



CODE OF CONDUCT

2025

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1. Introduction

Bodegas Baigorri, a single-member limited company (from here on referred to as Bodegas Baigorri or the company), began in 2002 with the vocational goal of becoming a leading brand and reference of premium wines both in their region and in Spain and other countries. Since their launch they have consolidated as a *bodega* (winery) of great quality and a highly distinguishing identity.

Bodegas Baigorri owns a total of 40 hectares of vineyards and 15 000m² of excellently equipped winemaking facilities which contribute to achieving their goals, and which includes advanced wine tourism features such as a 150-seat restaurant

Scope

All employees, managers and administrators in Bodegas Baigorri, independently of the contractual relationship which determines their labour or trade relationship and their position in the company, are obliged to understand and comply with this Code of Conduct, given that our behaviour influences the perception our stakeholders have of our organisation.

Aims of the Code

The goal of this Code of Conduct and Professionalism (from now on referred to as “Code” or “Code of Conduct”) is to establish the principles and basic rules that inspire decisions, professional behaviour and actions of all employees, managers and Bodegas Baigorri suppliers, which complement the laws of our country and comply with maximum ethical standards and responsibility, with the aim of fostering relationships that are mutually beneficial for the company and for the various stakeholders.

Bodegas Baigorri’s code of conduct, in line with the essence of our values and shared principles of action that underline our behaviour and decisions, and serve as a basis for our policies, stems from well-instilled internal norms for the functioning of the company.

Despite the fact that the code aspires to regulate the behaviour of our organisation, it is impossible to determine all possible situations. We have thus established, as general principles of behaviour, good will, integrity and common sense.

Objectives

To be a worldwide reference of quality and that the characteristics of our wines/Baigorri - both in the way that we interact with our surroundings and with people – leave a more positive legacy of our activity.

Mission and vision

Vision: We aspire to situate Baigorri on the world map, not only as a brand, but also as a symbol of passion, effort and excellence. Each bottle of wine we produce is a testimony of our commitment to these values. In choosing Baigorri, you join us on our journey to a better and more responsible world.

Mission: as a united family our mission is to be the best company FOR the world. We advocate consistency, respect and integrity in everything we do. Our passion for making original and excellent wines can only be matched by our dedication to spreading mindful practices and responsible choices.

Our values

- Consistency: to guarantee consistency in our actions and decisions, in line with our fundamental principles and long-term vision.
- Respect: honouring the inherent value and diversity of the earth and the dignity of all of those participating in the process, from vineyard workers to our loyal customers.
- Integrity: To maintain honesty and transparency in all our actions, instilling confidence in our community and with our partners.
- Passion: A lot is required both in initiating and in continuing with this challenge.
- Effort: Identifying features of our daily work and perseverance.
- Innovation: Combining avante garde with tradition to achieve excellence.
- Family: The project unites us as a family and as a team.

These values shape our management model and point of reference for our day-to-day running and continuous improvement of our organisation, maintaining and protecting our integrity and reputation.

Likewise, we focus our relation with stakeholders as:

- Prioritising quality and customer service through qualified, respectful and efficient personnel.
- Minimising our environmental impact through our activity, and participating in initiatives which help us include formulae for continuous improvement.
- Promoting the responsible management of our supply chain.
- Strengthening and improving the quality of life in society, thanks to our responsible behaviour and choices.

Hospitality, trust, respect and innovation are attributes that define and identify us and distinguish us from other bodegas.

2. General behavioural standards

Complying with the law

Complying with current legislation is imperative for Bodegas Baigorri, and we aim to comply beyond what is established by the law.

Considering our legal responsibility in what could occur if Bodegas Baigorri and/or their employees, management and administrators were not to comply with the law, rules and existing standards, we expect them to act in an ethical and professional manner in agreement with legal boundaries and the obligatory and voluntary code of conduct that affects the activity of the company.

Integrity

We would like the behaviour of our professionals to be excellent, in line with our aims and values, and thereby permitting these aspirations to be attained. Trust in our stakeholders strengthens the integrity of each of the professionals who form part of our organisation.

Behaving with integrity, which means always doing things correctly, positively reflects in Bodegas Baigorri the values and reputation of the company. The code of conduct aims to assure compliance with the law, in addition to our objectives and values which guide our business practices, rejecting any criminal behaviour for the supposed benefit, direct or indirect, to the company.

Human Rights

We wholeheartedly subscribe to the 1948 United Nations Universal Declaration of Human Rights and the principles of the United Nations Global Compact, achieving, promoting and transmitting to our professionals equal opportunities, fair and impartial treatment with no form of discrimination whatsoever, in addition to guaranteeing the safety and wellbeing of the people in our facilities.

Likewise, we expect our suppliers, as we do, to commit to respecting and protecting human rights.

Safeguarding, protection and confidentiality of data

All professionals at Bodegas Baigorri are compelled to protect the confidentiality of information entrusted to us, be it from the company, clients, employees or suppliers, respecting the personal and family privacy of all the people who make up the organisation, as well as our stakeholders: customers, suppliers and contractors.

In this sense, personal information may not be used for ends other than those strictly related to Bodegas Baigorri's activity, and this indefinite confidentiality continues even after a working relationship with Bodegas Baigorri has finished.

We provide our stakeholders with relevant information about the use and storing of their personal data, including information about how to access, rectify, delete or deny this information. We use adequate security measures to store personal data. If at any time this security is compromised, we act quickly and responsibly.

In this sense, we ought to respect internal norms about the treatment and confidentiality of personal

data in accordance with the European ruling 2016/679 about Data Protection and the Protection of Personal Data and guarantee of digital rights Organic Law 3/2018 of 5th December, in addition to any other national law which may apply.

3. Behaviour patterns with people

Bodegas Baigorri professionals must, through our professionalism, enthusiasm and effort, offer the best possible experience to our clients. To accomplish this, Bodegas Baigorri attempts to provide the best possible conditions for the professional development of all the employees that form part of the organisation, extending this to our suppliers, collaborators and business partners.

Human Rights

In line with our commitment to caring for the people and values of Bodegas Baigorri, we ensure the fulfilment of regulations and recognised principles of human rights, promoting and transmitting to our professionals the following:

1: Employment is by free choice.

1.1 Forced labour, including servitude or involuntary labour, is not permitted

1.2 Workers are not forced to leave a “deposit” or their identity documents in the company and are free to provide them after reasonable notification

2: Freedom of association and the right to collective negotiation are respected

2.1 Without exception, workers have the right to affiliate with or form trade unions of their choice, and to negotiate collectively

2.2 The employer adopts an open policy towards trade unions and their organising activities.

2.3 Worker representatives are not discriminated against and are free to exercise their representative functions in the workplace

2.4 When freedom of association and collective bargaining are restricted by law, the employee will facilitate and not obstruct the development of parallel means of free and independent associations.

3: Conditions for a safe and hygienic workplace

3.1 A safe and hygienic workplace will be provided, considering the predominant knowledge of the sector and any specific risks. Adequate measures will be taken to prevent accidents and any damage to health that may arise, be associated with or occurring at work, minimising in whatever manner possible, the inherent causes of risk in the work environment.

3.2 Workers will receive periodic and official training in health and safety, and said training will be repeated for new or reincorporated workers.

3.3 Access to clean bathrooms and drinking water will be provided and, where appropriate, sanitary

facilities to store foodstuff.

3.4 Accommodation, when provided, must be clean, safe and satisfy the basic needs of workers.

3.5 The company monitoring this code should assign responsibility for health and safety to a senior manager representative.

4: No child labour may be used

4.1 These policies and procedures will be adjusted according to relevant norms of the ILO (International Labour Organisation)

6: Decent wages will be paid

5.1 Salaries and benefits paid for a week's labour must, at the least, comply with national laws or reference norms of the industry, whichever is higher. In all cases, salaries should always be sufficient to cover basic needs and provide some discretionary income.

5.2 All workers should receive in writing comprehensible information about their employment conditions with respect to salary before commencing employment, and details of their salaries over a period of payment in question each time they are paid.

5.3 Reductions in salary as disciplinary measures are not permitted, and neither are deductions not specified by national law without the express permission of the worker in question. All disciplinary measures are to be registered.

6: No excessive working hours

6.1 Working hours should comply with national laws and collective agreements and provision of points 6.2 and 6.6 below, whichever covers the worker better. Points 6.2 and 6.6 are based on labour laws.

6.2 Working hours, excluding extraordinary hours, are defined in a contract and may not exceed 40 hours a week, always complying with current legislation.

6.3 All extra hours are voluntary. Extra hours should be used responsibly, taking the following into account: the scope, frequency and hours of each worker and the staff as a whole. They may not be used to substitute regular work hours. Extra hours may be remunerated economically or with time off, as outlined by current legislation and labour law.

6.4 Total working hours in a period of 7 days may not exceed 40 hours, except in cases stated in the following clause 6.5.

6.5 Work hours may only exceed 40 in a period of 7 days under exceptional circumstances and when they meet all of the following requirements: national law permits it; a collective agreement freely negotiated with a worker organisation that represents a significant part of the workforce permits it; adequate safeguarding to protect the health and safety of workers has been made, and the employer can demonstrate that there are exceptional circumstances such as unexpected production peaks, accidents or emergencies.

6.6 Workers are due at least one and a half days off for each 7 days, or, when national legislation permits it, 2 days free per 14 days.

7: Discrimination will not be tolerated

7.1 There can be no discrimination in the contracting, wages, access to training, promotion, dismissal or retirement for reasons of race, social class, nationality, religion, age, disability, gender, marital status, sexual orientation, or Trade Union or political affiliation.

8: Regular employment will be provided

8.1 Wherever possible, work completed must be based on a labour relationship that is recognised and established through legislation and national practices.

8.2 Contractual obligations for workers are based on regular labour relations and the law or social security norms, and may not be circumvented through manual labour contracts, subcontracts or agreements about working from home, or through training programmes when these have no intention of providing qualifications or creating regular employment. These contractual obligations may not be avoided by the excessive use of short-term contracts either.

The provision of this code constitutes minimum, not maximum norms. Furthermore, companies which apply this code are expected to comply with national legislation and other applicable laws of the moment, and, when both legislation and this code refer to the same issue, the version that offers the best protection for the employee will be offered.

Should a supplier violate this code, Bodegas Baigorri may take measures that they deem appropriate, always taking into account affected stakeholders and the considerations of the actual supplier.

Should the infraction be recurring and prejudice both parties, as a last resort, Bodegas Baigorri may terminate the business relationship.

9: Harsh or inhumane treatment is not permitted

9.1 Physical abuse, discipline, threats of physical abuse, sexual harassment or any other type of verbal abuse or other forms of intimidation are prohibited.

Apart from all of this, we opt for:

- *Honest treatment of people.* Personal relationships are part of our daily activity. Treating others as we would like to be treated must become habitual behaviour. In this sense, fair, polite, respectful and courteous treatment, and manners and respect towards our colleagues and other stakeholders, must be the way in which Bodegas Baigorri professionals relate with others, be they clients, contractors, the state or social organisations

In addition, we reject any display of physical, verbal or moral intimidation or abuse of authority, in line with the protocol against harassment in our work environment, and we commit to ensuring a workspace free of harassment, intimidation or offensive or inappropriate behaviour which may offend the dignity of people.

- *Diversity and no discrimination.* All people, irrespective of their gender, religion, political opinion, age, sexual orientation, marital status, nationality, origin or disability must be treated with fairness and respect, and with no discrimination for any reason. Furthermore, we value diversity as something which enriches our organisation and are convinced that it distinguishes the service we offer clients.
- *Labour, cultural and disability integration.* All professionals at Bodegas Baigorri form part of the same team, independent of our capacity and ability and also our culture or origin. To this effect, we need to concern ourselves with valuing differences and that all workers achieve their maximum potential, besides recognising their merit and professional conduct.
- *Equal opportunities.* All people we deal with deserve to be offered equal treatment under a given situation.

Health and safety

The wellbeing of Baigorri professionals is one of our top priorities, and we therefore offer a safe working environment. To this end we offer our employees measures that monitor and control, complemented by preventative action - with the aim of providing a safe and secure working environment for every workstation.

Bodegas Baigorri professionals must comply with all risk prevention plans and never proceed with or act in a manner which could place them or their colleagues at risk.

This prohibits the partaking of alcohol and/or any substance prohibited by law during the working day, or arriving at work under the effects of these substances.

Suitable work environment

At Bodegas Baigorri we're committed to creating a trusting environment in which all workers can grow and develop professionally. The following constitute the pillars on which this trust between professionals and the company can be built:

- *Conciliation and workplace flexibility.* We need to facilitate and foster conciliation between the demands of a family and those of work amongst all professionals constituting Bodegas Baigorri.
- *Professional development.* We encourage personal and professional development amongst our workers, thus fomenting an improvement in their own capacity and competence. Our policies and actions around the selection, contracting, training and internal promotion of workers are based on clear criteria concerning the capacity, competence and merits of professionals.

4. Behavioural standards with clients

Safety of the facilities and restaurant service

Bodegas Baigorri ensures the safety, health and wellbeing of visitors and guests, giving maximum priority to safety both in the facilities and in the restaurant service. We all share a paramount responsibility that our clients are safe and protected, something which can never be ignored or compromised. This commitment not only ensures the safety of clients, but also that the work environment is safe for all Bodegas Baigorri workers.

Guarantee of quality guarantee for our services

Friendliness and closeness in dealing with clients and the commitment to offering the best experience to our clients and visitors, implies converting the quality of service into the main axis for instilling a sense of trust and satisfaction in our clients.

Clear and transparent information

The commitment to quality of our services is a necessary condition, although not enough, to guarantee success - unless it is accompanied by the trust our clients place in the company. The transparency and reliability of information is always prevalent in our relations with clients, with the aim of building solid relationships which guarantee long-term trust. We naturally avoid any behaviour which could try to deceive or leave out relevant information in order to deceive.

5. Behaviour standards with other stakeholders

Relationship with the market

- *Respect for the competition.* In Bodegas Baigorri we believe that free competition in the market drives and incentivates a search for the best solution for clients. Likewise, we ought to guarantee, under the framework of free trade, that contracts with suppliers do not attempt to undermine the economic or technical conditions implied in this contract.

- *Transparency of information.* We provide true, complete and clear information which we register in the corresponding public bodies, likewise with any publication for our stakeholders. Our accounting and financial records are recorded precisely and reliably.

We collaborate with and facilitate the work of any auditing body (internal or external), inspections or other audits such as internal controls or those conducted by competent authorities.

- *Anti-fraud.* Bodegas Baigorri adopts and manifests our firm commitment to the sustainability of public spending through sound fiscal and social security practices. We expressly reject any form of fraud with any public revenue or social security bodies, including grant fraud and public subsidies or funds.

In order to achieve this, all Bodegas Baigorri professionals must respect and abide by their accounting, fiscal and social security obligations, acting in accordance with existing internal procedures.

Relations with suppliers and public administration

Contact with third party interests must be transparent and honest. To achieve this, Bodegas Baigorri workers must offer reliable information about products, services and prices so as to permit purchasing choices to be based on real and objective characteristics.

Relations with suppliers must be based on mutual benefit and trust, to this effect they are chosen in an equitable manner, with business objectives. Favouritism, which may distort free competition, is to be expressly avoided.

Promising, offering or providing any benefit of any kind - either directly or indirectly – with the aim of influencing any decisions or obtaining any benefit for the company, is not permitted. By the same token, obtaining or accepting rewards or unjustified benefits which could benefit the company or any third party, are not allowed.

We need to base ourselves on the principles of clarity and transparency, with the goal that none of our actions could be interpreted as being misleading or might serve to the detriment of our clients/suppliers or other stakeholders. Likewise, we have to inform our management in all processes of negotiation or contracting in the name of Bodegas Baigorri. In this sense, all workers in the company have signed an anti-corruption clause.

6. Behaviour standards with society and the environment

Involvement of society

Our commitment as a registered corporate company is to create a fairer, more inclusive and more regenerative economy, creating social, environmental and economic value for all stakeholders: workers, suppliers, clients, communities, the environment and shareholders.

In addition, and in line with this aim, we are committed to improving the environment through the implementation of systems, norms and initiatives that reduce the impact of energy and the consuming of natural resources, and which reduce residues and emissions.

Respecting the environment

We are aware that our activity is directly related to the environment and that our commitment to sustainability needs to incorporate environmental protection into our strategies and behaviour. In this sense, our actions should never damage or jeopardise the environment, and we are compelled to denounce, through our internal channels, any breach that we are aware of or that clearly and obviously contradicts the Code of Conduct and Bodegas Baigorri's norms around this matter. We need to abide by environmental regulations.

7. Acceptance of and compliance with the code

Accepting the code

Each and every Bodegas Baigorri professional needs to know, accept and take this Code of Conduct on through our functions and responsibilities, understanding that it is an essential guide to our actions and facilitates decision-making in accordance with the principles and policies it embodies.

The entire Bodegas Baigorri management team needs not only to know the Code of Conduct, but to live and transmit it by day-to-day example. It is the management team's responsibility to lead by precedence, practising daily the behaviour and attitudes it embodies.

While the code offers guidelines for our daily actions at work, it is impossible to understand each and every possible situation. The behaviour of all Bodegas Baigorri professionals should be based on the principles of trust, integrity and common sense to determine the correct procedure in any circumstance.

Guarantee of compliance with the code

We are obliged to denounce through our internal structures any non-compliance with the Code of Conduct and Bodegas Baigorri norms, of which we are aware of and understand. We are therefore obliged to cooperate with any investigation or audit, internal or external, which could be undertaken at Bodegas Baigorri.

In this sense Bodegas Baigorri guarantees that said denouncements, which the plaintiff has pointed out in good faith, will not have negative repercussions on the plaintiff. The confidentiality of the plaintiff with respect to third parties, and especially to the person accused, is guaranteed. The latter will be assumed innocent and will be treated with the rights and respect outlined in the relevant norm. This guarantee of non-retaliation policy applies to physical or legal persons related to the informant and to those present when the breach is communicated – for example, legal representatives who are assessing or supporting the informant.

Not understanding this Code of Conduct does not exempt anyone from relevant measures which could be adopted if not complied with, and there will be no retaliation or punishment to those who, in good faith, report any non-compliance with this Code of Conduct. Hence Bodegas Baigorri is committed to transmitting and spreading its existence by the best possible means so as to guarantee our full knowledge of its contents.

8. Methods of communication

Bodegas Baigorri has provided the following means of communication of this code and any updates:

- 1.- Bodegas Baigorri website.
- 2.- Welcome pack for new employees.
- 3.- Express declaration of acceptance through all contracts with suppliers.

Control of changes

Document	Professional and Ethical Code of Conduct	
Version	Date	Updated
v.1	November 2024	Initial version

