

## Slavery and Human Trafficking Statement

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015.

### About Us

The Edrington Group Limited is an international spirits company headquartered in Scotland with 60% of employees based overseas. As one of Scotland's leading privately owned companies, we consider our legal and ethical obligations in our business dealings to be of the utmost importance.

Edrington is owned by the Robertson Trust, Scotland's largest independent grant making charitable Trust and, as such, social responsibility is at the forefront of everything we do. Our commitment to playing our part in the eradication of slavery and human trafficking is no exception.

### Supply Chains

Our reach and use of third parties spans globally and we recognise the risk factor in this. Our engagement with the external supply chain aims to impose our values and policies on each link in the chain.

### Code of Conduct

Integrity has always been a core value at Edrington. Much of what we expect is clearly defined and enshrined in our Code of Conduct which specifies that we require all business partners to work to the same standards of integrity as we do. We commit to adopting the following in all business relationships:

1. Prior to engaging in any new material business relationships or transactions, we will carry out appropriate due diligence on the other party to ensure that they do business in a manner that is consistent with our Code
2. Where the people we work with have their own Code of Conduct, we will ensure that they are operating to the same ethical standards that we have set out in our Code
3. Where the policies, procedures or practices of a third party are not fully consistent with our Code, any elements of the Code necessary to supplement the third party's arrangements should be included in the relevant contracts, and
4. We will not work with business partners whose practices are inconsistent with our Code.

### Global Sourcing Guidelines

In addition to the Code, we have used internationally recognised Codes of Practice, such as the Ethical Trading Initiative Base Code and the UN Global Compact, to compile our Global Sourcing Guidelines which set out the standards we adhere to in order to be a responsible corporate citizen, positively managing the social, environmental and ethical impact of our activities worldwide.

1. We will only do business with business partners who, as individuals and organisations, promote and adhere to a set of ethical standards which are consistent with our own
2. We require our business partners to be law abiding, complying with all domestic and international legislation and/or regulations relevant to the conduct of their business
3. Activities which may suggest or give the impression of a lack of ethical behaviour, must be avoided without exception
4. We will not utilise prison or forced labour directly or indirectly in the manufacture and finishing of our products. Similarly, we will not utilise or purchase materials from a supplier which directly or indirectly utilises prison or forced labour
5. We will only do business with suppliers who provide wages and benefits that comply with all applicable laws and match the prevailing local manufacturing or finishing industry practices, and
6. We will not do business with suppliers who use child labour directly in any of their facilities, or indirectly throughout their extended supply chains.

We expect the same standards of our suppliers, and we require our suppliers to ensure that these standards are in turn applied throughout their own supply chains.

### Supplier Compliance

Edrington is committed to working with its suppliers to facilitate compliance with our Guidelines, and we strive for continual improvement. Through our Third Party Risk Management Policy, we operate a risk-based approach when selecting business partners and engage in enhanced due diligence and independent approval where appropriate. Our contracts with third parties require full compliance with the Modern Slavery Act 2015 and where breaches are discovered, we may cancel those contracts. Where an employee suspects that Edrington's high standards of ethical and compliant behaviour are not being met, they are encouraged to raise those concerns through our Speaking Up Policy.

The Edrington Group Limited

30 September 2016