UK Modern Slavery Act & California Transparency Act - Transparency Statement, 2024

It is a priority for William Grant & Sons Limited (“the Company”) to ensure that it trades ethically, sources responsibly and works to prevent modern slavery throughout its organisation and supply chain. This statement highlights the measures taken by the Company in this area and is made on behalf of William Grant & Sons and its subsidiaries.

# 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. It operates and complies with local laws and expects its suppliers to do the same.

# Policies

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

* The Ethical Sourcing 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 HR Policies and Processes, which ensure that employees are treated fairly in terms of:
* Pay and benefits
* Health & safety, working environment and conditions
* Treatment in the workplace
* Diversity, equity and inclusion
* The ability to speak up confidentially if issues arise
* Access to clear written terms of employment
* Clear expectations and processes with partner recruitment agencies for temporary staff.
* Recruitment processes which ensure that all employee candidates provide their right to work documentation and satisfy internal employment screening requirements
* The Speak Up Policy, which gives access to the Company’s confidential whistleblowing facility. This is available to all employees should they need to report discreetly a concern about illegal, dangerous, or inappropriate behaviour, including modern slavery.
* The Child remediation Policy, which outlines steps the Company will take if it detects Child Labour in its operations or supply chain.

# Due diligence

In addition to the above policies, the Company has dedicated functions and processes which ensure that William Grant & Sons 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 who ensure that employees adhere to the Anti Bribery and Corruption Policy and the Know Your Business Partner requirements when working with third parties.

Visits by the Company’s commercial teams to key distribution partners to understand their

supply chains.

Risk matrices and external management tools to assess and manage geographic and industry risks.

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.

Adherence to the UK’s HMRC and Irish Revenue Department requirements, which includes supply chain due diligence.

Our regular audits by various third parties, such as 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 upholds 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.

# Staff training

William Grant & Sons has mandatory e-learning training for all employees on 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 Ethical Sourcing Policy. All employees are assessed as part of this programme and asked to

sign an annual declaration of compliance, confirming that they have complied with the

Company’s policies and Code of Ethics.

# Assessing the risk and recent developments

* The Company recognises that there is a risk of modern slavery in its supply chain given the industry and jurisdictions in which it operates. The Company is committed to mitigating this risk. Since the publication of its last statement on modern slavery, the Company has developed its Supplier Code of Conduct, which includes requiring direct suppliers to conduct due diligence on modern slavery risks within their supply chain and is finalising a Global Modern Slavery Policy. It has also published a Global Child Remediation Policy, which outlines steps the Company will take if it detects Child Labour in its operations or supply chain.

# 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 legal team, HR team or to a member of the Executive Board. Additionally, the Company’s Child Remediation Policy stipulates that suppliers who identify Child Labour in their supply chain must notify their Company representative, reinforcing the Company’s commitment to addressing any issues within its supply chain.

This statement constitutes the modern slavery statement for the financial year ending 31 December 2023, as required by the UK Modern Slavery Act 2015, Australia Modern Slavery Act 2018 and the California Transparency in Supply Chain Act 2010. It has been reviewed and approved by the Executive Board of William Grant & Sons.

Søren Hagh

Chief Executive Officer 15 August 2024