

## **Global Human Rights (Policy 470)**

Brown-Forman's core values of Trust, Integrity, Respect, Teamwork and Excellence are central to our business. We are committed to operating according to our values, in compliance with the law, and with respect to the unique cultures and communities where we operate. To that end, Brown-Forman seeks to comply with all applicable local and/or national laws and regulations in all locations where we operate.

Our commitment to human rights is embodied throughout the company in various policies and statements including our Code of Conduct and Compliance Guidelines, our Diversity Principles, our Equal Employment Opportunity, Workplace Aggression and Anti-Harassment policies, our Civil Treatment for Managers and Civil Treatment for Employees training, our Professional Global Management training and through the endeavors of our Environmental, Health and Safety, Community Relations, Compliance and Corporate Responsibility programs.

### **DEFINITION**

For the purpose of this Statement, Human Rights is defined as the fundamental rights inherent to all human beings, regardless of nationality, place of residence, gender, gender identity or expression, national or ethnic origin, race, color, religion, veteran status, language, sexual orientation, physical or mental disability, or any other status.

### **GUIDELINES**

Brown-Forman strives to respect human rights in all aspects of our business, specifically pertaining to:

#### ***Our Workplace***

Brown-Forman promotes a diverse and inclusive workplace, focusing on safe working conditions, and giving people opportunities to develop both professionally and personally.

#### ***Our Suppliers***

We will share our human rights policies and practices with our suppliers and pursue partnerships with others who share our commitment to respecting human rights in the workplace. Our specific guidelines for Suppliers can be found in Brown-Forman's [Supplier Guiding Principles with respect to Human Rights](#). We expect our suppliers to comply with our standards and that their subcontractors do the same.

#### ***Our Customers***

Through our responsible marketing policies and advertising guidelines, we seek to create a positive culture amongst our customers (i.e., wholesalers and retailers) so that our brands are appropriately promoted to, and enjoyed by, our consumers.

#### ***Our Community***

We value and respect the unique cultures and communities where we live, work, and do business. Brown-Forman demonstrates our community commitment through the contribution of financial resources, employee volunteerism, government relations activity, and development of relationships with local stakeholders.

In all of our operations, Brown-Forman will use this Statement as a framework to guide our decision-making and practical engagement on human rights issues.

## ***Human Rights in the Workplace***

In conjunction with Brown-Forman's Global Human Rights Statement, this document outlines our specific guidelines with respect to Human Rights in our workplace. Specifically:

### **LABOR**

#### ***A) Child Labor***

Brown-Forman adheres to age standards as covered by applicable laws and regulations. In those situations where minors may be employed, Brown-Forman will act to assure that such employment is legal and will not lead to a child losing his or her educational opportunities. Consistent with our Health and Safety policies, minors may not be employed in jobs that are by their nature likely to harm the health, safety, or morals of minors.

#### ***B) Forced Labor***

All employment relationships are of a voluntary nature. Use of forced labor and/or indentured or bonded labor should not be allowed under any circumstances.

### **EMPLOYEE DIGNITY**

#### ***A) Freedom of Association***

Brown-Forman is proud of its relationship with its employees and believes in most cases it offers better alternatives to trade union and other types of employee representation organizations. However, we recognize as applicable the legal rights of workers to choose or not choose to form and join trade unions and other organizations in order to bargain collectively in support of their mutual interests. Workers who choose to form and/or join trade unions or other organizations, or those who do not, shall not be discriminated against on account of these lawful activities.

#### ***B) Non-discrimination and Harassment***

Brown-Forman is committed to equality of opportunity in all aspects of employment. It has been and will continue to be the policy of Brown-Forman to provide full and equal employment opportunities to all employees and potential employees without regard to race, color, religion, national or ethnic origin, veteran status, age, gender, gender identity or expression, sexual orientation, genetic information, physical or mental disability, or any other legally protected status. This nondiscrimination policy applies to all terms, conditions and privileges of employment, such as those pertaining to selection, training, transfer, promotion, compensation, and educational assistance programs. It is also the policy of Brown-Forman to prohibit all forms of sexual and other harassment.

### **WAGES AND HOURS OF WORK**

Wages shall be provided at least equal to the applicable legal minimum wage and in

accordance with local wage and benefits laws. Where no minimum wage exists, we will seek to pay to the relevant industry standard. Working hours shall respect applicable legal norms, and, when overtime hours are required, every effort shall be made to minimize their impact on workers.

## **HEALTH AND SAFETY**

Brown-Forman is committed to operating facilities that are safe for workers, visitors, and local communities. We seek to prevent all occupational accidents and injuries by: setting health and safety goals and integrating them into business planning; establishing safety procedures and training programs for workers; and, assessing and controlling potential workplace hazards.

## **ACCOUNTABILITY**

Brown-Forman recognizes the need to ensure that the guidelines in this Statement are practiced throughout our operations and to support consistent improvement in compliance with its terms and principles. To do this, Brown-Forman will:

- Communicate with and educate all employees of this policy and train employees involved in the supply chain on how to recognize and mitigate risk, specifically in the areas of slavery and human trafficking;
- Require that materials incorporated into our supply chain adhere to standards according to applicable laws and regulations as well as our Global Human Rights policy;
- Monitor and evaluate the level of compliance through self-assessments, independent and unannounced on-site audits, and employee surveys;
- Expect employees to report any and all actual or suspected violations as they become aware.

If violations are found, Brown-Forman reserves the right to place a supplier on a corrective action plan or to terminate a contract with a supplier.

## **ANONYMOUS COMPLIANCE HOTLINE AND ONLINE REPORTING**

The anonymous hotline number is 866-832-4920. Employees can also report online at [brownforman.ethicspoint.com](http://brownforman.ethicspoint.com). For those employees outside of the U.S. and Canada, visit the website and select the country in which you are located. The International Toll-Free Service (ITFS) number for your specific location will appear.

Contact Information for Questions, Concerns, or Reporting:

Jerry Kral  
SVP, Chief Ethics, Compliance and Risk Officer  
[jerry\\_kral@b-f.com](mailto:jerry_kral@b-f.com)  
502-774-7839

**Accountability:** All Employees  
**Responsibility:** Human Rights Committee  
**Effective:** November 20, 2012  
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June 1, 2020