



BROWN-FORMAN

SUPPLIER CODE OF CONDUCT 2024

[Leer este documento en español.](#)



EXECUTIVE MESSAGE

Brown-Forman has been responsibly building beverage alcohol brands for more than 150 years.

As the Brown-Forman ESG Council, we are responsible for guiding and advancing the company's environmental, social, and governance commitments. In pursuit of these commitments, it is important for Brown-Forman to work with business partners that share our commitment to responsible and ethical business practices.

We believe we are stronger and more competitive when our business partners reflect Brown-Forman's values of integrity, respect, trust, teamwork, and excellence. These values are at the forefront of who we are and how we conduct business day in and day out.

The following Supplier Code of Conduct ("SCC") sets forth the specific guidelines and expectations that we have for our business partners. By living our spirit of commitment together, we can confidently and responsibly achieve our business goals and uphold our promise of Nothing Better in the Market.

Lawson Whiting
President and CEO

Mike Carr
EVP, General Counsel

Tim Nall
SVP, Chief Global Supply Chain and Technology Officer

Crystal Peterson
SVP, Chief Inclusion and Community Relations Officer



INTEGRITY & BUSINESS CONDUCT

This SCC contains general principles applicable to our Business Partners, their employees, suppliers, and subcontractors. Business Partners are expected to communicate these expectations within their own supply chains. Particular written arrangements with individual Business Partners may contain more specific requirements. To the extent there is any discrepancy between this SCC and any individual arrangement, the terms and conditions of the individual written arrangement will take precedence.

Brown-Forman expects its Business Partners to conduct themselves in accordance with the following principles. Business Partners:

- **Compliance with Laws:** Will comply with all applicable laws and regulations in the countries where they provide goods or services to Brown-Forman.
- **Corruption:** Will comply with applicable domestic and foreign anti-bribery and corruption laws, including the U.S. Foreign Corruption Practices Act and the U.K. Bribery Act, and will cooperate fully and transparently with Brown-Forman's due diligence procedures.
- **Competition Law:** Will comply with applicable competition, antitrust and other laws or regulations regarding fair business conduct.
- **Product Standards:** Will adhere to applicable product quality and safety standards and immediately report to Brown-Forman and address any product or safety issues.
- **Accurate Books and Records:** Will maintain accurate books and records in accordance with applicable laws, regulations and accounting standards; and ensure that all submitted invoices accurately describe the goods and services provided and the price thereof.
- **Intellectual Property:** Will safeguard any confidential or otherwise proprietary Brown-Forman information, including all patents, trademarks and copyrights.
- **Security and Privacy:** Will respect the privacy rights and secure the data of Brown-Forman employees and Business Partners. Will implement and maintain physical, organizational, and technical measures to ensure the security and if applicable, confidentiality, of Brown-Forman data and information.
- **Trade Controls:** Will comply with applicable sanctions and trade controls in the import, export, sale or transfer of goods, services, software, technology or data, including restrictions on access or use by unauthorized persons or entities.
- **Regulation and Tax Law:** Will comply with all applicable regulations related to the transportation, storage, marketing, selling and serving of beverage alcohol products, including the payment of excise taxes.
- **Conflict of Interest:** Will avoid any conflict of interest with Brown-Forman and/or its employees and disclose any situation that might appear as a conflict of interest, including reporting to Brown-Forman if any Brown-Forman employee has an interest of any kind in the Business Partner's business or any kind of economic ties with it.
- **Acknowledgement regarding Gifts:** Brown-Forman employees cannot accept gifts from Business Partners with a market value greater than \$100, or gifts of any value that are meant to influence a business decision.
- **Non-Retaliation:** Will not retaliate against any person(s) raising a concern or potential policy violation in good faith.



RESPECT FOR HUMAN RIGHTS & LABOR

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. Our policies are further 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.

Our standards for Business Partners 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. Brown-Forman expects its Business Partners to conduct their operations in a manner consistent with the principles of the United Nations Universal Declaration of Human Rights and the eight fundamental International Labour Organization (ILO) conventions.

Brown-Forman recognizes that businesses have the ability and the responsibility to contribute positively on human rights. We expect all Business Partners, employees and contractors to be treated with dignity, respect and integrity, and to be protected under applicable international, federal and local laws. All Business Partners are expected to conduct themselves in accordance with Brown-Forman's standards, set out below.

- Business Partners must provide their employees with a safe and healthy work environment that supports diversity and inclusivity. We expect our Business Partners to comply with all applicable laws related to workplace safety. Where local or national laws do not exist, then international standards of best practice are to be applied.
- Business Partner employees must be treated fairly with respect to working hours and compensation for work performed.
- Wages must be at least equal to the applicable legal minimum wage and in accordance with local wage and benefits laws in the country where service is performed. Where no local minimum wage exists, the relevant industry standard should be applied. 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.
- Business Partners must only employ workers who are legally authorized to work. All employment should be voluntary and under no circumstances should the Business Partner use or benefit in any way from forced labor, indentured or bonded labor, modern forms of slavery, or any form of human trafficking.
- The use of exploitative child labor is strictly prohibited. In alignment with Brown-Forman's commitment to protecting children's rights, our Business Partners must comply with all applicable international, federal and local child labor laws concerning wages, working conditions, and working hours, and abide by the law offering the greatest protection for young persons. Business Partners are encouraged to implement and maintain age-verification and remediation programs to ensure compliance with ILO requirements for employing children.



BROWN-FORMAN

- In situations where young persons may be legally employed, such employment must be legal and not interfere with a child's educational requirements. Young workers must not be assigned to night work, overtime work, or any work that is mentally or physically dangerous.
- Business Partners must recognize and respect employees' legal rights to join, form, and/or not join a labor union without fear of reprisal, intimidation or harassment. Workers who choose to form and/or join trade unions or other organizations, and those who do not, should not be discriminated against on account of these lawful activities.
- Business Partners must not discriminate in hiring or employment practices and should take all reasonable actions to prevent discrimination based on 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.
- Business Partners must ensure that they provide their employees, interns and independent contractors with a work environment that is free of harassment of 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.
- Employees must be provided with mechanisms to express grievances without fear of reprisal and ensure that any concerns raised are addressed in an appropriate and timely manner.



ENVIRONMENTAL EXCELLENCE

Brown-Forman's vision – Building Forever – is inherently linked to environmental sustainability. The long-term interests of our business align with society's need to protect natural resources for future generations.

Business Partners must comply with all applicable environmental laws, rules and regulations, and demonstrate ongoing improvement in their environmental practices. Further, we encourage Business Partners to communicate and publicly report environmental performance. Business Partners should conduct business in ways which protect and preserve the environment.

TRUST & REPORTING

Business Partners are responsible for promptly reporting any actual or suspected violation of this SCC. This includes violations by an employee or agent acting on behalf of either the Business Partner or Brown-Forman. Report all issues or concerns to ethics@b-f.com or 1-866-832-4920. Brown-Forman forbids retaliation against any person raising a concern.

Brown-Forman reserves the right to discontinue working with any Business Partner based on failure to adhere to this SCC or applicable law.