

Modern Slavery Transparency Statement, 2025

William Grant & Sons Limited (“the Company”) is committed to trading ethically, sourcing responsibly, and preventing all forms of Modern Slavery—including forced labour, child labour, and human trafficking—within its operations and supply chains. This statement outlines the actions taken in this area and is made on behalf of William Grant & Sons and its subsidiaries, as listed in Appendix 1.

ORGANISATIONAL STRUCTURE, BUSINESS AND SUPPLY CHAIN

William Grant & Sons is a family business with a diverse portfolio of brands. The Company operates within a global supply chain and sources raw materials for the manufacture of its products and for the marketing, distribution, and sale of these products to customers and consumers. The Company is guided by a strong belief in morals and business ethics. The Company operates and complies with local laws and expects its suppliers to do the same.

ASSESSMENT OF THE RISK OF MODERN SLAVERY

The Company recognises that there is a risk of Modern Slavery in its supply chain and operations given the industry and jurisdictions in which it operates. The Company is committed to reducing this risk to the lowest level practicable.

ACTIONS TAKEN TO ADDRESS RISKS OF MODERN SLAVERY

Since the publication of its previous Modern Slavery Statement, the Company has continued to strengthen its approach to identifying and mitigating modern slavery risks across its operations and supply chains. Key developments include:

- **Enhancement of the Supplier Code of Conduct:** The Company has updated its Supplier Code of Conduct to reinforce expectations around modern slavery. Among other provisions, it now requires direct suppliers to conduct due diligence on modern slavery risks within their own supply chains. Suppliers must provide a written attestation confirming compliance, and acceptance of the Code is a mandatory condition for participating in WG&S tender processes.
- **Ongoing Supplier Risk Assessment via Sedex:** WG&S leverages its membership with Sedex to evaluate both existing and prospective suppliers through self-assessment questionnaires and third-party audits. These assessments are reviewed weekly to identify any risks or adverse findings. Where issues are identified, WG&S follows a structured protocol to ensure timely and effective remediation.

In addition to these measures, the Company continues to implement a range of initiatives aimed at addressing modern slavery risks throughout its global supply chain.

a. Policies

The Company has policies in place which ensure that the Company will not tolerate modern slavery in its organisation or supply chain. These policies include:

- The 'Procurement Policy', which sets out the behaviour expected of potential or current suppliers. It includes the Company's Supplier Code of Conduct which requires the human rights of employees to be respected and for suppliers to take appropriate steps to identify and eradicate modern slavery in all forms.
- The 'Code of Ethics', which requires employees to work fairly and with integrity. It references many of the Company's core policies, including the 'Anti-Bribery and Corruption Policy' and the 'Know Your Business Partner Policy', and requires employees to comply with these policies.
- The 'Anti-Bribery and Corruption Policy' and the 'Know Your Business Partner Policy', which requires employees to conduct due diligence on third parties or individuals prior to the Company engaging with their services.
- The 'Child Remediation Policy', which outlines steps the Company will take if it detects any form of child labour in its operations or supply chain.

The HR Policies and Processes, which ensure that employees are treated fairly in terms of:

- Pay and benefits, and access to clear written terms of employment;
- Work, health and safety, and working environment and conditions;
- Treatment in the workplace;
- Diversity, equity and inclusion in the workplace;
- Clear expectations and processes with partner recruitment agencies for temporary staff;
- Ensuring transparent recruitment processes where all prospective employees provide their right to work documentation and satisfy internal employment screening requirements; and

Furthermore, all employees can confidentially raise any issues via the 'Speak Up Policy', which outlines the Company's confidential approach to whistleblowing. This is available to all employees should they need to report discreetly a concern about illegal, dangerous, or inappropriate behaviour, including modern slavery.

b. Due diligence

In addition to the above policies, the Company has dedicated functions and processes which ensure that the Company is not working with business partners or individuals who do not share the Company's values.

These include:

- A global procurement team who is responsible for assessing direct suppliers.
- A global legal compliance team requires employees to adhere to the Company's 'Anti-Bribery and Corruption Policy' and the 'Know Your Business Partner Policy' requirements when working with third parties.
- Ad hoc visits by the Company's commercial teams to key distribution partners to understand their supply chains.

- Completing risk matrices and using external management tools to assess and manage geographic and industry risks.
- Maintaining Full Membership and participation in the Supplier Ethical Data Exchange (Sedex) which enables the Company to assess the ethical risks in its supply chain, including the controls suppliers have in place to prevent modern slavery.
- Being regularly audited by various third parties, such as the ISO, the British Retail Consortium, and our esteemed retail customers, serve as a testament to the Company's commitment to operating at the highest standards.

The Company maintains high standards of ethical sourcing and social responsibility. It requires its direct suppliers to comply with laws regarding slavery and human trafficking in the countries where they operate and reserves the right to terminate relationships with organisations or individuals who do not align with the Company's values or requirements.

c. Staff training

The Company has mandatory e-learning training for all employees in relation to its 'Code of Ethics'. The training enforces the importance of conducting business with integrity and requires employees to comply with key policies, such as the 'Anti-Bribery and Corruption Policy' and the Procurement Policy'.

All employees are assessed as part of this program and asked to sign an annual declaration of compliance, confirming that they undertake to comply with all of the Company's policies, including the Code of Ethics.

d. Reporting

The Company's commitment to responsible business practices includes a clear reporting process for non-compliance. The Company's 'Code of Ethics' mandates that any instances of non-compliance, including concerns around ethical sourcing, be promptly reported to an employee's line manager for resolution, or where not possible, to a member of the Company's legal team, HR team or to a member of the Executive Board.

Additionally, the Company's 'Child Remediation Policy' stipulates that suppliers who identify any forms of child labour in their supply chain must notify their Company representative, reinforcing the Company's commitment to addressing any issues within its supply chain.

MEASURING EFFECTIVENESS

The Company measures the effectiveness of our modern slavery response through:

- Training and Awareness: We track participation in training across relevant teams and assess understanding through feedback and knowledge checks.
- Incident Reporting and Remediation: We monitor the use of grievance mechanisms and whistleblowing channels to identify and respond to any modern slavery concerns. All reported incidents are investigated and resolved in line with our policies.
- Policy and Procedure Reviews: We regularly review and update our policies and procedures to ensure they align with best practices and evolving legal requirements.

These measures help us continuously improve our approach and ensure we are effectively addressing modern slavery risks within our operations and supply chains.

MEASURES TAKEN TO REDMEDIATE MODERN SLAVERY OR LOSS OF INCOME FROM MOST VULNERABLE

There have been no identified instances of forced labour or child labour in our activities or supply chain, nor any identified/reported instances of loss of income to vulnerable families that resulted from measures taken to eliminate the use of such forced labour or child labour. We have therefore not taken any measures to remediate these issues during the fiscal year ended.

EFFECTIVENESS OF ANTI MODERN SLAVERY MEASURES

There have been no identified instances of forced labour or child labour in our activities or supply chain, Therefore the measures that we have taken have been effective.

CONSULTATION

In preparing this statement, engagement has been sought from central Group functions that support the entities listed in the Appendix. This engagement included discussions on modern slavery risks, the implementation of relevant policies and procedures, and direct contributions to the content of this statement.

CONFIRMATION

This statement constitutes the Modern Slavery Statement for the financial year ending 2024, as

required by the Australian Modern Slavery Act 2018 (Cth), the UK's Modern Slavery Act 2015 and the California Transparency in Supply Chain Act 2010.

This Modern Slavery Statement is signed by Søren Hagh in their role as the Chief Executive Officer of William Grant & Sons Limited on 10 July 2025. It has been reviewed and approved by the Executive Board of William Grant & Sons. In doing so, the Board of William Grant and Sons confirm that the information contained in the report for the entities listed above is true, accurate and complete to the best of their knowledge.

I confirm that I have reviewed the information contained in this statement for the entity or entities listed above. To the best of my knowledge, and having exercised reasonable diligence, I attest that the information presented is true, accurate, and complete in all material respects, in accordance with the requirements of the Act for the reporting year stated.

Søren Hagh

Chief Executive Officer

10 July 2025