



**GOO∞D**  
*Spirited*

# MODERN SLAVERY STATEMENT

*FY25*



# FY25 Modern Slavery Statement



## Introduction

This Modern Slavery Statement is issued by Bacardi-Martini B.V. on behalf of the Bacardi Group for the financial year ending 31 March 2025. It is intended to meet the requirements of the United Kingdom Modern Slavery Act 2015, the Australian Modern Slavery Act 2018 (Cth), the Canadian Fighting Against Forced Labor and Child Labor in Supply Chains Act, and the California Transparency in Supply Chains Act.

This is a global statement that reflects the company's commitment to preventing modern slavery and human trafficking across its operations and supply chains worldwide. It covers all Bacardi entities and activities, including but not limited to those in the United Kingdom, Canada, Australia, and California. Bacardi-Martini Australia Pty Ltd and Bacardi Canada are (directly or indirectly) owned and controlled by Bacardi-Martini BV, incorporated and domiciled in The Netherlands. Bacardi-Martini BV's ultimate parent entity is Bacardi Limited, incorporated and domiciled in Bermuda. These entities operate in the same sector, follow the same policies and processes, and share common suppliers. Therefore, we are providing a single consolidated description of the actions taken to

address modern slavery risks.

For this reporting period, Bacardi-Martini Australia Pty Ltd does not meet the threshold to publish a mandatory Modern Slavery Statement, but it has elected to do so voluntarily within its global statement. 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. Due to the global nature of the Bacardi Group's activities and its supply chain, the attached document encompasses and covers all the company's operations.

Bacardi is the largest privately held international spirits company in the world, which sells its brands in more than 160 markets, and operates production facilities in 10 countries and territories.. Given the global nature of our business and supply chain, we take a unified and comprehensive approach to identifying, assessing, and mitigating the risks of modern slavery.

This statement has been developed by a cross-functional working group comprising representatives from Bacardi Global Leadership, Legal, Compliance, Supply Chain, Procurement, and Responsible Sourcing teams. It has been reviewed and approved by the relevant boards of directors and senior leadership teams across all Bacardi reporting entities.



## FY25 Modern Slavery Statement



### Endorsement from Chief Business Integrity Officer

Bacardi, the largest privately held international spirits company in the world(1), is rooted in a rich heritage. As a family-owned business after seven generations, the tradition of doing the right thing is in our DNA.

Our Corporate Sustainability strategy, which we call Good Spirited, is focused on protecting People & Planet. We care about the impact of what we do not just today but for the future.

A handwritten signature in black ink, appearing to read 'D-Sparkes'.

**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 10 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, PATRÓN® tequila, GREY GOOSE® vodka, BOMBAY SAPPHIRE® gin, MARTINI® vermouths, sparkling wines and non-alcoholic aperitifs, and DEWAR'S® Scotch whisky.



## FY25 Modern Slavery Statement



**Bacardi UK:** 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) and John Dewar & Sons Limited (00613551); and its affiliate Bacardi Global Brands Limited (03651489). 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.

**Bacardi Australia:** In Australia, Bacardi operates through Bacardi-Martini Australia Pty Ltd. (BMA) which then contracts with third parties to distribute our brands. BMA is a for-profit entity, incorporated and domiciled in Australia. The registered office and principal place of business of BMA is Level 14, 1 Market 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 65 employees in Australia and functions include sales (commercial), marketing, finance, supply chain and logistics and human resources. 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. BMA uses external manufacturing suppliers to produce locally our RTD products. In addition, BMA works directly with on premise venues to promote Bacardi products, but it does not retail directly to any such venues.

**Bacardi Canada:** In Canada, Bacardi operates through Bacardi Canada Inc. (BCI). BCI is a for-profit entity, incorporated and domiciled in Canada. The registered address is 55 University Ave., Suite 600, Toronto ON, M5J 2H7 Canada and the principal place of business of BCI are 3250 Bloor Street West, East Tower, Suite 1050, Toronto, ON M8X 2X9. This is the only BCI site in Canada. BCI's principal activities are the marketing and distribution of branded spirits, Ready-To-Drink ("RTD") and wine products. BCI employs approximately 70 employees in Canada and functions include sales (commercial), marketing, finance, supply chain and logistics, business intelligence and human resources. BCI does not own or operate any regional sales offices or local production or manufacturing facilities in Canada. All warehousing and distribution locations are owned and operated by third parties.

# Table of Contents

Operations and Supply Chain	.....	6
Modern Slavery Risks	.....	9
Policies and Codes	.....	12
Due Diligence	.....	15
Effectiveness of Actions	.....	24





# Operations and Supply Chain



## FY25 Modern Slavery Statement

### *Overview of our 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 of our 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 ten countries and territories: United States, Puerto Rico, Mexico, France, Italy, Scotland, England, 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'USSE® 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.



## FY25 Modern Slavery Statement



### 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. As a family- owned business, the tradition of doing what is right is in our DNA; we make choices based on doing the right thing for our people, our consumers, our partners, our brands, and our world. Bacardi knows that part of being Good Spirited means helping people make the best possible choices for themselves.

Bacardi has made it a priority to help people live more mindfully and make more informed choices through its corporate responsibility efforts and expanding range of no- and low alcohol products. Bacardi aims to inspire mindful drinking and mitigate alcohol related harm by providing clear and accurate information about all of its products, and marketing only to those of legal drinking age and above.





# Modern Slavery Risks

## FY25 Modern Slavery Statement

### Risk Identification

Bacardi has a zero-tolerance approach to modern slavery, but we recognize 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. 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 cease, prevent and mitigate modern slavery risks on our supply chain. 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 FY25, we conducted a Human Rights Saliency assessment, with the goal of identifying the most salient human rights risk

across our entire value chain. This project has focused on identifying salient human rights issues and assessing the maturity of our business management systems to align with the Human Rights Due Diligence (HRDD) process across our value chain. Conducting a saliency assessment is one of the key principles that enables us to prioritize human rights impacts. Saliency assessments:

- Assess the severity and likelihood of human rights issues;
- Consider all human rights a company causes, contributes to or is simply linked to; and
- Analyse impacts from the perspective of the rightsholders.

### Salient human rights risks & priority rightsholder groups

On the next page, we have included an overview of all risks that were assessed and where they materialize across Bacardi's value chain. The risks that are shown here do not consider mitigation actions in place. However, Bacardi has prioritized the rightsholders included in the list who are considered to be at highest risk, taking into account the mitigation actions that have already been implemented. Our own operations show a lower risk level than the rest of the value chain.





# FY25 Modern Slavery Statement



Safe & hygienic working conditions	<p><b>Risk definition:</b> Right to safe &amp; healthy working conditions, Right to work, Right to a safe and healthy working environment, Right to access clean water and sanitation facilities.</p> <ul style="list-style-type: none"> <li>Safe and hygienic working conditions includes health and safety at work incl. accidents, prevention of accidents etc.</li> <li>Health problems can affect an individual's ability to work, thereby impacting their right to work and to earn a livelihood.</li> </ul> <p><b>Rightsholders at highest risk:</b> Temporary workers (across supply chain), workers in packaging and co-packaging of the sites of Tier-1 suppliers, farmers and labourers of suppliers (incl. coops, botanicals, wild harvest), Agave farm labourers of direct growers, workers of distributors (incl. VAPs).</p>	child labour & young workers	<p><b>Risk definition:</b> Freedom from exploitative Child Labour, Right to Education .</p> <ul style="list-style-type: none"> <li>This covers all aspects of exploitative child labour and the protection of young workers (aged 15 – 18). It includes provisions on minimum age, hazardous work, and impact on schooling.</li> <li>The worst forms of child labour prevent children from receiving an education and/or are harmful to their physical and/or mental health – both can have catastrophic effect on quality of life for individuals.</li> </ul> <p><b>Rightsholders at highest risk:</b> Young workers &amp; children (across supply chain), Temporary workers (across supply chain), Farmers and labourers of suppliers (incl. coops, botanicals, wild harvest), Agave farm labourers of direct growers, workers of distributors (incl. VAPs).</p>
Freedom of employment	<p><b>Risk Definition:</b> Right to favourable working conditions, freedom of movement. Freedom of employment covers all aspects of forced/ bonded labour, coercion, exploitation, modern slavery, and unethical recruitment practices.</p> <p><b>Rightsholders at highest risk:</b> Temporary workers (across supply chain), Farmers and labourers of suppliers, (incl. coops, botanicals, wild harvest), Agave farm labourers, workers of distributors (incl. VAPs).</p>	Working Hours & Conditions	<p><b>Risk definition:</b> Workers have the right to reasonable working hours, overtime and rest days which enable a healthy work/life balance.</p> <p><b>Rightsholders at highest risk:</b> Workers in production sites (supply chain workers), Temporary workers (across the value chain), farmers and labourers of suppliers (incl. coops, botanicals, wild harvest), Agave farm labourers of direct growers, workers of distributors (incl. VAPs).</p>
Discrimination	<p><b>Risk definition:</b> Non-Discrimination, Equal Pay for Equal Work, Freedom of Religion. Workers may experience less favourable or unfair treatment related to protected characteristics (incl. gender, religion, sexual orientation etc) related to career progression, pay, and hiring practices.</p> <p><b>Rightsholders at highest risk:</b> Temporary workers (across the value chain), Farmers and labourers of suppliers (incl. coops, botanicals, wild harvest), Agave farm labourers.</p>	Fair Wages	<p><b>Risk definition:</b> Right to adequate remuneration and decent standard of living.</p> <ul style="list-style-type: none"> <li>Workers/employees may not earn a fair wage to support a decent standard of living due to earnings not meeting a fair wage or income.</li> <li>Not earning a fair wage or income can have a significant effect on quality of life and links to other impacts such as access to healthcare and education.</li> </ul> <p><b>Rightsholders at highest risk:</b> Farmers and labourers of suppliers, workers of distributors, Service provider workers incl. facilities, brand promoters, Point of Sale, logistics incl. VAP, waste disposal.</p>





*Policies and Codes*



## FY25 Modern Slavery Statement

### *Our Relevant Policies and Codes*

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 Supplier Due Diligence Policy
- Our Employee Code of Conduct
- Our Speak Up Code
- Our Employee Assistance Program, Bacardi Assist

### **Third-Party Code of Conduct**

We expect our business partners to follow the same high standards that we do. Our expectations around this are outlined in our Code of Conduct for Third Parties which is integrated into our contract templates. The Code 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.

[The Code is available to read online here.](#) The Code has a dedicated section seeking supplier compliance with our requirements on human rights and fair working conditions and specifically includes issues on forced and child labor.

### **Supplier Due Diligence Policy**

In FY25, we published our Supplier Due Diligence Policy. This policy applies to all Bacardi suppliers and highlights different levels of due diligence required for suppliers depending upon supplier categorization. Due diligence includes financial, social, and environmental evaluations tailored to the associated risks.



## FY25 Modern Slavery Statement



### 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.

### “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 that 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. Bacardi employees and third parties can use the [bacardiintegrityline.com](https://bacardiintegrityline.com) to report any wrongdoing. Any third parties reporting will be offered the same protection as a Bacardi employee – confidentiality and a zero tolerance to retaliation.

### Employee Assistance Program

“Bacardi Assist” is our global employee assistance program, which offers employees and their family members access to support with any work or personal issue, including short-term professional counselling and connecting them to local resources to help manage emotional, practical, or physical needs. This service is free to use, totally confidential and provides around the clock support seven days per week, 365 days per year.



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# FY25 Modern Slavery Statement



*Due Diligence*

## FY25 Modern Slavery Statement

### *Due Diligence Process*

The Bacardi approach to human rights due diligence is guided by internationally recognized frameworks and principles. We refer to the OECD Guidelines for Multinational Enterprises as a foundational reference for our due diligence process, while also aligning our practices with the United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Bill of Human Rights, and the International Labor Organization's (ILO) core conventions. These instruments inform our efforts to identify, prevent, mitigate, and account for human rights risks across our operations and supply chains. While we do not claim full implementation of these frameworks, they serve as critical benchmarks in shaping our responsible sourcing and ethical business conduct.

### **1. Identify & Assess Adverse impacts**

The Bacardi Group is determined to follow the highest standards of Business Integrity, Human Rights, Environmental Protection, Labor Standards and Health and Safety, based on international regulations, conventions and/or best practice. In FY25, we conducted a Human Rights Saliency assessment, with the goal of identifying the most salient human rights risk across our entire value chain. This included our own operations and our value chain.

#### **Own Operations**

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.





## FY25 Modern Slavery Statement



### Upstream and Downstream Value Chain

Bacardi aims to conduct business with like-minded third parties that have ethical practices at the forefront of their business activities. Bacardi business partners are subject to 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.

Third parties are screened against sanctions, embargoes, financial crimes, 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-house research to assess the risk to Bacardi's business.

At Bacardi, we leverage Sedex to evaluate the risk levels of our suppliers by utilizing their comprehensive tools and data insights. The risk assessment process begins with suppliers completing a Self-Assessment Questionnaire (SAQ) on the Sedex platform, which gathers detailed information about their business practices, workforce profile, and management systems. This data, combined with inherent country and category risk factors, helps us determine the overall risk level of each supplier. Sedex's risk scores, which integrate global data with site-specific information, allow us to prioritize our due diligence efforts effectively.

Additionally, the results of SMETA audits conducted on suppliers further inform their risk classification, ensuring that we maintain a robust and ethical supply chain.

Verification activities are conducted on a cyclical basis, with frequency determined by supplier risk level. Our methodology includes automated screening, third-party audits, and internal research to identify and manage risks related to human trafficking. SAQs and audits include questions on recruitment practices and employment terms.



## FY25 Modern Slavery Statement



## 2. Cease, Prevent or Mitigate

### Own Operations

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 (by DNV) including in relation to workforce selection and qualification. Every supplier (including co-packers) is selected and validated using a Vendor Qualification Process during which we evaluate suppliers' compliance with applicable laws and codes. Additional audits are conducted where the level of risk is higher.

### Upstream value Chain

#### **Signature of our Third-Party Code of Conduct**

At Bacardi, we are committed to upholding the highest standards of business integrity, human rights, environmental protection, labor standards, and health and safety. To ensure our suppliers align with these values, we require third parties

doing business with us to sign our Third-Party Code of Conduct or an equivalent standard. This Code sets forth the requirements that suppliers must meet in their business transactions with Bacardi, including full compliance with applicable laws, regulations, and industry standards including but not limited to anti-slavery and human trafficking in the countries in which they operate. By committing to this Code or an equivalent, suppliers demonstrate their commitment to maintaining legal and regulatory compliance, as well as supporting our dedication to ethical and sustainable practices. Failure to comply may result in corrective action or termination of the business relationship. We also encourage compliance through ongoing engagement, including training, audits, and support for suppliers seeking third-party certifications aligned with ethical labor practices.



## FY25 Modern Slavery Statement



### Tier-1 Supplier audit program

As part of Bacardi's social audit program, all direct suppliers are required to register on Sedex, register all the sites that supply to Bacardi on Sedex, link with Bacardi on Sedex, complete a Self-Assessment Questionnaire (SAQ), and undergo cyclical SMETA audits based on their risk level. This program is crucial to ensure that our suppliers uphold the principles established in our Third-Party Code of Conduct. The audit results are uploaded on the Sedex platform by the auditor and shared with Bacardi, and any open non-conformities must be addressed by the suppliers. These audits are conducted by independent third-party auditors and may be unannounced. The audit methodology includes site visits, worker interviews, and document reviews, with a focus on labor practices, working conditions, and recruitment methods.

### Working with Third-party certifications

At Bacardi, we use certifications as a critical tool for due diligence to ensure that our suppliers uphold our high standards of ethical, social, and environmental responsibility.

By encouraging our suppliers to obtain and maintain relevant certifications, we can verify their compliance with our rigorous standards. For instance, we target sourcing key raw materials from certified suppliers. Some of the key examples are:

- In 2014, we started a partnership with Bonsucro® to ensure that the sugarcane derivatives come from sugarcane sourced from responsible suppliers. Bonsucro® is a global non-profit organization that has developed a metric-based sustainability standard and certification process for the sugarcane industry. One of the strategic aims of Bonsucro® is to strengthen human rights in sugarcane milling and farming. As a founding member of Bonsucro®, Bacardi works with the organization to improve economic, environmental, and social conditions in the regions where sugarcane is produced. These standards ensure that human rights, labor conditions, and the environmental and economic viability of the sugarcane producers are maintained at the highest possible standard.





## FY25 Modern Slavery Statement



- For our elderflower sourcing, we rely on UEBT (Union for Ethical BioTrade) certification. UEBT ensures that biodiversity is respected and that fair trade practices are followed. This certification guarantees that our elderflower suppliers adhere to ethical sourcing practices, promoting sustainable use and conservation of biodiversity, and ensuring fair working conditions for the communities involved in the production.
- Our agave producers for PATRÓN® tequila are Global G.A.P. certified, which guarantees good agricultural practices. To date, 91% of the agave farmers supplying PATRÓN® Tequila have received their GLOBALG.A.P. CfP certification. This milestone achievement follows years of investment from the company to support the agave farmers it works with to implement safer and more sustainable farming methods that benefit the community and land. To support this, the premium tequila brand employs 21 agronomists who work closely with the farmers, also known as “agaveros”, offering training, conducting internal audits, teaching first aid, and promoting overall wellness.

### Participation in industry associations: AIM-Progress

As a member of AIM-Progress, Bacardi is committed to collaborative action on human rights and responsible sourcing topics. AIM-Progress is a global forum of fast-moving consumer goods manufacturers and common suppliers, joining forces to drive positive change in their supply chains. Through our membership, we actively participate in initiatives that tackle systemic human rights issues and enhance our suppliers' capabilities. By engaging in mutual recognition of audits and sharing best practices, we aim to increase our impact and coverage while reducing duplication and costs.



## FY25 Modern Slavery Statement



### Salient issues – Mitigation actions

- **Working Hours and Conditions:** Bacardi's Third-Party Code of Conduct stipulates that workers should not regularly work more than 48 hours per week, should have at least one day off for every seven-day period, and that overtime should be voluntary. SMETA audits are conducted to assess compliance with these standards.
- **Child Labor and Protection of Young Workers:** Bacardi ensures compliance with local laws and regulations related to child labor through its Third-Party Code of Conduct, which includes ILO standards. We request suppliers to undertake SMETA audits to identify potential non-conformities related to child labor.
- **Discrimination (incl. Race, Gender, Age):** We have zero tolerance for any form of discrimination on the basis of national origin, race, color, religion, gender, sexual orientation, marital status, disability, age, or any other protected characteristic under applicable laws. This principle of equality and fairness applies to all terms and conditions of employment. The same approach to equal opportunities and respect is applied to all of our third-party business partners, customers, and vendors with whom we work.
- **Fair Wages:** At Bacardi, we regularly engage external vendor Mercer to determine via statistical analysis if we have any pay equity issues associated with gender, race, ethnicity throughout the organization. Bacardi shows a strong standing with regard to pay equity with no overall gender or race pay gaps, concluding that Bacardi was paying all primos across all groups equitably. Bacardi commits to paying at least legal minimum wages through third-party Codes of Conduct for Tier 1 suppliers.
- **Freedom of Employment (incl. Forced, Bonded Labor):** Bacardi provides training on modern slavery for key stakeholder groups. Our Third-Party Code of Conduct includes prohibition of forced and bonded labor practices. We request our raw materials and packaging suppliers to complete the Sedex SAQ undertake SMETA audits to identify high-risk areas for forced labor.



## FY25 Modern Slavery Statement

- **Safe and Hygienic Working Conditions:** Bacardi has a strong safety culture that supports the ability to drive proactive safety rather than a reactive system based on accidents. This approach is the backbone of the company's preventive safety program which uses the identification of hazards and hazardous conditions to drive action. We have a comprehensive hierarchy of risk assessment that identifies risks at all levels of operation. Our Third-Party Code of Conduct includes guidelines on worker welfare, health, and safety. Bacardi helps ensure the health and safety of agave farmers in Mexico through adequate training and access to PPE – this is part of our support for PATRÓN® agave farmers in obtaining the GLOBALG.A.P. certification.



## FY25 Modern Slavery Statement



### 3. Provide for and cooperate

We require our suppliers to undergo regular SMETA audits to identify any non-conformities related to human rights, including child labor, forced labor, and working conditions. When issues are identified, we request our suppliers to develop and implement remediation plans to address these findings promptly. This includes creating detailed action plans with timelines to ensure that corrective measures are taken. Bacardi monitors the progress of these remediation efforts and, in cases where suppliers fail to comply, we reserve the right to terminate our contracts with them.

In addition to these measures, Bacardi provides significant support to our agave farmers, known as "agaveros", to help them implement safer and more sustainable farming practices. This support includes training, conducting internal audits, teaching first aid, and promoting overall wellness among the agaveros. These efforts not only improve the sustainability of our supply chain but also reduce the risk of human rights violations.

### 4. Other actions: training our people

Bacardi compliance, HR and legal teams conduct regular training for our business on our most important policies and processes. Training 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, and we also deliver an annual certification of compliance to every employee globally, ensuring continuing compliance with our Code.

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



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## FY25 Modern Slavery Statement



# Effectiveness of Actions

## FY25 Modern Slavery Statement

### *Key Performance Indicators*

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 analyse reports of any violation of our Code of Conduct including modern slavery matters. Reports 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 the

Bacardi Business Integrity Committee and Audit Committee. 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.

#### **Supplier Adherence and Tracking Performance**

We have implemented a tracking and monitoring system for our supplier audit program to ensure compliance with our high standards of ethical, social, and environmental responsibility. We utilise various Key Performance Indicators (KPIs) to monitor the compliance of our suppliers with the SMETA audit requirements. These KPIs help us track the progress and effectiveness of our audit program, ensuring that any non-conformities are promptly addressed. Additionally, we actively engage with our suppliers to monitor their certification status, ensuring that they maintain relevant certifications such as Bonsucro, UEBT, and Global G.A.P.



## FY25 Modern Slavery Statement

### Next Steps

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 groups:** We have established a dedicated working group focused on implementing a robust human rights due diligence process. During FY26, this group will continue to work on due diligence actions, with a particular focus on the salient human rights issues identified in our operations and supply chain.
- **Supplier Audit Program:** We will continue to roll out our supplier audit program, with a focus on increasing the number of audits performed and ensuring that more suppliers complete the Self-Assessment Questionnaire (SAQ).
- **Sustainably Accredited sources:** We remain committed to sourcing our key raw materials from sustainably accredited

sources. In FY26, we will continue our partnerships with Bonsucro and Global GAP to ensure that sugarcane and agave suppliers meet rigorous sustainability standards. Additionally, we will keep requesting our suppliers to sign our Third-Party Code of Conduct or an equivalent standard, reinforcing our commitment to ethical sourcing practices.

- **Engagement with AIM-Progress:** We will continue our active engagement with AIM-Progress, a global forum of fast-moving consumer goods manufacturers and common suppliers. Through this collaboration, we aim to drive collective action on human rights and responsible sourcing topics.



## FY25 Modern Slavery Statement



# Approval and Signature

This modern slavery statement for the year ended 31 March 2025 has been compiled by a multi-functional working group, comprising members from Bacardi Leadership, Compliance, Legal, Supply Chain and Procurement Teams globally.

This statement was reviewed and approved on 26/09/2025.

A handwritten signature in black ink, appearing to read 'Mahesh', is written over a horizontal line.

**Mahesh Madhavan**  
Chief Executive Officer