

DILLON BASS

PREMIUM WINE AND SPIRITS

DILLON BASS LIMITED SLAVERY AND HUMAN TRAFFICKING STATEMENT for the Financial Year ended 30 June 2025

Overview

Our success at Dillon Bass Limited (“**DBL**”) is intrinsically linked to the way we conduct our business in a responsible and ethical manner. These behaviours help to foster a culture of mutual trust and ethics both within the business and with our suppliers. DBL adopts a zero-tolerance approach to slavery and human trafficking. We are committed to taking all reasonably practicable steps to ensure that slavery and human trafficking are 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.

About Us

DBL is a wholly owned subsidiary within the Pernod Ricard SA group (“**Pernod Ricard**”), the world’s number two in the wines and spirits sector world-wide.

DBL was formed in 1990 and its principal activity consists of the marketing and distribution of wines and spirits in Northern Ireland. DBL’s principal supplier of spirits for distribution is Pernod Ricard.

Our Standards

Since 2003 Pernod Ricard has been a participant company in the United Nations Global Compact <https://unglobalcompact.org/> and is therefore committed to respecting and promoting its core principles.

In line with its shareholder, DBL is accordingly committed to eliminate forced labour and compulsory labour and to effectively abolish child labour.

This includes International Labour Organisation conventions 138 & 182 on the prohibition of child labour and 29 & 105 on the elimination of forced or mandatory labour.

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

Our Actions

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

- taking legal advice on the steps necessary to support compliance;

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- adopting a specific Anti-Slavery Policy (which as been approved by the DBL Board of Directors) and implementing this within DBL;
- maintaining our existing training programme to directly support compliance with our Anti-Slavery Policy;
- ensuring that bespoke contracts continue to include a compliance clause;
- adopting and implementing a new Code of Business Conduct;
- adopting and implementing a new suite of supplier due diligence tools to ensure that our supplier due diligence continues to support compliance with our Anti-Slavery Policy; and
- adopting and implementing Speak Up, a global platform which enables all Pernod Ricard employees to raise their concerns confidentially and anonymously, where they see, know of or suspect any conduct that may be unsafe, unethical or unlawful.

Policies and Practices

DBL's commitment is to act with integrity in all its business dealings and to promote ethical conduct, to enhance compliance with applicable laws and to provide guidance with respect to business conduct. DBL expects the same standards from all those we work with, including business partners and suppliers. DBL is committed to ensuring that any slavery and human trafficking risks within its business are identified and managed proactively.

We have a number of policies that are relevant to this commitment, which sets out what DBL expects from its employees and business partners.

The key policies are:

- The Pernod Ricard Code of Business Conduct 2023; and
- The Dillon Bass Limited Anti-Slavery Policy 2019.

Our Actions

Anti-Slavery Policy

We are committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy:

- applies to all staff and suppliers working for, or on our behalf, in any capacity;
- builds upon Pernod Ricard's existing policies (including our Procurement Code of Ethics and Responsible Procurement Policy);

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- aligns with our Code of Business Conduct;
- includes guidance to our staff with examples of unusual behaviour displayed by workers which may be indicative of someone experiencing slavery or human trafficking; and
- makes it clear that DBL will support anyone who raises genuine concerns in good faith, even in circumstances where it transpires that those concerns are mistaken.

The Policy can be found [here](#).

Working with our suppliers

To identify and mitigate the risk of slavery and human trafficking being present in our product supply chains, we employ sourcing strategies such as:

- informing our suppliers of the standards that we expect through our Supplier Standards;
- assessing suppliers using tools such as the Partner-up tool; and
- analysing the results of our assessments.

Training our people

Training on DBL's Anti-Slavery Policy and the risks modern slavery and human trafficking in our business and in our supply chains is available as part of the induction process for individuals who work for us to complete the Code of Business Conduct.

Our Next Steps


Following a review of the effectiveness of the steps we have taken to manage the risks of slavery and human trafficking in our supply chains, we intend to take the following further steps to combat slavery and human trafficking:

- we will continue to enforce our effective systems and controls to prevent slavery and human trafficking in our supply chains;
- we will monitor and review the effectiveness of our supplier due diligence tool Partner-up and wider compliance regime;
- we will continue to implement our Supplier Standards and Global Human Rights Policy; and
- we will continue to conduct our business in accordance with our ethical sourcing standards across our supply chains through our Responsible Procurement Policy.

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The Board of Directors of DBL has approved this statement which is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ended 30 June 2025 and it has been duly been signed by the following director:

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Greg Elliott
Business Unit Director
Dillon Bass Limited

15 December 2025