

ALBET I NOYA. CODE OF ETHICS



MISSION

Albet i Noya's mission is to lead the market for Catalan organic wines, offering high-quality products that meet consumers' needs. With a strong commitment to sustainability and innovation, we preserve the family tradition while aiming for a healthier and more environmentally respectful future.

Structure of the Code of Ethics

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OBJECTIVES AND VALUES OF THE CODE OF ETHICS

This Code of Ethics aims to establish the ethical principles and behavior expected of Albet i Noya, as well as its employees and management team, in the development of their professional activities. Ethical conduct requires compliance with applicable laws and regulations at all times, as well as adherence to internal rules and the codes of conduct and best practices that Albet i Noya voluntarily adopts.

The core values of our company are:

- **Leadership and Knowledge:** As pioneers in organic vineyards and wines, we are committed to spreading and preserving the fundamentals of organic agriculture, environmental protection, and the production of high-quality wines for consumers.
- **Future Vision:** Aware of climate change and new consumer needs, Albet i Noya commits to maintaining an open, flexible, and innovative vision, both externally and internally with our team, collaborators, suppliers, and local environment.
- **Integrity and Responsibility:** Albet i Noya operates with honesty, transparency, and consistency in all professional activities, upholding the highest standards of professional, social, and cultural ethics.
- **Quality and Customer Service:** We guarantee the quality of our products and services, ensuring they meet established standards and customer expectations. We aim to offer excellent wines and wine tourism experiences, listening and responding to customers' needs with respect, efficiency, and courtesy, fostering long-term relationships based on trust and mutual satisfaction.
- **Prevention of corruption, extortion, and misappropriation of funds.**
Albet i Noya rejects any form of corruption, extortion, bribery, fraud, or misappropriation of funds, both internally and in its relations with third parties. No person associated with the company may offer, request, or accept improper benefits that could influence professional decision-making. This commitment is binding for all staff, the management team, and collaborators, and is ensured through the dissemination of the Code and the existence of confidential communication and whistleblowing channels.
- **Respect for Human Rights:** Recognize and respect the human rights of all individuals within and outside the organization. This includes treating everyone with dignity, without discrimination based on race, gender, age, religion, sexual orientation, or any other characteristic, and promoting a safe, healthy, and inclusive work environment.
- **Relationship and Connection with Society and the Environment:** Aware that we are in a rural environment with great landscape and social value, Albet i Noya commits to being a valuable asset within this ecosystem. We aim to build positive relationships with the community and contribute to its social, economic, and environmental development.
- **Environmental Respect and Commitment to Sustainable Development:** We are committed to minimizing the environmental impact of our operations by promoting sustainable practices and efficient resource use. This includes reducing, reusing, and recycling materials, using renewable energy, managing water effectively, and encouraging innovation to develop solutions that contribute to environmental

protection and long-term sustainable development. We will also prioritize hybrid or electric mobility, and whenever possible, choose the most environmentally respectful transportation options (e.g., train over plane, public transport over individual transport).



ALBET I NOYA AS A WORKPLACE

Albet i Noya is a family business, and it is of vital importance to us that all workers feel part of this family. As a company, we are committed to fostering a work environment where the dignity of all individuals is respected, acting with honesty and transparency, and promoting and expecting these same values from all staff.

Workers' Rights and Responsibilities

- **Right to Equality and Non-Discrimination:** Albet i Noya promotes equal opportunities without discrimination based on gender, race, religion, sexual orientation, age, disability, or any other condition.
- **Right to Fair Compensation:** Offer fair and competitive compensation in accordance with the market and current laws. Ensure timely payment of salaries and provide bonuses, overtime, commissions, and other benefits as stipulated in the contract.
- **Right to Training and Professional Development:** Provide access to training and professional development programs, promoting continuous growth for our employees.
- **Right to Freedom of Expression and Participation:** Foster an environment where employees can freely express their ideas and concerns. Involve workers in decision-making processes that affect their work.
- **Right to Privacy and Confidentiality:** Protect the privacy of employees' personal information. Guarantee confidentiality of personal and professional data.
- **Right to Work-Life Balance:** Promote policies that allow for an adequate balance between work and personal life, offering flexible schedules and necessary permissions to manage family responsibilities.

Workers' Responsibilities

Albet i Noya employees play a key role in maintaining an ethical and safe work environment. Meeting the responsibilities outlined below contributes to the proper functioning of the company and fosters a respectful, safe, and productive workplace.

- **Knowledge of Regulations:** Workers must be familiar with, understand, and comply with the company's internal policies, including the guidelines of the Code of Ethics, safety regulations, and operational procedures.
- **Keeping Knowledge Updated:** Employees must stay updated on any changes in the company's rules and policies by participating in the training and refresher sessions offered.
- **Integrity and Honesty:** Employees must act with integrity and honesty in all their professional activities, avoiding any form of fraud, deception, or manipulation.
- **Respect and Professionalism:** Employees must behave with respect and professionalism in their interactions with colleagues, clients, suppliers, and other stakeholders, fostering a positive and cooperative work environment.
- **Confidentiality:** Employees must ensure the confidentiality of sensitive and private company information, as well as client information. This information should not be shared with unauthorized persons or used for personal purposes. Employees must protect the company's trade secrets and intellectual property, avoiding unauthorized disclosure.
- **Responsible Use of Resources:** Employees must use company resources, including materials, equipment, and work time, responsibly and efficiently. They should aim to minimize waste and the environmental impact associated with their work processes and ensure the good condition of company equipment and facilities, reporting any deterioration or malfunction.
- **Reporting Inappropriate Conduct:** Employees have a duty to report any conduct or activity that violates the Code of Ethics or internal company policies, including inappropriate behavior, security violations, or irregularities. They must collaborate in investigations related to complaints or incidents, providing truthful and complete information.
- **Compliance with Safety Standards:** Employees must follow all protocols and procedures established to ensure workplace safety, including the use of personal protective equipment (PPE) and participation in safety training. They must actively participate in internal safety audits and risk assessments, helping to identify and resolve potential hazards.
- **Social and Community Responsibility:** Employees should contribute positively to the sustainable development of the community and fulfill the company's social and environmental commitments. They should promote and participate in initiatives and projects that enhance community welfare and the company's positive impact on society.

Equal Opportunities

At Albet i Noya, we guarantee that all employees and candidates have equal opportunities in all aspects of employment, including recruitment, promotion, training, and compensation, regardless of gender, race, religion, sexual orientation, age, disability, or any other personal or social condition.

Any form of discrimination, whether direct or indirect, based on personal or social characteristics is strictly prohibited. This includes discrimination based on gender, race, ethnicity, religion, sexual orientation, marital status, age, disability, nationality, political opinion, or socioeconomic status. We also foster an inclusive work environment where

everyone feels valued and respected. Any discriminatory behavior will be treated with utmost seriousness and appropriately sanctioned.

We ensure that our recruitment and selection processes are fair and transparent, based solely on the candidate's skills and competencies, free from discriminatory influences. We guarantee that all employees have the same opportunities for professional development and promotion within the company, based on their performance, skills, and merits. If discriminatory practices are detected, we take immediate corrective action to rectify the situation and prevent its recurrence in the future.

Work-Life Balance

At Albet i Noya, we recognize the importance of maintaining a healthy balance between the professional and personal lives of our employees. The company strives to provide the necessary flexibility to balance family and personal life with work, whenever the job position and workload allow.

- **Flexible Hours:** We offer flexible work schedules that allow employees to adjust their work hours to their personal and family needs, as long as company needs permit.
- **Reduced Working Hours:** We facilitate the possibility of reducing work hours for family or personal reasons, with the corresponding salary adjustment, in accordance with current legislation.
- **Remote Work:** We promote remote work where possible, allowing employees to work from home or other locations outside the office, reducing commuting time and increasing flexibility.
- **Other Modalities:** We explore other work arrangements that support work-life balance, such as compressed workweeks, intensive working hours, and voluntary leaves.
- **Family-Related Leave:** We provide paid leave for urgent family matters, such as family illnesses, school meetings, or other important events.
- **Maternity and Paternity Leave:** We guarantee access to maternity and paternity leave as established by law and offer additional support for a smooth transition during these periods.
- **Counseling and Resources:** We offer counseling and resources to employees to help them manage their personal and professional lives in a balanced and healthy way.
- **Respect for Disconnection:** We ensure that employees have the right to disconnect from work outside of working hours to guarantee rest and recovery.
- **Employee Feedback:** We regularly gather feedback from employees regarding our work-life balance policies to identify areas for improvement.
- **Necessary Adjustments:** We make adjustments to our work-life balance policies based on employees' needs and suggestions, ensuring that we continue to offer a work environment that promotes a healthy balance between professional and personal life.

OCCUPATIONAL RISK PREVENTION

Company Commitment: At Albet i Noya, our commitment to the safety and health of our employees is fundamental. We strive to provide a safe and healthy work environment by complying with all current occupational safety regulations and standards.

- **Proactive Prevention:** We will take proactive measures to identify and minimize workplace risks, promoting a safety culture that involves all levels of the organization.
- **Risk Assessment:** We conduct regular risk assessments to identify potential hazards in the workplace. These assessments include a thorough review of processes, equipment, and working conditions.
- **Risk Mitigation:** We implement corrective and preventive measures to eliminate or reduce identified risks, ensuring that working conditions are safe.
- **Ongoing Training:** We provide continuous occupational safety training to all employees, ensuring they are informed about the specific risks of their job and the safe practices to follow.
- **Drills and Workshops:** We conduct emergency drills and practical workshops to prepare employees for possible emergency situations and ensure they can follow established safety protocols.
- **Provision of Personal Protective Equipment (PPE):** We ensure that all employees have the appropriate PPE for their tasks and that this equipment is kept in good condition.
- **Mandatory Use:** Employees must use the provided PPE according to the instructions and training received. We conduct regular inspections to verify compliance with this requirement.
- **Preventive Maintenance:** We establish a preventive maintenance program to ensure that facilities and equipment are kept in optimal working conditions.
- **Regular Inspections:** We conduct regular inspections of facilities and equipment to identify potential defects or risks and take immediate corrective action.
- **Emergency Plans:** We have established detailed emergency and evacuation plans that are reviewed and updated periodically. All employees must be familiar with and follow these plans when necessary.
- **Health Assistance:** We provide basic health assistance and first-aid training to key personnel to ensure a quick and effective response in case of an accident.
- **Reporting Protocol:** Employees must immediately report any accidents or dangerous situations to their supervisor and the occupational safety department.
- **Accident Investigation:** All accidents and incidents will be investigated to identify their causes and implement corrective measures to prevent their recurrence.



ALBET I NOYA AND ITS ENVIRONMENT

We know that Albet i Noya's relationship goes far beyond the company/worker dynamic. We are organic winegrowers and producers, which also implies a commitment to society, the surrounding nature, our customers, and all our suppliers.

At Albet i Noya, we commit to working with honesty and responsibility in everything we do. We strive to be sustainable, offer quality products, and respect our environment. Our values are the foundation of all our decisions, aiming to have a positive impact on our region, the environment, our customers, and our suppliers.

Commitment to the Territory

- **Local Roots:** At Albet i Noya, we feel deeply rooted in the Penedès region. We actively work to preserve and promote the winemaking traditions and culture of our region, contributing to local economic and social development.
- **Community Support:** We collaborate with local entities, cultural associations, and community initiatives aimed at improving the quality of life in our surroundings.
- **Heritage Promotion:** We work to preserve the historical and natural heritage of our region, recognizing its value for future generations.

Environmental Commitment

- **Organic Viticulture:** We are committed to practicing organic viticulture, respecting the environment by avoiding the use of synthetic chemicals and promoting biodiversity in our vineyards.
- **Innovation:** As pioneers in organic agriculture, we are committed to continuing to provide new solutions for the viticulture of the future. With this goal, Albet i Noya leads the VRIAC project (Resistant Varieties Adapted to Climate), which we consider the varieties of the future.
- **Sustainability:** We implement sustainable practices in all areas of our activity, from production to the distribution of our wines, minimizing environmental impact and managing natural resources efficiently.

- Emissions Reduction: We work to reduce our carbon footprint through the use of renewable energy, optimization of production processes, and the promotion of energy efficiency measures.
- Waste Management: We promote the reduction, reuse, and recycling of waste generated in our production process, always seeking the most environmentally respectful solutions.

Commitment to Customers

- Quality and Excellence: We are committed to offering products of the highest quality, crafted with passion and dedication, respecting the highest standards of organic production.
- Transparency and Information: We provide clear and transparent information about our wines, production processes, and the organic practices we follow, allowing customers to make informed decisions.
- Customer Service: We strive to offer excellent customer service, listening to their needs and suggestions, and responding quickly and effectively to any inquiries or issues.
- Social Responsibility: We promote responsible wine consumption and collaborate in initiatives that encourage healthy and sustainable consumption habits. Albet i Noya is part of the international Wine in Moderation program with global impact.

Commitment to Suppliers

- Ethical Relationships: We maintain ethical and trustworthy relationships with our suppliers based on mutual respect, transparency, and collaboration.
- Supplier Selection: We choose suppliers who share our values of sustainability and environmental respect and who meet the required quality and safety standards. To reduce our carbon footprint, we always prioritize local suppliers.
- Promotion of Sustainable Practices: We encourage the adoption of sustainable practices among our suppliers, working together to reduce the environmental impact of the entire supply chain.
- Support and Development: We collaborate with our suppliers to help them improve their practices and processes, promoting local development and creating shared value.



DISSEMINATION AND COMPLIANCE WITH THE CODE OF ETHICS

This Code of Ethics is mandatory for all parties involved with the company, and the responsibility for its implementation and supervision rests with the company's management. Furthermore, anyone involved with the company who detects any irregularity may report it through the following channels:

- Directly communicating it to their superiors (according to the organizational chart).
- Submitting a written complaint in the Suggestions Box located in the winery's kitchen.
- By email to **compromis@albetinoya.cat**.
- By post to Can Vendrell de la Codina 5, 08739 Sant Pau d'Ordal (Subirats).
- The anonymous whistleblowing channel located at the bottom of our website:
www.albetinoya.cat/en/canaletic.php

Upon receiving any complaint, comment, or report, the management team will analyze the information to verify its truthfulness and take the necessary measures to ensure compliance with this Code of Ethics. In these cases, the management team must act with complete transparency.

Albet i Noya's Code of Ethics must be available to all workers, customers, and suppliers, and it should be accessible for download directly from the website www.albetinoya.cat.

Any substantial changes to the Code of Ethics require explicit communication to all employees.

Sant Pau d'Ordal. January 2024