

## **ALTIA CODE OF CONDUCT FOR SUPPLIERS AND SUBCONTRACTORS**

(Updated 30 September 2019)

### **1. Introduction**

As a leading wine and spirits company in the Nordic and Baltic countries, Altia group (hereinafter "Altia") is committed to developing responsible and sustainable policies in its operations. A responsible supply chain is an essential part of the responsibility program at Altia, and we expect responsible and sustainable policies, practices, and their continuous development also from our suppliers and subcontractors.

**The Supplier shall ensure that the principles of this Code of Conduct are applied in the Suppliers own business processes and to its own suppliers and contractors and their respective suppliers and subcontractors.**

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

The Supplier agrees to follow in its operations the principles of this Code of Conduct in addition to the legislation and regulations of its operating countries.

To evaluate the compliance of this Code of Conduct, Altia or a third party authorised by Altia shall have the right to audit the Supplier. Altia will only conduct such audit should it have a genuine reason to suspect that a Supplier is not in compliance with the principles of this Code of Conduct. Any audit shall be conducted as non-invasively as possible to achieve the objective of the audit.

The Supplier shall, on request, provide Altia with information regarding the Supplier's conduct and business covered by this Code of Conduct, unless this would conflict with its statutory obligations on disclosure of information.

### **2. Enforcement of the Code of Conduct**

- This Code of Conduct is an irremovable part of the contracts and established cooperation processes between Altia 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 Altia 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, Altia may give written notice to the Supplier providing also sufficient evidence to support the alleged non-compliance, initiating a dialogue with the Supplier with the intent of the Supplier taking effective and prompt action to timely discontinue the non-compliance.

# ALTIA

- If the Supplier does not correct its policies or practices or if the Code of Conduct has been significantly violated, Altia shall have the right to terminate the contract and cooperation with the Supplier, applying if necessary a notice period reasonable under the circumstances to safeguard the Altia's business interests.

## **3. 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 amfori BSCI Code of Conduct

### **3.1 Human rights**

In its operations, the Supplier shall respect the UN universal declaration of human rights and ensure that they are in no way partaking in violations of human rights.

### **3.2 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 any form of 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 as defined by the International Labour Organization (ILO) is met. 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.

### **3.3 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 are 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 limit of hours worked prescribed above may be exceeded whereupon overtime is allowed. Each employee shall have resting breaks in every working day and 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.

### **3.4 Occupational health and safety**

- The supplier shall, as a minimum, comply with all the statutory occupational health and safety regulations.

# ALTIA

- 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.

## **3.5 Environmental responsibility**

- In its operations, the supplier shall comply with all the applicable regulations related to environmental legislation.
- The supplier shall estimate, attempt to reduce and prevent environmental impacts caused by their operations.
- The supplier shall create efficient policies and operational models to implement environmental responsibility.

## **3.6 Responsible policies**

- The supplier shall not take part in corruption, bribery, blackmail or fraud in any form.
- The supplier shall operate in accordance with the regulations of competition legislation and principles of fair competition.
- The supplier shall comply with the rules and regulations related to the quality and safety of products and services as well as applicable Altia safety and quality requirements.
- The supplier shall respect the intellectual property rights of Altia and any use of information, technology and know-how shall be subject to agreement with Altia and be used without risking the intellectual property rights of Altia.
- 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).