

# Sustainability policy

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## 1. Document updates 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.

The Viva Wine Group Sustainability Policy identifies key priority areas defined by the Double Materiality Assessment (CSRD), highlights general guidelines, and clarifies desired business approach. The policy is supplemented with area specific policies, detailed group and business segment targets and action plans.

## 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. Commitment to international standards

Viva Wine Group shall contribute to the UN Sustainable Development Goals and align its climate strategy with the Paris Agreement. Relevant goals are integrated in the sustainability strategy and action plans and monitored accordingly.

Viva Wine Group shall comply with the following international principles and guidelines regarding environment, human rights, labour conditions, anti-corruption and business ethics:

- The Ten Principles of the UN Global Compact, including:
  - UN Guiding Principles on Business and Human Rights
  - The Universal Declaration of Human Rights
  - ILO Declaration of Fundamental Principles and Rights at Work
  - Rio Declaration on Environment and Development
  - UN Convention against Corruption

- OECD Guidelines for Multinational Enterprise
- OECD Anti-bribery Convention

As members of amfori BSCI Viva Wine Group shall also comply with the amfori BSCI Code of Conduct.

## **6. Policy declaration**

Viva Wine Group acknowledges its impact on planetary and social-economical systems and shall conduct its operations with respect for people and planet while securing long-term business success. The Viva Wine Group Sustainability Policy defines our overarching ambition and commitments, regarding the fundamental pillars: environment, social and governance.

### **6.1 Environmental responsibility**

Viva Wine Group shall strive to minimize the environmental impact throughout the value chain, specifically addressing climate change, biodiversity, water scarcity and circularity.

Viva Wine Group shall make informed decisions, strive for continuous improvements, and use our resources as efficient as possible throughout the value chain.

#### **Climate change**

Viva Wine Group shall:

- Purchase renewable electricity, including Energy Attribute Certificates (EACs) to our offices and optimize energy consumption. Recycle paper, plastic, glass, metal, and electronics. Encourage sustainability certified supplies.
- Evaluate necessity for business travel.
- Encourage organic and other sustainable farming practices to reduce emissions generated from farming, e.g. reduce use of fertilizers and fossil energy.
- Encourage producers to use fossil-free energy in production and optimize energy consumption.
- Optimize logistics flows and prioritize sustainable transport by rail and boat and embrace fossil-free road transport when possible. Reduce emissions through co-distribution, sustainable transports and innovative bottling and warehousing solutions.
- Evaluate and encourage climate-smart packaging, e.g. lightweight glass, PET, Tetra and Bag-in-Box.
- Evaluate carbon offsetting and insetting as supplementary means to reduce climate impact globally and generate societal benefits locally.

#### **Biodiversity and water scarcity**

Viva Wine Group shall:

- Request producers to identify the environmental impacts of their operations (including but not limited to climate impact, biodiversity and water usage), and implement adequate measures to prevent, mitigate and remediate adverse impacts on the surrounding communities, natural resources, climate, and the overall environment.
- Promote organic and other sustainable farming practices to help increase biodiversity and reduce water use in farming.

## **Circularity**

Viva Wine Group shall:

- Work together with partners to reduce consumption of packaging materials. Seek to increase the use of recycled material and facilitate recycling to minimise environmental impact.

## **6.2 Social responsibility**

Viva Wine Group is committed to respect human rights in accordance with international standards in relationships with employees, suppliers, and other business partners.

### **Own workforce**

Viva Wine Group shall:

- Strive for an equal and inclusive workplace. Recruit those who are best qualified and see diversity as an asset. Ensure that all employees develop and reach their full potential as an equal, fair, and merit-based workplace benefits the individual and the organization alike.
- Invest in wellbeing. Take measures to ensure a good work-life balance, a safe workplace, compliance with relevant health and safety laws. The workplace should be safe, inclusive, equal, and developmental for all employees.

*For further guidance see: HR Policy*

### **Workers in the value chain**

As a member of amfori BSCI, Viva Wine Group adheres to the amfori BSCI Code of Conduct and requires Direct Suppliers (involved in cultivation, production, logistics, and packaging) to adhere and sign the amfori BSCI Code of Conduct to ensure fair and decent working conditions. This covers but is not limited to:

- Working hours and remuneration must comply with legislation and international agreements.
- All workers shall have the right to organize and negotiate terms collectively.
- Discrimination is not accepted
- Health and safety of workers must be respected.
- All forms of child and forced labour are prohibited.

Viva Wine Group strive for continuous improvements, work together with partners in a solution-oriented way and favour transparency and act on all possible shortcomings. Viva Wine Group regularly carry out site visits and conduct audits, preferably by independent third parties.

In addition, workers rights and working conditions for Indirect Suppliers (all other suppliers) are managed through the Code of Conduct for Indirect Suppliers.

*For further guidance see: Human Rights Policy, amfori Code of Conduct and Code of Conduct for Indirect Suppliers.*

### **Consumers and end users**

Viva Wine Group sell wine, spirits and other alcoholic beverages. We believe, that when consumed responsibly, our beverages can contribute to enjoyment and bringing people together. Additionally, they create opportunities for farming communities around the globe. We encourage conviviality but are aware that alcohol consumed irresponsibly can create problems, both for individuals, relatives, and society at large.

Viva Wine Group shall:

- Encourage moderate and responsible drinking. Example given through initiatives led by the industry organisations that include healthy attitudes to alcohol and support multi-stakeholder and science-based initiatives promoting responsible drinking, including combatting of underage drinking, information on hazards of alcohol during pregnancy, and “don’t drink and drive”-campaigns.
- Market its products responsibly, respect national advertising laws and champion supervision, self-regulation, and Industry Code of Ethics.

## **6.3 Governance**

### **Business ethics and anti-corruption**

Viva Wine Group shall:

- Adhere to high ethical standards, both at office and in external business relationships. Always strive to be good role model and lead by example.
- 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.

*For further guidance see: Anti-Corruption Policy*

### **Transparency and Accountability**

Viva Wine Group shall:

- Strive for full transparency in the value chain and work for continuous improvements.
- Hold itself accountable to meet the commitments outlined in this policy.

### **Grievance Mechanism**

Viva Wine Group, its’ producers and suppliers shall provide an effective operational-level grievance mechanisms for individuals and communities who may be adversely impacted and maintain accurate records.

Viva Wine Group provides a safe and confidential mechanism for employees and 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](http://www.lantero.report/viva)).

## 7. Communication and Training

All employees within Viva Wine Group shall receive information and training on the statements of this policy during onboarding and when policy is updated.

## 8. Roles and responsibilities

- The Group Sustainability 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.
- The Group Sustainability Manager of Viva Wine Group is responsible for ensuring that the business complies with the Sustainability 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.

## 9. Monitoring of compliance

To ensure Viva Wine Group Sustainability Vision and Ambitions are fulfilled, Group and Business Segment specific targets shall be set and followed up on a regular basis. The targets shall be reviewed every year.

- 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 employees within the area of sustainability, when deemed necessary.
- The Group Sustainability Manager shall ensure that all personnel who is subject to the policy shall read the policy.

## 10. Associated Documents

- Code of Conduct
- Code of Conduct for Indirect Suppliers
- Amfori BSCI Code of Conduct
- Anti-corruption policy
- Human Rights Policy
- HR Policy