

 WINERY- DISTILLERY AEGIO S.A.	<b>ETHICAL BUSINESS PRACTICE POLICY</b>	<b>ISSUE: 01</b>
		<b>DATE: 01/11/2020</b>

**CAVINO SA** produces products of high quality and safe for consumption and seeks the continuous improvement of all its activities. For this reason, it is committed to developing beneficial and sustainable business relationships, based on mutual trust, with all partners involved.

This corporate ethics policy provides the framework and is the company's commitment to development and implementation of ethical business practices throughout the organization. The company has the obligation to act responsibly and to demonstrate the highest possible environmental, ethical and social management in terms of providing quality and safe products. Supply chain partners are selected and evaluated based on their ability to apply ethical business practices.

Based on the above, **CAVINO SA** is obliged to carry out all its activities in compliance with applicable laws and regulations, but also to establish the following criteria as a minimum for the selection of its partners (employees, suppliers and customers), in order to be governed by integrity and honesty.

## 1. BASIC VALUES OF BUSINESS INTEGRITY

**CAVINO SA** adopts the highest ethical standards and responsibilities. For this reason, this policy applies to all parties involved, including employees, customers, suppliers, competitors in the following areas:

- ❖ The personal data of employees, suppliers and customers are used responsibly and are protected by applicable laws
- ❖ The protection of company confidential information is an inviolable obligation of all employees
- ❖ Conflicting interests are denounced
- ❖ Bribery and corruption are not allowed
- ❖ Unfair competition is not allowed
- ❖ Relationships with suppliers, customers and partners and payment practices are fair and equitable, while gifts and payment facilities are not allowed
- ❖ Donations to political organizations are not allowed
- ❖ Any employee who suspects or knows that there is a conflict of interest related to company matters should immediately inform his supervisor, who will give the appropriate instructions
- ❖ Bribery in Greece is a criminal offense and is a form of corruption that can be defined as any offer or acceptance of a gift, loan, cash, prize or any other privilege from or to any person of CAVINO SA as an incentive to do something dishonest or illegal in any activity of the company
- ❖ Zero tolerance to bribery and any other form of corruption

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- ❖ Employees who do not report bribery and other forms of corruption, while aware of them, commit a serious misconduct, which is considered synergy. For this reason, disciplinary measures are taken by the company and the consequences of the law are applied.

## 2. HUMAN RIGHTS AND WORKING STANDARDS

**CAVINO SA** ensures that:

- ❖ The labor is freely chosen
- ❖ Working conditions are safe and healthy
- ❖ Freedom of association is respected
- ❖ Child labor is prohibited
- ❖ The wages are not lower than the minimum wage of the respective collective agreement
- ❖ Working hours do not exceed the limits set by law
- ❖ No discrimination based on criteria such as race, color, religion, gender, age, physical ability, ethnicity or sexual orientation
- ❖ Cruel or inhuman treatment is not allowed.

## 3. ENVIRONMENT

**CAVINO SA** is aware of the impact that its business activities may have on the natural environment and seeks to minimize or mitigate these effects, where possible, by using environmentally friendly materials and practices.

For this reason, **CAVINO SA** participates in a device and waste recycling program. Also, all the suppliers of the company operate in compliance with the applicable environmental laws and regulations in the country in which the products and services are manufactured or provided.

## 4. SUSTAINABILITY

Sustainability is an integral part of our company and affects the way all stakeholders interact.

The CEO has the ultimate responsibility for the viability of the company and for this role is supported by the Board of Directors and the Managers of all departments, who are committed to research and develop practices that are sustainable in order to improve efficiency.

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## 5. SUPPLIERS

**CAVINO SA** provides products produced in compliance with current European legal requirements, aiming not only at the relation between quality and price, but also at the social, ethical and environmental consequences that result from them.

For this reason, the company ensures the communication of its policy to all suppliers, in order to organize the communication, understanding and acceptance of this policy as an integral part of the cooperation.

Finally, **CAVINO SA** supports and encourages any sustainable strategy of its suppliers by developing mutually beneficial partnerships and promoting ethical policies, practices and procedures.

The Corporate Responsibility Policy established by **CAVINO SA** is understood by all Staff and Associates and its fulfillment is their daily concern.

The CEO