27th September 2024

AUSTRALIA

Bacardi-Martini Australia Statement

This modern slavery statement is made pursuant to the Modern Slavery Act 2018 (Cth) (the "Act"). It applies to the Australian activities of the Bacardi Group and is made by Bacardi-Martini Australia Pty Ltd of Level 8, 201 Kent Street, Sydney, NSW 2000, Australia with company number ABN 40103911146 ("BMA"). BMA is the sole reporting entity for the Bacardi Group under the Act.

BMA is a wholly owned subsidiary of Bacardi-Martini B.V., of Weena 505, 3013 AL Rotterdam, The Netherlands. BMA runs a financial year ending on 31 March. This statement reflects the financial year ending 31 March 2024.

For this reporting period, BMA is not compelled to register a statement but as a responsible entity, has decided to do so voluntarily. The Bacardi Group takes the issue of modern slavery seriously and has a global approach to identifying and mitigating the risks associated with modern slavery. Other entities in the Bacardi Group outside of Australia also provide modern slavery statements in the jurisdictions in which they are located. Due to the global nature of the Bacardi Group's activities and its supply chain, substantial parts of those reports are encompassed within the attached document. This letter and the attached document form BMA's Australian specific reporting statement.

Board approval and signature.

BMA's modern slavery statement for the year ended 31 March 2024 has been compiled by a multi-functional working group, comprising members from Bacardi's leadership, compliance, legal, supply chain and procurement teams both globally and in Australia. The statement was reviewed and approved by the Board of Directors of Bacardi-Martini Australia Pty Ltd.

Luiz Schmidt
BMA Chairman of the Board and Managing Director

Steph Joachim
BMA Board Director

MODERN SLAVERY STATEMENT 2024

BACARDI

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Endorsement from Chief Business Integrity Officer

From a small, family-owned business to the largest privately held international spirits company, Bacardi has built a legacy of doing the right thing for seven generations.

We care about the impact of what we do not just today but for the next century, and we make choices based on what's best for our people, our consumers, our partners, our brands, and our world.

Bacardi pours its heart and soul into its spirits with a focus on responsibly sourcing ingredients, and by working with partners that adhere to ethical business practices. By holding its partners to the same high standards it sets for itself, Bacardi elevates its own business, the business of its partners, and the industry as a whole.

That's the Bacardi legacy. That's Good Spirited.

Duncan Sparkes
Chief Business Integrity Officer
Bacardi Limited

Our Business Structure

Founded over 160 years ago in Santiago de Cuba, Bacardi currently employs more than 8,000 people, operates production facilities in 11 countries and territories, and sells its brands in more than 160 markets. Our group of companies produces, markets, and distributes a variety of internationally recognized beverages globally through our network of operating subsidiaries. Our world-class portfolio includes more than 200 brands and labels, including BACARDÍ® rum, GREY GOOSE® vodka, BOMBAY SAPPHIRE® gin, MARTINI® vermouths and sparkling wines, DEWAR'S® Scotch whisky, and PATRÓN® tequila. We serve five regional markets categorized as North America; Western Europe; Asia, Middle East, Africa, Australia, and New Zealand; Eastern Europe, Greater China, Japan, and South Korea; and Latin America and Caribbean. Entities downstream from the organization include our customers, which vary from distributors, large global retailers and convenience stores to regional and local bars, restaurants and hotels.

In this statement, a reference to "Bacardi" or the "Bacardi Group" shall mean a reference to any member of the Bacardi group of companies ultimately owned by Bacardi Limited including Bacardi-Martini Australia Pty Ltd ("BMA"), and Bacardi U.K. Limited, and its UK subsidiaries.

Bacardi in Australia – Structure

In Australia, Bacardi operates through Bacardi-Martini Australia Pty Ltd. BMA is a for-profit entity, incorporated and domiciled in Australia. The parent entity of BMA is Bacardi-Martini B.V., incorporated and domiciled in The Netherlands. Its ultimate parent entity is Bacardi Limited, incorporated and domiciled in Bermuda. The registered office and principal place of business of BMA is Level 8, 201 Kent Street, NSW 2000. This is the only BMA site in Australia. BMA's principal activities are the marketing and distribution of branded spirits, Ready-To-Drink ("RTD") and wine products.
BMA employs approximately 70 employees in Australia and functions include sales (commercial), marketing, finance, supply chain and logistics, business intelligence and human resources.

Bacardi in UK – Structure

Bacardi is active in the UK through Bacardi U.K. Limited of 12 Francis Street, London SW1P 1QN (00366786) and its UK subsidiaries: Bacardi-Martini Limited (00305960), Bacardi Global Brands Limited (03651489), and John Dewar & Sons Limited (00613551).
In these companies, we employ over 900 employees across the United Kingdom. Functions include sales (commercial), marketing, finance, IT, distilling, blending, warehousing, supply chain and logistics, engineering, product development, and human resources.

Our Operations and Supply Chain

Overview of Supply Chain

Bacardi operates 24 bottling, distilling, blending, and aging facilities, located in the United States, Puerto Rico, Scotland, Ireland, Italy, France, India, England, Mexico, Switzerland, and Brazil. In addition, certain brands are produced or bottled at plants owned and operated by third parties at various locations around the globe.

Our route-to-consumer is tailored according to each market's regulations, size, and needs.

Production

Bacardi has 100% ownership of production sites in eleven countries and territories: United States, Puerto Rico, Mexico, France, Italy, Scotland, England, Ireland, Switzerland, Brazil, and India. At these sites, we produce BACARDÍ® rum, GREY GOOSE® vodka, PATRÓN® tequila, DEWAR'S® Blended Scotch whisky, BOMBAY SAPPHIRE® gin, MARTINI® vermouth and sparkling wines, CAZADORES® 100% blue agave tequila, D'USSÉ® Cognac, ANGEL'S ENVY® American straight whiskey (including bourbon and rye whiskies, and other leading and emerging brands including WILLIAM LAWSON'S® Scotch whisky, and ST GERMAIN® elderflower liqueur, as well as low proof products (comprising RTD and ready-to serve offerings.

Sourcing

We source high quality ingredients and raw materials from many countries around the world, including locations where achieving good workplace standards, environmental protection and sound governance can be complex.

BACARDI MARTINI AUSTRALIA

BMA does not own or operate any regional sales offices or local production or manufacturing facilities in Australia. All warehousing and distribution locations are owned and operated by third parties.

PRODUCTION

The Bacardi products listed comprise more than 90% of BMA's sales in Australia.

SUPPLY CHAIN

In Australia, Bacardi operates its sales and distribution channel through BMA which then contracts with third parties to distribute our brands. In addition, BMA works directly with on premise venues to promote Bacardi products, but it does not retail directly to any such venues.

Marketing and Sales

Our brands are enjoyed in over 160 markets across the world. Bacardi products are sold and distributed to a variety of customers, including retailers, bars, and restaurants. We care about the impact of what we do not just today but for the next century, and we make choices based on what's best for our people, our consumers, our partners, our brands, and our world.

That's the Bacardi legacy. That's Good Spirited

Bacardi is an ambassador of mindfulness and responsible drinking, working hard to reduce alcohol-related harm and empower people to be more educated when it comes to matters of consumption. It's about providing resources and options that educate, and enabling consumers to make more mindful choices for themselves as a way of truly enjoying every moment.

The Risks of Modern Slavery Practices in our Supply Chain

Bacardi has a zero-tolerance approach to modern slavery, but we recognise that no business is immune to the risk of it occurring in its supply chain. We are committed to understanding the particular areas of risk in our operations and taking steps to mitigate them.

Like any large global business, Bacardi relies on external suppliers. Depending upon business requirements and demand, Bacardi entities may engage with and appoint third party external labor contractors in relation to the provision of external labor support for an agreed upon period of time. Third party labor resources are contracted in compliance with each respective country's employment legislation and labor laws. The risk of forced labor occurring in third party owned supply chains is higher, particularly in relation to the sourcing of raw materials.

Our international operating model and the sheer number of partners and countries that we work with inevitably exposes us to the risk that modern slavery could enter our supply chains. We take various steps to address risk in our supply chain (see below). However, our use of indirect suppliers, distributors, subcontractors, and outsourcing partners adds an additional layer to other aspects of our supply chain which makes it more challenging to monitor and mitigate risks. In various locations we also employ seasonal labor and contract workers, which we recognize poses a heightened risk of forced labor.

Further, there are risks associated with certain raw materials that we source, particularly in relation to agricultural products such as sugarcane.

For BOMBAY SAPPHIRE® gin, our grain spirit is sourced in Europe, made from 100% sustainably sourced wheat*. 100% of our botanicals are from sustainably certified suppliers. ** GREY GOOSE® is made from 100% French wheat certified under SAI standard and, for DEWAR'S®Blended Scotch Whisky and our malt whiskies, all malted barley for Scotch whisky single malts is sustainably sourced from Scotland and is from a minimum SAI silver standard and from sustainable Scottish origin. The yeast is produced in UK. For PATRÓN® tequila, we are on track to ensure 100% of our agave growers receive their GLOBALG.A.P Crops for Processing (CfP) certification by the end of FY25 and, 100% of wineries for MARTINI® vermouth are certified sustainable by Equalitas.

*verified to FSA Silver standard under the SAI platform or equivalent
**100% sustainably sourced or wild harvested according to FSA Silver level under the SAI platform

BONSUCRO

We recognise the increased risks within the sugarcane industry and in 2014, we started a partnership with Bonsucro® to ensure that our molasses come from sugarcane sourced from responsible suppliers. Bonsucro® is a global non-profit organisation which has developed a metric-based sustainability standard and certification process for the sugarcane industry.

Bacardi works with the organization to improve economic, environmental and social conditions in the regions around the world where sugarcane is produced. The Bonsucro Production Standard covers areas such as human rights and labor conditions, and the biodiversity, environmental and economic viability of sugarcane producers. More information can be found at www.bonsucro.com.

SEDEX

Bacardi has been a Sedex member since 2009. Sedex is a not-for-profit membership association and Sedex Advance is one of the largest social governance collaborative platforms in the world for buyers, suppliers and auditors to store, share and report on ESG information. More information can be found at www.sedex.com. Bacardi is leveraging SMETA audits for social and environmental supplier tracking. We have over 220 supplier sites that have been either SMETA audited or evaluated. Audits follow the SMETA 4-Pillar audit protocol, or equivalent, covering health and safety, labor standards, environment, and business ethics.

Bacardi leverages the Sedex risk assessment tool to identify the types of operations and geographic areas that represent a significant risk of forced or compulsory labor in our operations and supply chain. The main countries identified with higher forced or compulsory labor risks are Kenya, India, China and Nigeria.

To vet our suppliers on their social performance, Bacardi requires goods suppliers to be registered on Sedex, and undertake a Self-Assessment Questionnaire (SAQ). For non-certified goods suppliers, Bacardi requires suppliers to perform a Sedex Members Ethical Trade Audit (SMETA), covering health and safety, labor standards, environment and business ethics. Audits and renewals of SMETA audits are tracked in the Sedex platform. Additionally, all new goods suppliers must comply with our own VQP, an internal review that includes an assessment of their social performance.

® https://bonsucro.com/what-is-bonsucro/

Risks we identify in the operations and supply chain of Bacardi-Martini Australia Pty Ltd

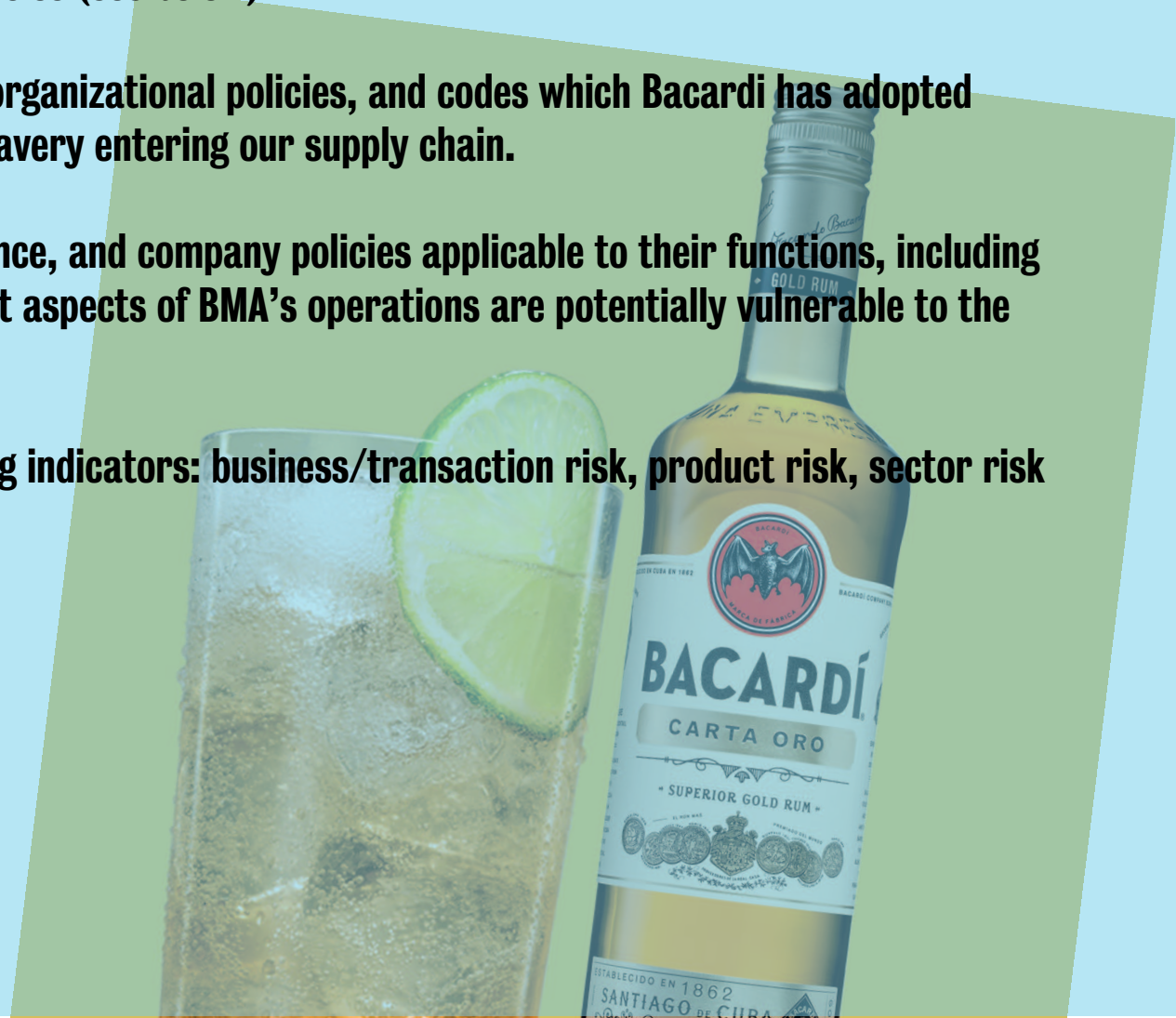
BMA categorizes the risk of modern slavery occurring in its business in Australia as low.

BMA complies with all applicable employment and labor laws, including the Fair Work Act 2009 and the Work Health and Safety Act 2011, and operates in accordance with global Bacardi compliance policies (see below).

Although BMA does not have a dedicated modern slavery policy, the organizational policies, and codes which Bacardi has adopted globally, including in Australia, help to mitigate the risk of modern slavery entering our supply chain.

Employees of BMA receive regular training on laws, regulatory guidance, and company policies applicable to their functions, including Business Integrity and Compliance. Nonetheless, we acknowledge that aspects of BMA's operations are potentially vulnerable to the risk of modern slavery.

Below we identify BMA's highest risk areas, according to the following indicators: business/transaction risk, product risk, sector risk and country risk.



Risks Assessment – Bacardi-Martini Australia

Category of Risk	Risk Area	More Detail
BUSINESS OR TRANSACTION RISK: Particular relationships or transactions that could be susceptible to slavery and human trafficking.	International operating model.	BMA sources the products it sells from Bacardi plants in France, Italy, Mexico, Singapore, UK, and the US.
	Use of external manufacturing suppliers.	BMA uses external manufacturing suppliers to produce locally our RTD products. BMA also uses indirect suppliers for Point-Of-Sale materials.
	Use of distributors, subcontractors and outsourcing.	BMA engages distributors, import/freight agents and outsourcing partners (e.g., for IT).
	Variety of employees.	BMA engages a small number of contract workers in its offices.
	Use of agencies for labor hire.	BMA uses marketing agencies to hire contract staff to work on events.
PRODUCT RISK: Risks associated with the locations that we source raw materials from.	Procurement of higher risk goods.	BMA sources the products it sells from overseas ISO accredited Bacardi-operated manufacturing plants (see above). These plants source raw ingredients and materials that are themselves certified or from sustainably certified suppliers. Electronic equipment is purchased by BMA from an external IT supplier.
SECTOR/INDUSTRY RISK: Parts of our business which may be vulnerable to slavery and human trafficking.	Labor in the operating sites.	There is potential in Australia for migrants to be exploited, particularly those coming from lower socio-economic geographies. BMA does not hire migrant labor to work in its offices but instead uses both its internal recruitment team and reputable recruitment agencies who comply with our Code of Conduct and agreed recruitment processes to recruit staff.
	Active in hospitality sector.	The hospitality sector carries additional risk around the potential for exploitation or abuse of staff. BMA does not operate in retail or hospitality itself but acknowledges that this is the channel through which a proportion of its products are ultimately consumed. Currently, BMA does not carry out any processes to address the potential for modern slavery within the operations of its third party partners in these sectors, but it expects all its employees and those of third parties to be treated fairly and with respect. Employees are encouraged to report any instances of abuse or modern slavery through our dedicated integrity line.
COUNTRY RISK: Countries where the organization operates that are vulnerable to slavery and human trafficking.	Countries where we source goods and services from.	BMA sources the products it sells from Bacardi-operated plants which are subject to Bacardi's Good Sources standards (available in the Bacardi FY24 ESG report on Bacardi Limited website) and compliance policies (see above).

Risks we identify in the operations and supply chain globally within the Bacardi group of companies.

Bacardi categorizes the risk of modern slavery occurring in its own operations as low.

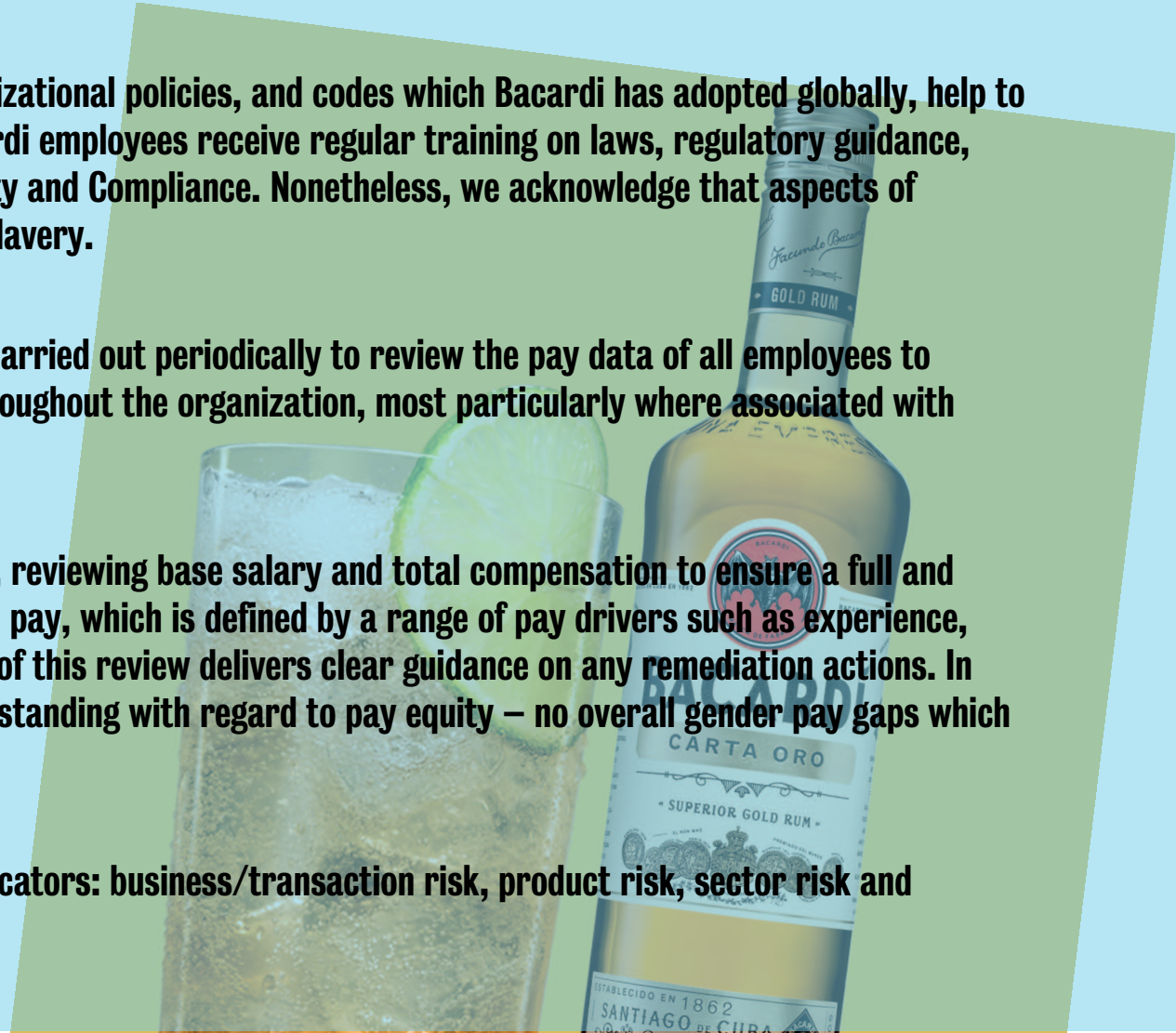
Bacardi complies with all applicable employment and labor laws in all markets where it has a business and operates in accordance with global Bacardi compliance policies (see below).

Although Bacardi does not have a dedicated modern slavery policy, the organizational policies, and codes which Bacardi has adopted globally, help to mitigate the risk of modern slavery entering our supply chain. Globally, Bacardi employees receive regular training on laws, regulatory guidance, and company policies applicable to their functions, including Business Integrity and Compliance. Nonetheless, we acknowledge that aspects of Bacardi operations globally are potentially vulnerable to the risk of modern slavery.

To ensure our employees are paid a fair wage globally, a pay gap analysis is carried out periodically to review the pay data of all employees to determine if and to what extent there are any unexplained pay disparities throughout the organization, most particularly where associated with gender.

Bacardi engages external vendor Mercer to conduct a full statistical analysis, reviewing base salary and total compensation to ensure a full and robust review. This process helps us to understand the appropriate predicted pay, which is defined by a range of pay drivers such as experience, performance, location, mobility, job family group and job factors. The output of this review delivers clear guidance on any remediation actions. In the 2023 review process, Mercer categorized Bacardi as “shows a very good standing with regard to pay equity – no overall gender pay gaps which could not be explained by legitimate, business-related factors.”

Below we identify Bacardi's highest risk areas, according to the following indicators: business/transaction risk, product risk, sector risk and country risk.



Risks Assessment – Bacardi

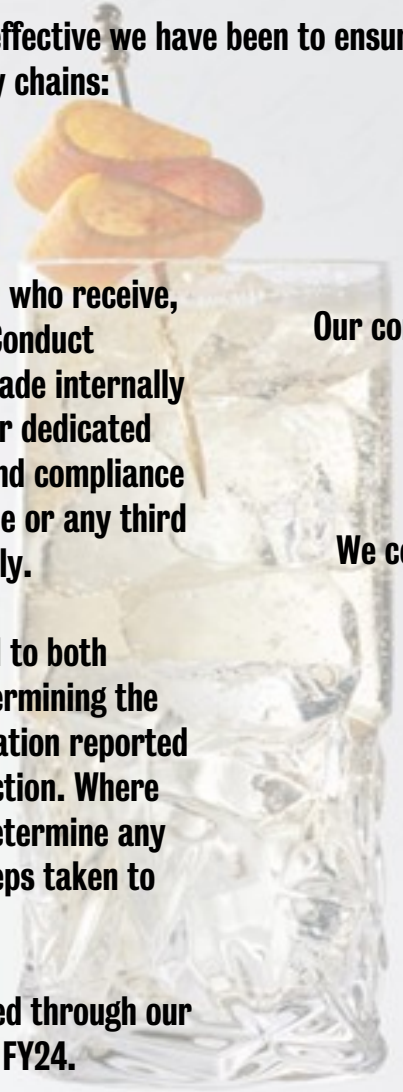
Category of Risk	Risk Area	More Detail
BUSINESS OR TRANSACTION RISK: Particular relationships or transactions that could be susceptible to slavery and human trafficking.	International operating model. Use of external manufacturing suppliers. Use of distributors, subcontractors and outsourcing. Variety of employees. Use of agencies for labor hire.	Bacardi produces its products in Bacardi owned plants located in France, Italy, Mexico, UK, Puerto Rico, US. Bacardi uses external manufacturing suppliers to produce locally our RTD products. Bacardi uses suppliers for Point-Of-Sale materials. Bacardi engages distributors, import/freight agents and outsourcing partners (e.g., for IT). Bacardi engages contract workers at some of its offices and at manufacturing plants via recruitment agencies. Bacardi uses marketing agencies to hire staff to work on events and hospitality.
PRODUCT RISK: Risks associated with the locations that we source raw materials from.	Procurement of higher risk goods.	Bacardi sources its raw and packaging materials from several countries, including Mexico, Italy, Spain, UK, France, and US. Bacardi owned plants source raw ingredients and materials that are themselves certified or from sustainably certified suppliers. Electronic equipment is purchased by external IT suppliers.
SECTOR/INDUSTRY RISK: Parts of our business which may be vulnerable to slavery and human trafficking.	Labor in the operating sites. Active in hospitality sector.	There is potential in many markets for migrants to be exploited, particularly those coming from lower socio-economic geographies. Bacardi does not hire migrant labor to work in its offices and plants but instead uses both its internal recruitment team and reputable recruitment agencies who comply with our Code of Conduct and agreed recruitment processes to recruit staff. The hospitality sector carries additional risk around the potential for exploitation or abuse of staff. Bacardi does not operate in retail* or hospitality itself but acknowledges that this is the channel through which a proportion of its products are ultimately consumed. Currently, Bacardi does not carry out any processes to address the potential for modern slavery within the operations of its third party partners in these sectors, but it expects all its employees and those of third parties to be treated fairly and with respect. Employees are encouraged to report any instances of abuse or modern slavery through our dedicated integrity line.
COUNTRY RISK: Countries where the organisation operates that are vulnerable to slavery and human trafficking.	Countries where we source goods and services from.	Bacardi leverages the Sedex risk assessment tool to identify the types of operations and geographic areas that represent a significant risk of forced or compulsory labor in our operations and supply chain. The main countries identified with higher forced or compulsory labor risks are Kenya, India, China and Nigeria.

*excluding Brand Homes

Due Diligence and Assessings the Effectiveness of our Risk Mitigation Actions

Key performance indicators to measure effectiveness of steps being taken

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:



KPIs monitored by the Business Integrity Team:

Bacardi has a dedicated and professional inhouse Business Integrity team who receive, manage, investigate, and analyze reports of any violation of our Code of Conduct including modern slavery matters. Reports of non-conformance can be made internally to various resources including the Business Integrity team, or through our dedicated confidential Bacardi Integrity Line which is provided by a leading ethics and compliance solution partner. Reports can be made by phone or online by any employee or any third party with whom we carry on business. Reports may be made anonymously.

A risk analysis on matters reported is carried out quarterly and reported to both Bacardi's Business Integrity and Audit Committees. Analysis includes determining the type of reports which give rise to concerns, any trends in the type of violation reported or any noticeable increase in reporting within a particular market or function. Where trends are detected, an additional internal audit may be undertaken to determine any underlying or unknown issues giving cause for concern, and necessary steps taken to manage the issue.

Globally, no matters of human trafficking or modern slavery were reported through our reporting channels or uncovered through our due diligence checks during FY24.

Supplier Adherence and Tracking Performance:

Our contracts with key suppliers require compliance with all applicable laws and our Third-Party Code of Conduct.

Globally, we track SMETA audit non-conformities.

We communicate reports (if any) of modern slavery or human trafficking through our annual responsibility reports.

Due Diligence Process – Supplier Audits

All Bacardi factories are certified by a qualified third party (LRQA) covering three ISO standards (9001, 14001 and 45001) and are audited once every three years for compliance including in relation to workforce selection and qualification.

Every supplier (including co-packers) is selected and validated using a Vendor Qualification Process (VQP) during which we evaluate suppliers' compliance with applicable laws and codes. Additional audits are conducted where the level of risk is higher. Every year, Bacardi conducts a risk assessment process to identify potential risks in supply chains in accordance with ISO standards. This is complemented by a mid-year review.

On a monthly basis, the Procurement Team meets to review a collective tracker on the status and pending actions of suppliers on the following topics: certifications, SMETA audits to be conducted or renewed, supplier non-conformities, Sedex Self-Assessment Questionnaire (SAQ), etc

In FY24, 70 SMETA audits were performed identifying 398 non-conformities. Our emphasis on SMETA audits for suppliers has given us valuable insight into the risk profiles of our partners. At the end of FY24, of these 398 non-conformities, 158 non-conformities across 34 supplier sites still need to be cleared; one is business critical, 29 are critical, 88 are major and 40 are minor. Most issues are related to health, safety and hygiene. Bacardi also identified five non-conformities related to child labor and young workers, of which three were still open at the end of FY24. The non-conformities are mainly linked to the absence of policies regarding young workers and child labor. Bacardi regularly reviews progress on closing these gaps with suppliers. The main countries and territories identified with higher child labor risks are China, Guatemala, India, Kenya, Malaysia, Nigeria, United Arab Emirates, the U.S. and Vietnam.

For critical non-conformities, Bacardi requires the creation of a detailed robust action plan that if not followed, could result in supplier contract termination.

Audits revealed 122 "good examples" (or observations) that demonstrate supplier commitment toward social and environmental responsibilities.

Due Diligence Screening

Third Parties

Bacardi wants to carry on business with like-minded third parties that have ethical practices at the forefront of their business activities. Bacardi business partners are subject to regular scheduled due diligence checks which are carried out using a risk rating model applying automated risk analysis that is specific to Bacardi's business strategy. Automated screening allows us to identify, evaluate and verify all available information on an individual or on companies. Due diligence builds confidence that we operate with integrity, security, and accountability. Further it helps Bacardi embrace its culture of compliance while protecting its reputation and prominent brand portfolio. Third parties are screened against watch lists, sanctions, embargoes, financial crimes, politically exposed persons, and government databases using an integrated industry leading external platform. That enables us to assess potential legal, corruption and regulatory risks when conducting business with a third party and provides us with the ability to make informed and confident decisions to conduct business partnerships that only meet with our ethics and compliance strategy. Where our screenings detect red flags, Bacardi carries out additional in-depth, in-house research to assess the risk to Bacardi's business. Where concerns remain, Bacardi may instruct enhanced due diligence using professional and experienced third parties with access to additional resources including on the ground investigations. Additional due diligence allows us to mitigate those red flags or where the risk assessed does not meet Bacardi's ethical practices, we may terminate our business activities with a third party.

Systematic due diligence screenings are carried out on a monthly basis on the vast majority of our third party business partners. Any third party business partner found to be guilty of activities of bribery or corruption, or sanctioned for criminal corrupt business activity, may have their contract terminated.

Internal

For internal investigations of corruption cases, a root cause analysis is carried out on all concluded investigations regardless of the result of the investigation. Recommendations will be made for remedial action, which may include review of internal controls, additional training, policy and process review, performance improvement plans, coaching and mentoring, and, potentially, termination of the employee or business contract.

On a quarterly basis, cases that include among other types of violations, reporting on anti-bribery and corruption matters, as well as trend analyses of the types of incidents investigated, are escalated to the Audit Committee. Recommendations are given to mitigate identified risks.

An ongoing systematic program of due diligence is managed by Business Integrity in conjunction with assessment and training assisted by our internal audit team.

Bacardi Due Diligence

On a monthly basis, Bacardi alerts suppliers on their outstanding actions in SEDEX as follows:

- Perform a SMETA audit,
- Renew a SMETA audit,
- Clear non-conformities, or
- Renew Sedex membership

Where any non-compliance is detected, remedial actions are agreed against a time frame for compliance and SMETA conducts follow up audits to ensure that these actions have been satisfied.

Due Diligence Questionnaire

Third parties within our supply chain are requested to confirm their compliance with our Third-Party Code of Conduct. In particular, compliance with the Third-Party Code of Conduct is requested as part of a due diligence questionnaire which is distributed to those parties that we assess are of the highest risk either on the basis of the financial element of our business dealings or regarding the country in which we conduct business with them.

Partnership with Sedex

Globally, Bacardi partners with Sedex, the largest collaborative platform for sharing ethical, supply chain data. This organization provides a third party Audit Management Service which enables Bacardi's suppliers to drive, and report in accordance with, an audit program based on the Ethical Trade Audit Protocol (SMETA). Suppliers are required to undergo a SMETA 4 Pillar audit, and the results of these audits are shared with Bacardi. Monthly we track suppliers' audits and non-conformities clearance.

Corporate Audit

A business risk assessment is completed annually and reviewed mid-year by the corporate audit team. Where risks are identified, action plans (e.g., supplier audits) are organized.

Our Policies and Codes

Our Relevant Policies and Codes

It is fundamentally important to Bacardi that we are trusted by our customers, consumers, employees, business partners and the communities we are present in. Whilst we don't have a dedicated policy on modern slavery, there are a range of organizational policies and codes which Bacardi has adopted globally to mitigate the risk of modern slavery entering our supply chain. Bacardi conducts regular reviews of these policies to ensure that they are being implemented properly and provide adequate protection for our employees and those of our partners. Below, we give more detail about:

- Our Third-Party Code of Conduct
- Our Procurement Policy
- Our Employee Code of Conduct
- Our Speak Up Code
- Our Employee Assistance Program, Bacardi Assist

Third-Party Code of Conduct

Bacardi actively promotes a working environment where all employees are treated and rewarded fairly. We expect third party business partners, customers and vendors with whom we work to follow the same high standards and same approach to equal opportunities and respect. Our expectations around this are outlined in our Code of Conduct for Third Parties which is integrated into our contract templates. The Third-Party Code of Conduct requires our partners to observe applicable laws, conventions, industry guidance and best practice and sets specific requirements about what we expect in relation to working conditions. Suppliers have to be able to demonstrate compliance with the Third-Party Code of Conduct. Additionally, we are leveraging Sedex, mainly at manufacturing sites.

Our key suppliers are contractually committed to complying with our Third-Party Code of Conduct which includes compliance with ILO standards on child labor. The Third-Party Code of Conduct is available to read online here. It includes detailed requirements that suppliers must adhere to in terms of Working Conditions for their labor forces.

Procurement Policy

Suppliers and business partners are selected impartially and objectively, based on criteria that include reputation, integrity, performance, and quality. Our supplier contract template include a clause with the commitment to comply with our Third-Party Code of Conduct.

Bacardi's procurement policy outlines how suppliers are required to adhere to the ethical standards contained in the Bacardi Third-Party Code of Conduct. This includes verifying that suppliers comply with internationally recognized human rights and labor standards, including the prohibition of forced labor, child labor, and modern slavery; and sets the expectation to suppliers to provide certifications confirming their adherence to these standards and compliance with all applicable laws and regulations. The policy also emphasizes transparency, accountability, and the prevention of unethical practices such as anti-bribery and conflict of interest, ensuring that modern slavery risks are addressed throughout Bacardi's procurement activities.

Employee Code of Conduct

The way we conduct our business is as important as the liquids we produce, the brands we market and the people we employ. At Bacardi, it is of the utmost importance that we maintain a working environment in which all employees are treated in a professional manner based on mutual respect and free from verbal or physical harassment, intimidation, or abuse. Our Employee Code of Conduct guides all of our employees (regardless of role) on how to conduct business in a way that continues to protect the health of our business and the integrity of our supply chain. If employees become aware of an action that they perceive to be a violation of our Code of Conduct, Bacardi employees have a responsibility to report this.

Employee Assistance Programme

“Bacardi Assist” is our global employee assistance program, which focuses both on the well-being and mental health of our employees. We provide support for employees and their family members with any work or personal issue, including short-term professional counseling and connecting them to local resources to help manage emotional, practical, or physical needs. Support can be requested on an anonymous basis. This service is free to use, totally confidential and provides around the clock support seven days per week, 365 days per year.

"Speak Up” Code and Reporting Integrity Line

It is crucial that our employees are empowered to speak up when they see something that is not right. Our “Speak Up” Code encourages employees and third party business partners to speak up about concerns of unethical behavior and dispels any misconceptions about reporting. All Bacardi employees have an obligation to flag concerns so they can be investigated and escalated quickly. Third parties carrying out business with Bacardi who believe an employee or representative of Bacardi has violated the law or any of our policies may also report in the same way a Bacardi employee can.

Local reporting is supplemented by our official grievance mechanism, the Bacardi Integrity Line, available 24/7/365 in phone and web reporting formats, with communication available in all local languages where our employees are located. The Bacardi Integrity Line is managed by a leading ethics and compliance solution partner, and reports can be made anonymously. Our Speak Up Code and Bacardi Integrity Line facilitates a remedy for any workers found in a situation where something is not right. Contractors, suppliers and third party business partners can also use the Bacardi Integrity Line or communicate with the Bacardi Business Integrity team should they need to raise concerns of noncompliance with the Bacardi Limited Code of Conduct or non-conformance with laws. Any third parties reporting will be offered the same protection as a Bacardi employee – confidentiality and with a zero tolerance to retaliation.

Any complaints received are recorded, reviewed, investigated as necessary and responded to all in accordance with a clear governance framework that follows EU requirements. Any investigation is initiated by the Bacardi Business Integrity Team and includes a defined escalation process.

There have been no significant instances of noncompliance with laws or regulations, and no fines were imposed or paid during the reporting period.

Training Our People

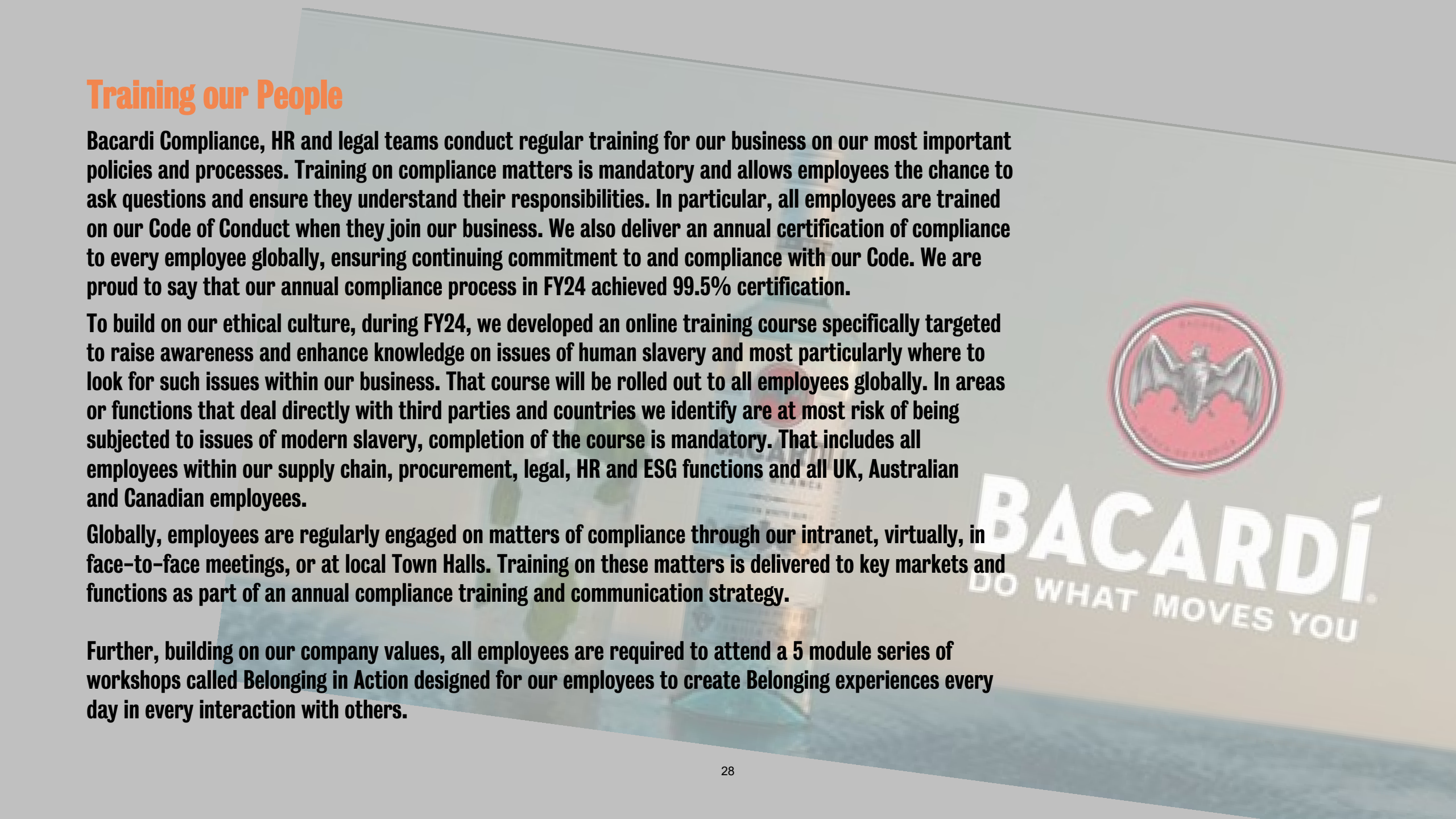
Training our People

Bacardi Compliance, HR and legal teams conduct regular training for our business on our most important policies and processes. Training on compliance matters is mandatory and allows employees the chance to ask questions and ensure they understand their responsibilities. In particular, all employees are trained on our Code of Conduct when they join our business. We also deliver an annual certification of compliance to every employee globally, ensuring continuing commitment to and compliance with our Code. We are proud to say that our annual compliance process in FY24 achieved 99.5% certification.

To build on our ethical culture, during FY24, we developed an online training course specifically targeted to raise awareness and enhance knowledge on issues of human slavery and most particularly where to look for such issues within our business. That course will be rolled out to all employees globally. In areas or functions that deal directly with third parties and countries we identify are at most risk of being subjected to issues of modern slavery, completion of the course is mandatory. That includes all employees within our supply chain, procurement, legal, HR and ESG functions and all UK, Australian and Canadian employees.

Globally, employees are regularly engaged on matters of compliance through our intranet, virtually, in face-to-face meetings, or at local Town Halls. Training on these matters is delivered to key markets and functions as part of an annual compliance training and communication strategy.

Further, building on our company values, all employees are required to attend a 5 module series of workshops called Belonging in Action designed for our employees to create Belonging experiences every day in every interaction with others.



Steps to be taken in FY25

To continue with our commitment to ensure that there is no slavery or human trafficking in our supply chains, we intend to take the following further steps to combat slavery and human trafficking in the next financial year:

Working Group	Through FY24 and into FY25, 2 members of the Bacardi Modern Slavery Working Group participated in a Business & Human Rights Accelerator program delivered by the UNGC. Attendance to this program was to increase knowledge within the company on modern slavery matters and how best to deliver improvements to identify and eradicate modern slavery issues within the extended supply chain.
Review of supplier contracts	In FY25, we plan to perform a saliency study to identify our salient human rights issues in our entire value chain, including our suppliers. This study will also identify and evaluate possible due diligence gaps and areas of improvement, such as management and tracking of supplier contracts and signature of the Code of Conduct.
Partnering with a third party to provide bespoke modern slavery training to Bacardi employees	In FY24 we explored partnerships with third parties to help raise awareness of risks in our supply chain by providing training materials. We targeted bespoke training to specifically address modern slavery risks within manufacturing, farming and hospitality. Dedicated modern slavery awareness training will be rolled out to all relevant employees in our Group companies during FY25. In certain functions and markets including Australia, UK and Canada, this training will be mandatory.
Revised Third-Party Code of Conduct	During 2023, we conducted an in-depth review of our Third-Party Code of Conduct ensuring compliance with necessary and incoming legislation not just as a standalone business, but additionally to support upward flow with our extended supply chain partners with whom we engage. The in-depth review has triggered Bacardi to include a more detailed and dedicated section seeking compliance with our requirements on human rights and fair working conditions. This new Third-Party Code of Conduct was rolled out to our third party partners during FY24 as contracts came up for renewal and we will continue to do so in future years until all contracts reflect adherence to our updated Third-Party Code of Conduct.
Due Diligence	During FY25, we will undertake a review of the risks incorporated to our monthly screenings in particular, those associated with human trafficking, including forced labor and child labor. Monthly screenings focused on such matters will enhance our monitoring program.

AUSTRALIA: Consultation with other reporting entities.

BMA does not own or control any other entities and therefore this criterion is not applicable.

Other Information.

BMA considers that it has disclosed all relevant information in this reporting statement.