Chivas Brothers
Pernod Ricard

Slavery and Human Trafficking Policy

VERSION 2.0 (last updated September 2025)

OVERVIEW

Our success at Chivas Brothers Limited and Chivas Brothers International Limited ("**Chivas**") is intrinsically linked to the way we conduct our business in a responsible and ethical manner. These behaviours help to foster a culture of mutual trust and ethics both within the business and with our suppliers. Chivas adopts a zero-tolerance approach to slavery and human trafficking. We are committed to taking all reasonably practicable steps to ensure that slavery and human trafficking are not present either in our business or in our supply chains. In order to achieve this, we seek to identify and tackle slavery and human trafficking risks.

1. ABOUT THIS POLICY

1.1 The aim

We are committed to combatting the risks of slavery and human trafficking. In basic terms:

- **Slavery** occurs where a person holds another person in slavery or servitude or forces that person to perform forced or compulsory labour.
- **Human trafficking** occurs were a person arranges or facilitates the travel of another person with a view to that other person being exploited. For more information, please see the United Nations Office on Drugs and Crime website.

1.2 Who this policy applies to

This policy applies to all staff and external contractors working for or on our behalf in any capacity.

- This includes employees, directors, agency staff, secondees, volunteers, interns and consultants. It also includes our suppliers, contractors, business partners and third party representatives.
- We expect the same standards from all those we work with, including business partners, contractors and suppliers. Chivas is committed to working closely with our suppliers to ensure that slavery and human trafficking risks are identified and managed proactively.

2. OUR CORPORATE SOCIAL RESPONSIBILITY

2.1 Our commitment

Since 2003, Pernod Ricard has been a participating company in the United Nations Global Compact - and is therefore committed to respecting and promoting the core principles.

- As part of the Pernod Ricard Group, Chivas is accordingly committed to eliminate forced labour and compulsory labour and to effectively abolish child labour.
- This includes International Labour Organisation conventions 138 & 182 on *the prohibition of child labour* and 29 & 105 on *the elimination of forced or mandatory labour*.

2.2 Our Statement

To combat the risks of slavery and human trafficking, and to fulfil our local responsibility under the UK Modern Slavery Act 2015, we are committed to producing a statement at the end of each financial year setting out the steps we have taken to ensure that slavery and human trafficking is not taking place in any part of our business or our supply chain. Our slavery and human trafficking statement (which will be updated annually) can be found on our website.

3. HOW THIS POLICY APPLIES TO YOU

3.1 Read this

You must ensure that you read, understand and comply with this policy. This includes avoiding any action which might result in a breach of this policy.

3.2 Your duty to report

Everyone to whom this policy applies is responsible for preventing, detecting and reporting instances of slavery and human trafficking in any part of our business or in our supply chains.

If you believe that there has been a breach of this policy or that a breach is likely to occur in the future, you must notify a member of Chivas Legal or raise your concerns through the *Speak Up* platform (available here) as soon as possible (at least within three business days). This extends to any suspicion you may have that slavery or human trafficking exists in any part of our business or supply chains.

EXAMPLES: The following are recognised examples of unusual behaviour displayed by workers which may be indicative of someone experiencing slavery or human trafficking:

- workers in a country not possessing legal documents required to demonstrate a right to work in that country;
- multiple workers being paid wages into the same bank account;
- unusual transport arrangements;
- appearance (for example, signs of malnourishment, physical injuries, few personal possessions);
- signs of intimidation or workers not speaking for themselves;
- inconsistencies in background stories; and
- fear of seeking medical care; not approaching authorities; or debt problems (or other dependence on someone else).

3.3 Dealing with reports

Reports of policy breaches will be assessed within one week of being reported and further investigations concluded as soon as possible thereafter.

We will support anyone who raises genuine concerns in good faith under this policy, even in circumstances where it transpires that those concerns are mistaken. We will take steps to ensure that those who report such concerns do not suffer adverse treatment.

- Adverse treatment includes bullying, harassment, threats, disciplinary action or dismissal connected with raising a genuine concern in good faith.
- If you are an employee of Chivas who believes that you have suffered any adverse treatment after raising such a concern, you should raise the matter formally with Chivas' Human Resources team.

3.4 Breaches by you

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

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

3.5 Training (for Chivas' workforce)

Training on this policy (and the risks of slavery and human trafficking in our business and in our supply chains) forms part of the induction process for all individuals who work for us. We will also provide upfront and ongoing training to all staff on this policy, including tailored training to those with responsibility for managing supplier contracts.

3.6 Your questions & suggestions

If you have any questions regarding how this policy applies, you should raise these with Chivas Legal.

- This includes any questions relating to particular actions, working conditions or any other issue relating to the treatment of workers either in our business or any tier of our supply chains.
- Chivas employees can also raise any queries they have with their manager.

If you have any suggestions for how this policy could be improved, please direct them to a member of Chivas Legal.

4. WORKING WITH SUPPLIERS

4.1 Responsible procurement

To identify and mitigate the risk of slavery and human trafficking being present in our product supply chains, we shall employ a number of sourcing strategies, including:

- Informing our suppliers of the standards that we expect through our Supplier Standards (available here);
- Identifying potentially at-risk suppliers by using the CSR Risk Mapping Tool to identify key risks (such as the presence of a supplier in an at-risk country, the criticality of the product to our operations and the size of the supplier);
- Communicating concerns to at-risk suppliers;
- Assessing suppliers using tools such as Partner Up!, the EcoVadis platform and our *Self-Assessment Checklist* (which includes scoring based on factors such as health & safety, child labour, slavery and payment of the minimum wage);
- Analysing the results of our assessments; and
- Conducting on-site audits.

As far as reasonably practicable, investigations should be undertaken into the supplier's supply chain, particularly where that supplier operates in a high risk country. In those circumstances, we will use supply chain tools to assess relevant risks and support necessary further investigations.

4.2 Agency workers

Our suppliers include staff supplied to us externally (e.g., via agencies). Particular care should be taken to ensure that:

- all staff have a written contract of employment;
- all staff have not had to pay any direct or indirect fees to obtain work;
- all staff are legally able to work in the UK; and
- checks are made to assess whether multiple workers are living at the same address or being paid wages into the same bank account.

We should only use agencies which are reputable. Where agencies offer or charge suspiciously low rates, we should seek to obtain:

- indicative pricing statistics to assess quotations and fees; and
- the employment terms of agency workers from such firms.

4.3 Supply contracts

Our supplier contracts require our suppliers to comply with our anti-slavery policy and to take other steps to protect against the risks of slavery and human trafficking.

4.4 Communication with suppliers

It is the responsibility of Chivas colleagues working with third parties (for example, those who manage supplier contracts or recruitment agencies) to communicate to them our zero-tolerance approach to slavery and human trafficking. We will refresh our third party communications on a regular basis.

5. CORPORATE GOVERNANCE

5.1 Board of Directors

The board of directors has overall responsibility for formulating our slavery and human trafficking compliance strategy, this policy and for ensuring that this policy is complied with.

5.2 Managers

All levels of management within Chivas are responsible for ensuring that those who report to them understand and comply with this policy. This responsibility extends to ensuring that steps are taken to report any slavery and human trafficking issues which are identified.

5.3 Compliance Team

The legal team has responsibility for the review and implementation of this policy. This includes:

- assessing the risk of slavery and human trafficking to Chivas;
- maintaining a training programme which ensures compliance with this policy;
- answering questions in relation to the interpretation of this policy;
- reviewing our supplier contract terms to identify compliance opportunities;
- reviewing our supplier due diligence procedures to support compliance with this policy;
- monitoring our supplier audit procedures to protect against the risk of slavery and human trafficking;
- facilitating appropriate corrective action when slavery and human trafficking issues are identified; and
- monitoring the effectiveness of this policy.

5.4 Other relevant policies

This policy should be read in conjunction with the following policies:

- Procurement Code of Ethics
- Code of Business Conduct
- Responsible Procurement Policy
- Supplier toolkit
- Grievance procedure (for Chivas employees)
- Health and Safety Policy

Copies of these polices (and information setting out our employees' rights) can be found at http://www.chivasspirit.com.

5.5 Continuous improvement

We may issue amendments to this policy at any time.