

**WHYTE AND MACKAY GROUP LIMITED**  
**ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT**  
**FINANCIAL YEAR ENDING 31 DECEMBER 2019**

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 2019.

**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 100 countries.

Whyte and Mackay operate in the heart of Glasgow where we have been for over 175 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 are 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 are 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. We have introduced a Supplier Declaration Document, requesting suppliers to confirm action taken within their organisation in relation to the prevention of modern slavery within their business and supply chains. This document has been issued to over 500 of our suppliers to date.

**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 have extended our Modern Slavery Training programme to include all functions within Whyte and Mackay to ensure everyone understands the risks and how to report any concerns. We continue to support the Stronger Together UK initiative and use the materials related to this to further promote awareness.

### **Performance Measures**

Whyte and Mackay do 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: 21<sup>st</sup> December 2020