



RÉMY COINTREAU

Remy Cointreau

Supplier Code of Conduct

Remy Cointreau owns several of the world's leading brands in the field of spirits and has a long-standing commitment to doing business responsibly.

Remy Cointreau's Supplier Code of Conduct, which supports this commitment, consists of principles covering Compliance with Laws, Anticorruption Practices, Responsible Supply Chains, Labor Practices and Human Rights, Environment, Sustainable Product Development and Application and Compliance.

Suppliers shall uphold the United Nations Universal Declaration of Human Rights, and the Eight Fundamental International Labour Organisation Conventions, and generally act in a manner that respects the human and Labour rights of their employees. Suppliers shall adhere to a high ethical standard, and comply with applicable laws, regulations and standards and with this Supplier Code of Conduct.

We require that our suppliers adhere to this Code of Conduct and ensure the compliance of their own operations with all its applicable principles. We also expect that our suppliers communicate and encourage their own contractors and vendors to incorporate these principles into their business policies and practices.

To ensure the requirements of this Code of Conduct are consistently met and that conformance with the Code can be verified, we expect our suppliers to put in place appropriate management systems and business processes.

Suppliers acknowledge that we may conduct monitoring visits or require third party audits to both verify compliance and support continuous improvement.

For the purposes of this Code, any references to Remy Cointreau shall also apply to its individual brands and subsidiaries. If suppliers have any questions relating to how to apply the principles and practices outlined below, they are advised to contact their relationship manager.

COMPLIANCE WITH LAWS

Principle 1 - General Laws & Regulations

Suppliers shall comply with applicable laws and regulations relating to their activities and the countries in which they operate. Where there are differences or conflicts with this document and local law, the higher standard should prevail. Suppliers shall ensure that any production, delivery, or other action subject to obtaining specific governmental, legal, or regulatory permissions is only to be undertaken when those permissions have been granted.

Principle 2 - Anti-corruption and influence peddling

Rémy Cointreau has a zero-tolerance policy on corruption and requires from its suppliers to not engage in any form of corrupt practices, including influence peddling.

All business transactions must be carried out transparently and accurately recorded in the books and professional records of the company. Control and implementation procedures must be put in place with the aim of ensuring compliance with this Supplier Code of Conduct.

Suppliers must not offer to Remy Cointreau employees any inducements, rewards, gifts, hospitality, or other payments that may compromise objective fair and lawful business decisions or impose negative consequences to employees voicing a concern or refusing to engage in an act of bribery.

Principle 3 - Conflict of interest

Suppliers shall avoid conflict of interest situations or the appearance of either. Suppliers shall provide immediate notification to Rémy Cointreau if a conflict of interest occurs in the course of the business relationship. Suppliers shall take all the necessary steps to mitigate a conflict of interest.

Principle 4 - Money Laundering

Remy Cointreau will not tolerate money laundering or the financing of terrorism.

Suppliers shall comply with the applicable national and/or international accounting and banking standards and processes, as well as law with respect to money laundering, financing of terrorism, fraud, and other illegal activities.

Principle 5 - Anti-trust

Suppliers shall act in compliance with anti-trust regulations. Suppliers shall not seek to make use of membership in trade organizations to obtain or exchange commercially sensitive information in contradiction to competition laws and regulations.

Principle 6 - Product Disclosure

Suppliers shall disclose the material characteristics and health and safety information of the products that they supply to Remy Cointreau in compliance with the relevant trading standards legislation, and where they exist, specific national or international regulations and generally accepted industry guidelines.

Principle 7 - Country of origin of product components

Suppliers may be asked to provide Remy Cointreau with information as to the country of origin and the sources of components and raw materials included in the products being delivered.

Suppliers should therefore maintain reliable information, including any changes, regarding the origin and composition of products being supplied.

Principle 8 - Security

Suppliers shall ensure the safety and security of employees in their operations.

Suppliers shall ensure the physical integrity and security of cash-convertible valuables in their operations and during transportation to or from their operations to avoid the encouragement of fraud, crime, and related anti-social behavior.

Principle 9 - Whistleblowing

Suppliers shall have in place a whistleblowing system to allow employees and third parties to report actual or suspected misconduct without fear of retaliation. Suppliers shall record, investigate, and address employee grievances in a fair way and take corrective actions if needed.

RESPONSIBLE SUPPLY CHAINS

Principle 10 - Responsible Agriculture

Suppliers are required to adopt the principles of Responsible Agriculture, defined as an integrated system of plant and animal production practices having a site-specific application that will, over the long term satisfy human food and needs; enhance environmental quality and the natural resource base upon which agricultural economy depends ; make the most efficient use of non-renewable resources and on-farm resources and integrate, where appropriate , natural biological cycles and controls; sustain economic viability of farm operations; and enhance the quality of life for farmers and society as a whole.

Principle 11 - Responsible Sourcing

Suppliers are required to demonstrate that their sourcing of supplies is responsible and respect principles expressed in this code.

Suppliers should provide evidence that their own suppliers and subcontractors follow the same principles and work in a manner that respects human and labor rights, does not inflict environmental damage either directly or through subsequent contamination from manufacturing or sourcing operations.

Principle 12 - Responsible Manufacturing

Suppliers are required to demonstrate that they are taking steps to assure that the supplies manufacturing to Remy Cointreau - from all sources - meet international standards for responsible business practices and have no impact on the environment.

Suppliers shall provide assurance as far as possible that products supplied to Remy Cointreau have been manufactured responsibly in a manner that respects human and labor rights, is conflict-free and does not inflict environmental damage, either directly or through subsequent contamination from manufacturing operations.

Suppliers shall provide assurance that products supplied to Rémy Cointreau do not infringe, nor imitate nor affect any Intellectual Property Rights belonging to Rémy Cointreau or third parties/companies.

Principle 13 - Forest Products

Suppliers are requested to source paper, packaging and other timber-based products in a responsible manner, either recycled or from forests that are managed in an environmentally friendly, socially-beneficial and economically-viable way.

Principle 14 - Animal Protection

Suppliers shall adhere to ethical practices regarding animal welfare

Suppliers shall ensure that products or ingredients supplied to Remy Cointreau have not been tested on animals before use.

Principle 15 - Community Impact

Where possible, suppliers are encouraged to support the development of communities involved in their supply chain, contributing to their social and economic welfare.

LABOUR PRACTICES AND HUMAN RIGHTS

Principle 16 - Human Rights

Suppliers shall respect the fundamental human rights and dignity of the individual, as according to the United Nations Guiding Principles on Business and Human Rights in ways appropriate to their size and circumstances.

Suppliers, if operating in, or sourcing directly from a conflict-affected area, shall perform human rights due diligence to assess the heightened risks of adverse human rights impacts.

Suppliers operating in conflict-affected areas or finding any evidence of sourcing from conflict-affected areas must inform Remy Cointreau immediately.

Principle 17 - Indigenous People

Suppliers shall recognize and respect the rights of indigenous peoples and the value of their traditional, cultural and social heritage, and to expect their own suppliers to comply with this requirement.

Principle 18 - Discrimination

Suppliers shall prohibit discrimination based on race, ethnicity, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, marital status, physical appearance, age, or any other applicable prohibited basis.

Suppliers shall not practice or condone any form of discrimination in the workplace on these bases; observe the right to freedom of practice by employees of religious or cultural practices, as far as is reasonable; provide appropriate training to all employees on a continued basis.

Principle 19 - Discipline and Harassment

Suppliers shall prohibit the use of corporal punishment under any circumstances and the use of degrading treatment, harassment, abuse, coercion, or intimidation in any form.

Suppliers shall not make use of or condone such practices; clearly communicate applicable disciplinary processes and procedures to employees; ensure that grievance procedures and investigation processes are in place and are communicated to all employees.

Principle 20 - Forced Labor

Suppliers shall adhere to applicable employment laws and regulations and make information available regarding their efforts to address the issue of slavery and human trafficking.

Suppliers shall prohibit any use of forced, bonded, indentured or prison labor, and not restrict the freedom of movement of employees and dependents ; ensure that all work performed on behalf of ourselves is based on recognized employment relationships; prohibit retaining original copies of employees personal documentation (such as identity papers), and not require any form of deposit or fee as a condition of employment ; and monitor relationships with recruitment agencies for risks of human trafficking where appropriate.

Principle 21 - Child Labor

Suppliers shall prohibit the use of child labor in their operations in any country.

Suppliers shall employ young people (younger than 18 and older than 15 years) only in well-defined circumstances (such as for the purpose of vocational training, or as extras in the holiday season) that are not harmful to the health, safety, or morals of children under 18 and in accordance with applicable Law. Vocational training employment will apply mainly to areas of traditional product craftsmanship.

Principle 22 - Wages and Benefits

Suppliers shall ensure that employees are paid with due regard to industry standards, including ensuring adherence to applicable legal minimum wage laws and/or collective agreements whichever is higher.

Suppliers shall compensate their employees fairly by providing a living wage that covers a worker's basic needs; pay performance-based wages that are no less than the legal minimum wage for a normal work week; compensate overtime hours at regular or premium rates, according to applicable legal requirements; and not make illegal deductions from wages for disciplinary purposes.

Principle 23 - Work Hours

Suppliers shall ensure normal working hours comply with the International Labor Organization conventions, as well as national legislation or the prevailing industry standards.

Suppliers shall ensure normal working hours shall not on a regular basis exceed a maximum of 48 hours per working week; ensure that the sum of the normal work week and overtime hours shall not exceed 60 hours in a week unless defined otherwise by applicable Law or permitted under a Collective Bargaining Agreement; and provide weekly rest and paid annual leave in accordance - at a minimum - with national legislation and applicable sector regulations, and will abide by all legally mandated provisions for leave, including maternity, paternity, and compassionate leave.

Principle 24 - Freedom of Association

Suppliers shall allow workers to associate free feely. Suppliers shall adhere to applicable Law and collective bargaining agreements where such agreements exist and support parallel means of dialogue such as the implementation of collective employee representation and effective dialogue between management and employees where laws prohibit these freedoms.

Principle 25 - Health and Safety

Suppliers shall commit to high standards of health and safety in their operations. Suppliers are expected to establish an appropriate health and safety management system (e.g., ISO 45001 or equivalent) including policies aimed at protecting the health and welfare of employees, contractors, visitors, and others who may be affected by their activities by striving to eliminate fatalities, work-related injuries, health impairment and limiting exposure to safety hazards.

Suppliers shall take reasonable steps to provide a hygienic working environment and establish emergency procedures and evacuation plans for all reasonably foreseeable emergencies, which are accessible or clearly displayed, regularly tested (including evacuation drills), and periodically updated; provide employees with clear, understandable information on health and safety, as well as with relevant training, updated on an adequate basis.

ENVIRONMENT

Principle 26 - General Laws, Regulations and Performance

Suppliers shall conduct their businesses in an environmentally responsible manner by ensuring compliance of their operations with relevant legal requirements, environmental norms and specific industrial environmental regulations and have appropriate mechanisms in place to keep management and key staff up to date.

Suppliers are encouraged to make continuous improvement on minimizing their environmental footprint, and shall ensure that all their manufacturing sites, new construction projects and refurbishments comply with similar requirements.

Principle 27 - Air Emissions

Suppliers shall ensure compliance of air emissions from their operations with relevant legal requirements. Suppliers shall obtain the necessary permits and demonstrate compliance with those permits where appropriate; and have procedures in place to monitor main point source emissions to air.

Principle 28 - Water and Wastewater

Suppliers shall practice good water stewardship. Suppliers shall obtain the necessary permits and demonstrate compliance with those permits where appropriate; have appropriate measures in place to minimize water consumption; operate appropriate pollution prevention and control systems as it relates to wastewater effluent streams.

Principle 29 - Hazardous Substances

Suppliers shall meet legal requirements relating to the use of hazardous substances. Suppliers shall prohibit the use of substances that are subject to national or international bans according to the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) for their adverse effects on humans or the environment. Suppliers shall obtain the necessary permits and demonstrate compliance with those permits where appropriate; ensure each of their operational sites maintain an inventory of hazardous substances with up-to-date Material Safety Data Sheets (MSDS); have appropriate measures in place for the management, storage, and transportation of hazardous substances; ensure that employees use hazardous substances in a safe and appropriate manner; and seek to minimize the use of hazardous substances.

Principle 30 - Hazardous and Non-Hazardous Waste

Suppliers shall ensure compliance of safe handling, storing, and transportation of waste generated from their operations. Suppliers shall ensure compliance with applicable laws and regulations for hazardous and non-hazardous waste, including obtaining permits where appropriate; establish proper management procedures for the separation of hazardous and non-hazardous waste for storage as well as the safe handling, storing, and transportation of waste; train employee in waste management procedures; seek to minimize the quantity of hazardous waste produced through their operations, and to ensure that hazardous waste substances arising from operations are disposed of in a manner which prevents pollution of the surrounding land, water resources and atmosphere; and seek to minimize waste to landfill and encourage recycling.

Principle 31 - Energy Usage and Greenhouse Gas (GHG) Emissions

We strongly encourage our suppliers to measure their Energy Usage and Greenhouse Gas (GHG) Emissions and to take steps to reduce the quantity of energy consumed and Greenhouse Gases (GHG) emitted from their operations. We also strongly encourage them to set targets with the Science Based Target initiative (SBTi).

Principle 32 - Biodiversity

Suppliers shall commit to zero deforestation; identify key Biodiversity Areas affected by their operations and use the mitigation hierarchy to avoid, minimize, rehabilitate or offset impacts on biodiversity and ecosystem services; not explore or mine in World Heritage Sites and shall ensure that their activities do not negatively impact directly on adjacent World Heritage Sites; have a process to identify nearby legally designated protected areas, and make decision to proceed with exploration, development,

operation and closure activities that take into account the presence of, and impact on, legally designated protected areas ; ensure there are no measurable adverse impacts on the critical for which Critical Habitat was designated on the ecological processes supporting those criteria.

SUSTAINABLE PRODUCT DEVELOPMENT

Principle 33 - Sustainable Product Development

Suppliers are encouraged to factor in appropriate environmental and social considerations into the full lifecycle of their processes, technologies, products, and packaging to optimize the environmental performance of their products through the product lifecycle and maximize opportunities for positive social impact. Specifically, and where feasible, the materials used for storage and transportation should be recyclable, renewable, and reusable.

APPLICATION

Principle 34 - General compliance

Remy Cointreau expects its suppliers to communicate the principles of this Supplier Code of Conduct to their employees, subcontractors and relevant third parties with whom they do business so as to ensure the principles are integrated into their operations.

To the extent that there may be a detrimental impact to the product or service supplied to Remy Cointreau, suppliers shall proactively report all existing or potential discrepancies between their current operations and the requirements set out in this Code along with proposed recovery and remedial action plans for consideration by Remy Cointreau.

Principle 35 - Evaluation

Remy Cointreau will be entitled to request information from its suppliers as to their compliance with the terms of this Supplier Code of Conduct.

Where necessary, Remy Cointreau may require a supplier to provide evidence of its compliance by way of independent verification or appropriate certification.

Remy Cointreau will have the right to have products and materials independently tested to establish whether the suppliers are in compliance with the terms of this Supplier Code of Conduct.

Remy Cointreau will be entitled to visit suppliers' production facilities and the facilities of their subcontractors and suppliers or have those visited by an independent third-party verification company, to establish compliance with this Supplier Code of Conduct.

Principle 36 - Non-compliance

Remy Cointreau reserves the right to terminate business relationships with any supplier that violates this Code of Conduct or whose suppliers or sub-contractors violate this Code of Conduct.

Any individual who is concerned about actual or suspected misconduct regarding the terms of this Supplier Code of Conduct may report their concerns directly to the Head of Compliance at: ethics.alert@RemyCointreau.com.

SUPPLIER CODE OF CONDUCT ACKNOWLEDGEMENT OF TERMS

Company name:

Address:

Remy Cointreau Supplier Code of Conduct

Contact name:

Position:

Does your company have an individual responsible for implementation of the Remy Cointreau Supplier Code of Conduct?

If yes, please provide contact information.

Does your company have a code of conduct or similar standards to which your suppliers adhere?

If yes, please provide a copy.

The terms of the Remy Cointreau Supplier Code of Conduct are hereby accepted and agreed to:

By authorized signatories:

Date: