



PROXIMO

PROXIMO APAC

(ABN 15 619 807 448)

MODERN SLAVERY STATEMENT: 2025

(Reporting Period: January 2025 to December 2025)

Proximo APAC Pty Ltd (ABN 15 619 807 448) of Level 12, 65 Berry Street, North Sydney NSW 2060, has continued business in Australia during the reporting period with a consolidated revenue greater than AU\$100 million and publishes this Modern Slavery Statement as the appropriate reporting entity for the purposes of the Modern Slavery Act 2018.

This statement is made pursuant to the Modern Slavery Act 2018 (Modern Slavery Act) and sets out the steps Proximo APAC has taken during its financial year ending 31 December 2025 to ensure that slavery, servitude, forced or compulsory labour, and human trafficking (collectively, "Modern Slavery") is not taking place in any part of its business or supply chain.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Proximo APAC recognises that it has a responsibility under the Modern Slavery Act to take an approach that rejects any forms of modern slavery and human trafficking. We are committed to promoting ethical business practices and policies that protect workers from being abused and exploited, both in our own business and our supply chain.

Proximo APAC is committed to limiting the risk of modern slavery occurring in our business, ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chain.

We expect our employees and our suppliers to share our commitment to help ensure modern slavery does not exist in our business and our supply chain.

Who is the reporting entity?

Proximo APAC (ABN 15 619 807 448) is the reporting entity and owns 100% of Proximo Australia (ABN 64 125 895 561). The ultimate controlling entity of Proximo APAC is BECLE, S.A.B. de C.V.

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What is Proximo APAC's structure, operations, and supply chain?

Proximo APAC Head Office is in North Sydney and is part of the distilled spirits distribution industry. The entity has forty-three employees across Australia. The ultimate controlling entity of Proximo APAC is BECLE, S.A.B. de C.V. Becle, S. A. B. de C. V. and its subsidiaries, which we refer to collectively as Becle, is a globally recognised spirits company and the largest tequila producer in the world. The Company manufactures, markets, and sells internationally recognized spirits and ready-to-drink alcoholic and non-alcoholic beverages. Becle's flagship tequila brand is Jose Cuervo Especial, but the Company has developed other internationally marketed tequila brands, including 1800 and Gran Centenario. Becle also distributes several categories of alcoholic beverages other than tequila, including vodka, whiskey, rum, and liqueurs and commercialises more than thirty brands in Mexico.

The Company operates in three regions:

- (i) United States of America and Canada,
 - (ii) Mexico
 - (iii) and throughout the rest of world (principally Latin America (LATAM), Europe, Middle East, and Africa (EMEA) and Asia Pacific (APAC)),
- and its branded products are currently sold in more than eighty-five countries worldwide.

The Company's activities in each region are as follows:

- **In the United States of America and Canada:** The Company distributes its products through its wholly owned subsidiaries, Proximo Spirits, Inc. (Proximo US) and Proximo Spirits Canada, Inc. The Group owns four distilleries (in Colorado, New York, and California) and a bottling plant and finished goods distribution centre in Indiana, and a finished goods distribution centre in Kentucky.
- **In Mexico:** The Company operates the largest private Agave Azul plantation to control the agricultural process with the goal of securing a sufficient supply of Agave Azul. The Group currently owns and operates two tequila distilleries and one processing and bottling facility, all located in the state of Jalisco, which form part of the territory of the Appellation of Origin for Tequila.
- **Throughout the rest of the world:** The Group distributes through its wholly owned subsidiary, Proximo Spirits UK Limited in the United Kingdom and through JC Master Distribution Limited in the Republic of Ireland. In Northern Ireland, The Old Bushmills Distillery Company Limited, is engaged in the distilling, maturing, and bottling of Bushmills Irish whiskey, and certain other Irish whiskeys. These entities have produced Modern Slavery and Human Trafficking Statements in their own right.



Policies

Proximo APAC is committed to addressing and ensuring ethical compliance, aligned with the broader Becele Group. We have adopted policies which reflect the values that we adhere to as a business and support our approach to the identification and prevention of modern slavery risks:

- **Global Becele Code of Business Conduct:** Our Code of Conduct explains the Company's expectations regarding human rights, fair business practices, and working conditions. It highlights that we only do business with partners who follow the law and operate ethically.
- **Code of Ethics for Vendors:** This outlines the standards and behaviours expected of all our vendors and is based on the 10 Principles of the United Nations Global Compact. All vendors must govern their conduct by these guidelines.
- **Whistleblower Policy & Ethics Line:** We operate an independent telephone 'Ethics Line' and electronic reporting mechanism available to employees and supply chain workers. It encourages reporting of wrongdoings, including human rights violations like modern slavery, facilitating anonymous reporting where needed.
- **Anti-Bribery and Anti-Corruption Policy:** This reinforces our commitment to winning business by acting ethically and honestly. We review and amend this policy on a regular basis of no less than every 2-3 years.
- **ESG Pillars:** Global Becele is guided by three main pillars: *From Source to Market, Looking after our People, and Sustainable Governance*.

Risk Assessment

Through our risk assessment, we consider that supply chains are key areas which our business must monitor to limit the risk of slavery and human trafficking.

Most of Proximo APAC's stock purchases are from related group entities, which lowers the risk of modern slavery occurring in our direct operations. The broader Becele Group engages with numerous well-known and long-term suppliers, taking competitive advantage of vertical integration from agriculture to final consumer.

To further align globally, we utilise the latest data from Walk Free's 2023 Global Slavery Index to identify any high-risk countries and regions where our business or suppliers may operate. Additionally, the Becele group's Annual Integrated Report for 2024 highlights our ongoing commitments to ESG principles and the protection of our people across all regions.



Due Diligence and Remediation Processes

Proximo APAC has taken multiple steps to deter the risk of modern slavery throughout our supply chain:

Supplier Onboarding & Screening: Aligning with Bece's global standards, vendors are onboarded through the ARIBA SLP system, and each must acknowledge our Ethics & Compliance Statement. We also evaluate our third-party risks using automated screening platforms like Diligent.

Supplier Questionnaires: Proximo issued a comprehensive questionnaire to suppliers regarding the actions they are taking against Modern Slavery. Most suppliers have provided completed questionnaires and have lodged their own Modern Slavery statements on the Australian Government portal. We continue to engage with suppliers to support their compliance journey.

SEDEX Membership: Proximo became a member of SEDEX (Supplier Ethical Data Exchange) in 2021, providing further evidence of our commitment to managing our supply chain responsibly and transparently in key areas of labour law, health and safety, environment, and business ethics.

Training

In 2025, Proximo APAC employees were trained on the Modern Slavery Act and the role everyone can play in identifying and deterring its existence. This internal training will continue in 2026 to ensure the topic remains relevant.

Furthermore, Proximo is a member of TRACE, a globally recognised non-profit business association dedicated to anti-bribery, compliance, and good governance. Through TRACE, we have undertaken comprehensive compliance and anti-corruption training, which reinforces our ethical foundations across the group.

Assessing Effectiveness

Proximo has integrated modern slavery risk management into our existing processes where we monitor and measure the effectiveness of our actions by setting key performance indicators. This includes monitoring:

- The number and level of incidents identified through our risk mitigation process.
- The number of issues reported through our Ethics Line and Whistleblowing process.
- Assessment of compliance with our supplier questionnaires.



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Proximo maintains records to measure the effectiveness of our approach, including internal training session logs, signed Code of Conduct documents, online training course records (e.g., TRACE), and our register of annual supplier questionnaire responses.

At this point in time, there have been no recorded issues or instances logged by Employees or Suppliers at the time of lodging this statement.

Consultation Process

Proximo APAC has collaborated closely with the parent company BECLE to align on a global approach to Modern Slavery. Consistency of approach has been achieved through a global code of conduct policy, shared online training courses, and a consistent global approach to appointing new suppliers.

Locally, the business has worked closely with Proximo Australia (ABN 64 125 895 561). Proximo Australia is a 100% owned entity of Proximo APAC, containing the same Directors and Management. To ensure an identical approach to deterring Modern Slavery in both entities, Proximo Australia & Proximo APAC share identical staff training, supplier processes, and adherence to the BECLE global code of conduct.

Approval

This Modern Slavery Statement has been approved by the Board of Directors of the principal governing body, Proximo APAC Pty Ltd (ABN 15 619 807 448, the reporting entity) and is signed below by Justin Casey, the Chairman of the Board, for and on behalf of Proximo APAC.

Justin Casey
Director, Proximo APAC Pty Ltd
19 June 2026