



Global Human Rights (Policy 470)

Purpose

Brown-Forman prioritizes the health, safety, respect and well-being of all people within our organization, across our operations, and in the communities in which we operate, because people are fundamental to our corporate purpose of “Enriching Life.”

Global Human Rights Statement

Brown-Forman is a 2018 signatory to the United Nations Global Compact (UNGC) and is committed to operating in ways that are consistent with UNGC’s fundamental responsibilities in the area of Human Rights. This Statement is informed by the United Nations Guiding Principles on Business and Human Rights, the International Labor Organization’s 1998 Declaration on Fundamental Principles and Rights at Work, and the International Bill of Human Rights.

Brown-Forman recognizes that businesses have the ability and the responsibility to contribute positive human rights impacts, and our core values of Integrity, Trust, Respect, Teamwork and Excellence are central to our approach. We are committed to acting ethically and with integrity in our business dealings and relationships, to complying with international, federal and local laws and regulations, and to implementing effective controls to prevent human rights abuses from taking place within our business operations. If we are made aware of a potential violation of this policy, we are committed to investigating it, and if the allegation is substantiated, to pursuing equitable remediation.

Our Workplace

Brown-Forman promotes a diverse and inclusive workplace, with safe working conditions for all employees. We are committed to ensuring that our employees have a high-level understanding of a broad range of human rights issues and have the ability to actively drive mitigation of these risks. This includes building awareness of what constitutes a human rights risk, explaining employee obligations to identify and report actual or suspected human rights violations, and incorporating human rights due diligence into various business processes. To achieve these outcomes, we provide our employees with Code of Conduct training that includes a specific focus on human rights risk that may arise in the workplace and the steps to be taken should a suspected or actual incident be identified.

Health and Safety

Brown-Forman is committed to ensuring our workplaces are safe for workers, partners and visitors. We seek to prevent occupational hazards, accidents and injuries by assessing and controlling potential workplace risk; setting health and safety goals and integrating them into business planning; and establishing safety procedures, accountability and training programs for workers. We have committed to ensuring that all employees have access to potable water, sanitation and hygiene facilities while at work.



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Brown-Forman is committed to providing a work environment that is free of workplace aggression. The possession of firearms or other weapons on Company property is strictly prohibited. We have a zero-tolerance policy for violence and incivility in the workplace, and our "No Threats, No Violence" Workplace Aggression Policy includes any behavior that could reasonably cause another person to fear for their safety, or the safety of others, while at work or while traveling for the Company. Examples of workplace incivility include, but are not limited to, shouting and name calling, obscene or hateful gestures, unwanted phone calls, verbal comments, and written or electronic correspondence.

Freedom of Association; Right to Collective Bargaining

Brown-Forman is proud of our relationships with employees. We recognize and respect employees' rights to join, form, and/or not join a labor union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, we establish a constructive dialogue with their freely chosen representatives and bargain in good faith with such representatives. Workers who choose to form and/or join trade unions or other organizations, and those who do not, will not be discriminated against on account of these lawful activities.

Non-Discrimination

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.

Anti-Harassment

Brown-Forman is committed to providing a work environment that is free of harassment. The company prohibits harassment of its employees, interns, and independent contractors in any form, including verbal, physical, written, electronic, or visual, or that creates an intimidating, offensive, or hostile work environment. This prohibition includes, but is not limited to, harassment based on sex, gender, gender identity or expression, transgender status, sexual orientation, race, color, religion, age, national or ethnic origin, ancestry, genetic information and characteristics, military or veteran status, marital status, physical or mental disability, medical condition, or any other legally protected status.

Sexual harassment is defined as unwanted sexual advances, requests for sexual favors, or visual, verbal, or physical conduct of a sexual nature. Sexual harassment includes unwelcome conduct that has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile, humiliating, or sexually offensive working environment.



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Child Labor

Brown-Forman complies with international standards, especially the relevant ILO Conventions, as well as international, federal and local laws concerning wages, working conditions and working hours for young people. The use of exploitative child labor is strictly prohibited within our company, and by suppliers and business partners.

In situations where young people may be legally employed, such employment must not interfere with educational requirements. Young people must not be assigned to night work, overtime work, or any work that is mentally or physically dangerous.

Forced Labor

All Brown-Forman employment relationships are of a voluntary nature. We strictly prohibit the use of all forms of forced labor, defined as work performed involuntarily or under the threat of penalty; indentured or bonded labor, work carried out with no compensation for a defined period of time; modern forms of slavery, defined as labor, sexual, domestic servitude or criminal exploitation; and all forms of human trafficking, which includes the recruitment, harboring, and movement of people through coercion, threats or force with the view of exploitation.

Wages and Hours of Work

Wages shall be provided that are at least equal to the applicable legal minimum wage and in accordance with local wage and benefits laws in that country. Where no local minimum wage exists, we will seek to pay at the relevant industry standard.

Working hours shall respect federal and local laws. Overtime work, defined as all hours worked in excess of the normal working hours, must comply with all applicable international, federal and local labor laws concerning working hours, with the law affording the greatest protection taking precedence.

Our Suppliers

We communicate our human rights commitments to our first-tier suppliers, and we pursue partnerships with suppliers who share our commitment to respecting human rights. We use a risk-based framework to include human rights-related requirements in contractual arrangements with suppliers. Our suppliers are subject to risk-based due diligence prior to engagement, and ongoing monitoring and evaluation of their compliance through periodic risk assessments during the course of our working relationship. We periodically undertake risk assessments of various aspects of our operations, including our supplier network, to confirm alignment with the Brown-Forman values, and we address identified challenges as appropriate.

Our Supplier Code of Conduct establishes our expectations of business partners, their employees, suppliers and subcontractors with regards to human rights, and ensures suppliers take appropriate action to understand and address human rights issues in their workplaces and supply chains.



We expect our suppliers to treat employees with dignity, respect and integrity, and these employees are to be protected under all applicable international, federal and local laws. Our standards for suppliers reflect the international labor standards set forth in the United Nations Universal Declaration of Human Rights and the eight fundamental International Labour Organization (ILO) conventions. In countries or specific situations where there is no law or regulation governing a particular activity or operation, Brown-Forman asks its business partners to conduct their operations in a manner consistent with the principles of the United Nations Universal Declaration of Human Rights.

Our Customers

Our direct customers are subject to annual risk-based due diligence and ongoing monitoring, and we hold our direct customers accountable for the responsible marketing and promotion of our products. Through our responsible marketing policies and advertising guidelines, as well as through our responsible consumption and service principles, we seek to promote responsible behavior among our customers (i.e., distributors, wholesalers and retailers) as well as our consumers so that our brands are responsibly promoted and enjoyed.

Escalation and Reporting

All employees are expected to promptly report any incidents or conditions they believe to be a violation of this policy.

In order to encourage all employees to promptly report instances of human rights violations, Brown-Forman has designated several avenues for reporting. An employee can report actual or suspected human rights violations to any of the following: their manager or supervisor, a risk management manager, a human resources manager, Legal, or directly through any of the Speak Up! or alternative communication channels noted in the Code of Conduct, including the anonymous Compliance Hotline at 1-866-832-4920 or via brownforman.ethicspoint.com.

Brown-Forman ensures employees are aware of the Global Human Rights (Policy 470) through mandatory training and knowledge assessment.

Investigation Procedure

If the Company receives an allegation of a human rights violation, a Human Resources, Legal, or Compliance representative, or another qualified individual, will promptly undertake a fair, timely, thorough, and objective investigation of the allegations in order to provide appropriate due process to all parties. The Company will reach reasonable conclusions based on all evidence collected.

Brown-Forman will maintain confidentiality to the extent possible and consistent with an appropriate investigation of the complaint. However, Brown-Forman's duty to investigate and take corrective action may require the disclosure of information to individuals with a need to know.



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Complaints will be:

- Responded to in a timely manner;
- Kept confidential to the extent possible;
- Investigated impartially by qualified personnel in a timely manner;
- Documented and tracked for reasonable progress;
- Given appropriate options for remedial action and resolution; and
- Closed in a timely manner.

The Company will take appropriate remedial actions for any human-rights related allegations substantiated and will work to implement strategies to prevent future violations.

Retaliation

Brown-Forman strictly prohibits unlawful retaliation. It is a violation of this policy to retaliate in any way against anyone who has stated a concern about or initiated a complaint regarding human rights. It is also a violation of this policy to retaliate in any way against anyone who participates in an investigation.

Policy Governance

This policy was developed by and continues to evolve with the input from Brown-Forman employees in key functional areas and from a diverse range of external stakeholders. The Human Rights Policy is overseen by the Company's Executive Leadership Team (which includes the CEO) and the Company's Chief Ethics and Compliance Officer.

We are committed to monitoring our performance with regard to human rights compliance and international standards of best practice, and reviewing and updating this policy annually.

Effective Date: March 15, 2022

Policy Owner: Chief Ethics and Compliance Officer

Related Policies and Documents:

- [Supplier Code of Conduct](#)
- [Modern Slavery Act Statement](#)