RESPONSIBLE MARKETING POLICY

Anora Group Plc

Foreword

At Anora, we are proud of our brands, our people and the creativity that helps us connect with consumers every day. Operating in the wine and spirits industry means that we work in a highly regulated environment, but responsible marketing is about much more than compliance. It is about earning trust, acting with integrity, and making choices that shape and support our long-term success.

We encourage bold ideas, innovation, and open collaboration. At the same time, we expect all our marketing and commercial communications to respect applicable laws, regulations and the principles set out in this Policy. When creativity and responsibility go hand in hand, together we can build stronger brands, inspire consumers, and contribute to a responsible drinking culture.

This Responsible Marketing Policy supports our Code of Conduct and provides a common framework for everyone involved in marketing and selling our products. By following these principles, we can continue to create engaging and effective communications, while maintaining the high ethical standards that define Anora.

Kirsi Puntila
CEO

1. Introduction

Anora is a leading wine and spirits brand house in the Nordic and the Baltic region, with an ambition to be an industry forerunner in sustainability. Our three business segments are Wine, Spirits and Industrial. Our market-leading portfolio consists of our own iconic Nordic brands and a wide range of prominent international partner wines and spirits. Our business operations also include world-class industrial operations in distillation, bottling and logistics services. Our key products include wines, spirits, low-alcohol ready-to-drink-products and non-alcoholic drinks. We also provide industrial products from the side-streams of the production process, such as starch, feed components, and technical ethanol for industrial customers.

At Anora, we are dedicated to conducting our marketing activities in a responsible and ethical manner, recognizing the potential adverse social and health impacts alcoholic products can have on society and individuals. In our Nordic core markets, marketing of alcoholic beverages is also strictly regulated. As a prominent participant in the wine and spirits industry especially in the Nordics, we commit to upholding the highest standards of responsible marketing, adhering to all applicable laws and regulations as well as the guidelines and principles outlined in this policy. We also support and promote a responsible drinking culture.

These guidelines are intended to give you a general understanding of the rules and regulations that apply to alcohol marketing in the geographical areas where Anora operates and how Anora complies with them.

2. Guiding principles

The following principles guide Anora's marketing activities throughout our operating markets. Compliance with these principles and this policy is mandatory. This is Anora's minimum standard policy for all external marketing communications. In jurisdictions where local laws are stricter, they supersede our policy.

2.1. Legal compliance and country-specific regulations

We adhere to all applicable laws and regulations related to the marketing, advertising, and promotion of our wine and spirits products. We duly respect and consider all local laws, regulations and guidelines in the countries in which we operate and apply them in our marketing actions. For example, in Finland, we adhere to Finnish legislation, which together with the Finnish Supervisory Agency's guidelines on alcohol marketing form one of the strictest sets of alcohol marketing rules in the EU. In Norway, where all alcohol-related marketing measures are prohibited, we refrain from all marketing of our alcoholic products.

2.2. Audience and contextual placement

Our marketing communications are targeted exclusively towards individuals of legal drinking age, which is why we do not place marketing in media or contexts that target individuals under the legal drinking age. This includes platforms and content popular among young audiences. We implement age verification mechanisms for online platforms and events to ensure that our messages are only targeted to those of legal drinking age. The use of cartoons, fairy tale characters or youth culture idols or phenomena that attract children and young people is strictly prohibited in our marketing, as is the use and portrayal of minors in marketing.

In addition to minors, we also protect other vulnerable individuals from our marketing, such as those suffering from alcohol misuse. We never target our marketing content at persons to whom alcoholic beverages may not be sold or should not be sold. These include, among others, people who are pregnant. Also, in line with our goal of supporting a responsible drinking culture, we develop no- and low-alcohol beverages to ensure inclusivity for people in different situations and with different preferences. Non-alcoholic options should be available at all events, sales points, and other occasions where we promote our alcoholic products.

2.3. Responsible consumption message

We are proud of our brands and want our products to be enjoyed responsibly. We believe in a sustainable and responsible drinking culture, which aims to minimize alcohol-related harm while supporting the positive aspects of enjoying drinks with moderation and ensuring that everyone has the freedom and opportunity to choose excellent non-alcoholic alternatives. We acknowledge that alcoholic products can have negative effects and are meant to be enjoyed responsibly, in moderation and abiding by local age limits.

Anora promotes responsible alcohol consumption and consumer awareness of the social and health risks associated with excessive use of alcohol. We take seriously the harm caused by alcohol misuse and are strongly against alcohol use by minors. Additionally, we stress that in all work-related situations, our employees must ensure that their judgement and performance are not impaired by alcohol consumption.

Our marketing campaigns actively promote responsible alcohol consumption. We integrate clear messages that advice against excessive or irresponsible drinking and encourage moderation. We never portray irresponsible drinking or excessive consumption of alcohol in a positive light and never condemn anyone who chooses not to drink. Any depiction of individuals consuming our products will focus on moderate enjoyment our wines and spirits.

Furthermore, we never emphasize alcohol content as a positive characteristic or endorse high alcohol content as such. For example, we do not give the impression that alcohol content is high compared to price or competing products in our advertising.

As part of advocating for the safe use of our products, we share important information on the effects of alcohol consumption and our view on how we can build a modern, responsible drinking culture. Anora's website also provides relevant information on the effects of alcohol use. More information can be found here.

Product packaging is our most direct way of communicating with consumers. Most of the packaging of our alcoholic products has a "Drink responsibly" call for action or link to a local or European website with information on alcohol and moderate enjoyment, such as: https://responsibledrinking.eu

Also, spirits packages have information about the quantity and energy content of one serving.

2.4. Avoiding glamorization

Firmly linked to the previous principle, our marketing does not glamorize alcohol consumption, depict excessive consumption, or associate alcohol with success, popularity, or attractiveness.

We do not imply that drinking alcohol will make a person more successful or socially acceptable, and we ensure that our advertising does not give the impression that alcohol increases functional capacity or makes one socially or sexually more successful or attractive.

Additionally, we make sure that our advertising does not give the impression that an alcoholic beverage or its ingredients have medical or therapeutic properties, or that they help prevent diseases, or solve conflicts.

2.5. Sensitivity to diversity

We are sensitive to cultural norms and values in our marketing materials, as we do not want to offend or disrespect any community.

We are also respectful of gender and other forms of diversity and avoid the use of stereotypes in our marketing. Further, we always aim to portray the characters and individuals in our commercial communications in a decent, positive, and mindful way.

We strive to actively promote inclusion and diversity in our advertising. We have zero tolerance for depicting discrimination, or anything that is likely to harm a particular group of people based on religion, ethnical background, gender, identity, sexual orientation, nationality, age or similar.

2.6. Accuracy and transparency

We do not use inappropriate methods in our advertising or give untruthful or misleading information about alcohol, its use, effects, or other properties. We are committed to accurate, transparent and responsible marketing communications. We will not engage in misleading or deceptive advertising practices.

We stand behind truthfulness and require that all factual statements presented in adverts are verified.

We are focused on increasing the transparency of our product information (nutritional data and ingredients) and in the jurisdictions where such information is allowed to be displayed to consumers, the information is available on anoraproducts.com.

2.7. Social and environmental responsibility

Anora's sustainability roadmap has three main focus areas – Planet, People and Product – and it has been designed to guide and develop our actions, such as the effort to reduce our emissions, enhance circular economy and foster a safe, equal and inclusive workplace. We aim to minimize our impact on the environment and are committed to respecting human rights in our own operations and throughout our value chain. We expect our suppliers and partners to do the same.

We increasingly pack our products in packaging that is recyclable, utilises recycled material or has a lower carbon footprint compared to traditional glass bottles. To help both promote and support a responsible drinking culture, we offer an ever-increasing range of no- and low-alcohol (NoLo) products to ensure everyone can find an option to suit them at every occasion. Equality and diversity are at the core of our organisational culture, and we want to ensure an inclusive and safe workplace.

We take greenwashing issues seriously and require that all claims and statements relating to sustainability of our products and activities are truthful and follow the relevant regulations and guidelines. We make no unfounded promises or exaggerated claims about our products and activities and always aim to provide transparent and comprehensive information about them. We closely monitor

developments in applicable legislation and adapt our marketing activities accordingly to ensure full compliance.

2.8. Fair treatment of competitors

Our marketing is focused purely on what we do and what we offer. We do not engage in comparative marketing. We do not mention our competitors' products in our marketing, and we do not portray our competitors nor their products in a bad light. Denigration is unacceptable and against our way of operating and marketing.

3. Implementation

Anora requires everyone involved in the marketing and sale of our products (including our partner brand products) to implement this Policy. This concerns not only Anora's employees but also suppliers, subcontractors, licensees and third-party distributors. To ensure effective compliance, the following measures are implemented:

- All business, communications, and legal team members, marketing agencies and others involved in the marketing and selling our products shall familiarize themselves with this Policy.
- When working with relevant third-party partners, such as distributors, suppliers, agencies or similar, we strive to ensure that they understand and comply with this Policy.
- Anora's Legal team should be involved as early as possible in any marketing or commercial communication where there are potential risks of non-compliance with this Policy to provide timely guidance.
- We take complaints regarding our marketing and other commercial communications seriously. We properly address and store all complaints for audit and record-keeping purposes.

3.1. Application of other guidelines

In addition to this Policy, and previously referred regulations and guidelines, we have integrated spiritsEUROPE's Guidelines for the Development of Responsible Marketing Communications (dated February 2022) into our marketing practices and materials, underpinning our commitment to responsible marketing.

3.2. Associations and campaigns

Anora is a member of industry associations, such as the Association of Norwegian Wine and Spirits Suppliers (VBF) in Norway, the Spirit and Wine Suppliers Association (SVL) in Sweden, the Finnish Food and Drinks Industries' Federation (ETL) in Finland and the Association of Finnish Alcoholic Beverage Suppliers (SAJK) in Finland. SVL and SAJK are affiliated with spiritsEUROPE contributing to regulatory insights and global best practices in promoting responsible drinking. Through these memberships, different responsible drinking culture campaigns and initiatives are supported, such as Talk about Alcohol campaign for primary schools in the Nordics.

3.3. Internal education

As a producer of wine and spirits products, we recognize that we must market our products responsibly and in compliance with applicable marketing laws and regulations in our marketing and sales channels. We distinguish between personal and professional use of social media and act in a correct and professional manner.

We comply with Anora's Code of Conduct and require that every employee completes and successfully passes an online course on the Code of Conduct when joining the company.

In addition, we are committed to Anora's Responsible Sourcing Practices as well as Anora's Quality, Safety and Environment Policy that is based on UN Sustainable Development Goals.

For internal purposes, we have implemented Anora's Internal Marketing Guidelines, that we require all employees involved in the marketing of Anora's products in any way to be familiar with. Related to this,

Anora has an e-learning course regarding marketing regulation that must be successfully completed by all employees involved in the marketing of Anora's products. In addition to marketing regulation training sessions held by Anora's Legal team for employees working in marketing, our organisation has an open and collaborative organisational culture that supports the Legal team's involvement in marketing campaigns already from the planning stage, when necessary.

We have put in place internal Social Media Guidelines that every new employee is required to familiarise themselves with when they join the company. We conduct ongoing internal training through various intranet publications on current topics related to, for example, promoting a responsible drinking culture both inside and outside the company.

While alcohol marketing regulation in Finland has changed, Anora's current expectation remains unchanged. All employees across Anora's markets must comply with applicable local alcohol marketing laws and to act responsibly, thoughtfully and with sensitivity on personal social media platforms.

4. Continuous improvement and stakeholder engagement

We are committed to continuously improving our responsible marketing practices. We actively engage with stakeholders to foster dialogue and gain insights into the evolving expectations and challenges related to responsible marketing. By listening to the views of consumers, employees, regulatory bodies, and industry peers, we adapt our activities accordingly.

5. Conclusion

This Responsible Marketing Policy, supplemented by the spiritsEUROPE guidelines, enforces our commitment to ethical and responsible marketing practices. By aligning our activities with these principles, we aspire to nurture a responsible drinking culture characterised by moderation and respect for personal choices and needs, ensuring the well-being of consumers and contributing positively to society.

This policy was updated on 22 October 2026 and continues the principles of the policy published in 2023. It will be periodically reviewed and updated in line with evolving industry practices and regulatory requirements.

This Policy and further information can also be found at https://anora.com/en/sustainability/policies

Approval date: 4.11.2026

Policy owner: Communications Director

Approving body: Chief Executive Officer