



# WILLIAM GRANT & SONS

## **UK Modern Slavery Act & California Transparency Act - Transparency Statement, 2022**

As required by the UK's Modern Slavery Act 2016 and California's Transparency in Supply Chains Act of 2010, this transparency statement sets out the steps we have taken during the financial year to ensure that modern slavery is not occurring in our company or supply chain.

This transparency statement covers the period of our financial year 2022/2023 which runs from 1 April 2022 to 31 March 2023. It was approved by our Executive Board on 9 June 2022.

It is a group statement applying to the following companies in our global group: William Grant & Sons Holdings Limited, William Grant & Sons Distillers Limited, William Grant & Sons Brands Limited, William Grant & Sons UK Limited, William Grant & Sons, Inc., William Grant & Sons Irish Brands Limited, William Grant & Sons Irish Manufacturing Limited and Quality Spirits International Limited.

### Our organisational structure, business and supply chain

Established in 1887, William Grant & Sons is a luxury spirits company with a portfolio of award-winning brands enjoyed globally. We employ over 2,600 people in approximately 30 countries worldwide. We are a family business, guided by a strong belief in morals and business ethics. Our Corporate Values shape the way we work and give all our employees a common framework about how we act, do business and make decisions.

We believe that any form of slavery is unacceptable in our business dealings anywhere in the world. This statement is an update to our fifth statement published in 2021. It sets out our efforts to ensure that slavery does not take place in our business or in our supply chain.

We operate within a global supply chain, sourcing raw materials for the manufacture of our products and marketing, distributing and selling them to our customers and consumers all over the world. In doing so, we operate and comply with local laws. We expect our suppliers to do so too.

### Our HR policies

We will always comply with local employment laws. In a number of countries, we go beyond the locally mandated minimum requirements. The range of benefits is broadly similar across the company, but specific benefits take account of local practice.

Our range of HR policies and ways of working ensure that our employees are treated fairly in terms of:

- Pay and benefits
- Health & safety, working environment and conditions
- Treatment in the workplace

William Grant & Sons Limited

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## WILLIAM GRANT & SONS

- Diversity, inclusion and engagement
- The ability to speak up confidentially if issues arise
- Access to clear written terms of employment
- Clear expectations of and ways of working with our partner recruitment agencies for temporary staff.

We continue to review all of our employment policies globally on a regular basis to ensure we are compliant with any legislative changes.

### Our due diligence processes

Given the nature of the products we make and sell globally, we set high standards for our business and supply chain. We always comply with standards and rules set by regulatory authorities and by national and international standards authorities. Our processes include:

- Anti-bribery policy, and global processes, including engagement, assurances, and compliance training for medium and high risk service providers
- Using risk matrices and external management tools to assess and manage geographical and industry risks.
- Cross-functional “Know Your Customer” checks before we work with new customers and distributors
- Full compliance with the UK’s HMRC and Irish Revenue Department requirements, including supply chain due diligence
- Site visits by our commercial teams to key distribution partners to understand their supply chains
- Supplier audit process which includes a review of social and ethical standards of all our packaging suppliers
- Periodic verification of our product supply chains in an effort to evaluate and address the risks of human trafficking and slavery
- Regular successful completion of audits by the ISO, the British Retail Consortium and large retail customers
- Membership of Supplier Ethical Data Exchange (SEDEX)  
A procurement process that ensures that we work with the right partners including in all tenders a mandatory and scored section on potential suppliers’ ESG aims, actions and progress

### Assessing and managing the risk

- Given the HR policies and procedures we have in place, we do not consider that there is a significant risk of slavery and human trafficking within our own business. But we are committed to responding to it appropriately if reported.
- As part of a complex supply chain, we continue to consider a range of options to better understand, identify and assess possible risks of slavery and human trafficking. We are also exploring opportunities to work closely with experts in this area, in order to better understand the issues and best practice.

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### Reporting Modern Slavery Or Human Trafficking

We use our Speak Up policy to report any illegal, dangerous or inappropriate behaviour, including concerns about suspected modern slavery associated with the Company or our suppliers. This service is available 24 hours a day, 7 days a week.

We sustain a culture of openness and support all reports made in good faith. Furthermore, we do our utmost to ensure that employees do not face detriment as a result of reporting concerns or suspicions of human trafficking or modern slavery. All reporting through the Speak Up can be made anonymously to ensure parties feel comfortable discussing their concerns. Employees are also encouraged to report concerns to their line managers or senior personnel.

### Breaches of this policy

We reserve our right to terminate relationships with organisations or individuals who breach this policy. Should a breach arise, we will work to ensure that violations are resolved in the first instance and that a corrective action plan is met within an agreed time period.

### What we have done in the last 12 months

We have accommodated hybrid working models by using technology to move to virtual visits and audits as an interim measure. In light of this change we have reviewed our Ethical Procurement Code to ensure that it covers these circumstances.

Where recruitment processes have been conducted remotely, candidates have been required to submit digital photographs or scans of their right to work documentation, and we have also required them to show us the original document on camera to verify that this is real to the best of our abilities. Where we were not able to physically inspect these documents, this will be undertaken as soon as reasonably practicable.

Our Applicant Tracking System continues to be developed, with new functionality being explored to allow for greater control over applicant data and continuous improvement of our recruitment processes to further mitigate the risk of modern slavery and human trafficking.

Enhanced pre-employment checks, including criminal background checks, have been completed for employees being hired in roles deemed as 'security sensitive' by the Civil Aviation Authority to comply with the requirements of Authorised Economic Operator and Known Consignor accreditations in our Scottish sites. Retrospective checks on existing employees are also conducted.

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### What we plan to do in the next 12 months

We will continue to abide by all local laws and customs regarding best practice in recruitment and all other people initiatives and work closely with our supplier to govern how our temporary production workers are engaged and controlled within our Scottish sites.

As the laws, guidance and recommendations regarding social distancing are relaxed the Procurement activity will focus on physical supplier visits to ensure that the standards that we set as a condition of being a supplier to our business are complied with. In addition, the Procurement team will rewrite and reissue the WG&S Ethical Procurement Code in light of the changes to the supply chain caused by the pandemic.

Our HR team is also in the process of implementing a new background checking provider, which will allow us to conduct more robust and objective background checks, including employment or educational references, identity verification, criminal record and financial background checks. The use of these checks will be governed by a global policy and the individual checks carried out will be dependent on role, level, and any local legal or customary requirements and restrictions.

The Company's leaders will ensure this statement and its implementation meet our legal and ethical obligations. We will ensure Directors and Managers at every level understand their responsibility for the prevention of human trafficking and modern slavery. We aim to provide adequate training in the identification and prevention of modern slavery to our Board of Directors, Management Team, Procurement and Human Resources Departments on an annual basis.

On 11 March 2021, the UK Government launched its registry for Modern Slavery Act 2015 (MSA) statements. In support of the Government's mission for transparency, we have voluntarily published our own modern slavery statements on this registry.

Glenn Gordon

Chairman

9 June 2022

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