

# CAMPARI GROUP

## GLEN GRANT LIMITED

### MODERN DAY SLAVERY STATEMENT IN ACCORDANCE WITH SECTION 54 MODERN DAY SLAVERY ACT 2015

This statement sets out the actions of Glen Grant Limited (the ‘**Company**’) to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains for the financial year ended 31 December 2024 (“**Reporting Period**”).

To that end, the Company seeks to ensure that quality and safety standards are maintained throughout its supply chain and that workers are treated fairly and in accordance with all applicable laws.

### Introduction and Structure

The Company is part of the Campari Group of companies. It is a subsidiary company of Davide Campari-Milano NV, a company listed on the Milan Stock Exchange. The Company is incorporated in Scotland and has a place of business in London. In 2024, the Company purchased the remaining minority shareholding in the shares of Campari South Korea Co Ltd (formerly Trans Beverages Co., Ltd) in South Korea so now owns 100% of Campari South Korea Co Ltd. The Company also owns a minority share in Spiritus Co. Ltd in Taiwan and Campari Benelux S.A in Belgium. These subsidiary entities carry out distribution and sales and marketing for Campari Group outside the UK and are supplied with finished goods by Campari Group entities outside the UK. During the Reporting Period, the Company purchased a minority stake in Capevin Holdings Proprietary Limited.

The Campari Group’s corporate headquarters are in Sesto San Giovanni in Milan, Italy, and as at 31 December 2024, the Group owned 25 manufacturing plants and has in market companies in 27 countries.

Campari Group has a deep belief in strong corporate values, including, ‘*Integrity*’, which is exemplified in our Sustainability Statement for the Reporting Period (contained in the Group Annual Report) as:

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

In addition, the Campari Group Behaviours guide the actions of Camparistas, including, “*Respect others and the planet*”, which, as noted in our 2024 Annual Report, directs us to, “*behave as proper members of our Company community and responsible citizens of this planet, and proactively commit to their development.*”

These values are at the heart of the Campari Group’s commitment to all forms of corporate social responsibility, including not knowingly participating in, causing, contributing to, or being linked to modern slavery practices in any of its operations and supply chains, and a further commitment that it will make efforts to mitigate the risks of modern slavery within those operations and supply chains.

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[www.camparigroup.com](http://www.camparigroup.com) – [office.uk@campari.com](mailto:office.uk@campari.com) - Company Number SC292101

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Campari Group further supports the United Nations Universal Declaration of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work. In May 2024, Campari Group also joined the UN Global Compact: a call to companies to conduct their operations and strategies according to ten universal principles in human rights, labour, environment and anti-corruption. In alignment with the UN Global Compact, Campari Group continues to take action in support of the sustainable development goals and operating responsibly to create a brighter future and a better society.

## Sector

The Company operates in the alcoholic beverages sector and Campari Group owns, markets, and distributes a portfolio of more than 50 premium and super premium brands in over 190 countries worldwide, and holds market-leading positions with many of those brands in Europe and the Americas. Campari Group's major brands include Courvoisier, (which was purchased in 2024) Campari, Aperol, Appleton Estate, Grand Marnier, SKYY vodka, and Wild Turkey bourbon.

The Company, which trades as Campari UK, acts as the UK importer and distributor for these various Campari Group brands. It also operates a distillery, bottling and production plant in Scotland, where it produces fine Scotch whisky which is bottled and sold under the Glen Grant name and produces Bulldog Gin for the UK market via a third party producer.

## The Company's policies on slavery and human trafficking

Campari Group is organised according to the Dutch corporate governance model, as Davide Campari-Milano N.V. is domiciled in the Netherlands, it has both a Board, and a supervisory body which has been in place since 2001. One of the supervisory body's main roles is to ensure compliance with the Group's governance model and the law, focusing on prevention of offences against administrative and corporate controls, as well as breaches of health and safety regulation. This ensures that matters relating to Modern Slavery are overseen and reported at the highest levels.

As noted by Campari Group's CEO during the Reporting Period in the Group's Code of Ethics, *"Compliance goes beyond simply adhering to local laws, it is about acting ethically, responsibly and with integrity towards customers, partners, stakeholders, the environment, our community and, ultimately, each other."*

Employees, associates, suppliers, and customers, as well as anyone who has had dealings with the Company or Campari Group is able to report violations of the Code of Ethics or any other Campari Group policy or applicable law through the *Campari Safe Line* which enables a confidential report to be sent directly to the Chairman of the Group's Board and to the head of the Group's internal audit function. The whistleblower is also protected against retaliation or any other consequences arising from the report.

The Company and Campari Group Governance Standards and Policies relating to dealing with suppliers are as follows:

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Code of Ethics	Sets out the Group's values and its fundamental expectations of conduct and dealing with shareholders, colleagues and associates, consumers and the community, as well as enforcement of its provisions
Supplier Code	<p>Issued in 2012 and revised in 2024, it sets out the Group's ethical values which suppliers and their employees undertake to sign, adhere to, and ensure compliance throughout their respective supply chains. These ethical values are:</p> <ul style="list-style-type: none"> <li>○ Integrity, loyalty, and honesty;</li> <li>○ Objectivity and immediate communication of real or potential conflicts of interest;</li> <li>○ Confidentiality;</li> <li>○ Transparency and completeness of information;</li> <li>○ Rejection and condemnation of any type of discrimination;</li> <li>○ Ban on forced and child labour;</li> <li>○ Health and safety in the workplace;</li> <li>○ Compliance with environmental law and ecological standards;</li> <li>○ Prevention and reduction of environmental pollution;</li> <li>○ Ban on unfair competition; and</li> <li>○ Compliance with the Group's Code of Ethics, and its Quality, Health, Safety &amp; Environmental Policy</li> </ul>
Campari Group Global Procurement Policy	The objective of the Procurement Policy is to standardise and define the roles, responsibilities, and rules of conduct for the management of Procurement processes, in keeping with the fundamental principles of the decision-making process, including transparency, impartiality, fairness and traceability.
Quality, Health, Safety & Environment Policy	Since 2013, this Policy has governed and protected the environment, health and safety of the Group's employees and consumers as well as the quality and food safety of products. The Policy applies to all Group locations and divisions and is regularly reviewed to ensure it remains appropriate for the nature and size of the Group and its corporate objectives. The Policy was ultimately revised in 2024 and is also shared with suppliers, investors and employees.

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Employees & Human Rights Policy	Issued in 2017, this Policy supports the UN Universal Declaration of Human Rights and the ILO's Declaration on Fundamental Principles and Rights at Work and requires legal compliance with national human rights legislation in every country in which the Group operates. Where differences arise between Group policies and national regulations, the Group applies the most stringent of the requirements. The Policy covers: non-discrimination, forced labour, child labour, harassment, diversity, working conditions (including hours and remuneration), freedom of association and the right to collective bargaining, training and personal development, community involvement and quality, health, safety & environment.
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These policies demonstrate the Company's commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to help prevent slavery and human trafficking in its supply chains.

In addition, the Company has adopted a specific Modern Slavery and Human Trafficking Policy to further strengthen these commitments and during the Reporting Period, Campari Group joined the UN Global Compact: a call to companies to conduct their operations and strategies according to ten universal principles in human rights, labour, environment and anti-corruption.

## **Supply Chains**

The Supply Chain function for the Company as part of the Campari Group is centralised and most materials and supplies are procured centrally for the Company. The Company purchases its other products as finished goods from international plants in Italy, Jamaica, Mexico, United States of America, UK, Brazil, Canada, and France.

Campari Group supports sustainable sourcing and aims at the integration of social, ethical and environmental performance factors within its own supply chain.

Campari Group has a Procurement Team which manages suppliers classified according to the following categories:

- **Product Related (PR):** materials that go into the final product, they are part of the Bill of Materials (BOM), such as packaging materials (e.g. glass bottles), raw materials (e.g. sugar) and semi-finished materials (e.g. distillates)
- **Non-Product Related (NPR):** goods and services that do not go into the final product; they are purchased to enable or support the business and its operations, such as: Media & Marketing, Logistics, Capital Expenditure, etc.

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Categories are mapped in a Portfolio Matrix, managed by Procurement, based on their supply risk and business impact. The Category Portfolio Matrix is updated from time to time, to reflect changes in external and internal environments.

Campari Group looks for local sourcing options to fulfil its aim of reducing its environmental impact along the supply chain, and continues to do so, all other commercial parameters being equal (such as competitiveness, quality, and availability of materials).

## **Due Diligence and Risk Mitigation Actions**

Campari Group drives sustainability compliance through its implementation of the Campari Group's Supplier Code in all geographies. The Campari Group sees responsible and transparent sourcing from commercial partners with similar values as a prerequisite for ensuring high-quality and safe products that create value in local economies.

Campari Group has a risk management system in place for its own operations which is managed by its Internal Audit function and is aimed at identifying, assessing, managing and monitoring potential events or situations that could impact Campari Group's activities and the achievement of its objectives. The risk management system also captures and monitors compliance, and personnel management, in terms of both health and safety, guaranteeing workers' rights and identifying environmental risk. In addition, Campari Group's Procurement team reserves the right to verify suppliers' compliance with its Supplier Code, to monitor their performance and operations in this regard, and to terminate any agreements in the event of violations of the Supplier Code, if considered necessary.

Campari Group became a member of Sedex (Supplier Ethical Data Exchange) in 2016 which provides further evidence of its commitment to managing its supply chain responsibly and transparently. Sedex is the world's largest shared platform through which member users can report and share their commercial practices in the key areas of labour law, health and safety, environment, and business ethics including modern slavery.

In addition, during the Reporting Period, in terms of risk mitigation and due diligence, Campari Group has established a dedicated Sustainable Procurement and Human Rights team responsible for the implementation of ethical procurement practices, as laid down in the Supplier Code. The team works closely with regional procurement teams to ensure compliance with the Supplier Code and related policies. Campari Group also introduced the Human Rights Due Diligence process in 2024 which is led by the Sustainable Procurement Human Rights team and under this process, attention is placed on engaging regional buyers and operational teams within Campari Group. This will enable proactive identification of potential risks in human rights compliance and proactively work at mitigating those risks to ensure that ethical standards are maintained throughout the value chain. On an ongoing basis, Campari Group's Sustainable Procurement and Human Rights team will conduct risk assessments to outline potential and existing risks to workers in the supply chain with the purpose of prioritizing suppliers by evaluating ethical and labor standards to identify any potential risk areas where compliance might not be adequate. The aim is to complete these risk assessments by 2027.

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As part of its due diligence process, Campari Group uses Sedex to inform its risk assessments and mitigation and by using tools like the SEDEX platform and SAQ (Self-Assessment Questionnaire), it has been possible to analyze country-specific, sector-specific, and demographic-specific data in order to identify hotspots. Other risks involving child labor, forced labor, poor working conditions, or wage-related issues are prioritized according to their severity and likelihood. No remediation plan was required to be implemented in 2024. The next risk assessment is scheduled for 2025. Once the assessment is complete, specific action plans will be developed and tailored if needed, to address any identified risks, ensuring that corrective measures are appropriately aligned with the findings. High-risk suppliers are selected for on-site audits, such as SMETA (SEDEX Members Ethical Trade Audit) audits, to further evaluate the working conditions and potential impacts on workers. These audits involve physical inspections, document reviews and interviews with workers to achieve a full understanding of the local working environment. This enables Campari Group to identify all cases of non-compliance with labor standards or areas where potential improvements might be made.

Further, suppliers are required to register on SEDEX and complete the SAQ, which provides risk scoring based on ethical and labor practices. In cases where material impact and/or risks will be identified, whether through DMA, SEDEX risk scores, audits, or direct reports, Campari Group will engage with the supplier in creating a corrective action plan. The corrective action plan will have to detail the exact violations or risks, stating clearly the objectives of the improvement, and defining timelines for delivering the required changes. Campari Group will conduct follow-up audits to ensure that corrective actions are thoroughly implemented and effective in addressing the identified issues. For instance, if non-compliance with labour standards is found, corrective actions may involve adjusting wages, improving safety protocols, or establishing fair working hours. Such corrective measures are scheduled to start in 2025.

Campari Group aims for compliance with its Supplier Code and eradicating incidents of labour violations within the supply chain for 95% of Tier 1 Product related suppliers, and 60% of Tier 1 Non product related suppliers both by 2028.

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

## **Training**

Campari Group ensures that key procurement employees are aware of the Campari Group Supplier Code as part of its procurement process. There is also mandatory training of all employees of the Campari Group on the Code of Ethics which includes promotion and protection of human rights and is against slavery, forced labour or child labour. With specific reference to suppliers' selection and management, Campari Group periodically conducts training with its Procurement team to underline the ethical approach in making decisions. This helps employees understand the possible impacts of their actions on value chain workers and promote responsible conduct across suppliers' relationships.

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## Actions completed during the Reporting Period

A summary of actions which have been taken in the last 12 months include (for more detail see sections above) :-

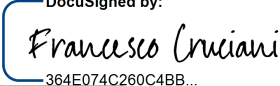
1. Working with Campari Group Sustainability team and Global Procurement team to assess ways in which Campari Group as a whole can improve how it addresses modern slavery risks; and
2. Identification of 'protection of and respect for human rights' as a key focus in the supply chain with the definition of a roadmap for Sustainable Procurement for the Group, with the support of an external consultant, to identify current and potential impacts and risks and to mitigate them as set out above including:-
  - Updates to the Campari Group Supplier Code and establishment of a new Human Rights Due Diligence process
  - Establishing a dedicated Sustainable Procurement and Human Rights team which will conduct risk assessments on key suppliers; and
  - Campari Group joining the UN Global Compact

## Actions for the Upcoming financial year

The further steps the Company has identified to be undertaken over the next 12 months are:-

1. Considering the need for modern slavery training programmes for additional staff in the Company and in relation to the Company's Modern Slavery and Human Trafficking Policy;
2. Ensuring that modern slavery risks are included, as appropriate, in any new local policies issued.
3. Continue the active screening of Tier 1 Product and Non product related suppliers using Sedex with regard to respect for human rights, including identification of actual/potential modern slavery risks, in line with the targets set;
4. Continue the risk assessment for T1 key suppliers and follow up of any high risk suppliers with audits to identify any remedial procedures.

## SIGNED ON BEHALF OF THE BOARD OF THE COMPANY

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**Francesco Cruciani, Managing Director**

This statement was approved by the board of directors of Glen Grant Ltd on **17 June 2025** under Section 54 of the United Kingdom's Modern Slavery Act 2015 for the financial year up to 31 December 2024.

Please note that this **Modern Slavery Statement** has been prepared and published in compliance with the requirements of the *Modern Slavery Act 2015* and is accurate and correct as at **17 June 2025**, the date of publication. The purpose of the statement is to provide general non-financial information only with the aim to illustrate the Company's stakeholders its steps taken in the calendar year to address Modern Slavery concerns. Interested stakeholders may choose to review the Campari Group's **Annual Report**, available on the Campari.com website, to review the Campari Group's global strategy and direction in this and other sustainability matters.

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