



Slavery and Human Trafficking Statement **April 2019**

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

Organisational Structure

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.

This statement applies in respect of The Edrington Group Limited and all of its subsidiaries, specifically including the following UK trading entities:

- The Macallan Distillers Limited (company number) SC024068
- Highland Distillers Limited (company number SC158731) and
- Edrington Distillers Limited (company number SC014472).

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. This now explicitly calls out compliance with the UK Modern Slavery Act. 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 this requires them to operate to the same ethical standards that we have set out in our Code
3. Where the policies, procedures or practices of a third party as set out in their Code of Conduct are not fully consistent with our Code, any elements of our 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.

The required approach to evaluating potential new third parties, and then overseeing third parties to ensure they remain appropriate to do business with, is confirmed in our third party risk management policy - Know Your Third Party - which is followed consistently across all company locations. As part of this approach all third parties defined as higher risk are subject to a daily screen, including indications of adverse media coverage.

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THE EDRINGTON GROUP LIMITED. REGISTERED IN SCOTLAND NO. 36374
REGISTERED OFFICE: 100 QUEEN STREET, GLASGOW, G1 3DN. SCOTLAND.
T: +44 (0)141 940 4000 F: +44 (0)141 940 4040

www.edrington.com

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Code of Conduct (Continued)

From 2019, our employees will complete an annual training on our Code of Conduct and the values and required behaviours therein. This training includes business relevant scenarios to illustrate and test trainee engagement and understanding and concludes with a compliance certification by the employee for the financial year just ended. It is made clear in our Code and related training that, should an employee ever have a concern that Edrington's high standards of ethical and compliant behaviour are not being met, either in the business or by the third parties engaged with, they are required to raise that concern through our Speaking Up Policy.

Our Code of Conduct, together with our Anti-Corruption and Speaking Up Policies, are widely available to employees and third parties, in English and all main languages spoken across the company, via company websites and intranets, the Edrington Academy training resource, company mobile devices. In addition, posters confirming key values and behaviours are displayed in communal areas at all locations.

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 is known or suspected to 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 are known or suspected to use child labour directly in any of their facilities, or indirectly throughout their extended supply chains.

Supplier Compliance

Edrington is committed to working with its suppliers to facilitate compliance with our values and behaviours and we strive for continual improvement. Since the publication of our last statement, we have invested further in third party on-boarding and oversight, including a series of webinars to refresh and best ensure a common understanding of the requirements of the Know Your Third Party Policy, a further full remediation of third parties across the company, and development of more robust and systemic on-boarding processes for UK companies.

The Code of Conduct and related training course were updated to include explicit reference to the UK Modern Slavery Act.

Edrington has also refreshed the terms and conditions on which we engage with suppliers, ensuring that during the course of providing goods or services to Edrington, our suppliers shall conduct their business in a manner consistent with our Code and the Modern Slavery Act 2015, and giving Edrington the right to cancel these contracts if any breaches are discovered.

In 2017, Edrington asked all of its top 110 suppliers to acknowledge and adhere to its standards and governance in four key areas: Code of Conduct, Anti-Corruption, Speaking-Up and Slavery and human trafficking.



Graham Hutcheon
Managing Director – Group Operations
The Edrington Group Limited
12 April 2019