



CODE OF BUSINESS CONDUCT AND ETHICS

Stock Spirits Group (SSG or the Group) is a multinational organization with global reach. The reputation of the Group is one of its greatest assets. Ethics and integrity are fundamental values in our business and daily operations. This Code of Business Conduct and Ethics of Stock Spirits Group (the Code) sets out the standards of ethical, responsible, sustainable and transparent business conduct that must be followed by our employees and is expected from our business partners. The Code is based on our shared values to be Open as we value transparency, openness and inclusiveness in our actions, Bold as we foster a forward-thinking culture that values entrepreneurial spirit in thinking and acting and United as we come from different cultures and backgrounds but always act as one team. Our Code reflects our core beliefs in fair and quality business. The Code applies to all operations, all employees and contractors of SSG and its business partners. Each company, present or future, within SSG, its directors, officers, managers and employees and representatives of the Group, are bound by this Code and will be expected to conduct their business accordingly.

SSG expects that its Associated Persons (consultants, agents, joint venture partners, customers, suppliers, as well as their consultants, agents, representatives and employees) adhere to the same standards of conduct as that expected within SSG itself while they are doing business with any of the Group companies.

The Group General Counsel will be responsible for administering the Code and monitoring compliance with it. If there is a real or apparent inconsistency between the requirements of different countries' applicable laws or between any country's law and this Code, the matter will be resolved by the Group General Counsel in order to ensure the utmost compliance with the regulations of the Code.

Each company within SSG should agree the Designated Officer (Managing Director, or the Finance Director or other appropriate representative of the local company), who will work with the Group General Counsel to administer the Code on behalf of the specific company within SSG and to monitor compliance.

The Group General Counsel shall be responsible for ensuring that the Code is kept regularly updated and will regularly report to CEO of Stock Spirits Group on all matters relating to it. Any breaches of the Code shall be reported immediately by the Designated Officer to the Group General Counsel or shall be reported by the employees directly using any of the methods of reporting mentioned later in the Code.

Each person to whom this Code applies is expected to know, understand and comply with this Code and is personally responsible to act within the letter and spirit of the law and to uphold this Code. Designated Officers and their direct reports are responsible for ensuring that the Code is understood and observed within their own areas of responsibility.

This Code cannot address every issue that arises in our business, and there may be times when a person would be unsure whether the Code applies or not. You do not have to resolve a difficult ethical decision alone. In such cases, please contact the Designated Officer, the Group General Counsel or the Legal team through the following email address: code@stockspirits.com or use the Speak-up Line. SSG encourages everyone to have an active involvement in detecting and preventing misconduct. We take reports of misconduct seriously, conducting investigations where necessary, and addressing issues appropriately. Retaliation against those who raise ethical concerns in good faith and against whistleblowers is not tolerated.

1. COMPLIANCE WITH THE LAW

SSG confirms that it conducts its business in accordance with all applicable laws, rules, and regulations of the European Union and the laws and regulations of each jurisdiction which may apply to the business activities of the companies conforming SSG. All employees and Associated Persons shall honour any restrictions placed on their conduct by their local laws, internal regulations or this Code.

All employees are required to comply with all applicable laws, as well those specifically referring to the business carried out by the Group companies, as any other like intellectual property, social or even road and traffic law. The compliance with laws by the employees is visible by the environment in which we operate and contributes to the reputation of the Group.

2. POLICY ON RESPONSIBLE DRINKING (UNDERAGE, EXCESSIVE CONSUMPTION OF ALCOHOL AND MARKETING)

SSG manufacture and sell alcohol beverages only for sale to and consumption by adults of legal drinking age in a responsible manner. SSG actively supports all laws and regulations establishing age restrictions on the marketing, sale and consumption of alcoholic beverages and it is member of several trade associations promoting the consumption, marketing and sale of alcoholic beverages to people over the legal drinking age.

A Drugs and Alcohol Policy has been designed to ensure that employees are aware of the risks associated with alcohol/drug misuse and the consequences, including the legal consequences of their actions. Our goal is to cultivate a culture where our employees serve as role models for responsible consumption. Through leading by example, we expect our employees to engage in responsible alcohol consumption and actively encourage others to do the same.

Additionally, SSG sets the standard for responsible marketing and advertising directed to legal drinking and purchase age consumers (the age may differ depending on the jurisdiction involved), which is in particular demonstrated by upholding the highest standards in brand marketing, with respect of national or regional advertising and marketing codes, laws and regulations. For more guidance in respect of SSG's marketing of its products you can contact the Group General Counsel.

3. ZERO TOLERANCE WITH BRIBERY AND CORRUPTION

SSG is committed to ensuring adherence to business ethics. SSG, its employees and all Associated Persons should act in accordance with the principles of integrity and ethics in relations with clients, contractors and whether they are public institution or private entities, in particular SSG is committed to carrying on business without bribery or corruption in all markets in which they operate. SSG do business in many countries, and they may well be subject to the laws of multiple jurisdictions. Thus, the Anti-Bribery and Corruption Policy is designed to ensure that the SSG, its employees and all Associated Persons comply fully with both the spirit and the letter of, all applicable anti-corruption laws in all jurisdictions in which the SSG Group operates.

In order to ensure compliance and adherence to business ethics, specific guidelines regarding relations with government officials, including officers of political parties, in particular regarding rules on giving or receiving gifts and hospitality were established by SSG in the Anti-Bribery and Corruption Policy and further detailed in Gifts & Hospitality Policy.

SSG expect its employees and all Associated Persons to be open and transparent about gifts and hospitality provided or received. The occasional modest giving and receiving of appropriate gifts and hospitality may be a legitimate contribution to good business relationships. However, it is essential that they do not influence, nor could be perceived as influencing, business decision making. Gifts / hospitality which influence business decision making may be regarded as bribes and illegal and as such are prohibited.

4. ANTITRUST AND COMPETITION LAW COMPLIANCE

Antitrust laws are designed to foster competition and to ensure a free and open market for goods and services throughout the European Union and other jurisdictions where similar regulations apply.

It is against the Code to have contacts with competitors that relate, or could be interpreted to relate, to, in particular, price fixing, market or customer sharing, limiting supply, bid rigging, or other matters relating to the restriction, prevention or distortion of the free market competition. In addition, it may be unlawful, under certain circumstances, to discriminate in prices offered to competing customers for the same goods, to engage in predatory pricing, or to introduce loyalty schemes designed to discourage customers from trading with competitors, as well as other practices with third party distributors.

Because questions under antitrust laws might be complex, it is essential that you consult with the Group General Counsel or the Legal team before engaging in any action of the type mentioned above. The potential penalties for antitrust violations are severe and include administrative, civil and, in some jurisdictions, criminal penalties, imprisonment, fines, injunctions and treble damage awards for the Group, its companies and the individuals involved in such activities.

In case of controls carried out by competent supervisory authorities from different jurisdictions in which SSG operates and/or by the European Commission, it is necessary to follow the guidelines of the Group General Counsel.

5. PERSONAL DATA PROTECTION

Personal data is strictly protected by data protection laws in all member states of the European Union and in many other countries outside it. SSG has a responsibility to ensure that personal data dealt with in the course of its business is handled in accordance with statutory requirements and necessary steps will be taken by all concerned to ensure this duty is observed.

No personal data should be shared with third party processors unless required for business purposes, appropriate contracts are put in place and no transfer of data to any other jurisdiction should take place without complying with applicable legal requirements.

Questions regarding the processing and transfer of personal data might be complex, so it is essential that you consult with the Group General Counsel or the Legal team on these matters before engaging in them. Please see the [Group's Privacy Policy](#) for guidance and information about penalties and consequences of breaches. All incidents and concerns related to personal data protection shall be reported to the Group General Counsel without undue delay. The aforementioned reports shall be made to the following e-mail address: gdpr@stockspirits.com.

6. SANCTIONS REGULATIONS

The number of regulations in relation to economic sanctions imposed by European Union, United States of America and other countries has grown significantly in recent years. SSG will comply with all sanctions laws, regulations, embargoes or restrictive measures to which apply to its business. SSG will maintain necessary measures to ensure compliance with and awareness of SSG employees and Associated Persons with such regulations. Internal procedures will be implemented to ensure necessary compliance.

Because matters in relation to sanctions regulations might be complex, it is essential that you consult with the Group General Counsel or the Legal team before engaging in any action where sanctions may be involved. The potential penalties for violation of sanctions regulations are severe and may be significantly harmful for the Group and its reputation.

7. CONFLICT OF INTEREST

Employees must act in the best interests of SSG and must conscientiously avoid any situation that might give rise to an actual or apparent conflict of interest which may reflect unfavourably on the SSG. All employees may be required to confirm in the statement that they are not aware of any circumstances that could indicate the existence of a potential conflict of interest in their case. SSG expects all employees to disclose in full and update, when necessary, any potential conflict of interest they may have as soon as it has been identified, so that it can be properly considered and the right action taken as detailed in the [Conflict of Interest Policy](#). The employee's statement of interest is part of the personal questionnaires signed at the beginning of the employment relationship.

8. DIVERSITY, EQUITY AND INCLUSION

SSG is an equal opportunities employer. This means that there should be no discrimination or victimisation of any employee, job applicant, customer, provider of services or member of public because of one of the following protected characteristics: age, disability, gender reassignment, sex or sexual orientation, marital or civil partnership status, pregnancy and maternity, race or ethnicity (including colour, nationality and ethnic or national origins), religion or faith.

Everyone is expected to conduct themselves with the highest regard for the dignity of others and, in particular, follow any applicable guidelines and/or instructions issued or given by the Group General Counsel. Decisions, including those with respect to the recruitment and selection, terms and conditions of employment, hiring, training and promotion and references after employment, must be taken on the basis of merit and the needs of



the business. Any instances of behavior that may violate the above rules should be reported in accordance with the procedure provided in the Speak-up line Policy.

9. BULLYING, MOBBING AND HARASSMENT

SSG is committed to developing and maintaining a culture where mobbing, bullying and harassment is not tolerated and employees can raise concerns without fear of reprisal. SSG ensures that its working environment contributes to all staff being treated with respect and dignity, feeling safe to work confidently and effectively. Any instances of behavior that may violate the above rules should be reported in accordance with the procedure provided in the Speak-up line Policy. Further specifications as regard bullying, mobbing, harassment and solutions applicable within SSG in order to counter such phenomena may be provided by the Group General Counsel.

10. ENVIRONMENT

Every employee and Associated Person is responsible to protect and prevent harm to the public health and welfare and the environment through strict compliance with all applicable laws and regulations. Each of our companies is committed to meeting the standards of performance on those key aspects of our operations that have environmental impacts and/or implications.

We recognize that addressing global environmental issues is one of the fundamental global challenges of tomorrow. At SSG, we prioritize taking proactive measures to mitigate our environmental impact and contribute to a sustainable future by, in particular, challenging business decisions that do not take into account environmental impact. SSG highly promotes and encourages responsible approach towards packaging, biodiversity conservation and develops sustainable approach towards resources such as water intake, sewage and waste. During SSG's course of business, SSG undertakes actions aiming at reducing carbon footprint and strives for climate neutrality. SSG supports local environmental initiatives and works with its suppliers on numerous programs to reduce environmental impact. The high standards of SSG operations are confirmed by ISO14001 certificate.

11. HEALTH AND SAFETY, WORKPLACE

At SSG health and safety is a key value that guides us in making and implementing our decisions, through which we strive hard to provide a safe, hospitable workplace for all of our employees and Associated Persons. Safe work performance is a condition of employment at SSG, so every employee and Associated Person must comply with all Group and Local Health and Safety Policies applicable to each jurisdiction in which SSG has businesses.

Health and safety is a key value that guides us in making and implementing our decisions, as we are committed to providing a working environment free of accidents and hazardous events. Aiming at this, we are committed to continuously improving health and safety conditions at work. Even today, all our processes, products and services comply with all applicable health and safety legislation. In order to implement the premises above effectively and efficiently, we follow the health and safety management system ISO 45001.

For further information on those policies employees and Associated Persons should contact the Group H&S Coordinator, the Local H&S Leader or Group General Counsel.

At SSG, we follow the Life Saving Rules by focusing on areas where the potential consequence of non-compliance with safety rules could be serious injury or loss of life. Each of us is responsible for the safety of both ourselves and our colleagues. Therefore, in line with the Golden Rule, we expect all employees and partners to stop work if conditions or behaviours are not safe. Stopping work is a life-saving attitude and there are no negative consequences for doing so.

Important part of workplace is company property. SSG provides its employees with numerous company resources and assets, such as laptops or mobile phones. All employees are required to use such resources carefully and professionally for their intended business purpose only and to undertake appropriate measures in order to protect SSG's property, in particular not to leave any resources provided by SSG without supervision.

12. CONSUMER HEALTH AND PRODUCT SAFETY

SSG makes due efforts to ensure the highest level of quality of its products and subsequent customer experience and satisfaction, in particular all products offered by SSG must meet the required standards in accordance with the quality management system.

13. ANTISLAVERY

SSG strictly prohibits the use of slavery, including modern slavery or human trafficking in its supply chain and has a zero-tolerance policy for violations. Modern slavery is a term not directly defined by applicable provisions of law, it refers however to situations of exploitation that a person cannot refuse or leave because of i.a. threats, violence, coercion and/or abuse of power, especially for commercial gains. Modern slavery includes i.a. forced labour and child labour. SSG is determined to take the necessary measures to promote fair and ethical recruitment in its operations and supply chain, especially for individuals who may be at increased risk of malpractice, such as migrant and other vulnerable workers.

It is essential that all persons involved in the sourcing, supply and production of our products, whether our employees or not, are treated with dignity and respect. All our suppliers must comply with all applicable labour laws, rules, and regulations, including but not limited to, all laws forbidding the facilitation, or any other use of slavery or human trafficking. Employees must report their suspicions of any of the SSG companies or a supplier breaching this requirement through the reporting methods described in this Code.

14. CONFIDENTIAL INFORMATION, INFORMATION SECURITY AND ICT COMPLIANCE

Except as otherwise approved by the SSG, no employee must publish or otherwise disclose, either during or subsequent to the employment, any confidential information about SSG, its companies, its personnel or the entities with which it does business.

All employees and Associated Persons should acknowledge that some or all of the confidential or sensitive information they have access to while performing business with SSG Group, may become unpublished price sensitive.

SSG pays attention to all risks associated with its activity, including information and communication technologies (ICT) security. Network and information systems constitutes important element of SSG's day-to-day business. ICT development has led to an expansion of the cyber threat landscape, bringing out new challenges. The number, frequency and impact of incidents are increasing, and in many aspects, they may present a threat to the functioning of SSG's operations. Cybersecurity effectiveness is therefore essential for the proper functioning of business. All employees and Associated Persons shall follow rules established by the SSG as regards confidentiality and information security.

15. INTELLECTUAL PROPERTY

Intellectual property such as trademarks, copyright, patents, domain names, trade secrets, business concepts and know-how ("IP") needs to be legally protected due to its critical value to SSG's brands and businesses. It is the responsibility of each employee to ensure that the IP is duly protected and coordinate with the Group General Counsel or the Legal team on all matters concerning the Group's IP. IP will be protected and managed according to rules set out in applicable provisions of law and business best practices, also with reference to possible use of IP by third-parties.

16. ILLEGAL BUSINESS TRANSACTIONS

SSG pays attention to all business transactions that includes SSG products and takes appropriate measures in order for all transactions to comply with all applicable laws and requirements. For the purpose of maintain the best practices with this regard, SSG's employees must not promote and/or engage in any activities related to the smuggling of SSG's products or using products suspected to be the subject to smuggling. If you have any doubts as regard the product, in particular when you think that the product may be counterfeit, you should immediately report such concern to the Group General Counsel, so that appropriate actions may be undertaken.

17. SOCIAL MEDIA

At SSG, we recognize the growing significance of social media in our daily lives, driven by the need to share our experiences and moments with family and friends. As social media platforms continue to play a pivotal role, both professionally and personally, it is crucial for employees utilizing these platforms to be aware of the SSG expectations and the potential impact their actions can have on our image. This includes not only content related to the SSG Group, our products, team members, or work-related matters but also other topics. Employees need to communicate responsibly. There is a need to maintain discipline and common sense when engaging in online activity whether acting for business purposes or privately. Content placed on social media can potentially cause a company serious reputable damage. For that purpose, SSG Group has established guidelines in the Social Media Policy, to help employees understand their obligations when sharing information and their opinions online.

18. OBLIGATION TO DISCLOSE AND WHISTLEBLOWERS PROTECTION

Employees are encouraged and expected to report any suspected violations of laws, regulations, and the Code, conduct directly to the Designated Officer or the Group General Counsel or the Legal team as well as using the Speak-up line available for all employees and Associated Persons. Guidelines on how to use the Speak-up line can be found in the Speak-up line policy. SSG ensures Whistleblowers protection. Regardless of the outcome of any review taken by SSG, no disciplinary action will be taken against any employee, including whistleblower filing a report in good faith.

19. THIRD-PARTY ASSESSMENT, ANTI-MONEY LAUNDERING AND ANTI-TERRORIST FINANCING

SSG conducts its activity in such a manner to not facilitate money laundering and terrorist financing. For these purposes SSG intends to specify activities, principles and rules of procedure of the SSG and its Associated Persons and employees in respect of counteracting money laundering and terrorist financing. Additionally, any guidelines and/or instructions issued or given with this regard by the Group General Counsel should be followed by all employees and Associated Persons.

20. CONTROLS OF COMPETENT SUPERVISORY AUTHORITIES

SSG operations can be subject to investigations and/or controls of competent supervisory authorities in particular jurisdictions. SSG puts every effort to cooperate with such supervisory authorities and to ensure the course of such control/investigation is in line with local and/or transnational laws. All engaged employees and Associated Persons must be aware of potential consequences of their actions taken under investigation and/or control (e.g. significant financial penalties) that may arise towards the SSG, companies belonging to the Group, and – in some cases in specific jurisdictions – towards the individuals involved.

21. BREACH OF THE POLICY AND QUESTIONS IN PRACTICE

It is the responsibility of each employee and Associated Person by action and supervision as well as continuous review, to ensure strict compliance with the Code. SSG may take disciplinary action, up to and including dismissal or termination of contract, against any employee or Associated Person who violates the Code.

The Group General Counsel is the key contact regarding the Code and any questions or concerns as to the impact of the Code on the day-to-day business dealings of the Group shall be referred to the Group General Counsel or the Legal team on the email: code@stockspirits.com.

Any employee of SSG who suspects or becomes aware of any violation of applicable law, or the Code, must immediately report the violation to its line manager who will report it to the Designated Officer who shall in turn report the matter to the Group General Counsel who will cause an appropriate internal investigation to be conducted. Employees can also report directly to the Designated Officer (who will still need to report it to the Group General Counsel), the Group General Counsel or to the Legal team on the email code@stockspirits.com. In addition to these reporting lines, an independent 'whistleblowing hotline' is available to report any such matters. This hotline permits anonymous reports to be made (subject to any local legal restrictions) according to the Speak-up line policy. The Group will not take any retaliatory action against any person including whistleblowers who makes a good faith report of such matters. All employees shall



execute, at the moment they join SSG, a Statement of Compliance acknowledging that they have read, understood and they will comply with the Code.

Save for any exceptions which must be agreed internally, all potential third parties and business partners retained by the Group shall agree in writing to comply with the Code by signing a declaration or the contracts they sign with SSG Group.

Exceptions to the Code must have prior written approval of the Group General Counsel, who will ensure that the necessary opinions are obtained to confirm that those exceptions do not violate any applicable laws and it is concluded that the exception is in the best interests of SSG Group.

22. RESPONSIBLE TAX AND TRANSPARENT REPORTING

SSG acts on the basis of full compliance with all applicable tax laws and in its business does not involve any practices which may be regarded as illegal tax avoidance. SSG is aware, that inaccurate reported tax and financial information can mislead or deceive both internal and external stakeholders, which can have severe and long-lasting consequences for its activity. The Group therefore ensures open and transparent reporting in line with applicable laws and best practices.

NB. Stock Spirits Group, in its sole discretion, reserves the right to change, modify, or terminate this policy for SSG at any time.