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EDRINGTON UK DISTRIBUTION LIMITED ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

ORGANISATIONAL STRUCTURE

Edrington UK Distribution Limited are a UK based spirits sales, marketing, and distribution company, and we consider our legal and ethical obligations in our business to be of the utmost importance. Our commitment is to play our part in the eradication of slavery and human trafficking.

SUPPLY CHAIN

Our reach and use of third parties span our operations and we recognise the risk factor in this and our engagement with the external supply chain, within the UK, aims to impose our values and policies upon each link in the chain,

1. POLICY STATEMENT

- 1.1 Slavery and human trafficking are crimes and a violation of human rights. Edrington UK Distribution Limited has a zero-tolerance approach to slavery and human trafficking.
- 1.2 Slavery and human trafficking involve the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain and encompasses practices such as: forced labour (i.e. involuntary work coerced by threatening behaviour); the sale and exploitation of children and other vulnerable groups; and arranging or enabling the trafficking of persons.
- 1.3 The following key principles apply to our business and suppliers:
 - (a) Child (under 16 years of age) labour must not be used, and we and our suppliers must not benefit from child labour either directly in their facilities or indirectly throughout their supply chains
 - (b) Any form of forced or compulsory labour must not be used and we and our suppliers must not benefit from forced or compulsory labour. Workers must be free to leave employment or work after reasonable notice.
 - (c) Passports should not be taken from workers.
 - (d) All forms of debt bondage are prohibited. Workers should not be subject to contracts that tie them into repaying a loan, accommodation or some other costs that they have little opportunity to repay.
 - (e) Compensation and benefits must comply with fundamental laws and local principles relating to minimum wages, overtime hours and legally mandated benefits.
 - (f) The formation of trade unions and powers of collective bargaining should be respected.

(g) Workers should have safe and healthy working conditions that meet or exceed applicable standards for occupational safety and health.

1.4 We are committed to implementing and enforcing effective systems and controls to ensure slavery or human trafficking are not taking place anywhere in our own business or in any of our supply chains.

1.5 We will work with suppliers to facilitate compliance with our values and behaviours – driving for continual improvement.

1.6 On an annual basis we will publish an anti-slavery statement which will set out our approach to prevent slavery and human trafficking in connection with our business.

2. COMPLIANCE WITH THE POLICY

2.1 Employees and suppliers must read, understand and comply with this policy and our related procedures.

2.2 Please raise any questions or concerns about slavery or human trafficking in any parts of our business or supply chains with your line manager or functional director. Employees in the UK can also contact a helpline provided by the Home Office on 0800 0121 700.

3. BREACHES OF THIS POLICY

3.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

3.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.