



## Anora Code of Conduct for Suppliers and Subcontractors

### 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 supply chain is an essential part of the responsibility programme at Anora, and we expect responsible and sustainable policies and their development also from our suppliers and subcontractors.

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

In this Code of Conduct, a "Supplier" refers to a person or organisation delivering goods and/or services to Anora. “Supplier” covers all suppliers and subcontractors involved in the supply chain.

The Supplier 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 compliance of this Code of Conduct, Anora or a third party authorised by Anora shall have the right to audit the Supplier.

The Supplier 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 Supplier.
- Should the Supplier observe any policies or procedures violating this Code of Conduct in their operations or those of any of its suppliers or subcontractors, the Supplier shall immediately notify Anora and take immediate action to correct the situation.
- In case of non-compliance of the Supplier with any of the principles set out in this Code of Conduct, Anora shall give a written notice to the Supplier providing also sufficient evidence to support the alleged non-compliance, initiating a dialogue with the Supplier with the intent to discontinue the non-compliance.
- If the Supplier does not correct their 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 supplier.

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## 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 Business Social Compliance Initiative (BSCI).

## Human rights

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

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## Environmental responsibility

- In its operations, the supplier shall comply with all the regulations related to environmental legislation.
- The supplier 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.

## Responsible policies

- The supplier shall not take part in corruption, blackmail or fraud in any form.
- The supplier shall operate in accordance with the regulations of competition legislation.
- The supplier 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 supplier 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 supplier shall record and report information related to business operations, corporate structure, financial situation and results in a transparent manner according to the applicable legislation or the regulations of the industry.
- The supplier should use a system for employees to anonymously and reliably report any defects and flaws observed in the responsibility issues of the company (so-called whistleblowing system).