



## Vinolok Code of Ethics

As a proud member of the Preciosa and Amorim groups, VINOLOK is committed to the highest standards of ethics and professionalism in all aspects of our business. This Code of Ethics establishes the fundamental principles that guide our daily decisions and interactions with all interested parties and complements the binding rules set out in the company's internal regulations.

This Code is a living document, and we expect each member of our team to take an active role in its observance and development.

### Core principles:

**Integrity and transparency:** We communicate openly and honestly and act accordingly.

**Fairness:** We are committed to treating our employees, partners, and customers equally and fairly.

**Accountability:** We take full responsibility for our actions and their impact on society and the environment.

### Management System:

We use an integrated management system in all our activities, which standardises the requirements of all our stakeholders in the following areas:

- Quality management system – ISO 9001
- Food safety management – ISO 22000
- Occupational health and safety management systems – ISO 45001
- Environmental management systems – ISO 14001
- Guidance on social responsibility – ISO 26000, CSR

This management system is regularly audited both by an independent auditor and by VINOLOK's customers.



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## **Compliance with laws and internal policies**

Compliance with laws, regulations and internal policies is a fundamental obligation of every employee. All employees have a duty to conduct themselves in accordance with these rules and documents and to endeavour to avoid any breach of them.

Each manager shall ensure that the employees in the unit under his/her control are aware of and comply with the principles of conduct prescribed in the above-mentioned regulations. It is also the responsibility of each manager to take action and respond appropriately to any breach.

## **Senior staff**

Senior staff at all levels of management are expected to:

- Lead by example;
- Direct, organise and control the work of their subordinates, setting clear and achievable goals;
- Motivate their subordinates appropriately;
- Provide their subordinates with the information and resources necessary for their work;
- Evaluate the performance of their subordinates in a demanding and fair manner;
- Ensure respect for the rules of courtesy and collegiality in interpersonal relations.

## **Efficient and cost-effective behaviour, damage prevention and professionalism**

All employees are required to use the tangible and intangible assets of the Company solely for work purposes or for other purposes that benefit the employer. In handling such property, each employee is required to act with the utmost care to avoid damage, loss, depreciation or destruction of such property. Every employee is expected to act professionally within the scope of their competence and to avoid any actions that could cause damage to the employer or to third parties.

## **Care for the good name and reputation of the company, loyalty**

The reputation of our company is of great importance to us, and we are committed to maintaining and enhancing it.

We foster, preserve, and enhance this reputation through the actions and conduct of every employee.

VINOLOK expects all employees to act in a loyal manner in both professional and personal relationships.

## **Confidentiality**

All employees are required to maintain the confidentiality of VINOLOK's trade secrets and other internal information, including know-how and other non-public intellectual property and to prevent their disclosure to unauthorized persons. This obligation extends beyond the termination of employment.



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## **Public statements and social networks**

VINOLOK respects the right of every employee to freedom of expression.

Any public statements, in particular those made on social networks and other similar platforms (blogs, video platforms and other social media), must be clearly identified as private opinions, attitudes and/or positions and must not be attributed to VINOLOK. In connection with such statements, employees are required to refrain from disclosing their affiliation with the employer.

## **Disclosure of conflicts of interest and ancillary activities**

In order to avoid conflicts of interest between the interests of VINOLOK and the private interests of the employee, each employee is required to inform in a timely manner and in writing of:

- the pursuit of ancillary economic activities that could adversely affect the employee's work performance;
- any business or employment relationship of the employee with entities that enter into business relationships with any of the companies of the Preciosa and Amorim groups, and any participation of the employee in the business of such entities;
- any other case where there may be a conflict of interest between VINOLOK and the employee's private interests.

The employer shall evaluate the situation and reserve the right to require the employee to cease such potential activities or take other measures to avoid any conflict of interest.

## **Accepting and giving gifts**

Any gifts made on behalf of VINOLOK are always made without expectation of any consideration to the employer or employee. Such gifts must be made in accordance with the employer's internal policies and in compliance with all relevant laws and regulations.

Small gifts or other small considerations, including food or drink, may be given or accepted by an employee, provided that such practices align with the company's normal business practices and that failure to comply could be perceived by business associates as discourteous. In this instance, it is not anticipated that a quid pro quo will be expected from either the employer or the employee.

It is not permitted for an employee to offer or accept gifts or benefits that could or are intended to influence the recipient's independent judgement.

## **Anti-corruption actions**

Any form of corrupt or fraudulent behaviour is unacceptable.

It is the responsibility of every employee to comply with this policy, which specifically prohibits any form of bribery, including offering, giving, requesting, or accepting bribes directly or indirectly. This applies to relations in both the private and public spheres (with suppliers, customers, competitors, public authorities, and local authorities).

Furthermore, it is not permitted for an employee to engage in fraudulent activities, which include providing false data, certificates, or other documents to third parties with the intention of obtaining personal gain.



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## **Protection of competitive business environment**

We are committed to maintaining a fair and competitive business environment.

Each employee is expected to act in a manner that does not distort or restrict fair competition. In particular, but not limited to, this includes colluding with competitors to fix prices directly or indirectly, engaging in impermissible business practices, deliberately restricting production, or engaging in any other conduct that tends to impair fair competition.

## **Personal data protection**

It is the responsibility of the employer and each employee to ensure that the personal data obtained by the employer in the course of its business is strictly protected. We collect, process and use personal data exclusively in accordance with the relevant legislation. In doing so, we respect all the rights of the subjects as owners of this personal data.

All employees involved in the processing of personal data are obliged to act in a way that does not affect the rights of the data subject. Furthermore, the employer's obligations relating to the protection of personal data must be fulfilled in order to prevent their leakage or unauthorised internal or external use.

## **Environmental protection**

We adhere to the standards set forth in ISO 14001. We endeavour to minimise the impact of our activities on the environment, wherever possible. We adhere to the rigorous standards set forth by environmental legislation.

It is the responsibility of all employees to ensure that their actions do not result in damage to or endangerment of the environment.

## **Social responsibility**

VINOLOK adheres to the principles of social responsibility as outlined in the ISO 26000 standard. All employees are committed to respecting and developing these rules.

Furthermore, VINOLOK, as a member of the Preciosa Group, contributes to the development of social responsibility through the Preciosa Foundation.

## **Compliance with the principle of equality, the prohibition of discrimination and the prevention of sexual or other harassment**

We promote equality of opportunity and equal treatment regardless of race, ethnic or social origin, nationality, gender, sexual orientation, age, disability and regardless of religion, belief or opinion, as long as they are based on democratic principles and on tolerance and respect for people of different beliefs.

The selection of new employees, the promotion of employees and the eventual termination of employment of employees shall be at the discretion of the employer, taking into account their qualifications, abilities and the results of their work.

All employees are expected to refrain from any form of discrimination in their conduct, including, but not limited to, sexual and other inappropriate harassment, mobbing, bossing, harassment, instruction to discriminate and/or incitement to discriminate.



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## **Taxes and other compulsory levies**

We are fully compliant with our obligations to pay taxes and other compulsory levies. VINOLOK maintains proper accounting records, prepares the relevant financial statements and arranges for their external audit. Additionally, the company provides audited financial results for consolidation purposes within the parent groups of Preciosa and Amorim.

All employees are required to make all statutory payments properly and on time in accordance with the relevant legislation.

## **Health and safety at work**

Occupational health and safety is one of our key priorities and is governed by ISO 45001. In accordance with applicable regulations, the employer is responsible for creating a health and safety-compliant working environment for employees. Each employee is expected to contribute to the maintenance and improvement of this environment.

Each employee adheres to all applicable legal and internal regulations and follows the set rules and H&S guidelines issued by the employer.

## **Interpretation, complaints and suggestions**

In the event of any ambiguity regarding the interpretation of this Code of Conduct, each employee should contact their line manager, who will liaise with the HR Manager if necessary.

Any employee has the right to report any violations of this Code of Conduct or other unethical conduct, including through the ethics helpline linked below.

### [Ethics helpline](#)

The reception, administration and impartial investigation of notifications for our company is provided by employees of BDO Audit s.r.o., with registered office at V parku 2316/12, Chodov, 148 00 Prague 4, ID No. 45314381 (hereinafter also "BDO"). These employees have been assigned the role of the so-called competent person under whistleblower protection legislation. Detailed information can be found on the Ethics Line website.

In Jablonec nad Nisou, date: 1<sup>st</sup> August 2024

Ing. Aleš Urbánek, CEO