

# Ethics & Compliance

by Pernod Ricard



## Policy

*March 2023*

# Background

<b>History</b>	<ul style="list-style-type: none"><li>- V1 (<i>"Speak Up Guidelines"</i>) entered into force in 2019;</li><li>- V2 (this current version) entered into force in March 2023.</li></ul>
<b>Scope</b>	<ul style="list-style-type: none"><li>- PR SA and all affiliates;</li><li>- All Pernod Ricard's employees;</li><li>- Pernod Ricard's external stakeholders (shareholders, suppliers, (sub)contractors, etc.).</li></ul>
<b>Document Owners</b>	<ul style="list-style-type: none"><li>- Group General Counsel &amp; Compliance Officer;</li><li>- Chief Ethics &amp; Compliance Officer;</li><li>- Senior Legal Counsel &amp; Compliance Manager.</li></ul>

**Please note that this Policy has a complementary character: any applicable national legislation remains valid.**

**Where the terms of this Policy are stricter than applicable legislation or provide additional safeguards, rights or remedies, the terms of this Policy will prevail.**

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## 1.1 What are the objectives of this Speak Up Policy?

Our strong sense of ethics is one of the core values of the Pernod Ricard Group (“**the Group**”), among mutual trust and our entrepreneurial spirit. It is one of our most valuable assets, to be upheld and protected at all times.

In accordance with its values and [Code of Business Conduct](#), our Group is uncompromising in its integrity and undertakes to conduct its business in strict compliance with applicable laws and high ethical standards. Pernod Ricard therefore encourages you to **speak up** about any practice or situation that you believe to be contrary or incompatible with our Code of Business Conduct, policies, standards, or the law. “**Speak Up**” is our global whistleblowing system.

To comply with its legal obligations and to spread a proper compliance culture, our Group has set up a specific whistleblowing ethics line known as “**Speak Up Line**”. This whistleblowing policy (“Speak Up Policy”) explains our approach towards speaking up and the framework of this Speak Up Line, its main features and the rights and obligations of the persons who report a concern.



## 1.2 Who can use the Speak Up Line?

The Speak Up Line is open to:

- **The Group’s current and former employees** (fixed-term or permanent employees, apprentices, trainees, temporary workers, as well as external like employees of subcontractors or consultants);
- **The Group’s stakeholders** regarding any work-related concerns, i.e. third parties having an interest in the Group’s activities because they:
  - take part in its economic life (customers, suppliers, shareholders);
  - observe or influence the Group’s behavior both internally and externally (trade unions, NGOs); or
  - are impacted, directly or indirectly, by its activities (communities or local authorities, States...).



## 1.3 What can be reported through the Speak Up Line?

- Any improper behaviour or situation contrary to our Code of Business Conduct, or our internal policies and standards;
- A serious and apparent violation of the law or regulations;
- A threat or serious prejudice to the public interest.

Please refer to Appendix 1 for the indicative list of issues covering matters related to Business Integrity, People & Safety and Company's assets & Information\*.



## 1.4 How to use the Speak Up Line?

To raise a concern, the person who reports a concern ("the Reporter") must go to the Ethics Line webpage and select its reporting channel:



OR




Online

By Phone

**Speak Up is hosted by an independent company (NAVEX Global). It is available 24/7 and can receive reports in most languages.**

This address is provided in particular:

- On the Group Intranet "My Portal", under the "[Smart Compliance](#)" tile; 
- In our [Code of Business Conduct](#);
- On [Pernod Ricard's website](#).

If you need any assistance, do not hesitate to ask your direct manager or your Ethics & Compliance or Legal teams.

*\*This list is not exhaustive, and these areas are likely to evolve over time.*



Any concern sent via the Speak Up Line which does not comply with the rules provided in this Policy may not be taken into consideration.



## 2.1 Complementary channel

The Speak Up Line is used **globally**, although it may not be the only one available in your location.

Pernod Ricard employees (or stakeholders) can still **discuss or report any concerns directly with their manager, HR, Legal or Ethics & Compliance teams**. When the report is addressed to one of these persons, they must inform the Reporter without delay of the receipt and anticipated processing time of the report.

**We strongly encourage you to raise concerns internally** (Speak Up Line or other existing internal channels). Taking a concern to an outside party in the first instance (such as the media or authorities) would not give the chance to our Group to review your concern upstream and take action if needed. That being said, you may also choose to report any concerns directly to the competent authorities in the EU, notably about violations of EU laws.



## 2.2 Good faith & no direct financial consideration

A **malicious report** may result in **disciplinary actions** and prosecution, a report submitted **in good faith** and **without direct financial consideration will not expose the person** who raised a concern to any action, even if the concern reported proves to be unfounded or inaccurate.

**"Good faith"** means that at the time you provided the information, you believed it was complete, honest and accurate, even if it later appeared that it was an error. If you realize after reporting that you have made a mistake, you should immediately share that information using the same channel.

**"Without direct financial compensation"** means that you should not expect any form of direct financial reward for having reported your concern.



## 2.3 Confidentiality

Regardless of the reporting channel used, **Pernod Ricard will keep the identity of the Reporter, the facts reported, and the identity of any persons targeted by the concern strictly confidential.** Only a few persons responsible for collecting, processing and investigating the concern will have access to this information. These persons are bound by an obligation of confidentiality.

**The Reporter's identity will not be shared without the Reporter's consent and the identity of the person(s) targeted by the concern will only be shared if the concern is substantiated,** but always on a strict need to know basis and subject to the strictest confidentiality obligations. However, exceptionally if required by local law, the Group may disclose the identity of the Reporter without his/her consent as well as the identity of any persons targeted by the concern, to the judicial authorities.

Speak Up is **hosted on NAVEX Global Inc.'s secure servers** and is not part of the Pernod Ricard website or intranet. NAVEX Global Inc. does not track phone calls, does not use features such as caller ID, and does not link your IP address if you report online.



## 2.4 Anonymity

**We strongly encourage reporters to identify themselves.** However, you may remain anonymous in countries where it is legally permitted and provided that the seriousness of the facts is established, and the facts sufficiently detailed.

Anonymity makes it more difficult to investigate and act on a reported concern, therefore providing your contact information can help an investigation. **If anonymity makes it impossible to process your report or if you are in a country with restrictions on anonymous reports, you will be informed.**



## 2.5 Non-retaliation

Retaliation means any conduct that discourages or penalizes an individual from supporting Pernod Ricard's culture of Ethics & Integrity. It can take many forms:

- **Direct retaliation** includes unfair disciplinary procedures (including warning, demotion or termination), direct threat, harassment, unfair treatment or discrimination, unwarranted negative performance appraisal, change to an unwanted job, removal of benefits or trainings.
- **Indirect retaliation** could also be characterized by isolation from the team, exclusion from meetings or discussions important to advancement or performance, hostile work environment or exclusion from promotion or new opportunities.

Pernod Ricard has **zero-tolerance towards retaliation** against anyone who has reported an allegation or supported an investigation in good faith, or even raised an Ethics or Compliance question or concern or sought advice about a particular business practice, decision or action. Any form of retaliation will be treated very seriously and may result in disciplinary sanctions.





As mentioned above, the **Speak Up Line** is available at: [www.pernodricardspeakup.ethicspoint.com](http://www.pernodricardspeakup.ethicspoint.com)



Regardless of the channel used, you must, in all circumstances, provide all the information and documents at your disposal (whatever their form and nature) to support your concern. We also encourage you to share all information that will allow us to exchange with you.



## 3.1 By phone

- You will hear a **recorded message** in English or you can select to hear it in your local language (if applicable). The operator will then speak to you in the selected language, but interpreters can be arranged if you need them. Please be aware that for less widely-spoken languages, there may be a delay whilst you wait for an interpreter.
- The operator will ask you **which company you are calling about**. They will read you a short data privacy statement about how the information you provide will be used. You will need to verbally agree to this to be able to proceed.
- You will then be asked a **set of standard questions** to clarify the exact nature of the concern or issue you are reporting. The more information you provide, the easier it is to investigate.



## 3.2 Online

- Online reporting is available in many languages. You will be directed to **an online form** to provide details about your concerns. The questions asked on the form are the same as the questions asked by the operator for reports by phone.



## 3.3 Follow-up by phone or online

Once you have communicated your concerns by phone or online, you will:

- **Receive a key and password** that can be used to follow progress of your report. You can use it to track your case, add more information and answer any questions the investigator may have.
- **Be notified** that your report has been received and will be provided with an estimation of the time necessary to give you a preliminary answer on admissibility of the report.
- **Be informed regularly** of the action taken on your report, via Speak Up.

# What does happen to a raised concern?



## What happens to your report?





## 4.1 Treatment

Once your report is submitted, it will be **received by a committee** composed of representatives of Pernod Ricard SA from the Legal & Compliance, Internal Audit, Human Resources and Security functions (the '**Integrity Committee**').

This Committee will determine if your report meets the legal requirements (i.e. good faith, absence of direct financial compensation). If the concern does not meet the legal requirements, it leads to the closure of the file. You will be informed in writing of such closure.

If not, the Integrity Committee will then **review your report, assess its seriousness and credibility and determine the action to be taken**. Investigations may be entrusted to appropriate persons at global, regional or affiliate level. In this regard, according to the European legislation, for some EU countries and several EU affiliates, if you do not consent that your report be submitted to the Integrity Committee, your report will be handled locally.

The Integrity Committee or the investigators may also seek the services of external auditors, investigators and/or legal advisers to assist it in its investigation and in the analysis of the results thereof. The findings of the investigation will be communicated securely to the Integrity Committee, which will review the outcome and proposed remediations.

**Any reporting will be handled fairly and in accordance with applicable local legislation.** In particular, the person who made the report may be informed of the nature of the allegations concerning him/her within the limits of the confidentiality obligations described above. The information may not be immediate if it proves necessary, for example, to verify the facts, preserve evidence or inform relevant authorities.

During an investigation following a report, **everyone is expected to cooperate fully** and provide without delay all information and documents.

Any person who has filed a report, or is the subject of a report, will be informed of the results of the process, **within a reasonable period of time**, to the extent that this is both appropriate and that information can be communicated without breaching the law or any other confidentiality obligations.



## 4.2 Retention of information collected

If the report falls within the scope of the Policy, unless disciplinary or judicial proceedings are initiated, the data contained in the report will be kept for a two months period from the end of the verification operations. In case of judicial or disciplinary proceedings, the personal data will be kept until the end of the procedure.

If the report does not fall within the scope covered by the reporting subject, the elements of the file will be discarded.

The duration of the data conservation may vary from country to country, depending on the applicable law at the local level, and may be subject to legal or regulatory obligations.

The archived information is stored within Navex Global Inc.'s secure servers located in the EU for a period that will not exceed the applicable data retention period.



## 4.3 Processing of personal data

The personal data processed through Speak Up will be collected, processed and stored **in compliance with applicable data protection laws and further to the Data Privacy Notice** attached in Appendix 2.

Any request related to data protection and privacy should be sent to the Data Protection Officer by email at [groupdpo@pernod-ricard.com](mailto:groupdpo@pernod-ricard.com).



# APPENDIXES

# Issues to be reported through the Speak Up Line



## 1) Business Integrity

- **Antitrust and unfair business practices:** Not complying with laws, regulations or policies intended to protect and promote free and fair competition.
- **Bribery and Corruption:** Offering, giving or receiving bribes or other improper advantages for business gain, and/or failure to comply with Pernod Ricard's anti-corruption global policy.
- **Conflict of Interest:** Letting personal activity or relationship interfere or conflict with our ability to make business decisions that are unbiased and in Pernod Ricard's best interests.
- **Money laundering:** Any action intended for concealing or disguising the true origins of money that may have been criminally obtained so that those funds appear to really come from legitimate sources or be legitimate assets.



## 2) People

- **Alcohol Misuse:** Violation of any law, regulation, corporate policy or procedure relating to the alcohol misuse.
- **Discrimination, Harassment or Unfair Treatment:** Engaging in discrimination in hiring, recruitment, placement, training, compensation, and advancement, engaging in bullying or harassment, or any behaviour that could be viewed as offensive, intimidating or discriminatory on the basis of race, sex, color, national or social origin, religion, age, disability, sexual orientation, political opinion, or any other status protected by applicable law, or engaging in verbal, physical, written or other behaviour retaliation against an individual who has raised a concern in good faith.

# Issues to be reported through the Speak Up Line



- **Health and Safety:** Not ensuring a safe and secure work environment, failure to comply with Pernod Ricard's health and safety global policies or local health and safety laws/regulations.
- **Other Human Rights and Fundamental Freedoms:** Breaching Pernod Ricard's commitments to comply with all applicable laws and with internationally recognized human rights, wherever the company operates. Examples of such practices include child labor, forced or compulsory labor, violation of freedom of association or of the right to collective bargaining, or violation of working hours or overtime standards or laws.



## 3) Company's assets

- **Accounting issues:** Violating or conflicting with either internal policies, procedures, or practices or government regulations related to the detailed reporting of the financial state or transactions of Pernod Ricard or the examination, verification, or correction of its financial accounts.
- **Data privacy:** Failure to protect any personal data collected, used and/or shared by the company regarding Pernod Ricard's data privacy global policy or any data privacy laws/regulations.
- **Insider trading:** Using inside (i.e not made public) information to trade in Pernod Ricard shares and any related financial instruments.
- **Intellectual property / Protecting our brands:** Not protecting Pernod Ricard property and resources, including inappropriate or unauthorized use of Pernod Ricard's intellectual property, company equipment, facilities or company money.
- **Theft, Fraud or Embezzlement:** Unauthorized removing or taking of supplies, equipment, furniture, fixtures, products, cash, merchandise or other tangible property of Pernod Ricard.



## 4) Quality and Environment

- **Protection of the environment:** Violation of any environmental law, regulation, corporate policy or procedure relating to the protection of the environment.
- **Product quality:** Failure to meet Pernod Ricard's quality standards or to comply with applicable laws, regulations regarding prohibition or restriction of specific substances within the product or the packaging.





Please refer to the section "[Further information](http://www.pernodricardspeakup.ethicspoint.com)" on [www.pernodricardspeakup.ethicspoint.com](http://www.pernodricardspeakup.ethicspoint.com)



## Contact

**For functional support,  
please contact:**

**@Affiliate:**

*Your Local Compliance Officer*

**@HQ:**

*Chief Ethics & Compliance Officer  
[antoine.brocas@pernod-ricard.com](mailto:antoine.brocas@pernod-ricard.com)*

**For technical support,  
please contact:**

Your Local Pernod Ricard IT Bar