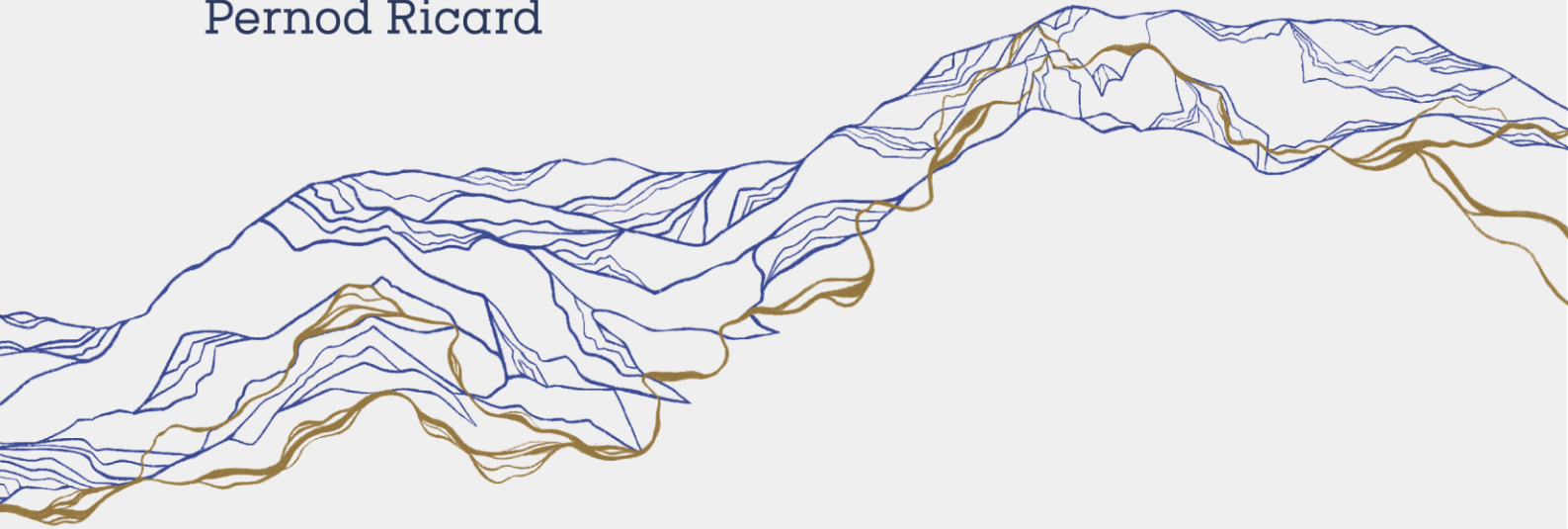




Chivas Brothers
Pernod Ricard



Slavery and Human Trafficking Statement

FOR THE YEAR ENDING 30 JUNE 2024



OVERVIEW

Our success at Chivas Brothers Limited and Chivas Brothers International Limited (“Chivas Brothers”) 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 Brothers 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.

1. OUR COMMITMENT

1.1 About us

Chivas Brothers is the Pernod Ricard business dedicated entirely to Scotch whisky. Our award-winning portfolio features some of the world’s most revered single malt and blended Scotch whisky brands, including Chivas Regal, Ballantine’s, Royal Salute and The Glenlivet. As the world’s No.2 Scotch whisky producer which exports to 150 markets globally, Chivas Brothers and its 1,800-strong team are rooted in communities across Scotland and around the globe, sharing a proud history and the ambition to open up to shape the future of whisky. Chivas Brothers was awarded ‘Scotch Whisky Producer of the Year’ at the International Wine & Spirits Competition 2021 and the 2020, 2021, 2022 and 2023 International Spirits Challenge. For more information about Chivas Brothers, please visit www.chivasbrothers.com.

- [Universal Registration Document FY23 | Pernod Ricard \(pernod-ricard.com\)](#); and
- [About Us | Chivas Brothers \(chivasbrothers.com\)](#)

1.2 Our standards

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

- As part of the Pernod Ricard Group, Chivas Brothers 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*.

We expect the same standards from all those we work with, including business partners and suppliers. Chivas Brothers is committed to working closely with our suppliers to ensure that slavery and human trafficking risks are identified and eliminated proactively.

Sustainability and Responsibility (S&R) is at the very core of what we do and is based on our four key pillars that address all aspects of our production, from grain to glass, with clear 2030 objectives supporting the [United Nations Sustainable Development Goals](#). Please see our [2030 S&R Roadmap](#) for further information.

1.3 Our actions

Since the [Modern Slavery Act 2015](#) came into force, we have built on our existing commitment by:

- taking legal advice on the steps necessary to support compliance;



- identifying and monitoring key slavery and human trafficking risks in our business and in our supply chains;
- maintaining a Project Plan to help manage compliance effectively;
- adopting a specific Anti-slavery Policy (which has been approved by the *Chivas Brothers Board of Directors*) and implementing this within Chivas Brothers;
- continuing to operate our cross-functional team responsible for implementing this policy (which continues to meet to monitor and review the effectiveness of our Anti-slavery Policy);
- maintaining our existing training programme to directly support compliance with our Anti-slavery Policy;
- continuing to deliver tailored training to staff with responsibility for managing supplier contracts;
- continuing to review our supplier contract terms to identify compliance opportunities;
- ensuring that bespoke contracts continue to include a compliance clause;
- maintaining a website link for suppliers to easily access all our supplier CSR policies;
- setting *Key Performance Indicators* against which to assess our progress;
- adopting and implementing a new [Code of Business Conduct](#);
- adopting and implementing a new suite of supplier due diligence tools (including a unified procurement platform, *SMART* and global due diligence platform, *Partner Up*) to ensure that our supplier due diligence and audit processes continue to support compliance with our Anti-slavery Policy;
- adopting and implementing our new [Supplier Standards](#) (which replaced our existing *Supplier CSR Commitment* and informs our suppliers of the standards we expect from them in relation to Labour & Human Rights, Health & Safety, Environmental Impact and Integrity & Fair business practices);
- adopting and implementing a new [Global Human Rights Policy](#); and
- adopting and implementing *Speak Up*, a global platform which enables all Pernod Ricard employees to raise their concerns confidentially and anonymously, where they see, know of or suspect any conduct that may be unsafe, unethical or unlawful.

2. OUR POLICY

2.1 About our Anti-slavery Policy

We are committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to prevent slavery and human trafficking in our supply chains. Our Anti-slavery Policy:

- applies to all staff and suppliers working for or on our behalf in any capacity;
- builds upon our existing policies and standards;



- aligns with our new Code of Business Conduct;
- includes guidance to our staff with examples of unusual behaviour displayed by workers which may be indicative of someone experiencing slavery or human trafficking;
- makes it clear that Chivas Brothers will support anyone who raises genuine concerns in good faith, even in circumstances where it transpires that those concerns are mistaken.

The Policy can be found [here](#).

2.2 Working with our suppliers

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

- informing our suppliers of the standards that we expect through our [Supplier Standards](#), our [Standard Sourcing Terms](#) and our [Contractors' Handbook](#);
- 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, how critical the product is to our operations and the size of the supplier);
- communicating concerns to at-risk suppliers;
- assessing suppliers using tools such as the *SMART*, *Partner-up* and *EcoVadis* platforms and our *Supplier-Audit Checklist* (which includes scoring based on factors such as health & safety, child labour, slavery, payment of the minimum wage, membership of *Sedex* and SA8000 certification);
- analysing the results of our assessments; and
- conducting on-site audits and carrying out necessary corrective action (SMETA) .

2.3 Training our people

Training on Chivas Brothers' Anti-slavery Policy and the risks of modern slavery and human trafficking in our business and in our supply chains is available:

- As part of the induction process for individuals who work for us to complete the Code of Business Conduct; and
- as part of a tailored training program for those with responsibility for managing supplier contracts.

3. ENSURING EFFECTIVENESS

3.1 Measuring our success

We use the following *key performance indicators* to measure how effective we have been in combatting slavery and human trafficking:

- Training is incorporated in all staff inductions and made available to all relevant existing staff.
- Policy breaches are reported to Chivas Brothers' Legal team within three business days of occurring.



- Policy breaches are assessed within one week of being reported and further investigations concluded as soon as possible thereafter.

We will continue to monitor the effectiveness of our compliance regime and take necessary steps to address any identified instances of slavery and human trafficking.

3.2 Our next steps

Following a review of the effectiveness of the steps we have taken to manage the risks of slavery and human trafficking in our supply chains, we intend to take the following further steps to combat slavery and human trafficking:

- we will continue to enforce our effective systems and controls to prevent slavery and human trafficking in our supply chains;
- we will monitor and review the effectiveness of our new supplier due diligence tools *SMART* and *Partner-up* and wider compliance regime;
- we will continue to ensure that our new and existing wet goods and material suppliers are assessed via our new *Partner-up* due diligence process;
- we will continue to implement our new Supplier Standards and Global Human Rights Policy;
- we will continue to conduct our business in accordance with our ethical sourcing standards across our supply chains through our Supplier Standards and Standard Sourcing Terms; and
- as far as reasonably practicable, we will continue to use external risk management tools (such as the [Global Slavery Index](#) and the [International Labour Organization's Resources on Forced Labour, Human Trafficking and Slavery](#)) to assess and manage geographical and sector risks.

This statement is made pursuant to [section 54\(1\) of the Modern Slavery Act 2015](#) and constitutes our slavery and human trafficking statement for the year ending 30 June 2024.

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Jean-Etienne Gourgues

Chairman and CEO
Chivas Brothers Limited and Chivas Brothers International Limited

Date: 30 June 2024
