

WHYTE AND MACKAY GROUP LIMITED
ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT
FINANCIAL YEAR ENDING 31 DECEMBER 2018

The following statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Whyte and Mackay Group Limited's slavery and human trafficking statement for the financial year ending 31 December 2018.

Organisation

Whyte and Mackay Group Limited, a company registered in Scotland (SC221954), is a global spirits company producing and distributing some of the most highly-awarded and respected whisky and spirit brands. We are the fifth largest Scotch whisky manufacturer in the world, with products distributed in over 50 countries.

Whyte and Mackay operates in the heart of Glasgow where we have been for over 170 years. The company employs over 545 people across the world, and owns 5 distilleries and a state of the art bottling plant.

Whyte and Mackay is a wholly owned subsidiary of Emperador UK Limited which in turn is wholly owned by Philippines based Emperador Inc.

Responsibilities

The Chief Executive Officer and Executive Team are responsible for ensuring the statement is up to date and accurately reflects the Company's actions and initiatives to tackle slavery and human trafficking.

HR are responsible for introducing policies and reviewing the process by which they are adopted.

All employees are encouraged to report any concerns they may have and management are required to act upon them with appropriate urgency.

Supply chains

Whyte and Mackay is committed to ensuring there is no modern slavery or human trafficking within its supply chains or in any part of its business. We strive to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place within any of our supply chains.

Due Diligence

Whyte and Mackay will not knowingly support or deal with any business or organisation involved in slavery or human trafficking. We have undertaken a risk assessment of our global supply chains, identifying where they extend into sectors and territories that are higher risk in terms of the potential presence of slavery and human trafficking. As part of our ongoing due diligence we continually seek to identify any possible risks in these areas and take appropriate corrective action.

When recruiting we adopt good practice approaches to identification and reference checking and as standard we require our agency providers to do likewise.

Managing risk

We ensure that the requirements of the Modern Slavery Act 2015 are reflected within our policies and procedures. We operate the following compliance policies: Preventing Hidden Labour Exploitation, Whistleblowing, Anti- Corruption & Bribery Policy, Bully and Harassment.

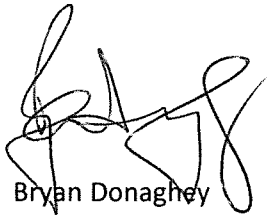
Training and Awareness

A key part of Whyte and Mackay's modern slavery and human trafficking risk mitigation strategy is to promote a high level of understanding and awareness of the risks through training and employee communication.

We provide training to senior management and members of our Supply Chain, Procurement and HR Teams, to ensure they understand the risks and on how to report any concerns. We support the Stronger Together UK initiative and intend to use the materials related to this to further promote awareness across all our employees.

Performance Measures

Whyte and Mackay does not have designated key performance indicators against slavery and human trafficking. However we will continue to monitor the effectiveness of our compliance regime and take necessary steps to strengthen it as appropriate.



Bryan Donaghey
Chief Executive Officer
Whyte and Mackay Group Ltd

Date: 19th December 2019