

NIO COCKTAILS CODE OF ETHICS

Introduction

This NIO Cocktails Code of Ethics of establishes the ethical principles that represent the values and rules of conduct that must be followed by all company representatives, employees and collaborators of NiO Cocktails, regardless of their role within the company, whether they are shareholders, directors or employees.

The company believes that ethics are fundamental to its success and its image.
The Code of Ethics was created to regulate the company's behaviour through rules of conduct.

The company is committed to respecting laws and social values, establishing proper relationships with all stakeholders and playing a positive role in society.

The Code of Ethics binds the company and all its members.

The approval of the Code of Ethics is a requirement for the implementation of an Organisation, Management and Control Model compliant with current laws (Legislative Decree 231/2001).

Adopted by resolution of the Administrative Body on 25 September 2023, the Code of Ethics has binding effect for all those who have an employment or collaboration relationship with the Company. It is delivered or made available to the members of the corporate bodies, all employees and collaborators of the Company.

For the effectiveness and compulsory nature of the Code of Ethics, it is published on the on the [corporate responsibility](#) page, on the Company's website.

COMPLIANCE WITH NATIONAL AND EUROPEAN REGULATIONS IN THE SPECIFIC SECTOR

NiO Cocktails is committed to integrating and adopting all European sectoral regulations and transposing national laws in order to ensure ethical and responsible behaviour across all our activities. This commitment allows us to operate in accordance with the highest standards, strengthening the trust of our stakeholders and demonstrating our integrity, transparency and compliance with the rules both nationally and internationally.

Through this adherence to European and national regulations, we are committed to creating a work environment that promotes integrity, transparency and compliance with the rules, at every level. A commitment that extends to all phases of our activities, from human resources management to production, from distribution to communication.

NiO Cocktails is aligned with the European directives regulating the production and distribution of alcohol, adopted to harmonise tax rules and provisions relating to the labelling of alcoholic beverages between the Member States of the European Union, in order to facilitate trade and ensure consumer protection. NiO Cocktails is also aligned with the transposition of these directives in the Member States in which it operates.

National regulations

Specifically, in Italy, where NIO Cocktails has its production and legal headquarters:

- Legislative Decree no. 17 of 2010: laying down the rules for the taxation of alcoholic beverages (Directive 2008/118/EC)
- Legislative Decree no. 33 of 2013: laying down the rules for the labelling of alcoholic beverages, including the indication of alcohol content, origin and nutrition information (Directive 2011/64/EU)
- Legislative Decree 116/2020 – Environmental Labelling: which establishes that the label must provide indications to allow both the correct collection, reuse, recovery and recycling and to inform consumers about the final destinations of packaging (EU Directive 2018/851 on waste, and EU Directive 2018/852 on packaging and packaging waste).

NIO Cocktails is committed to responsible conduct as a company that sells spirits. We have two fundamental documents that guide our commitments: Model 231 and the Code of Ethics.

At the corporate level, all our activities and commitments are carried out in compliance with human rights. We apply the precautionary principle and adopt due diligence to define responsibilities within the company.

We believe that people are critical to the success of NIO Cocktails. Therefore, we protect and value each individual, categorically prohibiting any form of discrimination. We believe that all company decisions should aim at the enhancement of employees.

Through respect and monitoring, we demonstrate our commitment to protecting all stakeholders. NIO Cocktails is committed to protecting consumers, employees, suppliers and customers by including protection, defence and complaint systems in our Code of Ethics. Any conduct that constitutes discrimination or harassment is considered unacceptable and appropriately sanctioned.

ETHICAL PRINCIPLES

NIO Cocktails is committed to maintaining relationships with its stakeholders, both public and private, based on respect for ethical principles and the provisions in force for the development of a sustainable company and business.

The NIO Cocktails Code of Ethics has the clear definition of fundamental ethical values as its main objective and contains the general principles that must inspire the behaviour of corporate bodies and their members, managers, employees and all those who act in the name or on behalf and in the interest or advantage of the Company.

Our code of ethics reflects the principles of conduct that we consider appropriate in the context of society where alcohol is part of that reality. We are committed to conducting our business in an ethical, responsible and sustainable manner.

Our core values are:

1. INTEGRITY
2. RESPONSIBILITY
3. QUALITY
4. SUSTAINABILITY
5. RESPECT
6. LEGALITY
7. COOPERATION

1) INTEGRITY

Integrity is a core value for NIO Cocktails and is the foundation of our trusted relationships. We act with honesty, transparency and respect towards our customers, suppliers and collaborators.

We are committed to conducting our business in an ethical manner, avoiding fraudulent, deceptive or unfair behaviour. To this end, we adhere to the laws and regulations in force, maintaining an ethical line of conduct, even in the most complex situations.

We promote a work environment based on mutual respect and diversity. We aim to create an environment where everyone feels valued and respected for their skills and contributions.

Aware that integrity is essential to establish trusting relationships with our customers, suppliers and collaborators, we are committed to being honest and transparent in our communications and business transactions.

We ask all our employees and collaborators to respect this principle of integrity in all their actions and decisions. Including the obligation to avoid conflicts of interest and to act ethically in every situation.

2) RESPONSIBILITY

We take responsibility for our actions and promote responsible consumption of our products.

As a cocktail producer, we believe it is essential to promote responsible and conscious consumption.

We are committed to providing clear information about our products, including the negative effects of alcohol abuse and binge drinking.

We do not direct our communication to people below the legal limit for alcohol consumption and we avoid the use of images or messages that may encourage excessive or irresponsible consumption. We are committed to complying with ethical principles and self-regulatory standards in alcohol advertising, avoiding any form of advertising that is misleading, offensive or that may promote inappropriate consumption.

Aware that alcohol abuse can have serious consequences for people's health and safety, we are committed to providing correct and responsible information about our products and the conscious consumption of alcohol and not to promote excessive or irresponsible consumption of our cocktails.

We inform and sensitize our employees first, and ask them not to consume alcohol during working hours or in situations that may compromise their safety or performance.

We are committed to always providing accurate, transparent and scientifically based information about our products.

3) QUALITY

We work to ensure the quality of our products and compliance with hygiene and safety standards.

We are committed to following strict production and quality control standards to ensure that our cocktails comply with the regulations in force in the countries in which we operate and to meet the best expectations of customers.

We carefully select and collaborate with the most reliable suppliers that best meet our ethical criteria. We carefully select the raw materials of each cocktail in compliance with the highest safety and hygiene standards and with the aim of offering the best premium product to our consumers.

We guarantee the traceability of our cocktails throughout the supply chain, to identify and resolve any problems or complaints from consumers in a timely manner.

The safety of our products is a top priority: ingredients, preparation, packaging and packs. We comply with all safety regulations in force for the entire production line, including labelling standards and consumer warnings.

In case of safety or quality problems of our products, we take immediate measures, informing consumers and cooperating with the competent authorities.

4) SUSTAINABILITY

NIO Cocktails adopts sustainable practices to reduce the environmental impact of our processes and products.

We integrate sustainability into all our business decisions, considering environmental, social and economic aspects.

We take measures to reduce environmental impact, such as resource optimisation, efficient use of energy and water resources, reduction of greenhouse gas emissions and responsible waste management.

Thanks to a careful and structured use of raw materials, waste is reduced to almost zero.

We promote sustainable practices among our employees, collaborators and suppliers, raising awareness and providing information to promote eco-sustainable behaviour.

Thanks to the support of the zeroCO2 partner, we are committed to continuing our journey towards carbon neutrality by measuring, reducing and compensating our environmental impact in a short to long term strategy, in line with best practices and regulations.

Starting from the reporting of all direct and indirect emissions generated in our operations, we will adopt an adaptation and mitigation strategy to reduce our greenhouse gas emissions and, where it is not possible to reduce, we will undertake to compensate them through certified nature-based projects selected for transparency and co-benefits.

We evaluate and adopt sustainable actions such as the use of renewable energy sources, energy efficiency and the responsible use of natural resources.

We use recyclable or biodegradable packaging and we supply the consumer with necessary instructions for the correct separation and disposal of the packaging according to local regulations.

For the separation, transport, delivery and valorisation of our waste, we rely on ECOSTRATO, a specialised consultancy company.

We promote environmental awareness among our employees, collaborators and suppliers through training and awareness programmes.

5) RESPECT

We are committed to treating all people with respect and dignity, without discrimination based on race, ethnicity, religion, gender, sexual orientation or other factors.

We work to create an inclusive and positive work environment, promote collaboration, open communication and mutual trust among team members.

We respect fundamental human rights, as established by international laws and standards. We avoid any form of discrimination, exploitation or violation of the rights of persons involved in our activities, including employees, suppliers and customers. We respect the rights of our employees, such as the payment of fair wages, compliance with occupational safety regulations and the promotion of a healthy and proactive work environment.

Our respect for consumers is based on the principles of quality and safety of our products, so we are committed to providing accurate and transparent information. We want to empower consumers to make informed and informed choices based on truthful and complete information.

6) LEGALITY

We operate in compliance with the laws and regulations in force, we fight corruption and tax evasion.

NIO Cocktails is aware of the laws and regulations in force that apply to the alcohol sector and operates in full compliance with them, both locally and internationally. This includes staff training to ensure that everyone understands the regulations and follows them correctly.

We are strongly opposed to corruption and are committed to maintaining high ethical standards in our interaction with customers, suppliers and associates.

We combat any unfair or fraudulent practices, such as price manipulation, misleading advertising or counterfeiting. Actions that go against the ethics of legality and could still damage the reputation of NIO Cocktails.

We protect the confidentiality and security of the information of customers, employees and other interested parties.

We adopt appropriate security measures to prevent data breaches and use the information in accordance with the European Data Protection Regulation: GDPR compliant.

7) COLLABORATION

We monitor and, where appropriate, work with relevant authorities and industry organisations to promote the adoption of ethical and responsible practices. This enables us to contribute to better regulation, a responsible consumer culture and a positive impact on the industry as a whole.

We work in full alignment with regulatory authorities and government institutions to ensure compliance with laws and regulations in the alcohol industry.

We recognize the importance of collaborating with industry organizations, such as associations of alcohol producers, distributors and retailers. These collaborations allow us to share best practices, promote the adoption of ethical and responsible standards, and work together to address common industry challenges.

Through collaboration, we aim to positively influence the entire alcohol industry, promoting a culture of responsible drinking, supporting alcohol abuse prevention initiatives, and working to reduce the environmental impact of sectoral activities.

AN EVOLVING COMMITMENT

The NIO Cocktails Code of Ethics represents our commitment to produce and distribute single-serve cocktails with premium spirits in an ethical, responsible and sustainable manner.

We are aware of the importance of promoting responsible consumption of our products and adopting sustainable practices to reduce the environmental impact of our activities.

Our company is committed to respecting and enforcing the Code of Ethics by all employees, associates and business partners. We want to be an exemplary company in terms of integrity, responsibility and sustainability, offering high quality products and services in the sector of single-serving cocktails with premium spirits.

From our headquarters in Italy, and subsidiaries in Germany, England, we are committed to contributing to local economic development, improving the environmental and social performance of the company and promoting innovation in the sector.

The trust of our customers and business partners is critical to our success, which is why we strive to maintain high ethical standards in all our operations.

We will continue to strengthen the ethics of our business, promoting transparency and communicating responsibly with our customers and society as a whole.

Our Code of Ethics represents our commitment to be a company that goes beyond mere profit, that cares about the social and environmental impact of its activities and that is committed to promoting an ethical, responsible and sustainable single-serve cocktail sector with premium spirits.

Thank you for giving us the opportunity to share our Code of Ethics and for your support in promoting a culture of responsible and sustainable consumption.

We are proud to be part of a movement that aims to create a better future for all.


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