



R. JELÍNEK

ORIGINAL CZECH DISTILLERY

CODE OF ETHICS

FOREWORD

The history of distillery in the Vizovice region reaches back to the 16th century. The rapid development of the business in the production of fruit spirits took place mainly in the second half of the nineteenth century, including the gradual establishment of the largest distilleries. The founder of the Jelínek distillery family, Jakub, started his business endeavours in 1856 in the city of Luhačovice, but his successors established themselves mainly in Vizovice. That included his most successful grandson, who gave our company his name in 1926.

Today's company RUDOLF JELÍNEK a.s. continues to produce spirits, especially fruit spirits and has also continued the traditional fruit growing. In 2010, together with its sister companies, it became part of the successor firm, R. Jelinek Group SE, which covers all of the companies and acts as their parent company.

The product flagship of the group continues to be Slivovitz in the iconic alarm clock-shaped bottle, which carries a touch of history, a guarantee of quality and a connection with nature.

Also thanks to the diversity of products, we are able to establish ourselves in many countries of the world and we can offer the highest level of quality of fruit spirits to our customers. Gradually, we have become one of the largest producers and sellers of fruit spirits. Strengthening this position and ensuring the perception of the brand as the majority representative of Slivovitz and fruit spirits is our long-term vision and driving force within the entire group. At the same time, we want to achieve the status of an experienced and reliable fruit grower, increase the shares of alcoholic and non-alcoholic products in the various markets, sustainably increase



profitability, grow high-quality fruit and subsequent distillate in the long term, and focus on diversification of the core business, including the related and support activities.

Achieving these strategic goals would not be possible without employees who are an integral part of our business and we are grateful for their contributions to our continued growth and success. We believe that the success of the company, or rather of the entire group, is not only due to our products, but especially to the hard work, skills, knowledge, creativity and experience of our employees. That is why we strive to create a positive working environment where our employees can develop their skills, relationships and careers in the long term.

The group's Code of Conduct is an important part of our business operations and compliance with its standards is one of the building blocks for the future of our company. This Code reflects our values and our commitment to conducting our business honestly, with integrity and with respect for all stakeholders.

Vizovice, 20. 7. 2023

Pavel Dvořáček, m.p.
Chairman of the Board of Directors

CONTENT

I. Purpose and Scope of the Code of Ethics

II. Group Principles

III. General Provisions

III.I Compliance with applicable laws and relationship with competitors

III.II Acting in the best interests of the RJG Group

III.III Acting with Integrity

III.IV Conflict of Interest

III.V Respecting Standards of the Organisational Hierarchy

IV. Group Directives

IV.I Prevention of bribery, corruption, money laundering and smuggling

IV.II Accuracy in bookkeeping, archiving of contracts and other records

IV.III Protection, exchange, transfer and due diligence concerning data and information

IV.IV Regulation of external and internal communication

IV.V Protection of the Group's name, property and customers

IV.VI Responsible drinking

IV.VII Responsible advertising

V. Employees

V.I Human rights and equal treatment

V.II Environmental and social responsibility

V.III Protecting your health and safety and that of others

V.IV Mutual cooperation and respect

V.V Objectivity and independence

V.VI Professionalism

V.VII Cooperation with private clients and entities

V.VIII Cooperation with public clients, public entities and within the framework of tenders

V.IX Whistleblowing

VI. Summary

I. PURPOSE AND SCOPE OF THE CODE OF ETHICS

The R. JELINEK GROUP SE Code of Conduct (hereinafter referred to as the "**Code**") is a set of rules that the Company and its representatives and employees apply in their conduct, while including legal and ethical standards. These rules apply to all the group companies, all their employees and members of statutory bodies and all other persons acting on behalf of the R.JELINEK Group SE (hereinafter referred to as the "**RJG Group**" or the "**Group**"), in this case, **RUDOLF JELÍNEK a.s.** and the **subsidiary orchard firms, RUDOLF JELÍNEK sady s.r.o. and BIOSADY s.r.o.** When referring to the RJG Group, this also means each of the companies separately, without it being necessary to state this explicitly or unless otherwise stated.

The implementation and adherence to the rules of this Code are essential for the sustainable maintenance of the Group's reputation, the confidence and trust of customers and suppliers, as well as the long-term sustainable business success. That is why we want all representatives of the Group to understand, follow, and promote the Code in their daily work. The Code of Ethics also provides a framework for decision-making in complex situations and assists statutory bodies and employees in choosing solutions to various issues, not only of an ethical nature. Those who do not comply with this Code or breach it expose themselves, their employees, their company, and the RJG Group to the risk of loss of reputation, and the Company shall vigorously oppose this.

Since the Code cannot describe all possible situations, the rule applies: **"It is always necessary to act in the best interests of R. JELINEK Group SE"**.

Each individual company may have its own policies and procedures to specify or supplement this Code. These specific procedures must be discussed and approved by the statutory body of R.JELINEK Group SE.

The company's representative in charge of supervising the Code of Ethics is Pavel Dvořáček, who may be contacted by anyone in case of any questions, comments or a breach of the Code. All senior employees of the Group are responsible for applying the Code of Conduct and monitoring compliance with it in respect of their subordinates and other persons acting on behalf of RJG.



II. GROUP PRINCIPLES

In achieving its strategic goals, the Group has long been guided by clear principles that underpin the rules and procedures contained in this Code. These principles are also the basis for the RJG Group's strategy:

Customer

We serve our customers and learn from them.

Strategy

We concentrate our resources to the main activity that we understand, i.e. growing and processing fruit, development, production, marketing and sale of fruit spirits and other products.

Quality

We constantly strive for exemplary quality of our products and services.

Communication

We speak openly among ourselves and handle information freely but responsibly.

Company Management

We require the responsibility of all our employees. We manage all processes with the help of open communication and agreed goals, while regularly evaluating the fulfillment of tasks and looking for room for improvement.

Creativity

We create an environment in which new ideas leading to further progress and development are encouraged. We support the creativity of our employees as well as members of statutory bodies.

Organization

We ensure autonomy and decentralization of all members of the Group while applying common, basic values. We protect our position of an independent company.

Employees

We strive to have motivated and committed co-workers, dedicated to the company.

Profit

We recognize profitability as the driving force of our company and want to achieve high efficiency. Not to work more, but better!

Innovativeness

We are constantly introducing newer and more efficient procedures in all processes.

*We speak openly among
ourselves and handle
information freely but
responsibly.*

III. GENERAL PROVISIONS

III. I Compliance with applicable laws and relationship with competitors

The RJG Group operates in several countries around the world. We undertake that individual companies, the group as a whole, its employees and members of statutory bodies will comply with all applicable laws, regulations, rules, industry standards in the given country in all their activities, as well as the common internal strategy of the Group. We pay special attention to compliance with all laws and regulations relating to the production, distribution, sale and advertising of spirits, including their taxation and labelling. All employees and members of statutory bodies are obliged to accurately report all tax and customs obligations and must not engage in any activity that would constitute tax evasion, any crime or customs fraud.

We pay great attention to competition regulations, the purpose of which is to keep competition fair and free.

Employees and members of the Group's statutory bodies generally do not disclose to competitors any inside information, and specifically information regarding prices, trading conditions, customers and suppliers, market share, strategic decisions and other information that could violate applicable competition laws. We see compliance with these rules as the basis for the functioning and success of the company as well as for the satisfaction of our customers and suppliers.

We undertake to comply with all anti-corruption laws and regulations applicable within the European Union, the Foreign Corrupt Practices Act (FCPA, USA) as well as the British Bribery Act. Members of the statutory bodies and employees shall not

offer or accept any gifts or money that could jeopardise their judgment or provoke inappropriate or prohibited conduct.

If a conflict arises between the law and an internal regulation or the Company strategy, the law is decisive. Neither the employees nor members of statutory bodies are expected to have a detailed knowledge of the individual laws, but they must be able to identify and assess whether a particular situation is in order, or whether it is necessary to seek consultation with a superior or other appropriate legal representatives. If they are not sure, they must always contact their superior.

We expect all members of statutory bodies and employees to act honestly, fairly and transparently, and to immediately report any violation of laws or regulations to their superiors and the competent authorities.

Related to the above is the maintenance of healthy competitiveness. In order for the Group to be competitive, it is essential to have as much information as possible about its competitors, however, some forms of collection of information may be against the law. Only public sources, such as social networks, web and other freely-accessible sources, newspapers, press, media and internet news (if properly published), trade fairs and similar events if addressed to the public, and field surveys constructed by prestigious and trustworthy companies are considered legitimate sources of information. Prohibited sources, on the other hand, include confidential or classified information about a competing entity in any form and obtained in any non-public form, including obtaining confidential information from employees about working with previous employers, information from tenders or other random findings.

III. GENERAL PROVISIONS

III.II Acting in the best interests of the RJG Group

Each member of the Board of Directors and all Group employees shall always act loyally and in the best interests of the Group and its stakeholders. This means they make decisions that are in line with the Group's strategy and promote the long-term success and reputation of the Group, not the interests of others or their own.

We avoid situations that could lead to a conflict of interest or create an impression of inappropriate conduct and use the individual's judgment to increase the value of the Group, protect its interests and contribute to better results.

III.III Acting with integrity

From members of the statutory bodies and all employees we expect honest conduct in all relationships, whether collegial, customer, supplier or with other stakeholders. Acting with integrity involves honesty, transparency, and a commitment to doing the right thing, even when "no one is looking." Everyone must comply with all laws and regulations relating to his or her activities and the Company's activities in work matters, act honestly and ethically in all their working relationships, both inside and outside the Company, avoid conflicts of interest and, in the event of their occurrence, demonstrably and immediately report any such, keep accurate records, and truthfully and honestly provide information and refuse to participate in activities that are illegal, unethical or contrary to the Group's values or strategy.

III.IV Conflict of Interest

A conflict of interest arises when the interests of a private individual are in conflict or appear to be in conflict with the interests of the Group. A conflict situation may arise when an employee or a member of the statutory body carries out activities or has an interest that complicates his obligation to perform his work for the Group objectively and effectively. Conflicts of interest may also arise when an employee or a member of the statutory body is granted disproportionate personal benefits as a result of his or her position in the Company.

Employees or members of statutory bodies do not accept tasks or work for a competitor, customer or supplier without the prior and demonstrable consent of their superior or a member of the Company's statutory body. At the same time, they shall avoid direct or indirect business associations with customers, suppliers or competitors of the Group, except when required in the course of their work for the RJG Group.

Any conflict of interest must be immediately reported to their superior or members of the statutory bodies.

III.V Respecting Standards of the Organisational Hierarchy

Our Group and the individual companies have a clearly-defined organisational structure that helps us to operate efficiently and effectively. All employees respect this hierarchy, follow the guidelines and job descriptions that define the responsibilities and roles of each level, whether they are dealing with a local centre, a specific Group company or with the heads of the individual departments of the Company or the Group.

IV. GROUP DIRECTIVES

In addition, the "Grandfather principle" is applied, i.e. important decisions must be approved by a senior manager (e.g. employment matters).

Each employee follows the instructions of his or her immediate superior, communicates any concerns or problems to his or her superior in a timely and professional manner, understands the roles and responsibilities of each level of the hierarchy and cooperates with all levels to achieve the set goals, and treats all employees with respect and avoids any behaviour that could be considered discriminatory or disrespectful.

IV. Group Directives

IV.I Prevention of bribery, corruption, money laundering and smuggling

RJG Group has a zero-tolerance policy towards bribery, corruption, money laundering and smuggling. We undertake to comply with all applicable laws and regulations in the countries where we operate and do not engage in any activity that could be perceived as unethical or illegal.

Bribery and Corruption

Bribery and corruption are illegal and unethical practices. The purpose of handing over marketing items or products/services of the RJG Group in the business environment is to achieve goodwill and strong working relationships, not to gain unfair advantages. No gift or service should be offered, given or accepted by any employee or member of the Board of Directors (or their family members), except that: such is not a cash

gift, the gift is infrequent and clearly in line with customary business practices, has minimal economic value, cannot be construed as a bribe or payment that is given in return or for any benefit and does not breach any laws, regulations or applicable strategy of the organisation of one or the other party.

Money Laundering

Money laundering is the process of concealing the proceeds of illegal activities. Our RJG Group does not tolerate money laundering and undertakes to comply with all applicable laws and regulations.

Smuggling

Smuggling is the illegal transportation of goods across borders. Our Company does not commit smuggling and we undertake to comply with all applicable customs regulations and requirements.

Members of statutory bodies and employees are obliged to always act in such a way as to comply with the relevant regulations and not to get into situations that could give the impression that the Group or its members commit or tolerate bribery, corruption, money laundering or smuggling of goods.

IV.II Accuracy in bookkeeping, archiving of contracts and other records

RJG Group operates in several countries around the world, which means that it must comply with various legal regulations and requirements affecting its financial and other records. True, accurate and timely recording and communication of information, management of contracts and documentation are therefore essential to enable all entities concerned to make responsible business decisions.

IV. GROUP DIRECTIVES

The financial records of the Group and individual companies are essential to their management, compliance with local company regulations, tax and customs declarations, compliance of companies with their obligations to shareholders and preservation of financial integrity. Employees who are involved in financial transactions and accounting must ensure that the books, records, accounts and financial statements of the Company are kept with the necessary level of detail, reflect the Company's transactions completely and appropriately, must never be incorrect or misleading, must be properly recorded by applicable laws and regulations, appropriate accounting procedures and internal requirements of the Company as determined by the individual companies or as is customary in the given country.

Corporate records and communication may be public under the given state laws, and we maintain a policy of avoiding exaggeration, abusive remarks, conjecture, and mischaracterisation of people and companies. This also applies to any other communication such as e-mails, internal circulars and formal messages. Records of all communication are always preserved or destroyed in an appropriate manner based on internal regulations.

Contracts and agreements of the Group or individual Group companies with employees, suppliers, customers and other business partners must be concluded in writing or using guaranteed electronic media with clear and unambiguous conditions, checked and approved by the relevant person and duly registered. Verbal agreements are difficult to verify, sometimes they can lead to suspicions that something illegal or unethical has occurred.

We always immediately describe and confirm such verbal agreements, at least in an electronic (e-mail) communication. All contracts and agreements are reviewed regularly to ensure that they remain valid and enforceable.

IV.III Protection, exchange, transfer and due diligence concerning data and information

Information is a valuable asset and therefore the RJG Group is committed to protecting the privacy and security of personal data and confidential information. We take appropriate measures to protect data and information from unauthorised access, use or disclosure, and any such must be handled by all employees and directors – with due care and in accordance with the communication strategy and internal regulations of the individual Group companies.

Data Protection

We collect and process personal data in accordance with applicable data protection laws and regulations (e.g. GDPR). We handle all personal data with care and use it only for legitimate purposes.

Protection of information

Confidential information, including trade secrets, customer lists and detailed financial information, is kept confidential and disclosed only when necessary. We ensure that confidential information is protected from unauthorised access, use or disclosure. Employees and members of statutory bodies never pass on or allow the sharing or consultation of confidential information, i.e. information that should not be known to the public, to people outside the Company, unless required by law and approved in advance by an authorised superior.



IV. GROUP DIRECTIVES

This information includes, but is not limited to: business plans, budgets and calculations of products and services, production and technological processes and information, marketing and sales programmes and any records of employees, customers and suppliers, including the terms of mutual business relations. It also includes contractual and informal relationships with financial institutions, state institutions (tax and customs authorities, ministries, etc.) as well as RJG Group companies.

Data Exchange and Transmission

The exchange and transmission of data only take place in accordance with applicable laws and internal data protection regulations. We ensure that the exchange and transmission of data takes place securely, transparently and with proper safeguarding measures.

IV.IV Regulation of external and internal communication

Due to the nature of its activities, RJG Group has established communication principles and procedures. Employees and members of statutory bodies adhere to these principles in the area of internal and external communication. As part of this policy, they respect confidential information, comply with the rules for ethical advertising of alcoholic beverages, use the Company's resources responsibly, and behave professionally in all manner of communication.

All external communication relating to the Company must be approved by the relevant manager or members of the statutory bodies.

IV.V Protection of the Group's name, property and customers

The reputation and name of the Group and individual subsidiaries are one of the cornerstones for its ability in the long term and repeatedly to succeed in competition, and it is up to each member of the statutory bodies and each employee to protect it and avoid activities that could harm the Company in any way. We expect everyone to take all necessary steps to protect the Company's name, assets, employees, suppliers and customers.

In practice, this primarily means protecting the Group's confidential information and business secrets, complying with all procedures for dealing with the Group's assets, such as any tangible and financial assets, protecting the Group's intellectual property, such as trademarks, patents and copyrights, treating customers with respect and providing services to the highest possible level, and avoiding any behaviour, which could damage the reputation of the Group or the trust of its customers.

If an employee or a member of the statutory body learns of any behavior that could damage the reputation of the Company or the trust of our customers, suppliers, employees, it is his duty to notify his superior or a member of the statutory body of the relevant Company.

IV.VI Responsible drinking

As an alcohol producer, we recognise the importance of responsible alcohol consumption. Members of statutory bodies and employees promote responsible alcohol consumption both as concerns the Company well as in their personal lives and do not engage in any activity that could be

V. EMPLOYEES

considered as promotion of excessive or irresponsible alcohol consumption. The Group's companies are members of professional organisations in each country that promote responsible alcohol consumption, including adequate raising of awareness.

IV.VII Responsible advertising

Due to the nature of the subject of its activities, the RJG Group is committed to responsible advertising, marketing and ethical practices. We will ensure that all advertising and marketing materials are accurate, truthful, not misleading and in accordance with the internal communication strategy. They must also comply with all applicable laws and regulations governing advertising and marketing, including those relating to advertising and alcohol marketing.

In addition to the above, the Group undertakes to comply with the ethical rules for the advertising of alcoholic beverages by professional organisations of which the individual companies are members – e.g. in the Czech Republic, UVDL:

www.uvdl.cz/cs_cz/eticka-pravidla/.

V. Employees

V.I Human rights and equal treatment

RJG Group values diversity and is committed to promoting and upholding human rights and equality both within our Group as well as in interactions with others. We do not tolerate any form of discrimination, harassment or prejudice and strive to provide a safe and reasonably inclusive work environment for all employees.

We commit to complying with all applicable human rights and equality laws and regulations, including those related to equal employment opportunity, diversity and inclusion, such as the United Nations Declaration on Human Rights and the International Labour Organisation's fundamental labour rights, which continue to include, but are not limited to, freedom of association and recognition of the right to collective bargaining. We expect all directors and employees to treat each other and everyone else with respect and dignity, regardless of their race, ethnic origin, gender, sexual orientation, age, religion, disability or other legally protected characteristics. RJG Group shall not tolerate any behaviour that may be considered discrimination or humiliation of others.

We also believe that it is important to respect the rights of the native population and local communities, especially those who live in the areas where we do business. We are committed to meaningful consultation and cooperation with these communities and to respecting their cultural heritage and traditional knowledge and rights.

RJG Group does not and will not use child labour, nor will it cooperate with subcontractors or suppliers who use it. All conduct that uses physical coercive means or physically threatens, abuses or exploits someone must be reported and will be dealt with at the level statutory bodies of RJG Group.

V.II Environmental and social responsibility

RJG Group recognises the importance of protecting the environment and promoting sustainable practices. We are committed to reducing our environmental impact and

V. EMPLOYEES

promoting social responsibility in all our activities, as sustainable development, social responsibility and landscape care are an essential part of our business. For more information, see: We think about the future 2022.

We expect all directors and employees to comply with all applicable environmental laws and regulations and to strive to minimise our impact on the environment through sustainable practices, including waste reduction and sorting, saving energy resources and promoting renewable energy.

We are also committed to promoting social responsibility in all our activities, including efforts to empower the communities in which we operate, support local initiatives and promote ethical business practices.

V.III Protecting your health and safety and that of others

RJG Group sees all its employees as the key to success and is committed to ensuring a safe and reasonably healthy workplace for all employees. On the other hand, all employees are responsible for observing all occupational health and safety policies and procedures arising from applicable laws and directives, for reporting any accidents or injuries and for taking measures to prevent accidents and injuries. We are all aware of the specific health and safety risks associated with alcohol production, so we take appropriate measures to protect ourselves and others, we are proactive and we make wise decisions to maintain our health. Therefore, we consider it illegal to perform any work under the influence of alcohol or drugs within the RJG Group.

V.IV Mutual cooperation and respect

We believe that cooperation and respect are essential to achieve our goals and maintain a positive work environment. We want to cultivate a culture where employees treat each other with respect and work together to achieve common goals, take care of themselves and others, the society, as well as the environment.

We encourage open and honest communication among all employees and expect them to listen to and consider the opinions and ideas of others. We also expect all employees to maintain appropriate confidentiality and refrain from any behaviour that could be considered bullying, harassment (sexual or otherwise) or discrimination in all internal and external interactions.

V.V Objectivity and independence

Each member of the Board of Directors and each employee of the Group must maintain objectivity and independence in all business dealings. We do not accept any financial interests of competitors, customers or suppliers that could influence decision-making. Any personal interests or relationships that may influence decision-making must always be communicated to a superior member of staff who will assess a potential conflict of interest and take appropriate action.

RJG Group sees all its employees as key to success

V. EMPLOYEES

V.VI Professionalism

Our Company values professionalism and expects that all members of statutory bodies and employees will always behave professionally. This includes adherence to appropriate dress and grooming, punctuality, reliability and effective communication with colleagues, clients and customers.

We are committed to upholding high standards of ethical conduct, acting honestly and fairly, and maintaining the highest level of professionalism in all interactions.

High ethical standards and professional conduct include compliance with this Code of Ethics not only by members of statutory bodies and employees, but also by all persons acting on behalf of the RJG Group or on behalf of its subsidiaries. All members of the statutory bodies and employees who are responsible for relations with such persons are responsible for acquainting these persons with this Code of Ethics and for incorporating the fact that the Code also applies to their actions on behalf of the RJG Group into the relevant contracts concluded with these persons.

V.VII Cooperation with private clients and entities

Our Company works with private clients and entities around the world, and is committed to ensuring that our business is conducted with the highest levels of integrity, professionalism and respect.

All members of statutory bodies and employees comply with all applicable laws and regulations related to working with private clients and entities, including those relating to the fight against corruption, money laundering and bribery. We all act honestly and honestly in all our interactions with private clients and entities, build trust as a basis for further cooperation, and maintain strict confidentiality in all business dealings.

V.VIII Cooperation with public clients, public entities and within the framework of tenders

The RJG Group cooperates annually with national, European or other state or local authorities. Honesty, fairness and confidentiality – the rules set out above in the context of cooperation with private clients – are of even greater importance, but at the same time we are aware of all the special rules that apply when dealing with or cooperating with public institutions. These rules are often different from those used in normal commercial conduct and may result in criminal or civil sanctions as a result of their infringement. When participating in public tenders and public contracts, local laws/rules usually apply and must always be observed. We undertake that all members of the statutory bodies, employees and other persons involved in tenders or the provision of services for the Group within the framework of public procurement are aware of these specific rules and observe them.



VI. SUMMARY

V.IX Whistleblowing

Whistleblowing is an essential tool for ensuring ethical practices and maintaining high standards of behaviour. We encourage our employees to come forward and report any suspected unethical or illegal conduct directly to members of the Board of Directors of the RJG Group or the subsidiary in question. All such submissions are completely anonymous and RJG undertakes to take appropriate measures to address the identified issues while maintaining their confidentiality. At the same time, the principle of non-retaliation applies, which prohibits any form of retaliation against whistleblowers.

VI. Summary

This Code describes the basic standards and procedures that the RJG Group has set for the performance of its activities. The basic qualities and habits that we consider to be the basis for the successful functioning of members of statutory bodies and employees are

Honesty

Everyone is honest and truthful in all their relationships with colleagues, customers and partners. Honesty helps build trust and promotes good relationships.

Clear responsibility

Everyone has a clear idea of their job responsibilities and what is expected of them. This helps to ensure that everyone is working towards the same goals, avoiding confusion or misunderstandings.

Setting and achieving goals

Each member of our team sets goals for themselves and their team and conscientiously works to achieve them. This includes adherence to deadlines, an active approach to problem solving and the constant search for ways of improvement.

Teamwork

Cooperation and teamwork are essential to our success. We believe that everyone has unique strengths and ideas they can bring and we encourage everyone to work together to achieve our common goals.

Bold leadership

We value employees who are willing to take risks, challenge the status quo and lead by example. We encourage everyone to think creatively, take initiative and make decisions that are in the best interests of the Company.

Pragmatic optimism

We believe in an optimistic view of our future and at the same time in a realistic approach to the challenges we face. We value anyone who is positive, resilient and able to focus on our goals even in the face of setbacks or obstacles.



R. JELÍNEK

ORIGINAL CZECH DISTILLERY