

DISTELL INTERNATIONAL LIMITED (“Distell”)

SLAVERY AND HUMAN TRAFFICKING STATEMENT – APRIL 2019

Introduction

Distell’s success is intrinsically linked to the way we conduct our business in line with our values of responsibility and integrity. These behaviours apply both within the business and in our dealings with suppliers.

Distell is committed to fair employment practices in line with our values, our Code of Conduct and relevant labour legislation. The Distell Group became an official member of the United Nations Global Compact in 2013 and is committed to eliminating forced or compulsory labour and to effectively abolishing child labour.

We adopt a zero-tolerance approach to slavery and human trafficking and are committed to taking all reasonably practicable steps to ensure that slavery and human trafficking is not present either in our business or in our supply chains. In order to achieve this, we seek to identify and tackle slavery and human trafficking risks.

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

Since the Modern Slavery Act 2015 came into force, we have built on our existing commitment by:

- taking external legal advice.
- holding discussions with our Human Resources and Supply Chain teams to identify key slavery and human trafficking risks in our business and our supply chain.
- identifying the legal team as the responsible department and the Legal Manager as the person with day-to-day responsibility for anti-slavery and human trafficking compliance.

Structure, business and supply chains

Distell's principal activities are the distillation, blending, bottling, marketing and sale of Scotch Whisky and the production, marketing and sale of other alcoholic beverages and has its head office in Scotland. Our group parent company, Distell Group Limited has its head office in South Africa. It is Africa's leading producer and marketer of spirits, fine wines, ciders and ready-to-drinks (RTDs) and the Distell Group employs approximately 5,300 people worldwide and sells products in more than 100 countries. Further information about our parent company can be found at:

<https://www.distell.co.za/home/about/>

We are committed to treating people in a way that respects their human rights in all our activities and in compliance with both the letter and spirit of applicable laws. It is also what our stakeholders expect from us and this goal is reflected in our Values. We are committed to upholding The South African Constitution, The Universal Declaration of Human Rights and the UK Modern Slavery Act as key to how we as a business behave. These National and International principles guide the manner in which we engage, promote and uphold human rights.

Supply chain

We are members of SEDEX and are independently audited against those standards for ethical trading. We are also fair trade certified.

Training

In 2018 our employees completed annual training on our Code of Conduct and the values and required behaviours therein. This training included business relevant scenarios to illustrate engagement and understanding. Key personnel involved within the Supply Chain have also received training on ethical standards associated with the Fair Trade Certification. It is made clear in our Code and related training that, should an employee ever have a concern that the Company's high standards of ethical and compliant behaviour are not being met, either in the business or by the third parties engaged with the business, they are required to raise that concern through our Ethics Line, which is managed by an independent company in their language of choice.

Further Steps

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains, we intend to take the following further steps to combat slavery and human trafficking:

- updating our Code of Conduct Policy to comply with the UK Modern Slavery Act.
- updating our supplier terms and conditions.
- reviewing our existing supplier due diligence and audit processes to ensure compliance with the UK Modern Slavery Act.
- Monitoring of any incidents or allegations across our supply chains which conflict with our values.

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 financial year ending 30th June 2018.



Fraser Thornton
Managing Director
Distell International Limited

Date: April 2019