



**DISTELL**

# Supplier Code of Conduct

January 2016

Applicable to all Distell Suppliers

## About Distell

The Distell Group (Distell) is Africa's leading producer and marketer of wines, spirits, ciders and other ready-to-drink beverages, sold across the world. With a diverse portfolio of brands with rich provenance and authenticity, our products are priced across the pricing continuum to cater to a broad spectrum of consumers. We enjoy a growing global reach and are building the presence of our brands through subsidiary companies, joint ventures, offices and agents on all continents. Distell employs about 5500 people worldwide.

Our mission is to craft distinctive alcoholic beverage brands, enhance memorable moments and inspire responsible enjoyment. The value we create enriches the lives of our people, shareholders and the communities within which we live and work.

Our vision is that we are a proud African alcoholic beverages company with heritage, global reach, world-class people and the ability to do extraordinary things!

Our purpose is that we exist to provide unique moments of social enjoyment through the responsible marketing of well-crafted wines, spirits and ciders.

## Our Supplier Code of Conduct

Distell has always been committed to doing business with integrity and proper regard for ethical business practices. Our commitment to doing business ethically is unwavering.

The general principles contained in this Supplier Code of Conduct (Code) sets out the way we do business. Distell not only expects its directors and employees to comply with these principles and to act in the best interest of Distell at all times, but also its agents, intermediaries, consultants, distributors, sub-contractors, customers, suppliers, and joint venture partners working on Distell's behalf anywhere in the world.

We herewith communicate Distell's Supplier Code of Conduct, setting out our principles and values to specify and supplement the continued implementation of the Distell Code of Conduct by establishing certain non-negotiable minimum standards as set out below. It is the Supplier's responsibility to educate its employees, agents and subcontractors accordingly. Likewise, the Supplier shall ensure that supplying farmers become fully aware

of this Code, the provisions stated therein and their meaning and implications for their farming methods.

By acceptance of this Code, the Supplier commits that all existing and future agreements and business relationships with Distell will be subject to the provisions contained herein.

# Values



## **Courage**

*We are enterprising and courageous in the way we tackle challenges and opportunities*

## **Respect**

*We live with respect for diverse perspectives, other people's views and honest feedback*

## **Customer and consumer focus**

*We are passionate about our customers and consumers*

## **Integrity**

*We have integrity in all that we do and avoid doing, conducting ourselves ethically*

## **Ownership**

*We take ownership for our words and our actions*

## **Collaboration**

*We are one Distell team, harnessing the collective wisdom and experience of everyone.*

## **I. BUSINESS INTEGRITY**

### **Compliance with Applicable Laws and Regulations**

Suppliers must comply with all applicable local, national and international laws and regulations and to act ethically in all matters.

### **Anti-Bribery and Corruption**

Distell has always been committed to doing business on an ethical and sound basis and Distell is committed to comply fully with local and global anti-bribery and corruption laws and to continuously conduct its business with integrity and with proper regard for ethical business practices.

Suppliers must not engage in corruption such as bribery or any form of improper or unlawful payment under any circumstances including financial fraud, money laundering, and extortion or facilitation payments.

No Supplier or associated person may directly or indirectly bribe a government official or any third party. Similarly, no Supplier or associated person may receive anything of value in exchange for performing their duties disloyally or illegally. Any demand for, or offer of, a bribe must be rejected immediately and reported to the Distell Compliance Department.

### **Transparency and Gift-giving**

Distell appreciates the important contribution its business partners and customers make to the success of its business and Distell is committed to fostering healthy, mutually beneficial relationships with them.

The giving and receiving of gifts and entertainment have a role to play in building business relationships, however the acceptance of gifts or the giving thereof should never create improper influence or obligate the recipient. The proposed gift or entertainment should be appropriate in value and nature considering local custom, the position of the recipient and the circumstances.

### **Conflict of Interests**

At Distell, we expect our Suppliers to disclose any present or past relationship between themselves and Distell employees that would be construed as a conflict.

### **Communication and Whistleblowing**

Distell Suppliers are encouraged to raise any queries, concerns and complaints regarding any illegal, non-compliant, fraudulent or unethical behaviour by reporting same through Distell's toll-free ethics line or other reporting mechanisms as set out in the table below:

South Africa	<ul style="list-style-type: none"> <li>• Toll free: 0800 004 822</li> </ul>
United Kingdom	<ul style="list-style-type: none"> <li>• Toll free: 0808 189 1196</li> </ul>
Namibia	<ul style="list-style-type: none"> <li>• Toll free: 0800 003 313</li> <li>• MTC Toll free: 081 91847</li> </ul>
International	<ul style="list-style-type: none"> <li>• +27 31 571 5657</li> </ul>
Web	<ul style="list-style-type: none"> <li>• distell@ethics-line.com</li> <li>• www.tips-offs.com</li> </ul>
Free Post	<ul style="list-style-type: none"> <li>• KZN 138, Umhlanga Rocks, 4320</li> <li>• Free fax: 0800 00 77 88</li> </ul>

An independent party manages the Ethics Line twenty-four hours a day, ensuring anonymity and confidentiality.

### **Books and Records**

Suppliers must be able to disclose to Distell sources of primary origin (including the country of origin) associated with the materials supplied to Distell. Likewise, we expect our Suppliers to keep accurate accounting records and maintain supporting documents to describe and reflect the true nature of underlying transactions.

## **II. HUMAN RIGHTS AND LABOUR STANDARDS**

## **Human Rights**

Distell embraces clear standards on employees' and human rights, such as zero tolerance for harassment, discrimination, human trafficking, child and forced labour and human rights violations.

## **Working Hours**

The Supplier will ensure that fair wages will be paid in line with normal practice for the industry and market. The Supplier must ensure that its employees work in compliance with all applicable laws and mandatory industry standards pertaining to the number of hours and days worked.

## **Compensation**

The Supplier's employees must be provided with wages and benefits that comply with applicable laws and binding collective agreements, including those pertaining to overtime work and other premium pay arrangements.

## **Freedom of Association and Collective Bargaining**

The Supplier will respect the right of its employees to freedom of association and collective bargaining. This includes the right to form and join trade unions and other worker organizations of their own choosing without harassment, interference or retaliation.

## **III. SAFETY AND HEALTH**

### **Workplace Environment**

The Supplier shall provide employees with safe and healthy working and, where provided, safe housing conditions. As a minimum, potable drinking water, adequate sanitation, fire exits and essential safety equipment, access to emergency medical care, appropriately lit and equipped work stations must be provided. In addition, facilities must be constructed and maintained in accordance with the standards set by applicable codes and ordinances.

## **Product Quality and Safety**

All products and services delivered by the Supplier must meet the quality and safety standards required by applicable law. When conducting business with or on behalf of Distell, the Supplier must comply with the Distell quality requirements.

## **IV. SUSTAINABILITY**

The Supplier must operate with care for the environment and ensure compliance with all applicable laws and regulations in the country where products or services are manufactured or delivered.

## **V. AUDIT AND TERMINATION OF THE SUPPLY AGREEMENT**

Distell reserves the right to verify the Supplier's compliance with the Code. In case Distell becomes aware of any actions or conditions not in compliance with the Code, Distell reserves the right to demand corrective measures. Distell reserves the right to terminate an agreement with any supplier who does not comply with the Code.

I read every page of this Code addressed to Suppliers. In order to commit myself and to bind my company (which I declare to represent), to its fulfilment and to apply the principles contained herein, as well as to adhere to Distell's values, during all the time my/our relationship with Distell is in force.

Supplier name (entity name): \_\_\_\_\_

\_\_\_\_\_  
Signature and designation of authorised signatory of Business Partner