GLEN GRANT LIMITED

MODERN DAY SLAVERY STATEMENT IN ACCORDANCE WITH SECTION 54 MODERN DAY SLAVERY ACT 2015

This statement sets out the actions of Glen Grant Limited (the '**Company**') to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

To that end, the Company seeks to ensure that quality and safety standards are maintained throughout its supply chain and that workers are treated fairly and in accordance with all applicable laws.

Introduction and Structure

The Company is part of the Campari Group of companies. It is a subsidiary company of Davide Campari Milano NV, a company listed on the Milan Stock Exchange. The Company is incorporated in Scotland and has a place of business in London. The Company has a majority share in Trans beverages Co., Ltd and a minority share in both Spiritus Co. Ltd and Campari Benelux S.A. These subsidiary entities carry out distribution and sales and marketing for Campari Group outside the UK and are supplied by Campari Group entities outside the UK.

The Campari Group's corporate headquarters are in Sesto San Giovanni in Milan, Italy, and as at 13 June 2022, the Group owned 22 manufacturing plants and had a proprietary distribution network in 22 countries. Campari Group has a deep belief in strong corporate values including working "***Together***", as summarised by, the Head of Group HR, to mean:

> *"'**Together**' we embrace our responsibilities and share our knowledge and best practices, accepting challenges and helping others to do the same with honesty and courage. '**Together**' we break all cultural, organisational, and geographic barriers, working across countries, businesses, and functions, with mutual trust based on our common values and goals".*

Another of the key values of Campari Group is, "***Integrity***". We believe in doing the right thing, living responsibly and working transparently as part of the organisation, and treating others with the utmost respect.

In addition, the Campari Group Behaviours guide the actions of Camparistas, including, "***Respect others and the planet***"

> *Respect others and the planet: Campari Group has always supported responsible and sustainable behavior, which it considers to be of paramount importance for the Group's growth. Sustainability, which runs through all our business activities, is part of our DNA. The path we have followed over the last few years has allowed us to achieve a greater level of maturity and awareness of the fundamental role that the business world can, and must, play in society.*

These values are at the heart of the Campari Group's commitment to all forms of corporate social responsibility, including not knowingly participating in, causing, contributing to, or being linked to

modern slavery practices in any of its operations and supply chains, and a further commitment that it will make efforts to mitigate the risks of modern slavery within those operations and supply chains.

Campari Group further supports the United Nations Universal Declaration of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

Sector

The Company operates in the alcoholic beverages sector and Campari Group owns, markets, and distributes a portfolio of more than 50 premium and super premium brands in over 190 countries worldwide, and holds leadership positions in many of those brands in Europe and the Americas. The Group's major brands include Aperol, Appleton Estate, Grand Marnier, SKYY vodka, and Wild Turkey bourbon, in addition to Campari.

The Company, which trades as Campari UK acts as the UK importer and distributor for these various Campari Group brands. It also operates a distillery, bottling and production plant in Scotland, where it produces fine Scotch whisky which is bottled and sold under the Glen Grant name and produces Bulldog Gin via a third party producer.

The Company's policies on slavery and human trafficking

Campari Group is organised according to the Dutch corporate governance model. It has both a Board, and a supervisory body which has been in place since 2001. One of the supervisory body's main roles is to ensure compliance with the Group's governance model and the law, focusing on prevention of offences against administrative and corporate controls, as well as breaches of health and safety regulation. This ensures that matters relating to Modern Slavery are overseen and reported at the highest levels.

Employees, associates, suppliers, and customers, as well as anyone who has had dealings with the Company or Campari Group is able to report violations of the Code of Ethics or any other Campari Group policy or applicable law through the *Campari Safe Line* which enables a confidential report to be sent directly to the Chairman of the Group's Board and to the head of the Group's internal audit function. The whistleblower is also protected against retaliation or any other consequences arising from the report.

The Company and Campari Group Governance Standards and Policies relating to dealing with suppliers:

Code of Ethics	Sets out the Group's values and its fundamental expectations of conduct and dealing with shareholders, colleagues and associates, consumers and the community, as well as enforcement of its provisions

Corporate Social Responsibility and Supplier Code	Includes the Campari Group Supplier Code which was issued in 2012 and sets out the Group's ethical values which suppliers and their employees undertake to sign, adhere to, and ensure compliance throughout their respective supply chains. These ethical values are: o Integrity, loyalty, and honesty; o Objectivity and immediate communication of real or potential conflicts of interest; o Confidentiality; o Transparency and completeness of information; o Rejection and condemnation of any type of discrimination; o Ban on forced and child labour; o Health and safety in the workplace; o Compliance with environmental law and ecological standards; o Prevention and reduction of environmental pollution; o Ban on unfair competition; and o Compliance with the Group's Code of Ethics, and its Quality, Health, Safety & Environmental Policy
Campari Group Global Procurement Policy	The objective of the Procurement Policy is to standardise and define the roles, responsibilities, and rules of conduct for the management of Procurement processes, in keeping with the fundamental principles of the decision-making process, including transparency, impartiality, fairness and traceability.
Quality, Health, Safety & Environment Policy	Since 2013, this Policy has governed and protected the environment, health and safety of the Group's employees and consumers as well as the quality and food safety of products. The Policy applies to all Group locations and divisions and is regularly reviewed to ensure it remains appropriate for the nature and size of the Group and its corporate objectives. The Policy is also shared with all suppliers, investors and employees.
Employees & Human Rights Policy	Issued in 2017, this Policy supports the UN Universal Declaration of Human Rights and the ILO's Declaration on Fundamental Principles and Rights at Work and requires legal compliance with national human rights legislation in every country in which the Group operates. Where differences arise between Group policies and national regulations, the Group applies the most stringent of the

	requirements. The Policy covers: non-discrimination, forced labour, child labour, harassment, diversity, working conditions (including hours and remuneration), freedom of association and the right to collective bargaining, training and personal development, community involvement and quality, health, safety & environment.

These policies demonstrate the Company's commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to help ensure slavery and human trafficking is not taking place anywhere in its supply chains. In addition, the Company has adopted a specific Modern Slavery and Human Trafficking Policy to further strengthen these commitment.

Supply Chains

The Supply Chain function for the Company as part of the Campari Group is centralised and most materials and supplies are procured centrally for Glen Grant. The Company purchases its other products as finished goods from international plants in Italy, Jamaica, Mexico, United States of America, UK, Brazil, Canada, and France.

The Campari Group supports sustainable sourcing and aims at the integration of social, ethical and environmental performance factors within its own supply chain.

Campari Group has a specialist Procurement Team which managed approximately 15,000 suppliers globally in the last 12 months. The Procurement Team manages suppliers classified according to the following categories:

- **Product Related (PR)**: materials that go into the final product, they are part of the Bill of Materials (BOM), such as packaging materials (e.g. glass bottles), raw materials (e.g. sugar) and semi-finished materials (e.g. distillates)
- **Non-Product Related (NPR)**: goods and services that do not go into the final product; they are purchased to enable or support the business and its operations, such as: Media & Marketing, Logistics, Capital Expenditure, etc.

Categories are mapped in a Portfolio Matrix, managed by Procurement, based on their supply risk and business impact. The Category Portfolio Matrix is updated from time to time, to reflect changes in external and internal environments.

Campari Group looks for local sourcing options to fulfil its aim of reducing its environmental impact along the supply chain, and continues to do so, all other commercial parameters being equal (such as competitiveness, quality, and availability of materials).

Compliance and Risk Mitigation Actions

Campari Group drives sustainability compliance through its implementation of the Campari Group's Supplier Code in all geographies. The Campari Group sees responsible and transparent sourcing from commercial partners with similar values as a prerequisite for ensuring high-quality and safe products that create value in local economies.

Campari Group has a risk management system in place which is managed by the Internal Audit function and is aimed at identifying, assessing, managing and monitoring potential events or situations that could impact Campari Group's activities and the achievement of its objectives. The risk management system also captures and monitors compliance, and personnel management, in terms of both health and safety, guaranteeing workers' rights and identifying environmental risk and Campari Group reserves the right to verify suppliers' compliance with this Supplier Code, to monitor their performance and operations in this regard, and to terminate any agreements in the event of violations of the Supplier Code, if considered necessary.

In addition, Campari Group became a member of Sedex (Supplier Ethical Data Exchange) in 2016 which provides further evidence of its commitment to managing its supply chain responsibly and transparently. Sedex is the world's largest shared platform through which member users can report and share their commercial practices in the key areas of labour law, health and safety, environment, and business ethics including modern slavery. Campari Group uses Sedex to inform its risk assessments and mitigation. Campari Group encourages its suppliers to join Sedex to assist with due diligence assessment.

Training

The Campari Group ensures that key procurement employees are aware of the Campari Group Supplier Code as part of its procurement process. There is also mandatory training of all employees of the Campari Group on the Code of Ethics which includes promotion and protection of human rights and is against slavery, forced labour or child labour.

Actions for the Upcoming financial year

The further steps the Company has identified to be undertaken over the next 12 months are:-

1. Working with Campari Group Sustainability team and global Procurement team to understand ways in which Campari Group as a whole, can address modern slavery risks;
2. Considering the need for modern slavery training programmes for additional staff in the Company and in relation to the Company's Modern Slavery and Human Trafficking Policy;
3. Ensuring that modern slavery risks are included, as appropriate, in any new local policies issued;
4. Reviewing the Campari Group Supplier Code of Conduct to assess whether further amendment of the code is required;

SIGNED ON BEHALF OF THE BOARD OF THE COMPANY

Brad Madigan

Brad Madigan, Managing Director

This statement was approved by the board of directors of Glen Grant Ltd on 13 June 2022 under Section 54 of the United Kingdom's Modern Slavery Act 2015 for the financial year up to 31 December 2021.

Please note that this Modern Slavery Statement has been prepared and published in compliance with the requirements of the *Modern Slavery Act* 2015 and is accurate and correct as at 13 June 2022, the date of publication. The purpose of the statement is to provide general non-financial information only with the aim to illustrate Campari UK's stakeholders its steps taken in the calendar year to address Modern Slavery concerns. Interested stakeholders may choose to review the Campari Group's Sustainability Report, available on the Campari.com website, to review the Campari Group's global strategy and direction in this and other sustainability matters.