

Supplier Code of Conduct

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1. Document updates and version history

Version	Owner	Date of Review	Date of Approval	Valid from date
2.0	Group CEO	03/12/2025	03/12/2025	10/12/2025

2. About the Supplier Code of Conduct

Viva Wine Group's 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.

It is only together with our producers and suppliers that we continuously can improve the conditions throughout the value chain. Viva Wine Group support the UN Guiding Principles on Business and Human Rights, The Universal Declaration of Human Rights and the ILO Declaration of Fundamental Principles and Rights at Work. Producers and suppliers in the Viva Wine Group supply chain are expected to adhere and respect these principles.

Viva Wine Group categorize 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.
- **Indirect Supplier:** All other suppliers fall into this category.

2.1 Direct Suppliers' Commitment

Wine Group is a member of the amfori business organisation for sustainable trade and is committed to the [amfori BSCI Code of Conduct](#) which aims to exercise human rights due diligence in the supply chain. All Direct Suppliers, which are the majority of our suppliers, shall commit to the human rights principles by signing the amfori BSCI Code of Conduct.

2.2 Indirect Suppliers' commitment

Viva Wine Group rely on and cooperate with many different Indirect Suppliers, where other types of conduct may be of higher importance. For this reason, we have adopted this Supplier Code of conduct (the "Code"). We expect our Indirect Suppliers to comply with this Code and to ensure that any subcontractors are compliant with the Code.

2.3 Scope and commitment

The Code applies to Indirect Suppliers that Viva Wine Group has assessed as essential from a risk or business perspective.

By signing the Code, you commit to comply with laws and regulations and to work proactively to meet the requirements of the Code. In cases where applicable laws or regulations differ from the Code, the strictest standard and/or interpretation shall apply.

As an Indirect Supplier, you must certify that your employees, suppliers and partners live up to the requirements set out in the Code. "Indirect Supplier" is hereinafter the party that signed this document.

Viva Wine Group treats all information about the individual supplier confidentially but reserves the right to share overall results and information from evaluations and potential audits to disclose developments in the supply chain.

If you, as an Indirect Supplier, repeatedly fail to follow the Code or provide incorrect information, Viva Wine Group will take this specifically into consideration for future business relationships.

The Code covers the following areas:

1. Management
2. Business ethics
3. Environmental responsibility
4. Working conditions and human rights
5. Health and safety

3. Management

The Indirect Supplier shall work systematically to ensure that the requirements in the Code as well as applicable laws and regulations are complied with and work for continuous improvements. The Indirect Supplier should ensure the following:

3.1 Responsibility

Assigned responsibility, preferably at management level, for environment, ethics and social issues as well as in the supply chain.

3.2 Policies and routines

Policies and routines that include the requirements in the Code, and which are communicated to employees and suppliers.

3.3 Compliance - laws and permits

Routines for ensuring compliance with applicable laws and maintaining valid operating licenses required by applicable laws and regulations

3.4 Goals and internal follow-up

Indicators and goals for monitoring development within ethics, environment and social conditions.

3.5 Supply chain

Routines for monitoring the requirements in the supply chain, from a risk-based approach.

3.6 External follow-up

Allow Viva Wine Group, or third parties on behalf of Viva Wine Group, to audit and evaluate the supplier in accordance with the Code, unless the equivalent can be verified by other third-party audits.

4. Business ethics

We advocate free trade, open and fair competition and an ethical approach. The Indirect Supplier must ensure the following:

4.1 Anti-corruption

Zero tolerance of any form of abuse of power for the benefit of oneself or another party. For example, by taking or giving a bribe or other gift, or abusing a position of trust. Comply with the UN International Anti-Corruption Convention and applicable anti-corruption laws, regulations, industry standards and best practice in the countries where the supplier operates.

4.2 Anti-money laundering

Comply with applicable anti-money laundering laws to counteract all forms of money laundering internally and in their relations with subcontractors.

4.3 Import/ Export controls and sanctions

That transactions with third parties or subcontractors always comply with applicable laws relating to import and export controls as well as any sanctions. This include but is not limited to economic, financial and trade sanctions.

4.4 Ensuring fair competition

Conduct business with fair competition and not initiate unlawful discussions or enter an agreement with competitors regarding price fixing, market share or customer allocation which would be a violation of applicable competition law.

4.5 Protection of rights and information

Respect immaterial rights and information of Viva Wine Group and only use or pass on information which are required to uphold the agreement towards Viva Wine Group in accordance with applicable law.

4.6 Brand and other trademarks

The Indirect Supplier is not allowed to use the name, brand or trademark of Viva Wine Group, or any other intellectual property belonging to Viva Wine Group of any of its affiliates, without prior written approval from Viva Wine Group.

4.7 Information security and integrity

The Indirect Supplier must work continuously to ensure, correct IT security in accordance with the best industry standard and always comply with current legislation.

Manage and protect personal information concerning Viva Wine Group. The Indirect Supplier must comply with laws and regulations for confidentiality and information security when personal information is processed.

5. Environmental responsibility

The Indirect Supplier shall actively limit and reduce its negative environmental impact. The Indirect Supplier must ensure the following:

5.1 Measure, monitor and reduce

Identify its material environmental impact and measure, monitor and reduce greenhouse gas emissions from the business direct and indirect emissions (scope 1, 2 and 3 according to Greenhouse Gas Protocol).

5.2 Reporting

Upon request from Viva Wine Group, be able to report greenhouse gas emissions for the products or services provided, or alternatively a proportion of emissions that are linked to Viva Wine Group's operations.

5.3 Circular products and services

There should be a strategy for the products and services provided, that takes a circular economy into account: materials, sustainable design, manufacturing, reuse and recycling.

5.4 Transports

Any transport takes place in the most resource- and climate-efficient way possible. Fossil-free alternatives shall be used wherever possible.

5.5 Waste

Systematic approach to identifying, managing, reducing, and recycling waste.

5.6 Hazardous waste

Chemicals, waste, and other materials that entail a hazard to humans and/or the environment shall be identified, labelled, and managed to ensure safe handling, transport, storage, use, recycling or reuse and disposal.

6. Working conditions and human rights

The Indirect Supplier must comply with recognised human rights and labour rights and promote a culture where all employees feel safe to express themselves freely.

6.1 Worker's involvement

All employees have written employment contracts stating their rights and obligations, signed by both parties, in a language understood by the employee. A copy of the agreement must be issued to the employee.

6.2 Salaries and compensation

Employees receive reasonable compensation to meet basic needs, including certain savings. Employees are guaranteed the applicable national statutory minimum wage or prevailing industry wage.

Follow laws and industry standards for regular working hours. All overtime is voluntary, unless necessary and required by local laws. The employees shall have the right to breaks which are reasonable in relation to the working conditions.

Salary shall be paid to the employee on agreed time and the supplier shall guarantee equal salary for equal work regardless of gender.

6.3 Freedom of association and collective agreements

Employees have the right to form and join any trade union and freely choose to collective bargaining. In countries where the rights of freedom of association and collective bargaining are restricted by law, the supplier must allow employees freely to choose their own representatives.

6.4 Right to freedom of expression and integrity

The rights of freedom of expression and integrity is respected and supported for all employees.

6.5 Non-discrimination and anti-harassment

No one is discriminated based on, but not limited to, gender, age, sexual orientation, ethnicity, nationality, social or cultural background, disability, parental status, membership, political or religious beliefs or marital status. Decisions on employment, salaries, benefits, training opportunities, tasks, advancement, discipline and dismissal may only be based on the employee's experience, qualifications and performance.

Promote a workplace free from harassment and abuse, whether physical, mental, verbal or sexual in nature.

6.6 Oppose forced labour

Do not participate in, or support any form of forced labour, whether it is forced labour, prison labour or human trafficking. The work shall be conducted voluntarily, and the employee must have the right to end their employment within a reasonable notice. The supplier shall not withhold identity documents, work permits or salary to force an employment.

6.7 Child labour and young workers

Child labour is forbidden. Employees must be at least 15 years old and comply with:

- the national minimum age for employment or
- the minimum age for mandatory school attendance.

If the Indirect Supplier discovers any child labour in their business activities or supply chain, it is the Indirect Supplier's responsibility to act in the best interest of the children.

7. Health and safety

We expect our Indirect Suppliers to use a risk-based approach to prevent health and safety risks. The Indirect Supplier must ensure the following:

7.1 Preventive measures

Identify, evaluate and manage health and safety risks. Identify emergencies and implement plans and procedures for these situations.

7.2 Training and protective equipment

Train employees in health and safety issues relevant to their work tasks and ensure that protective equipment is used where considered necessary.

7.3 Incidents and accidents

Work-related accidents and incidents are reported, analysed, followed up and managed. Accidents and incidents are documented.

8. Grievance Mechanism

The Indirect Supplier shall establish or participate in effective operational-level grievance mechanisms for individuals and communities who may be adversely impacted and maintain accurate records. The operational-level grievance mechanism should be accessible in relevant local languages and should allow to address and remedy the issues effectively across jurisdictions through partnerships and coordination.

Viva Wine Group provides a safe and confidential mechanism for external stakeholders to report any misconduct, unethical behaviour, or violations within Viva Wine Group's organization. If any suspicion of a policy violation, they can report concerns through the whistleblowing channel, provided by the third part Lantero (www.lantero.report/viva)

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

9. Exceptions

There are no exceptions to the Code. Any breach or deviation from the Code must immediately be reported to policy owner. A breach or deviation from the Code will, unless expeditiously rectified, be considered when evaluating current and future business relations.

10. Roles and Responsibilities

- The Group CEO of Viva Wine Group is the owner of the Code 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 Code 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 indirect suppliers have committed to the Code, by signing the Code.
- The Group Sustainability Manager of Viva Wine Group is responsible for ensuring that this Code 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 Code.

11. Monitoring of Compliance

- The Code shall annually be reviewed by the Group CEO
- The Code 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 of Viva Wine Group is responsible for annually reviewing that Indirect suppliers has signed the Code.
- The Group Sustainability Manager is responsible for developing and implementing internal trainings for all relevant stakeholders within the Group, when deemed necessary.
- The Group Sustainability Manager shall ensure that all personnel who is subject to the shall read the policy.

12. Appendix A – Confirmation of the Supplier Code of Conduct

Confirmation of the Supplier Code of Conduct

By signing this document, I as signatory of the Company below (business partner to Viva Wine Group or its subsidiaries) confirm that the Company endorse the Supplier Code of Conduct and that the Company is committed to take all appropriate measures to observe the values and principles of the Supplier Code of Conduct.

Signature on behalf of the Company

Date of the signature

Name of the Company

Name of the signatory