WINESTONE
GROUP

Code of Ethics and Conduct
WineStone Group

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01 Mission, Purpose and Values

Our Mission

To promote the sustainable growth of our activity, preserving and creating value for local Communities, Shareholders, Suppliers, Customers and other stakeholders.

Our Purpose

To preserve wine's natural and human heritage of the past, to respect and extend this capital in the present and to inspire future generations.

Our Values

WineStone's values are the basis that unites us, providing unity and consistency in our way of being, thinking and acting.

Innovation We foster an entrepreneurial culture and an open, curious mindset, constantly looking for new solutions and opportunities to create value. With a spirit of anticipation and permanent search for new opportunities, we invest in innovative alternatives that make a difference in the wine industry.

Competence We encourage a mindset that aims to continuously do more and better, through individual responsibility and teamwork, striving for excellence and consistency. The investment in qualified and highly competent professionals leads to the implementation of coherent solutions, based on the assumptions of quality, deadlines and value.

Human Development We put the dignity of people at the centre of our decisions and contribute to the development of their capacities, fostering autonomy and continuous learning. Individual contribution is seen as key to collective success. Investing in People makes it possible to make day-to-day life a permanent challenge for learning and sharing contributions.

Integrity We promote ethical and honest behavior, creating relationships of trust and loyalty, treating everyone with fairness and truth.

02 Objectives

The Code of Ethics and Conduct, hereinafter referred to as the "**Code**", aims to:

1. Disseminate the principles that govern the activity of WineStone group to all Employees, and other stakeholders such as Customers, Suppliers, Service Providers, Public or Private Entities and the general public.
2. Promote a culture of compliance and ethical conduct.

This Code is based on the legislation associated with the National Anti-Corruption Strategy and the General Regime for the Prevention of Corruption (RGPC) and seeks to contribute to the United Nations Sustainable Development Goal No. 16.

03 Scope

The Code applies to internal *stakeholders* such as employees, managers and administrators of WineStone group, regardless of the function and region where they perform functions. They undertake to guide their decisions and actions by the principles defined in this Code, fulfilling their responsibilities with professionalism and integrity. They are committed to promoting an appropriate working environment, protecting the reputation of WineStone group.

Additionally, it applies to external *stakeholders* with whom we establish a commercial and institutional relationship. They are asked to accept and comply with the principles set out in this Code.

04 Employees

At WineStone Group, we strive to create a dignified, safe and inclusive work environment where all people are treated with respect and equal opportunities.

We conduct our activities according to the following behavioural principles:

Fundamental Rights

We commit to respecting and protecting human and labour rights, enshrined in national and international law, in accordance with the United Nations Universal Declaration of Human Rights.

Forced Labor and Child Labor

We uphold the International Labour Organisation's guidelines on Fundamental Principles and Rights at Work and do not allow any form of child labour and forced labour.

Equality and Non-Discrimination

We celebrate the unique contribution that each person brings to the company and recognize that diverse teams are more capable. We promote equal opportunities and repudiate any form of discrimination whether on the grounds of ethnic origin, gender, marital status, age, sexual orientation, disability, nationality, political options, philosophical, religious beliefs, party or union membership or other.

Harassment

Safeguarding the well-being of our employees is a priority for WineStone group and all employees must be guided by conduct that respects the dignity and individuality of each one. We do not tolerate any form of harassment in the workplace and behaviors that affect dignity or create a hostile, humiliating, intimidating or offensive environment. If you believe that any employee or interested party is engaging in disrespectful conduct, you should report it via the Whistleblowing Channel available on WineStone website.

Freedom of Association and Collective Bargaining

WineStone group respects the right of employees to join trade unions or join a works council.

Occupational health and safety

WineStone group is committed to the health and safety of all people across its operations.

We assess the impact of our activities on the health and safety of our employees and promote internal initiatives focused on accident prevention, awareness and training for compliance with safety standards in the workplace.

As a shared responsibility, safety in the workplace is the responsibility of all employees, who must not only know and care for their own safety, but also that of their colleagues, acting as agents for the promotion of good practices. You can consult our Occupational Health and Safety Policy, available on the website.

Privacy and protection of personal data

WineStone group respects the privacy and protects the personal data of all its employees in accordance with Regulation (EU) 2016/679 (GDPR) and Law No. 58/2019, of August 8.

Data processing is carried out in a lawful, transparent and protected manner, exclusively for legitimate and previously established purposes, implementing technical and organizational measures that ensure the confidentiality and integrity of the information.

Access to or sharing of personal data is limited to what is strictly necessary and carried out only with consent or when there is a legal obligation. All data subjects have the right to information, access, rectification, deletion and opposition, under the terms of the law.

05 Business

Customers, Suppliers and Service Providers

Customers

WineStone group bases its relationship with Customers on trust, transparency and excellence, seeking to understand and respond to their needs. In the relationship we have with customers, we try to treat them with professionalism, in order to provide a product of excellence.

We treat all Clients with respect and fairness, ensuring clear, honest and responsible communication, and ensuring the protection of the confidential

information entrusted to us.

Customer satisfaction is essential to our success and is a pillar of long-term value creation, which is why we promote long-lasting and ethical relationships, based on the quality of our wines, the integrity of our practices and the coherence of our values.

Suppliers and Service Providers

WineStone group promotes a continuous and cooperative dialogue with its partners, encouraging continuous improvement and the adoption of responsible practices. We believe that sustainable, long-term relationships are built on shared values and common goals, contributing to the creation of economic, social and environmental value throughout the supply chain.

We reserve the right to verify and monitor compliance with these principles and may conduct audits, annual compliance assessments or visits to our partners' facilities. In the event of serious non-compliance, WineStone group may suspend or terminate the business relationship.

WineStone group is also committed to treating its Suppliers and Service Providers with fairness, respect and professionalism, ensuring transparent, impartial contracting processes based on objective criteria.

Anti-corruption and anti-fraud

WineStone group does not tolerate any form of corruption, whether active or passive, and behaviour that may constitute situations of bribery, influence peddling, money laundering or other related offences. All interested parties are prohibited from receiving or making payments or other forms of bribery for their own benefit or that of WineStone group.

Conflict of interest

All employees must perform their duties impartially and avoid situations that may give rise to conflicts of interest, that is, any situation in which personal, professional, financial or other interests may influence professional decisions.

Fair and honest competition

WineStone group defends and practices free and fair competition, rejecting any behaviour that distorts the market or violates competition rules.

All Employees must act with integrity, transparency and respect for market principles, refraining from practices such as the exchange of sensitive information with competitors, price fixing, market sharing, abuse of dominant position or other restrictive conduct.

Any partnership, commercial agreement or participation in industry associations must fully respect competition laws and the principles of transparency and fairness.

Quality and Food Safety

WineStone group recognizes that Quality and Food Safety are fundamental to

the success of its operations, in all wines produced and bottled by the company. To this end, we are committed to:

- Guarantee safe, authentic and high quality products, through a management system focused on continuous improvement.
- Comply with applicable standards and regulations, applying good manufacturing practices, hygiene and HACCP principles.
- Promote effective internal and external communication on food quality and safety.
- Train and sensitize employees to the culture of food safety.

You can consult our Food Safety and Sustainability Policy, available on the website.

Confidentiality of information

Employees must maintain absolute confidentiality about any personal or confidential information to which they have access, even after the termination of their relationship with WineStone group.

The obligation of confidentiality includes - but is not limited to - information relating to working documents, trade secrets, human resources, Customers, company banking information and personal data.

06 Society

Responsible alcohol consumption

As a company in the wine sector, WineStone group recognizes the responsibility that arises from its activities and is committed to promoting a culture of responsible alcohol consumption, through education and awareness of the negative impacts associated with excessive alcohol consumption.

We are committed to disseminating responsible consumption practices among employees, customers and other stakeholders, reinforcing messages of moderation and prevention of risks associated with excessive alcohol consumption.

Environment

Aware that ecosystems are the basis of our activity, we seek to integrate environmental protection across our management model, in order to minimize our impact on the exploitation of natural resources, acting in accordance with the following commitments:

- Carry out responsible resource management;
- Ensure efficiency in the consumption of water, energy and waste, both in the vineyard and in the winery and in all operations belonging to the WineStone group;
- Incorporate circular economy principles such as the reuse of by-products from the operation and promote waste reduction:
- Implement solutions with less environmental impact in our packaging and logistics.

07

Code enforcement

Our guide to ethical decision-making

Before making a decision or acting on behalf of the WineStone group, please ask yourself the following questions:

Is it in accordance with the law?

V

Does it comply with the values of WineStone group?

V

Would this action seem appropriate to others?

V

Is this action honest?

V

Can I defend my claim before managers, co-workers and the public?

V

If my action were made public, would I be comfortable?

If the answer to any of these questions is "No" or if you are unsure, please contact your manager or Human Resources (compliance@winestone.com), for guidance.

Requests for clarification of doubts related to the interpretation of this Code should be addressed to WineStone Group Code of Ethics and Conduct Monitoring Committee.

This Code is published on the WineStone group's website and made available to all employees in digital and/or printed format.

Alternatively, if you are aware of or suspect any violation of this Code, you can make a complaint, anonymously, via the whistleblowing channel available on WineStone group's website.