

# Modern Slavery Act Statement

For the Fiscal Year ended April 30, 2023



BROWN-FORMAN

# Introduction

## What is Modern Slavery?

Modern slavery is a violation of fundamental human rights, as it represents the deprivation of a person's liberty by another for the exploitative purpose of personal or commercial gain.

Modern slavery can take various forms, including slavery, servitude, forced and bonded labor, and human trafficking.

Modern slavery is prevalent across the globe. The International Labor Organization estimates that more than 25 million men, women and children are forced to work against their will.

Global businesses have an important role to play in the prevention of modern slavery. By identifying high-risk activities and locations, as well as the common indicators of potential violations, businesses can implement processes designed to reduce the risk of individuals being unethically and unlawfully exploited as they seek to earn a living.

## Brown-Forman's Commitment

Brown-Forman is committed to acting ethically and with integrity in all our business dealings and relationships, complying with all applicable laws and regulations, and implementing effective controls to ensure modern slavery is not taking place within our business operations or our supply chain. We expect the same commitment from our business partners, and we expect that they will in turn hold their employees, suppliers and subcontractors to these same high standards.

### Fundamental Purpose

Brown-Forman prioritizes the health, safety, respect and well-being of all people within our organization and across our operations, because people are fundamental to our corporate purpose of "Enriching Life."

# Our Business

Brown-Forman Beverages Europe, Ltd. (“BFBE”) and BenRiach Distillery Co., Ltd. (“BRD”) are UK subsidiaries of Brown-Forman Corporation, one of the largest American-owned spirits and wine companies, whose portfolio of more than 40 brands is sold in more than 170 countries across the globe. Below is a chart of Brown-Forman Corporation’s most significant global operations facilities.

## 170+

Brown-Forman’s portfolio of brands are sold in more than 170 countries worldwide

## 25+

We produce our brands and barrels from more than 25 facilities around the world

## 5,200

We employ approximately 5,200 people across more than 40 countries



## Global Operations



### UNITED STATES



### EUROPE



### LATIN AMERICA



Find out more about Brown-Forman Corporation, its business and organizational structure



Find out more about where we operate

# Our Supply Chain and Route to Consumer

Brown-Forman's primary business activities include manufacturing, marketing, selling and distributing branded beverage alcohol products. Our products are sold in more than 170 countries worldwide, and our supply chain and route to consumer processes involve complex global flows of material, information, and finished goods. We own and operate corporate offices, stave mills, cooperages, distilleries, warehouses, and bottling plants, and we employ over 5,200 people across more than 40 countries. In addition, we partner with more than 5,000 third parties in support of our business operations.

In our operations and across our supply chain, we continuously strive to improve how we plan, source, make, market, and sell our products. The principal raw materials we use in the manufacture of our products include water, corn, rye, malted barley, agave, grapes, sweeteners, flavorings, neutral spirits, whiskey, tequila, and malt. The main packaging materials include glass, PET (polyethylene containers), corks, cartons, labels, finished barrels, and wood to make barrels. Our primary customers include distributors, retailers, on-premise accounts and global travel retail operators. We purchase branded point-of-sale and promotional items from external suppliers.

## Risk Assessment

In 2021, Brown-Forman partnered with an external consultant to analyze the company's global spend to identify geographic and category risk across our network of 5,000+ business partners and suppliers. Based on the results of the analysis, we have begun a number of tailored risk assessments to evaluate and improve as needed the processes and controls we have in place to support of our human rights commitments.

# Shared Human Rights Commitment

We pursue partnerships with suppliers who share our commitment to respect and support human rights, and we expect our business partners to adhere to the standards of ethical business conduct set forth in our [Supplier Code of Conduct \(SCOC\)](#).

When assessing new business partners, we undertake risk-based due diligence prior to engagement. Once engaged, our suppliers and business partners are subject to continuous monitoring throughout the course of the relationship in order to systematically identify and mitigate against risk, including modern slavery risk. We use the Refinitiv World-Check Risk Intelligence system to surface negative media related to human rights violations in credible media sources globally. Partners and suppliers that are flagged in screening are investigated, and any deficiencies or violations identified are addressed.

Recognizing that we do business in geographies where human rights risk may be elevated, we believe it is our responsibility as a company to identify high-risk activities and choose our business partners carefully.

## Point-of-Sale Supplier

In 2021, we consolidated the sourcing for the majority of our point-of-sale materials through a global provider who shares Brown-Forman's commitments with respect to human rights and modern slavery.

## Our Human Rights Strategy

As a signatory to the United Nations Global Compact, Brown-Forman is committed to operating in ways that are consistent with fundamental responsibilities regarding human rights. Our Human Rights Steering Committee, chaired by our Chief Risk, Ethics, and Compliance Officer, continues to make progress on our three-year human rights strategy.

Building on last year's progress, we reviewed and improved existing company commitments, policies, processes, and practices. In fiscal 2023, our agave field operations were a focus of our program. We also piloted a human rights questionnaire and implemented training globally.



# Our Commitments & Expectations

## Our Commitments

Brown-Forman subscribes to the United Nations Sustainable Development Goals.

We are a 2018 signatory to the United Nations Global Compact (UNGC) and are committed to operating in ways that are consistent with the UNGC's fundamental principles in the area of human rights. We maintain a UNGC Index on our corporate website.

Our work 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.

## Our Policy Framework

Brown-Forman's Code of Conduct sets forth the expectation that all employees will conduct themselves in accordance with our corporate values of integrity, trust, respect, teamwork and excellence. The Code provides guidance in respect of 20 risk areas, and human rights is one of these enumerated risks.

Our commitment to human rights, including with respect to modern slavery, is set forth in our [Global Human Rights Policy](#). The Policy is overseen by the Company's Executive Leadership Team (which includes the CEO) and the Company's Chief Risk, Ethics & Compliance Officer.

## Our Suppliers

Brown-Forman's business partners, including their employees, suppliers and subcontractors, are expected to conduct themselves in compliance with applicable national laws, and in accordance with the standards set forth in Brown-Forman's [Supplier Code of Conduct \(SCOC\)](#), including with respect to human rights and modern slavery.



[Read our Global Human Rights Policy Statement](#)



[Read our Supplier Code of Conduct](#)



[UNGC Index](#)

# Accountability

## Training

The Company offers human rights and modern slavery training as part of its annual compliance training curriculum.

Where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers and business partners to help them address coercive, abusive and exploitative work practices in their own businesses and supply chains.

## Tracking Performance

We communicate any reports of human rights violations through our Annual Integrated Report and our ESG Scorecard.

## Escalation & Reporting

Employees are expected to report suspected human rights violations. Employees and business partners can report concerns via numerous channels, including at [brownforman.ethicspoint.com](https://brownforman.ethicspoint.com). Brown-Forman strictly prohibits retaliation against anyone reporting a concern regarding human rights.

## Contact

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