

CAMPARI GROUP

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 for the financial year ended 31 December 2022.

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 in South Korea and a minority share in both Spiritus Co. Ltd in Taiwan and Campari Benelux S.A in Belgium. 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 31 December 2022, the Group owned 23 manufacturing plants and has in market companies in 23 countries.

Campari Group has a deep belief in strong corporate values, including, ‘*Integrity*’, which is exemplified in our Sustainability Report for the year ended 2022, as:

“We recruit, develop and reward employees that work with utmost integrity and transparency. Integrity means being a responsible corporate citizen and treating all of our stakeholders correctly and with respect. Most importantly, it means ensuring that fairness, honesty and consistency are the hallmarks of our business transactions and the guiding light for our employee’s professional lives.”

In addition, the Campari Group Behaviours guide the actions of Camparistas, including, “*Respect others and the planet*”, which, as noted in our 2022 Sustainability Report, directs us to, “*behave as proper members of our Company community and responsible citizens of this planet, and proactively commit to their development.*”

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.

Glen Grant Limited t/a Campari UK

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www.campargroup.com – office.uk@campari.com - Company Number SC292101

Registered in Scotland

Registered Office: Glen Grant Distillery, Rothes, Morayshire, AB38 7BN – T: +44 (0)1340 832103

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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 market-leading positions with many of those brands in Europe and the Americas. Campari Group's major brands include Campari, Aperol, Appleton Estate, Grand Marnier, SKYY vodka, and Wild Turkey bourbon.

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, as Davide Campari-Milano NV is domiciled in the Netherlands. 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

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<p>Corporate Social Responsibility and Supplier Code</p>	<p>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:</p> <ul style="list-style-type: none"> ○ Integrity, loyalty, and honesty; ○ Objectivity and immediate communication of real or potential conflicts of interest; ○ Confidentiality; ○ Transparency and completeness of information; ○ Rejection and condemnation of any type of discrimination; ○ Ban on forced and child labour; ○ Health and safety in the workplace; ○ Compliance with environmental law and ecological standards; ○ Prevention and reduction of environmental pollution; ○ Ban on unfair competition; and ○ Compliance with the Group’s Code of Ethics, and its Quality, Health, Safety & Environmental Policy
<p>Campari Group Global Procurement Policy</p>	<p>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.</p>
<p>Quality, Health, Safety & Environment Policy</p>	<p>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.</p>
<p>Employees & Human Rights Policy</p>	<p>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</p>

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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 prevent slavery and human trafficking in its supply chains. In addition, the Company has adopted a specific Modern Slavery and Human Trafficking Policy to further strengthen these commitments.

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 20,000 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).

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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 its 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.

Finally, Campari Group checks for the compliance of all its operating units with its human rights commitments by monitoring and analysing its grievance mechanisms as appropriate. In 2022, there were no reports of human rights violations as reported in Campari Group Sustainability Report for the year ended 2022.

Training

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 completed for financial year ended 31 December 2022

Actions which have been taken in the last 12 months include:-

1. Working with Campari Group Sustainability team and Global Procurement team to assess ways in which Campari Group as a whole can improve how it addresses modern slavery risks; and

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2. The Company has rolled out specific Modern Slavery training to its senior leadership team to raise greater awareness within the Company of modern slavery risks.

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 further understand and implement 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.

SIGNED ON BEHALF OF THE BOARD OF THE COMPANY

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Francesco Cruciani, Managing Director

This statement was approved by the board of directors of Glen Grant Ltd on 14 June 2023 under Section 54 of the United Kingdom's Modern Slavery Act 2015 for the financial year up to 31 December 2022.

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 **14 June 2023**, 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.

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