

Diamond Estates Wines & Spirits - Code of Conduct and Ethics

Diamond Estates Wines & Spirits Inc. and its subsidiaries and divisions (all collectively, “Diamond” or the “Company”) is committed to maintaining a professional, respectful and ethical workplace. As ambassadors of our Diamond brand, the wines we make and the products we represent, our employees play a vital role in upholding our values and ensuring a positive work environment. This Code of Conduct and Ethics outlines expectations for professionalism, integrity, and compliance with legal and company standards.

1. Professionalism & Workplace Conduct

- Employees must conduct themselves with professionalism, courtesy, and respect toward colleagues, business partners, and vendors.
- Proper attire and personal hygiene should be maintained in accordance with company dress code policies.
- Gossip, inappropriate language, and unprofessional behavior that may damage workplace morale or the company’s reputation are prohibited.
- The use of mobile devices should be limited to business purposes during working hours and photos of others (unless they have given their informed consent in advance) are prohibited.
- Employees must maintain clear and professional communication in all interactions, including verbal, written, and electronic correspondence.

2. Responsible Alcohol Handling & Compliance

- Employees involved in alcohol handling must have the required certifications and adhere to all responsible service and regulatory guidelines.
- No alcohol consumption is permitted during work hours unless specifically authorized for business-related events.
- Employees must comply with all local and provincial liquor laws and refuse service to intoxicated individuals or minors.
- Any employee found to be under the influence of alcohol or impairing substances during work hours will be subject to disciplinary action, including termination.

3. Ethical Conduct & Integrity

- Employees must demonstrate honesty and integrity in all professional dealings, including financial transactions and business decisions.
- Any form of fraud, theft, misrepresentation, or misuse of company resources is strictly prohibited and will result in disciplinary action.
- Company policies regarding discounts, promotions, or other benefits must be followed and not used for personal gain.
- Conflicts of interest, including outside business activities that may impact the company, must be disclosed to management.
- If an employee becomes aware of any of the above, they must report it to their direct superior, Diamond management or use the Company whistleblower process.

4. Workplace Respect & Collaboration

- A respectful and inclusive work environment must be maintained, free from harassment, discrimination, or bullying.
- Employees must comply with all workplace harassment and violence prevention laws and report any incidents to management.
- Teamwork and cooperation are essential; employees should support colleagues and foster a positive workplace culture.
- Punctuality and adherence to scheduled work hours are required. Any absences must be communicated according to company policy.
- Workplace conflicts should be addressed professionally, with escalation to management when necessary.

5. Health, Safety & Regulatory Compliance

- Employees must adhere to all health and safety regulations, including proper handling of materials and equipment.
- Workspaces must be kept clean and sanitary, and all safety hazards should be reported immediately.
- Employees are required to follow emergency response protocols, including fire safety and first aid procedures.

6. Confidentiality & Brand Representation

- Employees must maintain confidentiality regarding company policies, customer information, and business strategies.
- Any public statements or representations of the company, including social media activity, must align with company guidelines and require prior approval where applicable.
- Employees should avoid any activities, both online and in person, that could harm the company's reputation.

7. Compliance & Disciplinary Action

- Violations of this Code of Conduct and Ethics may result in disciplinary action, including warnings, suspension, or termination.
- The company reserves the right to update this policy as needed, with employees notified of any changes.

Acknowledgment & Agreement

I, _____, acknowledge that I have read and understand the Code of Conduct and Ethics. I agree to abide by these guidelines and understand that non-compliance may result in disciplinary action.

Employee Signature: _____

Date: _____

Effective Date: May 1, 2025