



S U P P L I E R C O D E O F C O N D U C T A N D E T H I C S



Contents

Introduction.....	4
Seeking Help.....	5
Acting Honestly and Ethically While Working with Beam Suntory.....	6
Health, Safety and Respect.....	7
Good Corporate Citizenship.....	7
Product and Service Quality.....	8
Fair, Ethical Relationships.....	8
Conflict of Interest Avoidance.....	8
No Corrupt Practices.....	9
Trade Compliance.....	9
Protecting Assets and Information.....	10
We Are Environmental Stewards.....	10
Audits and Termination of Supplier Agreements.....	10
Appendix A - Instructions for using the Compliance Hotline.....	11



Introduction



At Beam Suntory, we believe that maintaining the utmost trust and integrity in our relationships with our suppliers is critical to our success—so much so, that we require them to acknowledge and adhere to values and principles that align with our own. Beam Suntory defines a supplier as an organization that provides goods and services to the Company. The term supplier can refer to a contractor, co-manufacturer or vendor.

We expect our suppliers to know and follow the laws, regulations, rules and industry standards in all of the locations where they operate. We also expect our suppliers to adopt the Beam Suntory Supplier Code of Conduct (Supplier Code). This Supplier Code provides guidelines that are intended to help our supplier companies understand and comply with our high ethical standards.

We assume that sustainable business practices in our supply chain will contribute to improvement of our products and to long-term, mutually beneficial relationships with our suppliers. The Supplier Code forms part of our corporate sustainability policies and has the objective of minimizing any adverse environmental and social impact directly associated with the goods and services we purchase.

The Supplier Code is part of the contractual obligations between the supplier and Beam Suntory and is subject to periodic verification. Beam Suntory will help our suppliers comply with the principles embodied in the Supplier Code where possible, but will take appropriate measures against suppliers that refuse to adhere to these principles.

This Supplier Code does not address every situation our suppliers may face when working on our behalf—it couldn't possibly. It does, however, illustrate the important concepts our supplier companies must keep in mind when conducting business with Beam Suntory.

Seeking Help

Beam Suntory suppliers have a duty to report any actual or suspected misconduct that involves or impacts the Company. This is applicable to violations of this Supplier Code or applicable laws committed by supplier or Beam Suntory employees. Reporting these concerns helps the Company proactively address issues and maintains the integrity of our business relationships.

In addition to your company's own internal reporting resources, you have resources available to you through Beam Suntory, including:

- The Hotline
- Our Commercial, Logistics, Procurement and/or Legal Departments

The Hotline is maintained by an independent third-party provider—it is not staffed with Beam Suntory employees.

Just as we expect of our employees, all of our suppliers must fully cooperate with an investigation or inquiry by Company personnel, outside auditors or government officials. Beam Suntory does not tolerate discrimination of or retaliation against anyone who makes a report—or participates in an investigation of one—in good faith.

Details for using the Hotline can be found in Appendix A.



ACTING HONESTLY AND ETHICALLY
WHILE WORKING WITH BEAM SUNTORY



Acting Honestly and Ethically

Health, Safety and Respect

Beam Suntory believes in fostering a diverse, inclusive work environment where all ideas, perspectives and backgrounds are considered. Likewise, we feel strongly that our health and safety are paramount to the work we do. To this end, our Company provides a safe place to work where ideas and productivity can thrive.

Therefore, we expect our suppliers to adhere to all applicable laws and regulations, such as the International Labor Organization (ILO) standards, and not discriminate on the basis of legally protected traits, such as:

- RACE
- COLOR
- SEX
- MARITAL STATUS
- RELIGION
- POLITICAL AFFILIATION
- NATIONALITY
- ETHNIC BACKGROUND
- SOCIAL ORIGIN
- AGE
- DISABILITY
- FREEDOM OF ASSOCIATION
- ANY OTHER TRAIT PROTECTED BY LAW

The Company also does not tolerate any form of unlawful harassment, threats or acts of violence, or disrespectful behavior by or toward our suppliers. Suppliers must know and follow proper safety protocols when working on our behalf, and must never work while impaired by alcohol, drugs or medications.

If you witness any acts of discrimination or harassment, or any unsafe behaviors or conditions, you have a duty as a Beam Suntory supplier to speak up right away through the available resources.

Good Corporate Citizenship

Beam Suntory is a good corporate citizen that believes in promoting human rights throughout our organization. In doing so, we adhere to all wage and hour laws in the locations where we operate. We also do not use or condone unlawful child or forced labor, and do not conduct business with those who do.

Just as importantly, we expect our suppliers to uphold individual rights, including wage and hour laws, in the work they perform for us. Our supply chains must allow their people to maintain a good quality of life, and must actively work to help them achieve that standard of living. We also ask that our suppliers take care of and give back to the communities in which they operate. No matter what, we demand the same transparency from our supply chain that we employ in all of our dealings.

Acting Honestly and Ethically

Product and Service Quality

We take great pride in the superior quality of our offerings. Upholding our commitment to quality and safety ensures those who consume our products enjoy the best possible experience, while those who work with us in manufacturing, marketing and distributing them may do so with confidence.

We expect our suppliers to take the same pride in their products and services. To this end, Beam Suntory suppliers are expected to comply with all applicable legislative and regulatory requirements when providing goods or services to our Company. For goods, compliance applies not just to the country of origin (such as where the product was produced), but also to the countries of destination. It covers all the characteristics of the goods, including packaging. If concerns about product safety or quality control arise, our suppliers have a responsibility to alert our Company right away.

Fair, Ethical Relationships

We expect our suppliers to provide us with accurate and truthful information about their products and services, just as we do for our customers.

We also expect our suppliers to abide by international competition laws. Beam Suntory suppliers should not discuss topics that could violate—or appear to violate—competition laws, including:

- Price fixing
- Bid rigging
- Dividing territories or customers
- Tying and bundling products
- Abusing dominant market position

Conflict of Interest Avoidance

Our suppliers are expected to make decisions in the best interest of Beam Suntory. Any situation that creates—or even appears to create—a conflict between your personal interests or those of your employer and those of our Company must be avoided.

In particular, suppliers may not offer cash, lavish or inappropriate gifts or entertainment to a Company employee or to a third party on behalf of Beam Suntory. Beam Suntory's global policy allows for the giving and receiving of gifts valued at USD \$50. Gifts and entertainment should:

- Be legal
- Be of a nominal value such that it cannot be construed as a bribe, payoff, or method to procure business
- Not be given in exchange for a particular service or outcome
- Not be cause any sense of embarrassment to Beam Suntory or the supplier

Suppliers are expected to disclose actual or potential conflicts of interest to our Company. Having a conflict of interest is not necessarily a violation of our Supplier Code, but failing to disclose the conflict is a violation.



Acting Honestly and Ethically

No Corrupt Practices

We strongly believe in doing business fairly and free of any corrupt influence. Engaging in bribery or other forms of corruption yields no long-term benefit for our Company. Bribery and other forms of corruption undermine Beam Suntory's integrity.

To be clear, a bribe can be anything of value, such as money, gifts, entertainment or special favors. Beam Suntory is prohibited from paying bribes to third parties, including government officials.

While working on behalf of Beam Suntory, do not:

- Make, offer or promise a bribe to a third party, including a public official or government personnel
- Offer or accept a "kickback," or the return of a sum paid or due to be paid as a reward for making business arrangements
- Retain a third party to pay a bribe or kickback on our behalf, or knowingly allow one to do so
- Make "facilitation payments," or payments made to speed up routine government actions (such as issuing a permit)

Trade Compliance

Customers around the world enjoy our products, and we strive to make them globally available. In order to ship our products—and obtain the goods and services to help produce them—we are expected to comply with international trade laws. This extends to our compliance with the various export and import controls that apply to our work. We expect our suppliers to do the same.

As a supplier of Beam Suntory, you must adhere to the various export and import controls that govern your work. If you engage in trade activity, ensure you know and follow the rules and regulations that apply to your job.

In addition, suppliers must abide by international trade sanctions. If you do not know whether a particular country, entity or individual is subject to trade sanctions, contact our Company's Legal Department or your company's internal resources for assistance.



Acting Honestly and Ethically

Protecting Assets and Information

At times, suppliers of Beam Suntory may be given access to our Company's assets and information. All suppliers must take reasonable precautions to prevent these resources from being stolen, damaged or misused. Our suppliers are also expected to comply with any non-disclosure and/or confidentiality agreements regarding our Company's confidential information. Beam Suntory's resources must be used at all times in a way that is safe, ethical and lawful.

We Are Environmental Stewards

Beam Suntory operates with a vision of Growing for Good, including commitments to protect water and the environment. We are mindful of our effect on our surrounding environment and are taking steps to lessen our impact. To this end, we implement sustainable practices worldwide, always meeting environmental laws and regulations. We seek to conserve resources, minimize waste and valorize it where possible, and make efficient use of water, energy and raw materials.

We hold our suppliers to similar standards of environmental excellence as well. In particular, we expect our suppliers to:

- Reduce the use of energy, water and raw materials;
- Reduce waste and emissions to air, soil and water;
- Reduce the use of chemicals and fertilizers and exclude the use of chemicals and fertilizers which are hazardous to human health;
- Contribute to recycling and reuse of materials and products;
- Use environmentally friendly technologies; and
- Incorporate environmental impact into product development and packaging design.

Audits and Termination of Supplier Agreements

Beam Suntory reserves the right to verify our suppliers' compliance with this Supplier Code through audits or other monitoring activities.

In the event that Beam Suntory becomes aware of any actions or conditions that violate our Supplier Code, we will request that corrective action be taken. Furthermore, Beam Suntory maintains the right to terminate an agreement with any supplier who does not comply with this Supplier Code.



Appendix A - Instructions for Using the Compliance Hotline

From U.S. and Canada: dial 1-800-374-6129

From Other Locations:

1. Dial the appropriate AT&T Direct Line for caller's country from list
2. Caller will hear "AT&T Direct Services"

You will hear a message before speaking with an operator. Upon connection, please tell them if you don't speak English and that you would like to use your preferred language. You will be placed on hold momentarily and the agent will connect you with a translator who speaks your language.

Calls to the hotline will be kept confidential to the extent possible without inhibiting a satisfactory investigation. Only those who need to know will be advised of the report, subject to duties arising under applicable law, regulations and legal proceedings, and further subject to data-privacy requirements.

The Company has a policy of preventing retaliation against anyone for making a report in good faith.

Australia	1-800-339276
Brazil	08008911667
China	4009913434
France	0800-902500
Germany	0-800-225-5288
India	000-800-100-1071
Japan	0034-800-900110
Mexico	001-800-840-7907 or 001-866-737-6850
New Zealand	0800-447737
Russia	8-10-8002-6053011
Singapore	800-1204201
South Africa	0-800-99-0123
South Korea	00798-1-1-003-7421
Spain	900-991498
Taiwan	00-801-102-880
United Kingdom	0800-032-8483