12.2 Alcohol and drugs

Abuse of alcohol, drugs and tablets is not in line with Viva Wine Group's Code of Conduct and 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.

12.3 Discrimination and harassment

Viva Wine Group is committed to ensuring a working environment free from discrimination and harassment based on but not limited to gender, ethnicity, religion or other belief, sexual orientation, gender identity or expression, disability or age.

There is a zero-tolerance approach towards any form of discrimination, harassment, or abusive behaviour, including sexual harassment, bullying, and other forms of intimidation. All employees are entitled to fair treatment, regardless of gender, race, age, disability, sexual orientation, religion, or nationality.

In the event of discrimination or harassment, it is the responsibility of management to take measures for further investigation and to ensure appropriate disciplinary action. Procedures for reporting, investigating, and addressing complaints must be clear and accessible to all employees.

13. Collection of personal data

Viva Wine Group is committed to safeguarding personal data in accordance with applicable data protection laws, as the General Data Protection Regulation ("GDPR"). All employee personal information is collected, stored, and processed with utmost care and only for legitimate business purposes. Employees have the right to access, correct, or delete their personal data as necessary.

14. Social Media

Employees must use social media responsibly, maintaining the confidentiality of company information and respecting the privacy of colleagues. While personal use of social media is allowed, employees are

prohibited from posting anything that could harm the Viva Wine Groups reputation or disclose sensitive information.

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.

Only designated spokesperson(s) is allowed to make public statements or speak on the behalf of Viva Wine Group.

15. Whistleblowing

Viva Wine Group encourage employees to report any unethical, illegal, or inappropriate conduct through the company's whistleblowing procedure. Employees can report anonymously if they wish, and all reports will be taken seriously and investigated thoroughly. Retaliation against whistleblowers is strictly prohibited, and the company ensures that all disclosures are handled confidentially.

For more detailed information please refer to the *Code of Conduct* and the *Whistleblower procedure*.

16. Roles and responsibilities

- Group HR Manager of Viva Wine Group is the owner of the policy and is responsible for ensuring that the organization is compliant with the terms and requirements stated in this policy.
- The Board of Directors of Viva Wine Group AB is responsible for approving the policy annually or when deemed necessary.
- All versions of this document shall be kept under strict control. All major changes must be formally approved, recorded in the version history, and communicated to the persons concerned according to their role and responsibilities.
- Group HR Manager of Viva Wine Group is responsible for ensuring that the business complies with the HR Policy and for developing and implementing guidelines, processes, plans and controls necessary to comply with this policy.
- Group HR Manager of Viva Wine Group is responsible for ensuring that this policy is available to all those affected within Viva Wine Group. Every person within Viva Wine Group who is subject to the policy shall read this policy.

17. Monitoring of compliance

- The policy shall annually be reviewed by Group HR Manager.
- The policy shall annually or when deemed necessary be approved by the Board of Directors of Viva Wine Group AB.
- The Group HR Manager of Viva Wine Group shall annually report on policy compliance to the Risk and Internal Control Manager, Group CFO shall present a compiled report on policy compliance to Board of Directors of Viva Wine Group AB annually.
- The Group HR Manager is responsible for developing and implementing internal trainings for all employee within the Group, when deemed necessary.
- The Group HR Manager shall ensure that all personnel who is subject to the policy shall read the policy.

18. Associated document

- Code of Conduct
- Local Employee Handbooks
- Whistleblowing procedure
- Sustainability Policy