

# Human Rights Policy

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## 1. Document updated and version history

Version	Owner	Date of Review	Date of Approval	Valid from date
2.0	Group Sustainability 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 acknowledges the fundamental importance of human rights and labour rights and expects all parts of its supply chain to respect and promote human rights and decent working conditions.

This policy outlines our commitment to respect and promote human rights in all aspects of our operations, in alignment with the United Nations Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights and the ILO Declaration of Fundamental Principles and Rights at Work. These principles are used as a basis for our work and help contribute to a positive impact on local society where Viva Wine Group has production or sourcing.

## 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 deviations to this policy must be clearly defined, documented and reported to the policy owner. All deviations shall be reported to and approved by the Board of Directors of Viva Wine Group AB. Violation of this policy may result in disciplinary actions, which may lead to personal consequences such as termination of employment, legal action, or indemnification.

## 5. Policy declaration

Viva Wine Group is committed to respect and promote internationally human rights in our relationships with our employees, suppliers, and other business partners. We support the United Nations Guiding Principles on Business and Human Rights, The Universal Declaration of Human Rights and the ILO Declaration of Fundamental Principles and Rights at Work. Viva Wine Group enforce these international standards through the membership and commitment to the amfori BSCI Code of Conduct and thereby agrees to respect principles and exercise human rights due diligence and environmental protection in the value chain.

Viva Wine Group categorizes its suppliers into two groups:

- **Direct supplier:** These suppliers are involved in the entire process of bringing beverages from farm to shelf, including cultivation, production, logistics, and packaging, and are expected to adhere to the amfori BSCI Code of Conduct.
- **Indirect Supplier:** All other suppliers fall into this category and are expected to adhere to the Code of Conduct for Indirect Suppliers.

### **Labour and Human rights principles**

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

This policy encompasses the 13 focus areas identified in the amfori BSCI Code of Conduct.

- Social Management System and Cascade Effect
- Workers Involvement and Protection
- The Rights of Freedom of Association and Collective Bargaining
- No Discrimination, Violence or Harassment
- Fair Remuneration
- Decent Working Hours
- Occupational Health and Safety
- No Child Labour
- Special Protection for Young Workers
- No Precarious Employment
- No Bonded, Forced Labour or Human Trafficking
- Protection of the Environment
- Ethical Business Behaviour

We expect our producers and suppliers to comply with the requirements in these principles, including environmental, social, and human rights requirements whilst maintaining the utmost quality and safety standards.

## **6. Due diligence**

### **Risk Assessment**

Viva Wine Group continuously, and at least annually, screen, monitor and follow-up on human rights and labour rights risks across the supply chain.

- The risk analysis is at first hand country based, meaning which country the product is produced and where grapes or crop is farmed. However, the risk of violation of human rights within agriculture has increased in all countries.
- To reduce risk, Viva Wine Group promote producers and farmers to certify according to internationally acknowledged third party audited management systems that address human rights and labour conditions, such as Fairtrade, Fair For Life and Wieta.

## **Audits**

- Based on risk assessment, Viva Wine Group orders third party audits through amfori conducted by independent auditing firms. The audits are based on the amfori BSCI Code of Conduct and review human rights and labour conditions.
- In case of breaches to the Policy, producers and farmers will undergo the mitigation process and severance mechanism established by amfori BSCI. In case of severe breaches to the Policy or failure to mitigate within agreed timeframe, contracts can be terminated.

## **Stakeholder Engagement**

Viva Wine Group shall continuously engage with stakeholders, including employees, local communities, NGOs and memberships in e.g. amfori BSCI to understand and address human rights concerns.

## **7. Implementation and integration**

### **Training and Awareness:**

Viva Wine Group provide training for employees and management on our company policy and human rights issues.

### **Operational Integration**

Viva Wine Group integrate human rights considerations into the business processes, including procurement and supply chain management.

- At producer visits, employees are expected to verify that the producer is aligned with the amfori Code of Conduct. To facilitate the producer dialog, regardless of previous experience, there is a producer visit checklist that supports employees in the dialogue regarding human rights, labor conditions and environmental performance.

## **8. Monitoring and reporting**

### **Performance Indicators**

Viva Wine Group has key performance indicators (KPIs) to monitor the effectiveness of the human rights policy. The KPIs are reviewed on an annual basis.

### **Transparency**

Viva Wine Group shall annually communicate and report on human rights and labour rights risks and status in the Annual and Sustainability Report. Progress shall be documented and made available publicly on Viva Wine Groups Website.

## **9. Grievance mechanisms**

A grievance mechanism is a tool for individual workers to report perceived abuses and violations, e.g. regarding human rights and labour conditions.

### **Grievance mechanism in the value chain**

Viva Wine Group shall inform and appropriately verify (e.g. by producer dialog, producer visits or third-party amfori BSCI audits) that producers have established a grievance mechanism that offers opportunities for workers to make their voices heard anonymously and that there is a remedy procedure where complaints are managed by someone other than the direct reporting manager.

### **Grievance mechanism at Viva Wine Group**

Viva Wine Group has established a whistleblowing process for employees and business partners, more detailed information can be found in our *Whistleblowing procedure*.

If any employee or business partner suspects a policy violation, they can report concerns through the following channels:

1. **Direct Supervisor:** Employees can report directly to their immediate supervisor who is responsible for escalating the matter if needed.
2. **Human Resources:** Employees can contact the HR department, who is responsible for escalating the matter if needed.
3. **Anonymous channel:** Employees and business partners can report concerns anonymously through the whistleblower channel, provided by the third party Lantero ([www.lantero.report/viva](http://www.lantero.report/viva)).

No retaliation will be taken against any employee for raising concerns. Viva Wine Group will investigate, address, and respond to the concerns and will proceed to take any necessary corrective action in response to any violation.

For more detailed information refer to the *Whistleblower procedure*.

## **10. Roles and responsibilities**

- The Group Sustainability 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.
- The Group Sustainability Manager of Viva Wine Group is responsible for ensuring that the business complies with the Human Rights Policy and for developing and implementing guidelines, processes, plans and controls necessary to comply with this policy.
- The Group Sustainability 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.

## **11. Monitoring of compliance**

- The policy shall annually be reviewed by the Group Sustainability Manager

- The policy shall annually or when deemed necessary be approved by the Board of Directors of Viva Wine Group AB.
- The Group Sustainability Manager 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 Sustainability Manager is responsible for developing and implementing internal trainings for all employees within the Group, when deemed necessary.
- The Group Sustainability Manager shall ensure that all personnel who is subject to the policy shall read the policy.
- The Group Sustainability Manager of Viva Wine Group is, together with the entities within the group, responsible for managing the third-party audits of producers conducted by Viva Wine Group in accordance with amfori BSCI.
- Group Sustainability Manager of Viva Wine Group are responsible for compiling the results from the performed audits.

## **12.Associated documents**

- Code of Conduct
- Code of Conduct for Indirect Suppliers
- Whistleblowing procedure
- Sustainability policy