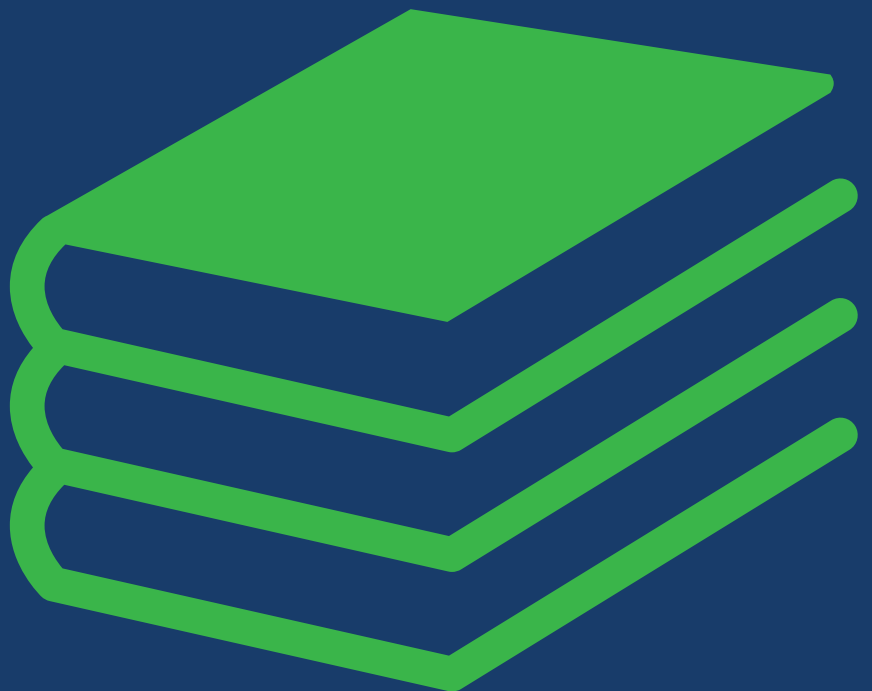




EDRINGTON



Code of Conduct



Edrington Codes

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INTRODUCING THE CODE OF CONDUCT



Edrington Codes

AN INTRODUCTION FROM THE CHIEF EXECUTIVE

Giving, integrity, excellence and respect – the four values that promote the behaviours which are at the heart of Edrington, woven into the fabric of our culture as we build the thriving, independent business our founders envisioned.

As a growing international company we are required to comply with complex regulations and legal requirements in many of our daily business dealings. Whilst the company is well-equipped to handle such compliance our ethos encourages us to go further, to promote integrity and fairness in all our business dealings.

These standards flow through to our commitment to encourage responsible consumption of the company's brands, either through our own marketing activity or in collaboration with others.

In this document you will find our Code of Conduct which explains these standards in detail. A working knowledge of the Code of Conduct can provide employees with protection and support when difficult circumstances arise. It is your responsibility to familiarise yourself with the Code and to embrace its principles in your daily work.

At Edrington our values and behaviours set us apart. It's in all our interests to maintain our high standards of conduct.

Scott McCroskie

THE EDRINGTON VALUES



EDRINGTON

GIVING

Our central purpose is giving more – to our people, our consumers, our shareholders and partners, and to society as a whole.

INTEGRITY

We are honest and trustworthy and a good corporate citizen.

EXCELLENCE

We strive for excellence in the quality of our products and in the way we go about our work.

RESPECT

We are proud of our rich heritage, and act with respect towards our colleagues, partners and competitors, and the communities in which we operate across the world.

We should all endeavour by our individual actions to consistently bring these Values to life in whatever way we can. We should try to create an environment in which the Values can flourish and help the business to grow – a strong Edrington will benefit us all as individuals.

WHAT IS A CODE OF CONDUCT AND WHERE DOES IT APPLY?

PURPOSE

- To reinforce Edrington's values, culture, behaviours and responsibilities;
- To explain how the company's values apply to its internal and external business activities and relationships;
- To set out the behaviours we require from employees and those we do business with; and
- To enable concerns to be raised and help sought as necessary.

KEY MESSAGES

We recognise that this Code may not address every situation which you may encounter. When faced with uncertainty, employees should ask themselves the following questions and, if the answer to any is no or there is any uncertainty, guidance should be sought before taking any action:

- Is it legal?
- How would I feel if it was reported in the media?
- Does it comply with our Code of Conduct, and the company's policies and procedures?
- Am I setting a good example?
- Would I be comfortable explaining this to my colleagues, family and friends?

RESPONSIBILITIES

The Code of Conduct applies to everyone in the company and those we do business with and we must all follow its principles and supporting policies, and pro-actively seek guidance if we are unsure how to be compliant with the Code or any Policy.

Heads of department, Area Managers, Regional Managing Directors and Line Managers have additional responsibilities under this Code. They should ensure that they:

- Explain the Code and ensure it is understood by employees;
- Consider applicable local legislation and guidance in their market;
- Set an example to employees and third parties by promoting the standards of the Code;
- Address any training or guidance needs which employees or third parties may have in order to meet the standards of the Code; and
- Ensure that employees and third parties remain aware of, and comply with, the principles of the Code.

ASKING QUESTIONS AND RAISING CONCERNS

ASKING QUESTIONS

The company believes that the ethical behaviour set out in this Code should be consistently demonstrated in all of our business activities and relationships.

If you have any doubts or queries regarding any of the principles of this Code, it is important to seek guidance before taking any action – ignorance will not be an acceptable defence. Heads of department should be contacted in the first instance. Thereafter the local or group anti-corruption officers or a member of the legal team should be contacted.

SPEAKING UP

Should you have a concern that malpractice or any act in breach of the Code or related policies has occurred, may occur or is planned to occur, your concern should be raised at the earliest opportunity in accordance with the company's Speaking Up Policy.

The Speaking Up Policy allows concerns to be raised in a fair, secure and confidential manner, using the following process:

- In the first instance the concern should be raised with the individual's immediate manager. This can be done verbally or in writing.

- If, for whatever reason, the individual does not consider it appropriate to raise the concern in this manner, or if they feel that their concern has not been addressed, they should contact their Head of Department / Director. Again, this can be done verbally or in writing.
- To deal with circumstances in which an employee does not feel comfortable raising their concerns internally, we have contracted with an external company to provide 'FairCall'.
- Where an individual, in good faith and with reasonable belief, suspects an issue relating to malpractice, they can raise this concern through FairCall and can do so by phone, by email, online, by fax or by post. Details of how to do so are set out on the following page and in the Speaking Up Policy.
- FairCall will pass the report to the Group HR Director and the Group General Counsel within 24 hours of receipt so that an investigation can take place.

The company is committed to thoroughly and fairly investigating all concerns of malpractice raised, and will do so in a confidential, sensitive and just manner.

Retribution or other adverse consequence against the person raising the concern will not be tolerated in any circumstance where a concern has been raised in good faith.

**FairCall can be contacted
in one of the following ways:**



TOLL FREE TELEPHONE NUMBERS

specific to territory:

China	400 120 6249	Russia	810 800 2371 5011
Cyprus	800 966 40	Singapore	800 120 6646
Denmark	808 20182	South Africa	0800 980 941
Dominican Republic	1888 7519 133	South Korea	00798 4434 1369
Finland	0800 112 422	Spain	8000 98603
Hong Kong	800 968 035	Sweden	0200 899 925
Indonesia	00180 3011 3290	Taiwan	0080 1136 571
Malaysia	1800 812 341	UAE	8000 444 7652
Mexico	001 855 297 8092	UK	08000 564 643
Netherlands	08000 227 956	USA	1844 677 4154
Norway	800 12783	Vietnam (VNPT)	1203 2627

ONLINE:

web portal form available
through the FairCall website at
www.thornhill.co.za/kpmgfaircallreport



EMAIL:

edringtonfaircall@kpmg.co.za

FAX:

In South Africa **0800 200 796**
Outside South Africa **+2712 543 1547**

POSTAL ADDRESS:

KPMG FairCall
P.O Box 14671
Sinoville
Pretoria
South Africa

INTEGRITY IN OUR BUSINESS



FIGHTING CORRUPT PRACTICES: ANTI-CORRUPTION POLICY

OUR POLICY AND PRINCIPLES / STANDARDS

Bribery, other corrupt practices and unethical behaviour of any sort are contrary to our beliefs and aims and will not be tolerated in any of the company's global activities or relationships.

Bribery is the offering, promising, giving, accepting or soliciting of an undue reward with the intention of encouraging someone to "improperly perform" their duties in order to obtain or retain a commercial advantage.

Facilitation payments (a payment made to a public official to expedite or secure performance of an action that would reasonably be considered routine to the official carrying out their duties) must not be made, regardless of value or whether they may be considered local custom and practice.

In all of the company's activities we will take proportionate steps to monitor the performance of our partners, third party agents, contractors, etc. to ensure that they observe these anti-corruption standards.

OUR RESPONSIBILITY

We will all comply with the guidelines set out in the Global Anti-Corruption Policy and Procedures and, most importantly, will never:

- offer, pay, solicit or accept a bribe in any form, either directly or indirectly;
- engage in the unauthorised or inappropriate receipt, transfer or disbursement of funds; or
- engage in activities which may suggest, or give the impression of, a lack of ethical behaviour.

MORE INFORMATION / WHAT NEXT?

Full guidance is available in Edrington's Anti-Corruption Policy and Procedures.

Remember to follow the Speaking Up Policy if you have any concerns of malpractice.

SCENARIO:

QUESTION:

We are awaiting tenders for a contract and one of the applicants has invited you to attend a weekend trip away with all expenses paid. Should YOU accept?

ANSWER 1.

Yes, provided you notify your Line Manager and Local Anti-Corruption Officer.



ANSWER 2.

Yes, however, you should pay for your own travel costs.



ANSWER 3.

No, it is possible in this scenario that the gift bestowed of a weekend trip could be intended to influence your conduct and decision making. This could constitute a bribe. In accepting this gift, you would not only be contravening the Code of Conduct but may be personally liable to criminal or civil liability. The conduct of the third party is not acceptable and should be reported to your Local Anti-Corruption Officer.



SUMMARY:

Most countries now have laws prohibiting bribes and inducements which are intended to influence business decisions. In offering or accepting (or even if you do not accept) a bribe you are exposing yourself and Edrington to prosecution. There are various forms of inducement which could constitute a bribe and more information is available in the Anti-Corruption Policy and Procedures. Remember you can also utilise our Speaking Up Policy if you wish to make a confidential report of unacceptable or suspicious behaviour.



COMPETITION / ANTI-TRUST



OUR POLICY AND STANDARDS

We ensure that we comply with legislation and rules wherever we do business, including the anti-trust and competition laws of each country in which we operate.

The competition rules vary in every country, but generally speaking competition law seeks to prohibit:

- agreements between businesses that restrict fair competition; and
- abusive conduct by businesses in a dominant market position.

OUR RESPONSIBILITY

Infringement of competition law could lead to serious penalties including criminal sanctions and director disqualification, so it is therefore important that, where relevant, we:

- familiarise ourselves with the competition and anti-trust guidelines for each market in which we operate;

- never get involved in conversations, meetings, e-mail exchanges, or share information, directly or indirectly with competitors, regarding details of prices, costs, profits, margins, trading terms, or new product launches; and
- never try to fix prices, divide up markets, customers or territories, or to boycott any customer.

MORE INFORMATION / WHAT NEXT?

Full guidance is available in the Competition Compliance Manual.

If you have a particular concern regarding compliance with competition laws, or wish to report behaviour which you believe is anti-competitive, it is important that you contact Edrington's General Counsel on +44 (0)141 940 4007 or follow the steps set out in both the Raising Questions section of the Code of Conduct and Speaking Up Policy.

SCENARIO:

QUESTION:

You are attending a local industry association annual dinner, attended by many of our competitors. During a conversation with one of the sales directors of a competitor, he starts to discuss selling prices and price margin with you. What should you do?

ANSWER 1.

Discuss, in a general manner, prices and products. ❌

ANSWER 2.

Agree that perhaps there is something that could be done to agree pricing of products. ❌

ANSWER 3.

Immediately remove yourself from the conversation and inform him that you are unable to discuss prices or margins as this is inappropriate, illegal and contrary to your Company's Code of Conduct. ✅

SUMMARY:

This is potentially a serious infringement of competition or anti-trust laws. Competitors should never agree, discuss or exchange information on pricing. For more information on Competition law issues please consult the Legal Team.



SCENARIO:

QUESTION:

You are copied into an e-mail from a colleague to one of our third party distributors discussing retail pricing. The e-mail gives a recommended retail price (RRP) and then another price which is described as the absolute 'floor' minimum price for the products. Is there anything wrong with your colleague's e-mail?

ANSWER 1.

Yes, setting fixed or minimum prices is contrary to competition law.



ANSWER 2.

No, we need to inform our distributors how much our products should be sold for.



ANSWER 3.

Yes, this is illegal but we can legally give our distributors an indication of our recommended retail prices, whilst avoiding fixed minimum prices.



SUMMARY:

The scenario here concerns resale price maintenance, which is illegal. It is acceptable for us, acting in the role of supplier, to recommend prices but we should not seek to fix minimum prices or penalise non-compliance with our recommended prices. However, where a distributor is one of our wholly owned distribution companies competition law does not apply and we can influence pricing. Please check with the Legal Team if you have any particular concerns.



GIFTS, ENTERTAINING & HOSPITALITY



OUR POLICY AND PRINCIPLES / STANDARDS

The company believes that the occasional acceptance or provision of modest items of hospitality, entertaining or gifts can legitimately contribute to good business relations so long as they are reasonable, proportionate and transparently recorded, and do not influence proper business decision-making.

OUR RESPONSIBILITY

Employees are expected to adhere to the guidelines set out in the *Business Transactions – Specific Types of Activity* section of the Anti-Corruption Policy and Procedures when engaging in all new and existing business relationships and activities.

It is prohibited for employees to solicit hospitality, entertaining or gifts.

Travel expenses (met in relation to a third party), charitable donations, contributions to political parties and sponsorship also require careful consideration to ensure they comply with the Anti-Corruption Policy.

MORE INFORMATION / WHAT NEXT?

Full guidance is available in the Anti-Corruption Policy and Procedures. Remember that you can raise any concerns of malpractice you may have using the Speaking Up Policy.

WORKING WITH BUSINESS PARTNERS



OUR POLICY AND PRINCIPLES

The company will adopt the principles of this Code in all of its business relationships, including those with:

- Subsidiaries and other entities over which we have effective control;
- Joint ventures;
- Agents and intermediaries; and
- Contractors, customers and suppliers.

OUR RESPONSIBILITY

Third parties can present compliance and reputational risks, including sanctions, the UK Bribery Act and Corporate Criminal Offence of failing to prevent tax evasion, as well as Data Protection.

Prior to engaging in any new business relationships or transactions, we will carry out appropriate due diligence on the other party to ensure that they do business in a manner that is consistent with our Code. Full guidance on the process for establishing a new trading relationship is available in the Third Party Risk Management Policy and Procedural Guidance (“KY3P Policy”).

The company will not tolerate any form of slavery in its business or supply chain. In addition to the KY3P Policy, the Global Sourcing Guidelines confirm the following commitments in relation to the manufacture and finishing of our products.

We will not:

- use prison or forced labour directly or indirectly, and will not use or purchase materials from a supplier who is known or suspected of directly or indirectly utilising prison or forced labour
- do business with a supplier which provides wages and benefits that do not comply with all applicable laws and the prevailing practices in the industry
- do business with a supplier who is known or suspected of using child labour directly in any of their facilities, or indirectly throughout their extended supply chain

Where the people we work with have their own Code of Conduct, we will ensure that they are operating to the same ethical standards as we have set out in our Code.

Where the policies, procedures or practices of a third party are not fully consistent with our Code, any elements of the Code necessary to supplement the third party’s arrangements should be included in the relevant contracts.

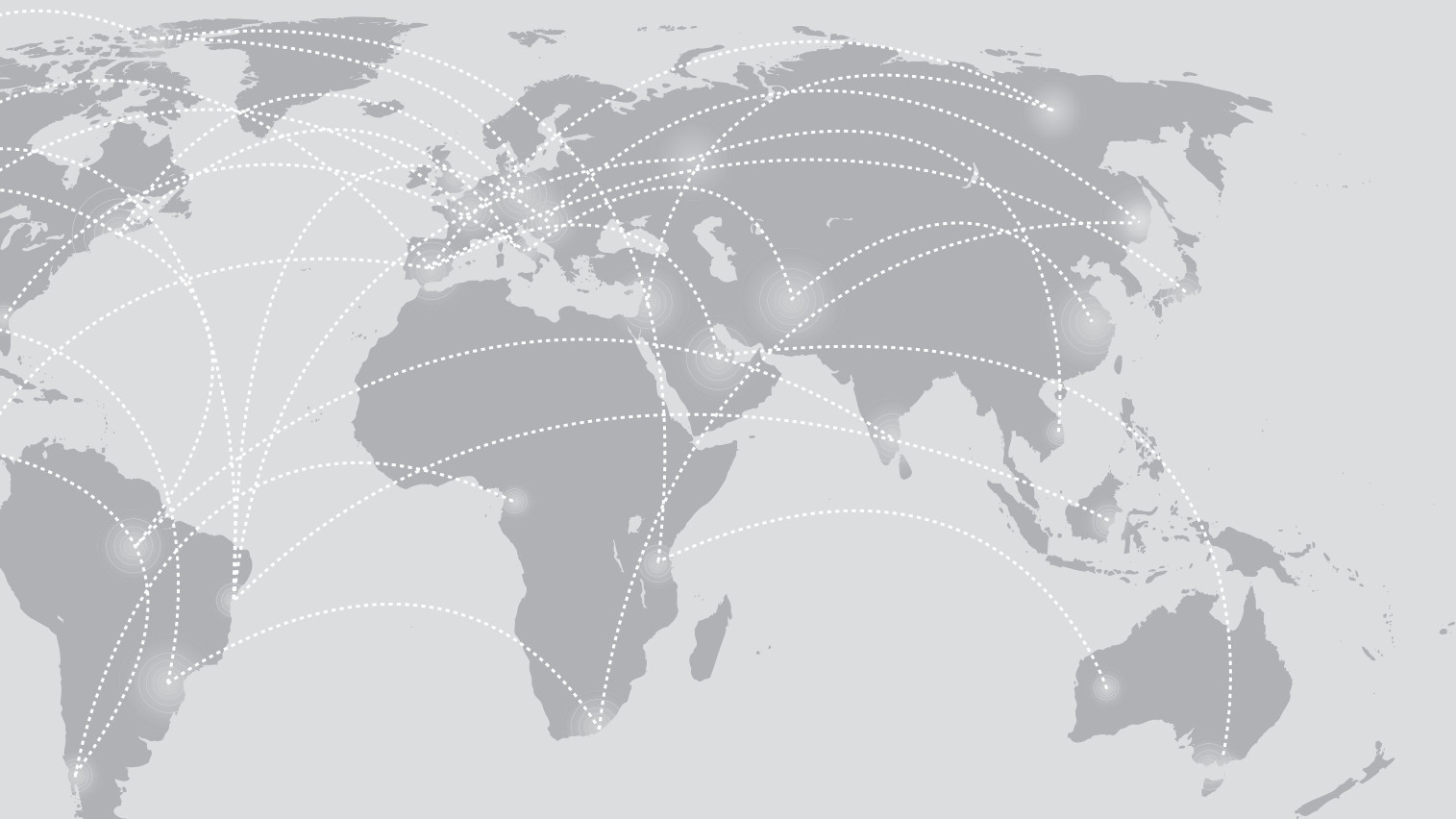
We will not work with business partners whose practices are inconsistent with this Code.

MORE INFORMATION / WHAT NEXT?

For further guidance in this area, or if you have concerns of malpractice regarding the conduct of, or relationship with, a business partner, please reference the *Business Relationships* section of Edrington’s Anti-Corruption Policy and Procedures, or follow the guidance in the *Seeking Guidance* and *Raising Concerns* section.



INTERNATIONAL TRADE



OUR POLICY / PROCEDURES

The company at all times acts in compliance with local laws, regulations and international sanctions which relate to the import, export and trading of our goods within each country in which we operate.

OUR RESPONSIBILITY

- Carry out appropriate due diligence on our business partners in accordance with the KY3P Policy;
- Ensure that we comply with all legislation governing the import and export of our products and the trade laws of each country we operate in or do business with;

- Obtain and maintain all necessary import and export licences; and
- Provide accurate information to all customs authorities.

MORE INFORMATION / WHAT NEXT?

For further information, or to raise any concerns, please contact your line manager or the legal team.

CONFLICTS OF INTEREST

OUR POLICY AND PRINCIPLES / STANDARDS

We believe that conflicts of interest can be damaging to our business and reputation.

OUR RESPONSIBILITY

It is the responsibility of employees to act in the best interests of the company at all times and to avoid situations where our personal, social or financial interests, commitments or loyalties may conflict with its business.

If any family member or close relation works for a customer, supplier or competitor, or you have any other existing or potential conflicts of interest, you should disclose this in writing to your line manager and the legal team.

If such a conflict does arise and is properly notified, the individual will be isolated, without disadvantage, from decision-making or operation in the area in which the conflict of interest exists.

All company assets should be utilised appropriately and not by employees for their own personal gain or benefit.

Employees should seek written approval if they wish to act as an officer or director of another business.

MORE INFORMATION / WHAT NEXT?

Contact the legal team and/or your line manager for any further information.

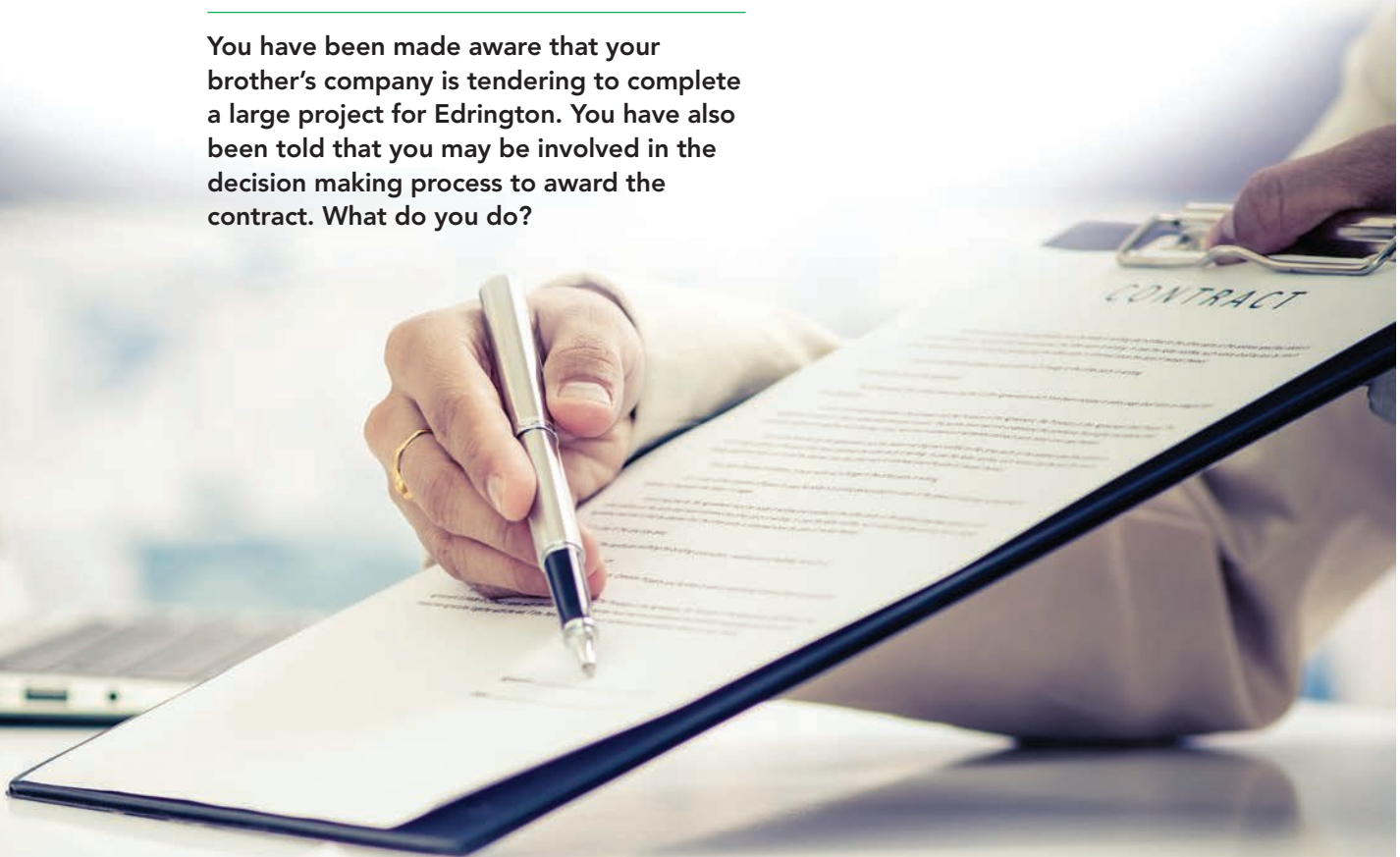
Remember that you can raise any concerns you may have using the Speaking Up Policy.



SCENARIO:

QUESTION:

You have been made aware that your brother's company is tendering to complete a large project for Edrington. You have also been told that you may be involved in the decision making process to award the contract. What do you do?



ANSWER 1.

You do not see any problem with this and become fully involved in the process. You feel that you can remain independent and make your decision based on the most suitable applicant.



ANSWER 2.

You feel there is a potential conflict and you inform your Line Manager of your concern.



ANSWER 3.

You do not inform anyone but you do not become involved in the project.



SUMMARY:

Where a situation arises which has the potential to be a conflict of interest, it is important that you notify your Line Manager to allow appropriate action to be taken. If a conflict does arise and is properly notified, you will not suffer disadvantage, but will be isolated from decision-making or operation in the area where there is a conflict of interest.

OUR PEOPLE

RECRUITMENT

The company is committed to recruiting the highest calibre of individuals to support business growth, provide a pipeline of talent for the future and positively contribute to the culture of the company.

We are committed to hiring the person best suited to the job through application of the company's Equal Opportunities Policy at all stages of recruitment and selection.

Recruitment will be based solely on the applicant's abilities and individual merits as measured against the criteria for the position without regard to gender, gender reassignment, sexual orientation, marital or civil partnership status, colour, race, nationality, ethnic or national origins, religion or belief, age, pregnancy or maternity leave or trade union membership.

Any candidate with a disability will be included unless it is clear that the candidate is unable to perform a duty that is intrinsic to the role, having taken into account any reasonable adjustments which may need to be made to the recruitment process or the job role to ensure that no applicant is disadvantaged because of his/her disability.

More information is contained in the Recruitment and Selection Policy.

PERFORMANCE MANAGEMENT & DEVELOPMENT

We operate an annual performance management and development process at all levels across the business.

The purpose of this process is to set clear objectives for individuals which contribute to the overall achievement of the company's goals, provide regular feedback to individuals regarding their job performance, identify personal development needs, and support employee career progression.

LEARNING & DEVELOPMENT

We are committed to the learning and development of our employees. This commitment ensures the company has quality employees at all levels to achieve current objectives, realise long-term plans and ensure continued success. All learning and development plans are developed and delivered in line with business values, company strategy and annual operating plans.

The learning and development needs of every employee are assessed on an annual basis, as a minimum, via the performance management and development process, and may be identified at any time throughout the year.

All line managers within the company have a responsibility to develop their staff through an open and supportive management style, and have effective development conversations with them.

Responsibility for learning and development has traditionally been shared between the individual employee and the line manager.

Our online learning portal 'Edrington Academy' provides all employees globally with access to a central learning hub which enables them to develop in a fast and flexible





way to meet their own development needs, thus encouraging a more 'learner-led' approach to our development activities.

We support continuous learning and will facilitate an employee's further education and training where this is relevant to the individual's ability to perform their current role more effectively, or where it will enhance future potential to contribute.

Financial and study leave support for professional or further education must be supported by a career and personal development plan, and is offered on the terms outlined in the Learning and Development Policy, set at local level.

EQUAL OPPORTUNITIES

We are committed to providing equal opportunities in employment and to avoiding unlawful discrimination in all areas of our business. Striving to ensure that the work environment is free of harassment and bullying, and that everyone is treated with dignity and respect, is an important aspect of ensuring equal opportunities in employment. Every employee is required to assist the company in meeting its commitment to equal opportunities.

The Equal Opportunities Policy contains further information.



SCENARIO:

QUESTION:

You recently applied for a promotion but were unsuccessful. Your Line Manager has repeatedly made comments about how inconvenient it is when you have to leave work on time to pick up your children from school. You have explained that your family circumstances are such that this is unavoidable but you suspect that this may be the reason that you were not successful with your application. What should you do?

ANSWER 1.

Nothing, there is no way of proving this was the reason so you are best not upsetting your Line Manager.



ANSWER 2.

It is reasonable that the promotion went to a colleague who can work longer hours than you as they will get through more work. The decision is understandable.



ANSWER 3.

You should speak to your HR Business Partner if you feel there is a likelihood that you have been discriminated against.



SUMMARY:

All Edrington recruitment should be based on the applicant's abilities and individual merits without consideration of personal circumstances. We are committed to hiring the best applicant for the job.



HARASSMENT

The aim of the company's Harassment Policy is to protect employees from harassment or bullying at work. Such behaviour is viewed as unacceptable, as the company strives to create a culture where all employees are treated with dignity and respect.

Harassment, in any form, is considered unacceptable and will not be condoned.

The company requires the support and involvement of all employees in our efforts to avoid harassment or bullying in the workplace.

Any employee who, after careful investigation is found to have breached the Harassment Policy, will be subject to the company's disciplinary procedures.


The Harassment Policy contains more information.

SCENARIO:


QUESTION:

Your Line Manager is very well respected within Edrington and always gets results but his/her behaviour can be intimidating, regularly shouting and losing his/her temper with your colleague who was very distressed following a recent meeting. You have also heard, on occasions, your Line Manager make inappropriate comments about your colleague's performance. You get on well with you Line Manager so should you do or say anything?


ANSWER 1.

No. Your Line Manager is very good at their job and in business it is sometimes necessary to act in an intimidating or aggressive manner to get results and drive better performance. 

ANSWER 2.

Yes, any kind of hostility or intimidation in the workplace is unacceptable. You should advise your colleague to report the matter to your HR Business Partner or alternatively make a confidential report through the Speaking Up Policy. 

ANSWER 3.

Yes, you should have a word with your Line Manager and ask them to ease off your colleague. 

SUMMARY:

Edrington's culture is one of inclusivity and respect. Harassment in any form, including bullying, is unacceptable and will not be tolerated.

HOW WE CONDUCT OURSELVES

MARKETING & PROMOTION

Edrington is a producer of high quality spirits. As a responsible company with a strategic mission to grow a sustainable, long-term business, Edrington wishes to ensure that its brands, and those of third parties, are promoted and enjoyed responsibly.

In recognising the spirits industry's role in encouraging responsible consumption, Edrington believes that this complements the obligation on every consumer who chooses to drink alcohol to do so in a responsible manner.

Edrington has created The Edrington Code of Practice for the Responsible Marketing and Promotion of Edrington Brands. The objective is to ensure that Edrington's brands are promoted in a manner that is consistent with international regulations and Edrington's ethics and values. Online training is mandatory for every employee with a role in marketing, promotion, events, packaging and procurement. All other employees are encouraged to complete the online training programme.



ALCOHOL

Edrington's Alcohol Policy is intended to promote a greater awareness of the impact of alcohol in the workplace, and to ensure that the company continues to safeguard the health and safety of employees.

The company's approach is to set an expectation, based on the individual responsibility of each employee, that alcohol will not be used in such a way as to adversely affect safe behaviour or work performance.

Employees are under an obligation, in any situation where they may be viewed as representatives of the company, to protect our reputation. Employees should recognise that as a result of drinking irresponsibly, or committing offences relating to the misuse of alcohol, their reputation and that of the company is at risk.

In some areas of the business, particularly in roles which involve the entertainment of clients, customers or consumers, situations may arise whereby an employee may legitimately consume some alcohol during working hours or while attending a business related function. Such circumstances do not negate or otherwise diminish the employee's obligation to promote responsible drinking. Employees should never feel obliged to drink at such events.

The Alcohol Policy contains more information.

SCENARIO:

QUESTION:

Your colleague was at a work event last night and has arrived in the office late and clearly still under the influence of alcohol. Should you take any action?

ANSWER 1.

Yes. Your colleague may be placing themselves and others in danger. It is also not acceptable behaviour. You should report this to your Line Manager and HR Business Partner.



ANSWER 2.

No, your colleague was representing the company at the event so this is excusable.



ANSWER 3.

Maybe, it will depend on the nature of the work your colleague undertakes.



SUMMARY:

We encourage our consumers to drink responsibly so we expect the same of our employees and business partners, especially when representing Edrington. It is our reputation and your own at stake. There are also potential health and safety concerns where an employee is on-site under the influence of alcohol and this could represent breach of the company's alcohol policy.





DRUGS

Edrington's Drugs Policy is intended to promote a greater awareness of the negative and potentially dangerous impact of drugs in the workplace and to ensure the health and safety of our employees.

We expressly forbid employees from being impaired by, consuming, being in possession of or supplying illegal drugs while in the workplace or on company business.

The Drugs Policy contains more information.

ROAD RISK

Edrington, underpinned by local legislation particular to each geography, requires any employee driving on company business in either a company owned vehicle or their own private vehicle, to adopt and maintain a responsible attitude to road safety and uphold the highest standards of driving and safety.

The Road Risk Policy contains more information.



EXPENSES

The company operates a compliant, robust and equitable Expense Policy which is designed to ensure that appropriate standards are met and that employees who incur costs on its behalf are treated in a consistent and fair manner. The company will authorise and reimburse expenses which are:

- incurred wholly and exclusively and necessarily in carrying out an employee's duties in the course of company business;
- properly and appropriately incurred, in keeping with our core values; and
- submitted and approved in compliance with Edrington's Expense Policy.

Employee expenses which do not comply with the Expenses Policy are, in the first instance, returned to the employee for correction, deletion or resubmission. Serious breaches of this Policy in respect of persistent non-compliance, or knowingly or falsely attempting to claim expenses, may ultimately result in disciplinary action being taken.

The Expense Policy contains more information.

INFORMATION MANAGEMENT



EMAIL & INTERNET USE

The appropriate use of e-mail and internet access within Edrington is encouraged. Appropriate use facilitates communication, knowledge and efficiency, and is of assistance to many employees in the performance of their duties. Inappropriate use can result in problems, ranging from minor distractions to legal claims against the company.

The E-mail and Internet Policy sets out the company’s view on the correct use of e-mail and internet access, and explains how this can be achieved, as well as the response to inappropriate use.

IT NETWORK SECURITY

We all rely upon the efficient operation of our IT network to support the business, and it is therefore in all our interests that the appropriate security measures, as set out in the IT Network Security Policy, are followed. Any breach of security will be taken seriously by the company and may result in action taken under the disciplinary procedure after the matter has been referred to Human Resources.

SOCIAL MEDIA

The company recognises that the internet provides many opportunities for employees to engage in interactive discussions and share information using a variety of social media. However, it is important that employees use social media in a responsible manner to ensure that it does not pose any risk to our confidential and proprietary information, our reputation, and our legal obligations.

If you are uncertain or concerned about any issue regarding social media, please contact your Line manager or follow the guidelines set out in the Speaking Up Policy.



SCENARIOS:

QUESTION A:

You are connected to an Edrington colleague on the social networking site Facebook. You notice that your colleague has recently made an announcement on their Facebook page regarding some highly sensitive company information. What do you do?

ANSWER 1A.

You comment on the colleague's announcement.



ANSWER 2A.

You report this to your Line Manager and the Legal Team to allow appropriate action to be taken.



ANSWER 3A.

Nothing.



QUESTION B:

You have recently moved to Edrington from a competitor and brought along confidential information from your previous employer which you feel would be of commercial value to Edrington. Is there a problem in sharing this information given that it will be of use to your particular department?

ANSWER 1B.

No, it was information which you generated in your previous role therefore it belongs to you and you can share it as you see fit.



ANSWER 2B.

No, you can share the information provided your colleagues at Edrington agree to keep the information confidential.



ANSWER 3B.

Yes, if the information is confidential or you are aware it is commercially sensitive, you cannot use it for personal benefit and most definitely cannot share it with others. Edrington hired you for your expertise and not to gain access to a competitor's confidential information.



SUMMARY:

Confidential information includes (but is not limited to) financial information, sales, pricing, terms with distributors and new product development. Confidential information related to Edrington and our business is owned by Edrington and must be protected. If you are asked to share any such information or are provided any such information from a competitor then consult the Legal Team before taking any action.

DATA PRIVACY & SECURITY



OUR POLICY AND PRINCIPLES / STANDARDS

As part of its business operations, Edrington collects, stores and processes personal information ranging from employee records to individual consumer details.

Edrington ensures that all personal information is handled and stored appropriately, following the data privacy and protection rules in the countries where we operate.

OUR RESPONSIBILITY

- To only use personal information for valid business or legal purposes.
- To keep information only as long as is necessary to carry out the business or legal task.
- To obtain permissions to use an individual's personal details and to only use information in ways in which individuals have consented.
- To protect personal information, keeping it confidential and secure.
- To report any loss of personal information, whether on hard copy or electronic device, to your line manager or head of department.

MORE INFORMATION / WHAT NEXT?

Full guidance is available in the Information Management and Data Protection Framework. If you have any concerns please contact the Legal Team.



HEALTH, SAFETY & ENVIRONMENTAL



HEALTH & SAFETY

The company is committed to providing the highest level of health and safety in the workplace for all employees and others who have occasion to be on our premises, or who may be affected by any of our operations.

The company is also committed to complying with health and safety legislation in all territories in which we do business. In addition we co operate fully, and maintain open relationships with, all relevant regulatory authorities.

The Health and Safety Policy contains more information.

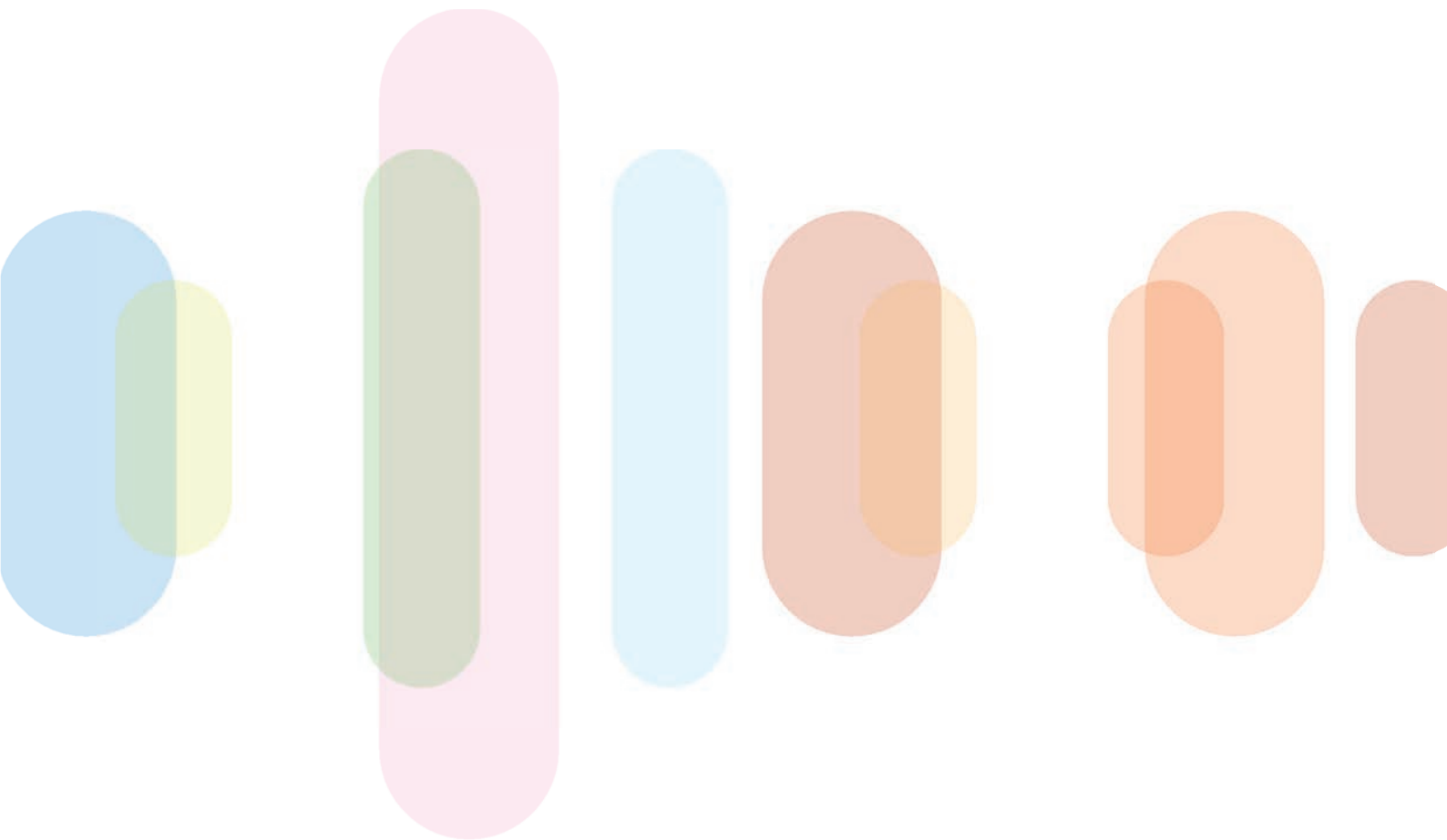


ENVIRONMENTAL

The company is committed to the prevention of pollution and to the positive management of its operations on the environment. We regard the conservation of energy, raw materials, and water, and the minimisation of waste, to be a high priority in our business.

The company is also committed to complying with environmental legislation in all territories in which we do business. In addition we co operate fully, and maintain open relationships with, all relevant regulatory authorities.

The Environmental Policy contains more information.



THE CODE OF CONDUCT AND ANTI-CORRUPTION AND SPEAKING UP POLICIES CAN BE FOUND ON THE EDRINGTON INTRANET UNDER "EDRINGTON CODES", IN THE EDRINGTON ACADEMY UNDER "CODE OF CONDUCT: OUR VALUES IN BUSINESS" AND ON THE EDRINGTON WEBSITE AT WWW.EDRINGTON.COM.

OTHER POLICIES REFERRED TO IN THE CODE CAN BE FOUND IN THE RELEVANT FUNCTIONAL AREAS OF THE EDRINGTON INTRANET.

PLEASE USE THE SEARCH FUNCTION PROVIDED FOR ASSISTANCE AS REQUIRED.



Edrington Codes