

Responsible Sourcing Standards

Bacardi's Responsible Sourcing standards apply to all suppliers providing goods and/or services to Bacardi. We seek to gain agreement on and compliance with our Responsible Sourcing standards from all our suppliers.

Our standards are based on the Ethical Trading Initiative (ETI) Base Code, an alliance of companies, NGOs and trade unions. This alliance is committed to working together to identify and promote good practices in the implementation of codes of labor practice and key international standards, including the International Labor Organization's (ILO) Fundamental Conventions on labor standards.

The standards encompass what we expect from our suppliers in terms of labor standards, human rights, health and safety, environmental protection and business integrity. They represent minimum standards, and we

encourage suppliers who seek to implement higher standards within their operations. Bacardi also applies these standards within its own operations.

Responsible Sourcing Standards and Supplier Code of Practice

Each of the 12 Bacardi Responsible Sourcing standards is supported by examples of the practices that are expected in meeting that standard. These examples, outlined below, are available to suppliers in an integrated Code of Practice document, which includes our standards and implementation steps.

1. EMPLOYMENT IS FREELY CHOSEN

- There is no forced, bonded or involuntary prison labor.
- Workers are not required to lodge deposits or their identity papers with their employer and are free to leave their employer after reasonable notice.

2. FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING ARE RESPECTED

- Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- The employer adopts an open attitude toward the activities of trade unions and their organizational activities.
- Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder the development of parallel means for independent and free association and bargaining.

3. WORKING CONDITIONS ARE SAFE AND HYGIENIC

- A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- Access to clean toilet facilities and to potable (drinking) water, and, if appropriate, sanitary facilities for food storage shall be provided.
- Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- Responsibility for health and safety is assigned to a senior management representative.
- A health and safety policy is in place.

4. CHILD LABOR SHALL NOT BE USED

A child is defined as a person under 18 years old. The minimum age for employment is defined as the local legal minimum age for employment or the age for completing compulsory education, but in no case lower than 15 for full-time employment and 13 for light, part-time work. (ILO guidelines allow some developing countries whose economy and educational facilities are insufficiently developed to apply to initially set the limits at 14 and 12).

- Child labor is defined as work that is harmful to children (i.e., work which is exploitative, prevents children from getting an education or jeopardizes their physical, mental or moral well-being).
- Suppliers will comply with ILO standards on child labor.
- There shall be no new recruitment of child labor.
- Suppliers shall develop or participate in and contribute to policies and programs which provide for the transition of any child found to be performing child labor to enable her or him to attend and remain in quality education until no longer a child.
- Children and young persons under 18 shall not be employed at night or in hazardous conditions.

5. FAIR WAGES ARE PAID

- Wages and benefits paid for a standard working week should meet, at a minimum, national legal standards or industry benchmark standards.
- All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6. WORKING HOURS ARE NOT EXCESSIVE

- Working hours must comply with national laws and benchmark industry standards.
- In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every seven-day period on average.
- Additional overtime shall be voluntary, shall not regularly exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

7. DISCRIMINATION IS PROHIBITED

- There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

8. TEMPORARY WORKERS ARE TREATED FAIRLY

- Employment of temporary workers must comply with relevant national employment laws.
- Workers who are continually employed on a series of temporary contracts are potentially missing out on the benefits of permanent employment such as holiday and sick pay. Suppliers must be able to demonstrate they do not keep temporary employees on a series of short-term contracts to avoid providing them with the benefits of permanent employment.

9. ANY HARSH OR INHUMANE TREATMENT OF EMPLOYEES IS PROHIBITED AND PREVENTED

- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
- A formal disciplinary and grievance appeal procedure with documented records of individual disciplinary hearings exists. Such a procedure will support fair treatment of workers.

10. ENVIRONMENTAL PROTECTION

- Suppliers carry out their activities in accordance with national laws, regulations, administrative practices and policies relating to the preservation of the environment of the countries where they operate, as well as in accordance with relevant international agreements, principles, objectives, responsibilities and standards with regard to the environment.
- There is a documented environmental policy, signed by the Managing Director or equivalent.
- The main areas of environmental impact are identified and documented. This should include as a minimum:
 - The consumption of energy, water and other natural resources
 - All significant polluting emissions, discharges and wastes
 - Impacts on biodiversity, for example, from the destruction of natural habitats, the use of agro-chemicals and the use of genetically modified crops (GMOs)
- Evidence of controls and programs in place to address environmental impacts is available.
- Written confirmation of compliance with local and national environmental regulations is available.

11. BUSINESS INTEGRITY

- Suppliers comply with all applicable laws and regulations.
- Policies and processes are in place to conduct business without the payment or receipt of unlawful incentives.
- Suppliers do not allow employees to provide or accept excessive or inappropriate entertainment of gifts from customers or suppliers.
- Suppliers do not enter into any agreements or understandings with competitors or others that restrict competition, in particular agreements to fix prices, allocate markets or limit sales.
- To prevent financial fraud and money laundering, any payment by Bacardi to a vendor, supplier or other third party must be made to a bank account titled in the name of the contracted vendor, supplier or other third party.
- Suppliers have a policy and procedure in place to ensure employees avoid a situation where a conflict of interest arises.
- Bacardi respects the confidential information of others. We will never seek to obtain or disclose the confidential information of other companies, whether it comes to us directly or from third parties and we expect our suppliers to do likewise. Confidential information includes, for example, customer lists, product information, sales and marketing plans, company business plans and any other sensitive or proprietary information.

12. RESPONSIBILITY TO PROMOTE BACARDI RESPONSIBLE SOURCING STANDARDS

- Suppliers are expected to promote the policy to their staff and subcontractors.
- Suppliers are expected to promote and assess compliance with the Responsible Sourcing standards with their own suppliers.

Bacardi's Responsible Sourcing standards are based on the following international principles:

The Ethical Trading Initiative (ETI) Base Code
www.ethicaltrade.org

The Fundamental Conventions of the
 International Labor Organization (ILO)
www.ilo.org

UN Global Compact Principles
www.unglobalcompact.org

The United Nations (UN)
 Universal Declaration of Human Rights
www.un.org/en/documents/udhr

UN Convention on Biological Diversity
www.biodiv.org