

Anora Code of Conduct for Business Partners

Introduction

As a leading wine and spirits company in the Nordic and Baltic countries, Anora Group (hereinafter “Anora”) is committed to developing responsible and sustainable policies in its operations. A responsible value chain is an essential part of the responsibility and sustainability program at Anora, and we expect responsible and sustainable policies and their development also from our Business Partner.

Our Business Partners are also committed to amfori BSCI Code of Conduct.

This Code of Conduct applies to Business Partners and their suppliers and subcontractors

In this Code of Conduct, a "Business Partner" refers to a person or organisation collaborating with Anora. “Business Partner” covers all stakeholders involved in the value chain of Anora’s goods and/or services or any other entities operating with Anora.

The Business Partner agrees to follow in its operations the minimum requirements set in this Code of Conduct in addition to the legislation and regulations of its operating countries, with the strictest of these always complied with.

To evaluate the Business Partner’s compliance with this Code of Conduct, Anora or a third party authorised by Anora shall have the right to audit the Business Partner.

The Business Partner shall, on request, provide information to Anora regarding issues covered by this Code of Conduct, unless this would conflict with its statutory obligations on disclosure of information.

Anora may from time to time amend this Code of Conduct.

Enforcement of the Code of Conduct

- This Code of Conduct is an irremovable part of the contracts and established cooperation processes between Anora and the Business Partner.
- Should the Business Partner observe any action, policies or procedures violating this Code of Conduct in their operations or those of any of its suppliers or subcontractors, the Business Partner shall immediately notify Anora and take immediate action to correct the situation.
- In case of non-compliance by the Business Partner with any of the principles set out in this Code of Conduct, Anora may give a written notice to the Business Partner and initiate a dialogue with the Business Partner with the aim of discontinuing the non-compliance.
- If the Business Partner does not correct their actions, policies and practices or if the Code of Conduct has been significantly violated, Anora shall have the right to terminate the contract and cooperation with the Business Partner.

Basis for this Code of Conduct

This Code of Conduct is primarily based on the following international agreements and principles: UN Universal Declaration of Human Rights, UN Global Compact and amfori Business Social Compliance Initiative (BSCI).

Human rights

In its operations, the Business Partner shall respect the UN universal human rights and ensure that they are in no way partaking in violations of human rights.

Basic rights of employees

- The Business Partner shall recognise the employees' right to unionise, join a trade union and negotiate collectively.
- All employees shall be treated equally and not be discriminated against.
- The use of child and forced labour is absolutely forbidden. Children under the mandatory, law-regulated school age, which must be at least 15, shall not be employed unless the criteria for exceptions defined by the International Labour Organization (ILO) is met. According to ILO, having children help do chores at home or in family business operations outside school hours and during holidays is not considered child labour.
- The Business Partner shall ensure that the employment of young people meeting the minimum age limit but under the age of 18 does not hinder their education, health, safety or psychological development.

Wages and working hours

- The employees' wages shall be based on legal, documented agreements.
- The wages paid to the employees shall be at least the minimum wage defined in national legislation or an applicable collective agreement, whichever is higher.
- Employers shall comply with working hours according to the applicable legislation and collective agreements. In the event that there is none, the employer shall ensure that the regular working hours are a maximum of 48 hours per week. In exceptional cases defined by the ILO, the 48-hours working week may be exceeded whereupon overtime is allowed. Each employee shall have at least one day off in seven days.

- Overtime shall be voluntary and the working hours and overtime compensation shall comply with local legislation and the regulations set in collective agreements.

Occupational health and safety

- The Business Partner shall comply with all the statutory occupational health and safety regulations.
- The Business Partner shall guarantee the health and safety of their employees and visitors.
- The Business Partner shall have an appointed person in charge of occupational health and safety issues.
- The Business Partner shall have systems to evaluate, reduce and eliminate occupational health and safety risks.

Environmental responsibility

- In its operations, the Business Partner shall comply with all the regulations related to environmental legislation.
- The Business Partner shall estimate, attempt to reduce and prevent substantial environmental impacts caused by their operations and create efficient policies and operational models to implement environmental responsibility.
- The Business Partner shall strive for circularity in its operations.
- The Business Partner shall have a water management plan and strive for decreasing use of water particularly in water scarcity areas.
- The Business Partner must understand the impacts its business may have on biodiversity, and as relevant, act to safeguard biodiversity with for example adopting regenerative farming methods.
- The Business Partner shall aim to reduce energy use, shift from fossil energy to renewable energy sources and actively monitor and strive to reduce greenhouse gas emissions in its own operations and supply chain.
- The Business Partner shall proactively work to prevent environmental incidents and to take preventive, mitigative and corrective measures to any adverse impacts towards the environment.

Deforestation

- Anora is committed to eliminate deforestation from Anora's supply chains.
- In relation to all materials Anora purchases, Business Partners are expected to follow the requirements set forth by EU's deforestation legislation. Business Partners shall implement procedures to verify that wood-based materials and derivatives purchased by Anora are legally harvested and traded.
- To achieve no deforestation, Anora's Business Partners shall ensure that sourcing of raw materials throughout the value chain:
 - Do not come from primary forests or any other pristine natural ecosystems.
 - Do not cause deforestation, which includes development of tropical peat lands, conversion of natural forests, high conservation value (HCV) areas and forests of high carbon stock (HCS) to agriculture, tree plantations, or other land uses, or severe human-induced degradation.

Business integrity and compliance

- The Business Partner shall not take part in corruption, bribery, blackmail or fraud in any form.
- The Business Partner shall operate in accordance with the regulations of competition legislation.
- The Business Partner shall comply with the rules and regulations related to the quality and safety of products and services as well as the Anora safety and quality requirements.
- The Business Partner shall respect the intellectual property rights of Anora and any information, technology and know-how shall be used without risking the intellectual property rights of Anora.
- The Business Partner shall record and report information related to business operations, corporate structure, financial situation and results in a reliable and transparent manner according to the applicable legislation or the regulations of the industry.
- The Business Partner shall maintain a system for employees to anonymously and reliably report any suspected illegal or unethical behavior or actions (so-called whistleblowing system).
- The Business Partner shall represent and warrant that neither it, nor any of its beneficial owners or shareholders or directors, employees, or to its knowledge any of its agents, representatives or any other person working on its behalf is subject to any sanctions administered or enforced by the U.S. Department of the Treasury's Office of Foreign Assets Control ("**OFAC**"), the United Nations Security Council ("**UNSC**"), the European Union ("**EU**"), Her Majesty's Treasury ("**HMT**"), or other relevant sanctions authority (collectively "**Sanctions**"). The Business Partner shall not directly or indirectly distribute or sell goods to an entity, individual, country or territory that is subject to any such Sanctions.