

## Overview

Suntory Global Spirits Inc. (“Suntory Global Spirits”) is issuing the following statement pursuant to the **California Transparency in Supply Chains Act of 2010** and **United Kingdom Modern Slavery Act of 2015**. This statement sets forth the steps that Suntory Global Spirits has taken and is continuing to take to ensure that human rights abuses and modern slavery are not taking place within our operations or our supply chains.

An external evaluation of our supply chain identified the following potential risk areas: Forced Labor, Working Hours, Fair Wages & Welfare, Discrimination, Harassment, Freedom of Association and Right to Collective Bargaining, Access to Remedy and Health & Safety. We remain committed to working collectively across our value chain to mitigate these risks and address any issues of modern slavery, ethically, legally and with integrity. Accordingly, Suntory Global Spirits has established robust policies, processes, and procedures to promote respect for human rights and to prevent modern slavery practices.

Suntory Global Spirits and its employees respect human rights, workplace safety and protection of the environment in every community where Suntory Global Spirits operates. Suntory Global Spirits requires the same of our suppliers, partners, and contractors. Suntory Global Spirits does not allow the use of forced, bonded or involuntary prison labor.

## Our Business

Suntory Global Spirits Inc. is a wholly owned subsidiary of Suntory Holdings Limited. Suntory Global Spirits is a global business headquartered in New York, with more than 6,000 employees. Suntory Global Spirits produces premium spirits including bourbon, whiskey, tequila, vodka, gin, rum, cordials, liqueurs, and ready-to-drink cocktails under various brands, including Jim Beam and Maker’s Mark.

Suntory Global Spirits has facilities around the world. Most of the commercial offices are located in major metropolitan areas, while our operating units are located in North America (USA, Mexico, Canada), Asia (Japan & India), and Europe (UK, Spain, France, Ireland).

Suntory Global Spirits relies on our suppliers and partners to produce and distribute our finished products globally. We procure direct materials, agricultural commodities, distribution, logistics and various services to support our operations globally. Our anti-modern-slavery efforts require collaboration, engagement, and compliance from our global partners.

## Relevant Policies

Suntory Global Spirits has policies, procedures, and controls in place to prevent and reduce the risk of modern slavery practices and to promote respect for human rights. The primary policies include:

- [Suntory Global Spirits Global Citizenship Policy](#)
- [Suntory Global Spirits Code of Conduct and Ethics](#)
- [Suntory Global Spirits Supplier Code of Conduct and Ethics](#)

The Global Citizenship Policy provides guidelines to ensure that Suntory Global Spirits and its employees respect human rights, workplace safety and protection of the environment in every community where Suntory Global Spirits is located and expects the same of Suntory Global Spirits suppliers and contractors. Global Citizenship Policy elements include:

- Working Conditions / Health & Safety

- Child Labor
- Forced Labor
- Discrimination
- Working Hours
- Wages & Benefits
- Environmental
- Management Systems
- Contractors & Suppliers

We strive to hold our employees and suppliers to high standards. Any violation of our standards by an employee can result in disciplinary action, including termination of employment. Any violation by a supplier or member of our extended workforce can result in contract or engagement termination.

Contracts with suppliers include language requiring compliance with our Supplier Code of Conduct and Global Citizenship Policy, which prohibits the use of any form of slavery. Suntory Global Spirits' suppliers and contractors are contractually obligated to comply with the Suntory Global Spirits policies and all applicable laws, including laws related to modern slavery and human trafficking.

### **Training**

Suntory Global Spirits' employees who have direct responsibility for supply chain management receive training in all aspects of supply chain risk mitigation, which is intended to identify, among other things, circumstances that suggest a high risk of noncompliance with Suntory Global Spirits' policies and applicable laws. Any concerns relating to potential noncompliance to our policies are investigated promptly. Suppliers that fail to meet Suntory Global Spirits' expectations will be terminated. In addition, employees who violate the policies are subject to discipline up to and including termination.

### **Internal Governance**

The Suntory Global Spirits Global Citizenship Committee provides Global Citizenship Policy oversight and governance. Members of the Suntory Global Spirits Global Citizenship Committee include representatives from sustainability, legal, compliance, human resources, supply chain and communications. This Committee meets on a routine basis throughout the year to review status of open action items and recommend additional actions (as needed) to ensure conformance to the Global Citizenship Policy.

The Suntory Global Spirits Global Citizenship Committee reports periodically to the Suntory Global Spirits Corporate Responsibility Committee of the Board of Directors.

### **Risk Assessment**

Suntory Global Spirits periodically assesses human rights and modern slavery risk in our business and supply chain. Our assessments identify higher risk areas of our business based on external guidance and standards, country and sector risk profiles, previous assessments, supplier questionnaires, and input from experts in this area. In addition, to assess supplier-specific risk, we consider the industry, work type, geography, and supplier performance against our Supplier Code of Conduct, among other factors.

In 2023, we've incorporated supplier risk evaluations into our Request for Proposal process and supplier selection methodology. Suntory Global Spirits is proactively vetting suppliers prior to awarding business to ensure we are partnering with suppliers who are aligned to our values and priorities. As members of Supplier Ethical Data Exchange

(SEDEX), upon award of business, we require all direct spend suppliers to become members of Supplier Ethical Data Exchange (SEDEX), as well as comply to third-party on-site auditing, via Sustainable Agriculture Initiative (SAI) and Bureau Veritas, or other third-party organizations at our discretion.

### **Reporting and Assessing Effectiveness**

Suntory Global Spirits considers several key performance indicators in the assessment of the effectiveness of actions taken to mitigate modern slavery and human trafficking risks, including percentage of suppliers that are SEDEX members along with the number and type of risk findings and status of corrective action plans.

In 2023, Suntory Global Spirits achieved our goal of managing 70% of our direct spend through SEDEX. We also partnered with our suppliers to identify and create action plans for all business critical and non-critical corrective actions that needed to be taken to mitigate existing risks.

As part of our commitment to tackling modern slavery and human trafficking, we will continue to identify ways to improve upon our existing policies, procedures, ways of working and in promoting awareness with our employees and our suppliers. We will continue to expect that our suppliers and our partners share our commitment to tackling modern slavery and human rights issues.

Suntory Global Spirits maintains appropriate evidence of supplier and contractor compliance to our requirements and policies as subject to local rules. This evidence may include certification forms, written questionnaires, audit reports, or other appropriate documentation.

### **Reporting Concerns**

We offer multiple reporting options to our employees and members of our extended workforce, including a helpline that gives an option to report concerns anonymously, including on modern slavery. We promote this reporting channel through our internal policies, communications, and trainings. We also have a policy prohibiting retaliation for raising concerns.

If a modern slavery concern is raised through the helpline or other reporting channels the appropriate stakeholders are notified to investigate and address the issue. If a reported concern is substantiated, the corrective response may involve working with the supplier to ensure that the issue is addressed or, if that is not possible, terminating the supplier.

### **Our Continued Commitment**

Suntory Global Spirits will continue to assess the potential risks in our supply chain and increase the awareness across key stakeholders in our business to ensure that our policies, processes, and procedures are understood and being implemented. Suntory Global Spirits will monitor and report our progress annually.

This disclosure statement was approved by the Board of Directors of Suntory Global Spirits on May 6, 2024 as applicable to Suntory Global Spirits and its subsidiaries during fiscal year 2023.



Gregory Hughes  
President & CEO of Suntory Global Spirits Inc.  
Member of the Board of Directors for Suntory Global Spirits Inc.