

SUPPLIER CODE OF ETHICS AND CONDUCT



ZAMORA COMPANY GROUP
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I. INTRODUCTION

This Supplier Code outlines the basic and minimum standards of conduct expected from our Suppliers working on behalf of Zamora Company or any of its subsidiaries.

The Zamora Company Group (hereinafter, "Zamora Company") upholds the highest ethical values and standards of integrity in its business activities and expects the same from its Suppliers*. Acting ethically and responsibly requires, but is not limited to, observing and complying with all applicable laws and regulations and doing business in a manner that respects and supports basic human rights principles when interacting with our stakeholders.

Zamora Company is committed to establishing a framework of mutual respect, trust and cooperation with its Suppliers; accordingly, it has adopted this "Supplier Code of Ethics and Conduct" (hereinafter, "Supplier Code"), fully aligned with the Zamora Company Code of Ethics and Conduct, which reflects and embodies the business practices, standards and principles that support this commitment and the foundation for developing and maintaining stable, trusting and long-lasting business relationships with Suppliers who share our values and sense of responsibility, with the goal of achieving continuous improvement and excellence throughout our supply chain.

This Supplier Code outlines the basic and minimum standards of conduct expected from our Suppliers working on behalf of Zamora Company or any of its subsidiaries.

The Code supplements, but does not supersede, any rights maintained by Zamora Company under any contract with the Supplier. Zamora Company reserves the right to audit or review distributor compliance with this Code.

*Suppliers mean any third parties participating in the Zamora Company value chain, including contractors and consultants, that provide raw materials, finished products, goods and services to Zamora Company or that act on behalf of Zamora Company in any type of activity (collectively, "Suppliers").

II. COMMITMENTS AND GUIDING PRINCIPLES FOR ZAMORA COMPANY SUPPLIERS

A. Respect and Equality

❖ Human Rights and Labor Rights

Zamora Company expects its Suppliers to share its commitment to Human Rights and Labor Rights, in accordance with internationally recognized laws, principles and practices such as:

- 1) The protection of the rights and values enshrined in the Universal Declaration of Human Rights;
- 2) The Guidelines for Multinational Enterprises of the Organization for Economic Cooperation and Development (OECD);
- 3) The International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

Accordingly, Suppliers shall at all times conduct their businesses and activities in a manner that upholds the following:

- **Internationally recognized human rights.** Suppliers shall respect and promote internationally proclaimed human rights and ensure that they are not complicit in human rights abuses. Likewise, Suppliers shall respect the human rights of local and indigenous communities in the areas where they carry out their activities.
- **Labor laws.** Suppliers shall comply with all applicable labor and employment laws, regulations and standards and respect all workers' rights afforded under the local labor laws of the relevant country, specifically undertaking not to employ persons under the age of 16 (or under the applicable statutory minimum age for workers in the relevant country) and not to engage in or condone any kind of labor exploitation.
- **Fair and respectful treatment, equal opportunity and non-discrimination.** Suppliers shall treat their employees with dignity and respect, protect and uphold their rights to privacy and any other workers' rights and freedoms and reject all offensive, intimidating or abusive behavior. They shall endeavor to foster an inclusive and nondiscriminatory work environment where all employees are valued and given equal and fair treatment. In keeping with this principle, Suppliers shall promote equal opportunity in the workplace and prohibit any type of discriminatory practices based on race, age, gender, marital status, sexual orientation, nationality, social or ethnic origin, ideology or political affiliation, religion, disability, health condition, pregnancy or any other personal, physical or social condition.
- **Employing persons with disabilities.** Suppliers shall respect laws on mandatory hiring quotas for disabled persons, where applicable, and adopt policies to support the inclusion of such persons in their workforce.
- **Child labor.** Suppliers shall avoid and prohibit any form of child labor and shall always respect the minimum employment age as set out in applicable legislation, ensuring that all workers are over 16 years of age (the minimum legal age to be able to work in Spain) or over the applicable statutory minimum age for workers in the relevant country; likewise, they shall take

all reasonable steps to ensure that workers under the age of 16 are not assigned strenuous or dangerous tasks that may interfere with their education, or be detrimental to their health or physical, mental, moral, or social development.

- **Forced labor.** Suppliers shall ensure that no type of forced or compulsory labor exists within their organization, meaning that no one shall work under duress or any threat of penalty, punishment or retaliation.
- **Harassment.** Suppliers are expected to create and maintain a work environment that is free from all threats of violence, physical, sexual, psychological or verbal harassment, sexual exploitation, intimidation, bullying, coercion, abuse of authority or any other abusive conduct.
- **Freedom of Association and Collective Bargaining.** Suppliers shall recognize the right of workers to organize, carry out trade union activities and conduct collective negotiations, respecting the applicable laws in each case.

B. Integrity

❖ Legal and Regulatory Compliance

Suppliers shall respect and obey the relevant laws and regulations of the countries and jurisdictions where they operate, and shall not encourage, permit or engage in any practices or conduct that may be contrary to the law or that violate basic ethical principles.

❖ Anti-Bribery and Corruption

Zamora Company will not tolerate any form of corruption or fraudulent behavior or practices that are contrary to its Code of Ethics and Conduct.

Suppliers must always act in an ethical manner that allows them to forge trusting, transparent and cooperative relationships with their business partners, clients and subcontractors. In furtherance of this goal, they shall establish the appropriate mechanisms to detect and combat bribery and corruption in all of its forms and shall abide by the following guidelines and restrictions:

- Never directly or indirectly offer, give or promise to give cash payments or their equivalent or any other favors to any individuals, regardless of whether they are government officials or representatives of a private company, with the purpose of:
 - Inappropriately influencing a business decision or obtaining preferential treatment.
 - Persuading such individuals or entities to use their power or influence to unlawfully obtain business or benefits.
- Never directly or indirectly offer facilitation payments to government employees with the purpose of expediting or guaranteeing the performance of a routine duty or action. In most countries, such payments are viewed as corrupt and are considered illegal; in Zamora Company, they are normally prohibited and will only be tolerated as long as they are legal in the countries where we operate and are accurately accounted for.

- Never offer gifts, favors, meals, entertainment, travel, or any other business courtesies to Zamora Company employees during an ongoing tendering process, which is strictly forbidden.

❖ **Conflicts of Interest**

Suppliers are expected to exercise reasonable care and diligence to prevent any actions or conditions that could result in an actual conflict of interest or give the impression of influencing a Supplier's ability to act in the best, objective interests of Zamora Company.

Suppliers shall not use their position for personal gain or benefit at the expense of Zamora Company.

Suppliers must identify and take steps to resolve any potential, perceived or actual conflicts of interest, so as to maintain and ensure complete independence and objectivity in their business dealings with Zamora Company. In cases where a potential conflict may exist, Suppliers shall be mindful of the following duties:

- Duty to abstain from taking part in any decision-making processes and accessing any confidential information.
- Duty to be transparent and proactively notify any conflicts of interest

❖ **Fair Competition**

Suppliers shall manage their business respecting the principle of fair competition as well as any applicable regulations, and shall conduct themselves in an ethical manner vis-à-vis their competitors. Accordingly, Suppliers shall not enter into any agreements or understandings (whether express or implied) or engage in any actions that illegally or improperly restrict trade or competition or that violate antitrust and competition laws.

❖ **Supply Chain Integrity**

Suppliers must carefully and thoroughly scrutinize, select and monitor the third parties they use and who will act for or on behalf of Zamora Company.

Accordingly, Suppliers are expected to perform appropriate screening and background checks on their counterparties in order to guarantee the integrity of their supply chain, taking into account the activity, origin and government interaction of such third parties. They must use extra caution and exercise due diligence in order not to take part, directly or indirectly, in any transactions or dealings with individuals, entities, or countries subject to sanctions under applicable international trade restrictions or sanctions programs.

Third parties, contractors, agents, or subcontractors should be selected based on merit and a fair and competitive selection process, avoiding any practices that can compromise this process. Suppliers shall be held responsible for ensuring their own third parties comply with this Supplier Code and applicable standards and policies with respect to business conducted for or on behalf of Zamora Company.

❖ **Corporate Image and Reputation**

Zamora Company's reputation relies on the honesty and integrity of the suppliers and business partners that support our day-to-day activities. Suppliers shall undertake to exercise utmost

care and diligence in preserving and protecting Zamora Company's image and reputation in their business activities, ensuring that their employees and subcontractors act accordingly.

C. Transparency

❖ Recordkeeping

Suppliers shall ensure that transparent, accurate and up-to-date books and business records are maintained at all times, in accordance with all applicable legal and contractual obligations. Suppliers shall immediately notify Zamora Company if they identify any irregular or questionable payments, suspicious transactions or suspected money laundering that may potentially involve Zamora Company.

❖ Audits and Assessments

Suppliers are expected to provide their fullest cooperation, as required, in any inspections or audits conducted by Zamora Company and shall report to Zamora Company's Internal Audit and Compliance on any investigation, audit, evaluation or unusual request related to Zamora Company to work performed on behalf of Zamora Company.

D. Workplace health and safety

Zamora Company is committed to providing a safe, secure and healthy workplace for all our employees and any other persons working at or visiting our facilities. In keeping with this commitment, Suppliers shall likewise implement and enforce workplace health and safety standards, regulations and policies that are consistent with ours to ensure:

- Safe, secure and healthy working conditions that strictly comply with all legal requirements on occupational risk prevention pursuant to international labor laws, the applicable laws of the country of operation and the standards and regulations of the Zamora Company Group.
- Workplaces that guarantee good industrial hygiene conditions, adequate lighting and ventilation, sanitation and safe drinking water, providing the suitable firefighting and protective equipment for each activity.
- Preventive measures to avoid workplace accidents and illnesses, implementing effective emergency plans, drills and response procedures.
- Training and awareness programs for employees to enable them to properly address health and safety issues that may arise in the performance of their work.
- Availability of appropriate and well-maintained equipment and materials that meet the relevant occupational health and safety standards.

E. Product safety and Quality

Zamora Company is committed to guaranteeing the highest level of satisfaction amongst its clients and customers and expects its Suppliers to provide the same levels of quality in its products and services. Zamora Company has systems in place to initially verify and monitor compliance with the quality standards of each product and service engaged and expects its suppliers to cooperate in the implementation of such quality assurance systems.

Suppliers shall at all times ensure that any products delivered or services provided meet or exceed the quality standards set forth in applicable laws and regulations as well as Zamora Company's contractual requirements.

In terms of product safety, Zamora Company is well aware of the importance of compliance with the strictest legality and control in the development of its activity and, specifically, in the production of the wines and liquors it sells, and, in line with this, it submits all its production to strict compliance controls to ensure the good condition of all its products for consumption by the population.

F. Environment

Zamora Company is committed to the environment, convinced that this commitment is indispensable for guaranteeing a possible future for the coming generations. The rational use of available resources and a policy of conservation and recycling of all resources will allow the maintenance of our natural environment.

This commitment is present at all levels of the organization from the input of products, services or supplies, with the control and prevention of pollution (through product design and study of activities) to the output of its by-products (with the recycling of materials and waste management).

Zamora Company prevents and reduces environmental contamination, promoting its protection and the balanced use of natural resources, acting with ethical and labor responsibility in all its activities.

Suppliers shall conduct their business in an environmentally sound and responsible manner and abide by all applicable laws and regulations in the countries where they operate, making every effort to minimize their environmental footprint and to promote measures aimed at tackling climate change and protecting biodiversity.

Suppliers shall also take special care to: optimize the use of relevant resources, such as energy, water and materials; minimize waste; and promote activities involving reuse and recycling, wherever feasible.

G. Data Privacy and Protection

Zamora Company guarantees the right to privacy of its employees and individual stakeholders, protecting and making appropriate use at all times of the personal data it handles, in accordance with the applicable laws and regulations for each situation and circumstance.

Suppliers shall abide by all relevant data protection and privacy laws and regulations and conduct data processing within the framework of their contractual relationship with Zamora Company. Accordingly, each Supplier shall only acquire confidential information or personal data through the appropriate means. Such information must be kept secure and access provided only on a need-to-know basis. Suppliers shall not discuss, disclose, transfer, release or share any confidential information or personal data related to Zamora Company without prior written consent and authorization from Zamora Company

III. SUPPLIER RESPONSIBILITIES

Your responsibilities as a Zamora Company Supplier with regard to this Code are to:

- Respect and comply with the Code as long as you are a Zamora Company Supplier.
- Be aware of and follow all laws and regulations and Zamora Company rules and policies that apply to your professional activities.
- Avoid any type of activity that could be unethical, illegal or damaging to Zamora Company's reputation.
- Provide your fullest cooperation with investigations and audits by volunteering any truthful information you may have.
- Endeavor to implement the appropriate control mechanisms recommended by Zamora Company wherever necessary or desirable to guarantee the supply chain.
- Report, in good faith, any concerns or suspected violations of this Code or any information you consider relevant to the standards and requirements contained in this Code to the Ethics & Compliance <https://zamoracompany.integrityline.com/frontpage>
- Take steps to ensure that your contractors and third parties have their own policies that are consistent with the contents of this Code and that they respect and uphold the same values and principles set out herein, as a means of guaranteeing supply chain integrity

IV. AMENDMENT AND ACCEPTANCE OF THE CODE

The contents of this Code shall be revised from time to time and amended and updated accordingly, following the same procedures used for their preparation, to reflect the inevitable process of change in society in general and in Zamora Company in particular.

The most recent version of this Code shall be made available on Zamora Company's website at: www.zamoracompany.com