



Pernod Ricard  
*Créateurs de convivialité*

# What we stand for

**Our Code of Business Conduct**

*Enjoy our brands responsibly*



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**Alexandre Ricard**  
CHAIRMAN & CEO  
OF PERNOD RICARD



# Executive statement

Dear Colleagues and Business Partners,

Our reputation for integrity and professionalism is the cornerstone on which Pernod Ricard was built, growing from a small pastis producer in the South of France almost 100 years ago, to a global producer of superb spirits and wines available in over 160 markets today.

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

Our ambition is to become the leader of our industry, but not at any cost. We believe that without integrity, there can be no sustainable success. Therefore, we will continue to uphold our zero-tolerance policy towards any substantiated breach of our ethical standards. We don't adopt this stance for mere moral reasons, but because our consumers, employees, business partners, communities, and other stakeholders expect it from us.

**By abiding by this Code, you will contribute to the long-term success of our Group.**

The new edition of this Code sets out our position on matters of ethics and compliance and is designed to be as reader-friendly as possible. Read it, refer to it, and ask your Legal team and peers for guidance.

This is a living document which will be updated over time. As always, I welcome your feedback.

Yours faithfully,  
Alexandre Ricard



Enjoy our brands responsibly

# We are convivialists

As “Créateurs de Convivialité” our purpose is to turn every social interaction into a genuine, friendly, and responsible experience of sharing and our mission is to unlock the magic of human connection by bringing good times from a good place.

## *The Convivialist Manifesto*

**We are convivial** because our brands, businesses, and people share a belief that we humans need to come together to create joyful moments. We are connected by conviviality across the globe, and we are proud to belong to the global community of convivialists. We support and believe in each other with mutual trust.

**We are responsible**, and this means respecting each other, our communities, and our planet as we strive for a more convivial world, without excess. At work, this means we are committed to care and have a strong sense of ethics in everything we do.

**We are successful** and a leading actor in the wines and spirits sector, we have a long-term outlook that aims for industry leadership, innovation, and sustainable growth. We embrace our entrepreneurial spirit and harness our passion for what we do. Our decentralised business model means we are empowered to perform at our best.





Enjoy our brands responsibly

# Our Code

## *What we stand for*

Our Code of Business Conduct sets out the standards of ethical and responsible business conduct that must be met by all our employees and business partners. It helps guide how we make our decisions, every day.

Our brands are sold in more than 160 markets, and we are subject to an extensive regulatory framework, some of which applies across borders. By following the principles of this Code and our policies, you are helping Pernod Ricard to comply with these laws, and therefore, contributing to our sustainable success.

**For our employees**, violations of this Code of Business Conduct may result in disciplinary action including termination of employment. **For our business partners**, we will take with the utmost seriousness any violation of the principles and provisions of this Code in the determination of the continuation of our contractual relationship.



### Want to know more?

This Code refers to a number of internal policies and procedures at Pernod Ricard. Additional policies may be in place within your affiliate. Please refer to the documentation on page 26.



### Something missing?

We have done our best to draft this Code in the most reader-friendly manner, with as little legalese as possible. We hope you appreciate this effort! However, that means that this document cannot address every ethical concern or every single sticky situation you may face. You will find information on where to seek guidance on page 23, how to report a concern on page 24, and the list of complementary policies on page 26.



# Our golden rules

*We will achieve our ambition of leadership by acting with integrity, every step of the way.*

## *In our business*

- › **We never offer or accept** bribes of any kind.
- › **We never offer or accept** inappropriate gifts or hospitalities.
- › **We vet our partners** thoroughly, so that we can work together in a spirit of mutual trust.

## *In our trade*

- › **We will earn** our leadership position through fair competition.
- › **We comply** with applicable laws including global export and import laws and sanctions.
- › **We act** in Pernod Ricard's best interests.
- › **We use** the resources made available to us by Pernod Ricard responsibly.
- › **We are mindful** of what we say, write, and share.
- › **We provide** our stakeholders with clear, accurate information.
- › **We use data** to expand our business, but we only use what we need.

## *In our workplace*

- › **We create** a safe workplace for all.
- › **We believe** that diversity and inclusion are at the core of our collective spirit as "Créateurs de Convivialité".
- › **We take care of each other and we strive to eliminate** occupational accidents, hazards, and diseases.
- › **We aspire to create** a more convivial world, a world without excess.
- › **We strive to ensure** respect for human and labour rights.







Introduction

**How we behave**

In our business

In our trade

In our workplace

How we uphold our Code

# How we *behave*





*In our business*

# Prevent bribery and corruption

We earn our leadership thanks to our people, products, brands, creativity, business model, conviviality and strategy. That's it. We never offer or accept payments, incentives, or anything else intended to improperly influence a business decision.

## 3 RULES TO LIVE BY

- › Never offer, promise, or give anything of value to a government official or anyone else as an inducement to act improperly.
- › Remember, anything of value can be considered as a bribe. This can include a favour, a promise of employment, or the promise of a charitable donation.
- › Report any attempted act of corruption.



**Q: One of our key clients wants me to hire his son as an intern. What should I do?**

**A:** Explain to your client that our Code prohibits you from being involved in the recruitment process and that all you can do is share his/her son's résumé with HR.

**Q: I need an urgent delivery of stock for Christmas. The customs clearance might take too long. The customs officer told me he knew a special way to speed up the procedure in exchange for a cash payment. The amount is ridiculously low.**

**A:** Cash payments to perform or fast-track an administrative formality, known as facilitation payments, are strictly prohibited under this code. You should always decline such requests and inform your manager. The only narrow exception is when refusing payments puts you under unavoidable physical threat.

*“We never offer or accept bribes of any kind.”*



*Enjoy our brands responsibly*



## What applies to us applies to third parties acting on our behalf

Pernod Ricard may be liable for the actions of third parties. We must not let third parties do anything illegal on our behalf.





## In our business

# Give or receive gifts and hospitalities

It is ok to nurture your relationship with a customer or third party with appropriate gifts and hospitalities. It is not ok to use them to improperly influence business decisions since they could be regarded as bribes.

### 3 RULES TO LIVE BY

- › Only exchange reasonable and customary gifts and hospitalities where there is a legitimate business purpose.
- › Before offering or accepting a gift, always ask yourself: how would this look if it was made public?
- › You must systematically seek pre-approval when it comes to gifts and hospitalities involving government officials.



**Q: An influential bar owner is considering signing an exclusive deal with a competitor. I am thinking about giving her and her staff gift cards in the hope that it will sway her towards us.**

**A:** Bad idea. Gifts in cash or cash equivalents, such as gift cards, are particularly problematic. Your jurisdiction may have additional restrictions on providing items of value to retailers. Systematically consult your Legal or Ethics & Compliance teams.

**Q: A supplier I often work with has invited me to a 2-day retreat in the Bahamas to present us their latest innovations. Can I go?**

**A:** Being invited by a supplier to discover their innovations is fine in principle. However, use your common sense: if the trip seems disproportionate, don't go. Ask your Legal or Ethics & Compliance team.

*Reasonable gifts and hospitalities are a normal part of doing business. However, we never offer or accept gifts or hospitalities to improperly influence people.*



### Gifted!

Declare and seek pre-approval before offering or accepting gifts and hospitalities on Gifted!, our dedicated app, or you may use the equivalent system in place in your affiliate.



## In our business

# Work responsibly with third parties

We want to do business with partners who share our values and ethical standards. Vetting them through Partner Up, or the approved tool in your affiliate, means we can enter into relationships with our eyes open.

### 3 RULES TO LIVE BY

- Conduct due diligence on third parties, through Partner Up (or your affiliate's tool of choice) to ensure prospective partners are trustworthy, reputable, and accountable.
- Aim to share this Code, and make sure our template compliance clause (available on MyPortal) is included in the contract.
- Look out for suspicious payments to or from any unusual account, or accounts located in tax havens. This might indicate tax evasion or money laundering practices.



**Q: One of our customers has asked if they can pay through a mix of different accounts, using a combination of cash and cheques. Is this OK? What should I do?**

**A:** Proceed with caution. It could be part of a tax evasion scheme or an attempt at money laundering, a process in which funds obtained through illegal means are made to look legitimate. Before you proceed, ask your manager and Legal or Ethics & Compliance contacts for advice.

**Q: I need to launch a new product really quickly. I have met an innovative marketing agency who could help us with a brilliant campaign if I sign today. Can I go ahead right now?**

**A:** You should be careful before rushing into a new business relationship. You must follow our Partner Up process or your affiliate's approved similar tool. This is the best way to get your project off the ground whilst protecting Pernod Ricard. As a rule of thumb, do not do anything with the company's money that you would not do with your own.

**Q: A consultant I have been working with has asked to be paid into an offshore account. Can I make this payment?**

**A:** Offshore accounts can be used to avoid paying tax. This request looks suspicious. You should seek advice from your finance director and/or Legal or Ethics & Compliance contacts.

*“We vet our partners thoroughly, so that we can work together in a spirit of mutual trust.”*



### Raising awareness

Through our supplier standards and due diligence process, we aim at increasing awareness on anti-bribery, but also on human rights and labour law, health & safety, environmental impact, responsible drinking, integrity, tax evasion and fair business practices.





*In our trade*

# Compete fairly

We are committed to promoting fair competition. We will not tolerate agreements, exchanges of sensitive commercial information or any other practices that could hinder competition. We do not discuss sensitive commercial issues with third parties and in particular with competitors.

## 4 RULES TO LIVE BY

- › Never enter into written or verbal agreements with competitors (e.g., to fix prices, exclude a competitor or divide a market).
- › Exclusive distribution agreements and agreements that contain territorial restrictions or “non-compete” clauses should always be considered with care. Reach out to the local Legal or Ethics & Compliance teams in such case.
- › Make sure that any information you receive about a competitor comes from publicly available sources or has been otherwise legitimately obtained.
- › We can only recommend, and never demand, the ultimate resale price of our products used by our clients.



**Q: I meet up with my former boss from my previous job. The relaxed atmosphere is an opportunity for her to ask me about my new position at Pernod Ricard. The questions move onto our market strategies for the coming months.**

**A:** The fact that you have an existing relationship with this person should not cause you to lower your guard. Keep in mind that you should never exchange sensitive business information with competitors, or anyone else for that matter.

**Q: I have been invited to the annual dinner of a professional association. A number of my peers from the competition are seated at my table. After a few minutes, one of the guests brings up the subject of prices.**

**A:** This kind of situation could hinder competition and is against competition law. If you ever find yourself part of such a conversation, seek legal advice on the spot if possible. If not, let the other guests know that you believe this conversation is non-compliant and if the conversation continues, excuse yourself, ask the minute-taker, if any, to indicate that you have left and promptly contact the Ethics & Compliance team.

*“We will earn our leadership position through fair competition.”*



## Mind what you say and write

Do not make references to Pernod Ricard being “dominant” in a given market since this is a matter of complex legal and economic analysis and bears legal consequences.



*In our trade*

# Follow global trade rules

Pernod Ricard is a global group and is committed to complying with the complex and changing global export and import laws, including trade sanctions such as embargos, asset freezes, restrictions, and bans. New sanction regimes may be put in place and jeopardise existing or prospective relationships and projects. Be vigilant and ask for advice.

## 3 RULES TO LIVE BY

- Keep a strict separation between anything with an American component (operations, third parties, people) and Havana Club. If you identify any potential, direct or indirect link with the US when working on any project involving Havana Club, always consult the Legal or Ethics & Compliance team.
- Sanctions regimes are complex and are evolving constantly. Reach out to the Legal or Ethics & Compliance team before engaging with sanctioned or embargoed countries and parties.
- Vet counterparties through Partner Up or the approved tool in your affiliate to avoid violating any sanction or trade restriction.

**Q: A new American tech player could help us achieve our marketing goals more efficiently. The Group plans to purchase a global licence and roll it out across all our brands. Good news?**

**A:** Yes, but since this supplier is from the US, some of our brands will not be able to use this tech solution. You should check with the Legal and Ethics & Compliance teams whether this is the best solution for the group. Be mindful of IT tools: if any component is from the US, they cannot be used in Cuba!

**Q: We want to further develop Havana rums in Europe. Our marketing agency suggests promoting them in an upcoming music festival which is also sponsored by a renowned U.S. soft drinks brand. Can we go ahead?**

**A:** Yes, but you must ensure that no co-branding or common activations between the two brands will be made during the Festival. Since U.S. companies are generally prohibited from dealing with Cuban origin goods, you may not enter into any commercial relationship with this soft drinks brand.



*“We comply with global export and import laws and sanctions.”*



## Don't judge a bottle by its label

The Absolut Company (TAC) is owned by a US-based subsidiary of Pernod Ricard. As such, under global trade laws, some of our brands, such as Havana Club, cannot work directly with TAC.





*In our trade*

# Be loyal and transparent

We must avoid situations where our personal interests and relationships conflict with the interests of Pernod Ricard. The mere appearance of a conflict of interest, if it is not disclosed, can tarnish Pernod Ricard's reputation, as well as your own.

### 3 RULES TO LIVE BY

- Disclose any potential conflict of interest on Clear Up, our dedicated tool, as soon as possible. The situation may arise from your relationship with a family member, a closely related person, or a particular business.
- Inform your manager and seek advice before engaging in any activity that presents a potential conflict of interest or the appearance of it.
- Be mindful before engaging in any professional activity outside of your employment by Pernod Ricard.

**Q: I was recently hired by Pernod Ricard and my girlfriend works for our main competitor. Does this situation create a conflict of interest?**

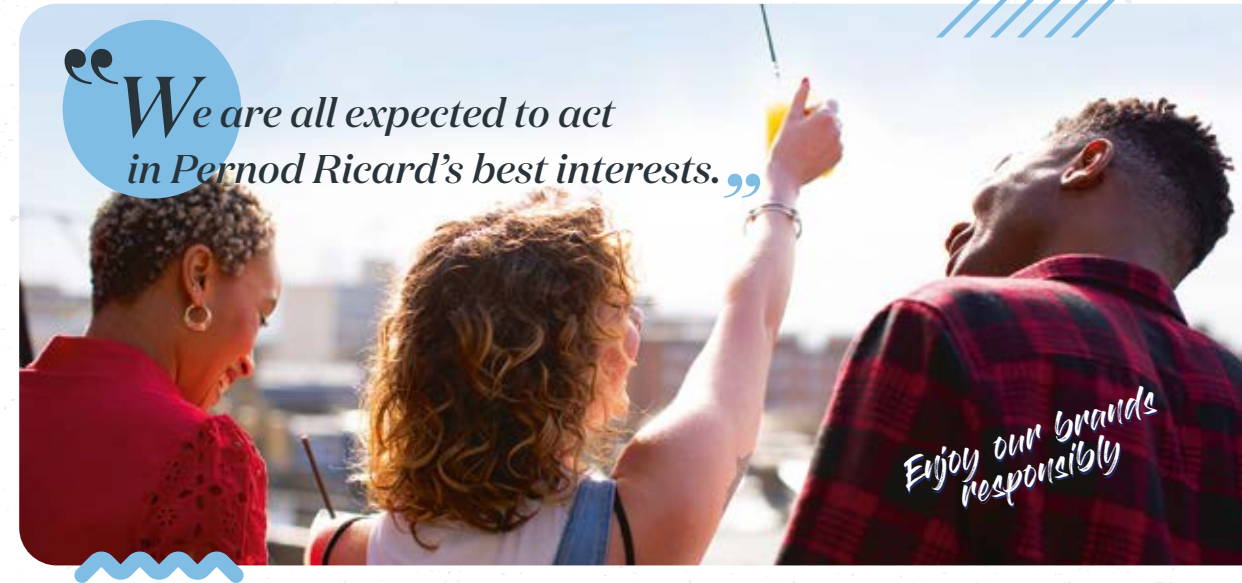
**A:** Not necessarily, but you should disclose the situation on Clear Up.

**Q: My cousin has founded a digital marketing agency. I am objectively convinced that their innovative approach could help us with our next communication campaign. Can I suggest this agency to my team?**

**A:** Yes. However, regardless of the quality and reputation of this agency, the situation creates the appearance of a conflict. You must inform your manager and withdraw from the selection process. You must disclose the situation on Clear Up and implement the related mitigation measure that will be recommended.

**Q: I am a teetotaler. I have been contacted by an anti-alcohol NGO. This NGO promotes the complete ban of any form of spirits consumption. Can I join them?**

**A:** While we respect everyone's choice to drink or not, it would become problematic if you were part of a group that proactively promotes interests in direct conflict with Pernod Ricard's business. Speak to your Ethics & Compliance or HR teams.



*“We are all expected to act in Pernod Ricard’s best interests.”*

*Enjoy our brands responsibly*

### UNSURE IF A SITUATION IS A CONFLICT OF INTEREST? ASK YOURSELF:

- Would any relative or I **benefit, or seem to benefit**, from my involvement in this situation?
- Could my personal interests, or those of my relatives, **affect my business decisions**?
- Would I **act differently** without these personal considerations?
- Could my participation in this activity **interfere, or appear to interfere**, with the way I should perform my job?
- Could my decisions **be questioned** or seen as **not in the interest of Pernod Ricard**?
- Does it feel wrong? Would I feel **embarrassed** if the situation **came to light**?

If you answered yes to any of these, you should probably report it on Clear Up. Still unsure? Contact your Ethics & Compliance team for any question.



### Growing into friends

Be careful, a business relationship that has evolved into a personal one can be a source of conflict or create the appearance of a conflict.



*In our trade*

# Protect Pernod Ricard's assets

Our assets are precious: whether they are tangible (laptops, cell phones...) or intangible (personal data, financial information, technical information, or intellectual property). We must protect them.

## 4 RULES TO LIVE BY

- › Use Pernod Ricard's assets and resources with care and for legitimate business purposes only.
- › Data & information shall be used in accordance with data ethics.
- › Check with the Group IP Hub when working on a new product, brand, or tagline.
- › Protect your access to Pernod Ricard's assets – this includes your passwords and your electronic devices.



**Q: My client left his USB key in my office. I might find useful stuff on there...**

**A:** It is absolutely prohibited. Also, it is never safe to use a USB key that was not supplied by your IT team.

**Q: We have a fancy name in mind for a new brand. How can we protect it?**

**A:** Our brands are our most valuable assets. Making them unique and distinctive is the best way to protect them. Call the Group IP Hub to secure all relevant IP rights.

*“We use the resources made available to us by Pernod Ricard responsibly.”*



## How do you treat your assets?

Whether it is a laptop, a cell phone, internet access, business data, trademarks or even a building, we expect you to treat our assets and those of our partners as well as you would treat your own.





In our trade

# Be convivial, but do not overshare

Although we are proud to be part of Pernod Ricard and like to boast about our successes, we must keep confidential or sensitive information to ourselves. We must also be aware that certain sensitive issues may be particularly divisive. Therefore, we should not take public stances on them in our professional capacity.

### 3 RULES TO LIVE BY

- > Keep to yourself all confidential or proprietary information.
- > Unless specifically approved as indicated in the decision tree, do not make statements on sensitive issues such as:
  - Religious beliefs;
  - Moral issues around life & death;
  - Armed conflict; rebellion / uprising; terrorist attacks;
  - Partisan politics / elections;
  - Race / ethnicity & gender issues not covered by Pernod Ricard's D&I Policy;
  - Natural disasters where corporate positioning must be carefully calibrated. Check the Corporate Statements Policy for more information.
- > Post responsibly about alcohol on social media.

**Q:** I happen to have access to non-public information about the upcoming acquisition by Pernod Ricard of a start-up which could very well change the face of conviviality. I know I can't buy shares based on this information, but can I make a recommendation to someone else to buy Pernod Ricard shares if I don't mention this transaction?

**A:** A clear "no". Giving a "tip" for trading purposes is a breach of the trust we have established with our investors and the market regulator. Using inside information to trade in Pernod Ricard's securities is called insider trading and is severely punished.

**Q:** I feel very strongly about a particular societal issue that has been dividing the country I live in. I want to take a position on my personal social media accounts. Is that Ok? Can I decide on my own?

**A:** Of course, it is ok to express your opinions on your personal social media accounts. However, never express yourself on sensitive matters when appearing as a Pernod Ricard representative (e.g., on LinkedIn), as your own opinions on a particular matter may seem fair to you but offensive to others. Many of these issues require a judgment call and because they are sensitive, approval must be sought at ExCom level.

## How to decide if a PR entity/spokesperson should comment or take a stance on an issue in society: decision tree



**Q:** There is a big political controversy going on right now in my country.

**Q:** I think it would be beneficial for Jameson to take a stand on this. Should I work with marketing to design assets to that end?

**A:** Absolutely not. This is usually counterproductive, our brands should not be used for divisive and polarizing issues which have to do with religion, war or partisan politics for instance.

**Q:** Should we launch a debate in the office?

**A:** Employees must refrain from initiating official debates around sensitive issues in a professional context, unless the discussion is needed to operate our business (as determined by the CODI of the relevant affiliate).



## In our trade

# Communicate openly and sincerely

We strive to send clear, consistent messages to co-workers, customers, investors, public authorities, and other stakeholders, as well as to the general public. Open and honest communication establishes trust in our relationships and enhances our reputation.

### 3 RULES TO LIVE BY

- › Record all transactions and submit any required filing or reporting on time.
- › Make sure the information you provide is comprehensive, accurate and easy to understand.
- › Ensure any description of our products and services as well as any claim about them are truthful.



**Q: My monthly sales figures are disappointing. Would it be wrong to inflate my results a little since I'm sure I can make up for it next month?**

**A:** Yes, it would be wrong. Manipulating sales figures might give a false impression of the performance of our business to our investors, trigger sanctions and harm our reputation.

**Q: One of my clients has asked me to raise false invoices to avoid certain taxes. He has been through a difficult economic period. This could help him without major consequences for us.**

**A:** Making a false statement to a tax authority or issuing a false invoice is prohibited. Pernod Ricard does not promote any form of tax evasion and refuses to take part in any fraudulent activity or any artificial tax arrangement.

**Q: One of my suppliers advises that they can reduce the cost of materials if we import the goods using a different classification code because it has a lower customs duty rate. They say they will amend the description to prevent any question by customs.**

**A:** Knowingly using the wrong code amounts to a fraudulent declaration and could result in additional penalties and even criminal sentences in certain jurisdictions. Seek advice from your local customs, Tax, or Legal team before giving any customs clearance instruction.



### Be truthful

Just one deceptive or dishonest act can seriously damage a relationship. So, make sure you understand your responsibilities and always act in good faith with our stakeholders.





*In our trade*

# Use personal data with respect

Personal data is the fuel that powers many of our cutting-edge digital tools. We must always process personal data securely, confidentially and with fairness to comply with applicable legislation and earn the trust of consumers.

*“We use data to expand our business, but we only use what we need.”*

### 3 RULES TO LIVE BY

- › Always ask yourself if the personal data you are collecting is necessary for the purpose you want to achieve, and if you are using it for a legitimate business purpose.
- › Be transparent in your use of personal data and, where relevant, obtain people's consent.
- › Check internal processes and procedures before sharing the personal data of our employees, customers, or suppliers with third parties.



**Q: I am developing a new brand website with the help of an outside agency. The agency offers to identify and install all relevant cookies on the website for me. I don't have to check anything. Isn't that perfect?**

**A:** You must always oversee what our contractors propose to do, on our behalf, with any personal data (including when using cookies). Pernod Ricard should always be the one deciding which cookies go on our websites and how they are to be used. If in doubt, contact your Legal team and/or your Privacy Champion.

**Q: I am recruiting a new team member. I met a promising candidate, but I heard she has health problems. Can I write it in the report for my manager?**

**A:** Certain personal data is very sensitive and subject to various legal restrictions. That's typically the case of health data. You should refrain from collecting any such sensitive data unless it is part of a well-defined process that has been vetted by your entity's Legal team.

**Q: I have received a data access request from a consumer. I'm not in the customer service department. Can I just ignore it?**

**A:** Your entity's Legal team and/or Privacy Champion must be informed of this request immediately. They will ensure that it is properly processed.



### Nothing is too small for action!

In case of doubt about personal data, reach out to your Pernod Ricard's Group Data Protection Officer (DPO) through the Group's Privacy Champions' network.



*In our workplace*

# Be kind and respectful

At Pernod Ricard, we make sure that everyone is treated with respect and dignity. This is part of our convivial spirit. Accordingly, any offensive conduct, including but not limited to harassment, is banned from our workplace and our sphere of influence, and we will treat with the utmost seriousness behaviours that could be considered bullying, humiliating or hostile.

### 3 RULES TO LIVE BY

- Treat our colleagues and business partners in a courteous and respectful manner.
- Enforce Pernod Ricard's anti-harassment and anti-bullying policies by reporting any inappropriate conduct.
- A behaviour that is not acceptable at a business meeting is no more acceptable at a social event.



**Q: We are under a lot of pressure. My manager keeps calling late at night or during the weekend. She is especially targeting one of my co-workers by criticising her work in front of the team. She looks like she is going to have a breakdown soon. How can I help my colleague?**

**A:** We understand working under pressure. However, if you believe, in good faith, that a manager does not respect our anti-bullying and anti-harassment policies, try to talk to your manager or directly to HR, or use our Speak Up line to report.

**Q: At a work event, one of my colleagues acted inappropriately towards me. When I brushed him off, he said it was just a joke and that I should "just lighten up". What should I do about it?**

**A:** Sexual or any form of harassment is unacceptable, whether in a work or social setting. Socialising does not mean lowering our ethical standards. You should report the situation immediately to your manager or directly to HR or through the Speak Up line.



*“We create a safe workplace for all.”*



### Conviviality at work

We create an environment where everyone feels safe to bring fresh thinking, try something new and demonstrate what they can bring to the table. We value simple and direct relationships that build trust, support, and collaboration.





*In our workplace*

# Value diversity and inclusion

Building an inclusive culture is the way diversity will thrive and deliver its benefits. We encourage openness, cooperation, and transparent communication. This way we can all feel welcomed and truly be ourselves at Pernod Ricard.

## 3 RULES TO LIVE BY

- Support Pernod Ricard's commitment to diversity and inclusion, and promote these commitments in your relationships with suppliers, clients and any other business partners.
- Promote fairness and equal opportunities for employment and promotion, based on qualifications and skills only.
- Speak up when you witness actions and behaviours that are inconsistent with our values.



**Q: A customer refuses to talk to one of my teammates. He does not acknowledge her presence and is dismissive of everything she says. I believe in good faith that this has to do with the ethnicity of my colleague. What action can I take?**

**A:** We choose to work with people who share our values and principles. If one of your customers is seemingly displaying racist behaviour, you should report it to your manager, HR or the Ethics & Compliance team.

**Q: One of my colleagues likes being provocative and sometimes tells "jokes" with sexual innuendo. People seem to think he's funny but personally I find this offensive. What should I do?**

**A:** We can take a joke, but in the workplace, an offensive joke is never funny. Let your colleague know that you are offended by his remarks. If you are not comfortable confronting that colleague, or if he doesn't stop, inform your manager and HR about the situation, or report it on Speak Up.

*"We believe that diversity and inclusion are at the core of our collective spirit as "Créateurs de Convivialité"."*



## Live without labels

Mirroring the diversity of our society and customers enables us to better create the magic of human connection, where people are open and allow differences to connect, not separate us.



*In our workplace*

# Create a secure work environment

Pernod Ricard's Global Health & Safety Policy is underpinned by our "Créateurs de Convivialité" vision. The Group is thus committed to developing a culture where everyone has a role to play and where employees take responsibility for their own safety and for that of their co-workers.

## 3 RULES TO LIVE BY

- › Take every precaution to maintain a safe and healthy working environment.
- › Ensure that we are not putting ourselves or others at risk by our actions.
- › Report near-misses and unhealthy or unsafe conditions or behaviours.



**Q: I have a safety concern. I am afraid that bringing it up will slow down our production. I do not want to jeopardise our business. What should I do?**

**A:** Health and safety always come first. You should report health and safety concerns immediately, even if it means slowing down production, missing a deadline or losing a business opportunity.

**Q: I am worried about a colleague who seems to be terribly stressed right now. He missed a couple of deadlines recently and does not seem like himself. How can I make sure he is okay while looking out for our business?**

**A:** We care about our colleagues and their physical and mental well-being. Situations like this should be handled with great sensitivity. You should contact your manager and HR before taking any action.



## Taking Care of Each Other

Our global Health & Safety Policy focuses on developing a culture where safety is at the heart of conviviality. *Taking Care of Each Other* is making Pernod Ricard a safer place to work.





In our workplace

# Bring Good Times from a Good Place

As “Créateurs de Convivialité”, we strongly believe in the art of sharing in all that we do. We aim at bringing “Good Times from a Good Place” by nurturing the earth, valuing people, helping to preserve natural resources, fighting alcohol abuse and creating shared value for all our stakeholders. Our roadmap is integrated into all our activities, from grain to glass.

### 3 RULES TO LIVE BY

- › Promote our 2030 Sustainability & Responsibility (S&R) roadmap at all times.
- › Our products come from Nature and it is our duty to help protect and regenerate natural resources.
- › Share warmth, care and respect for people at all times, and always act responsibly in all conviviality moments.



### Speak Up

Pernod Ricard’s “Whistleblowing Policy” also includes the possibility to report, in good faith, any potential violation of environmental practices.



**Q: I'm at the company Christmas party and one of my colleagues seem to be drinking in excess, should I do something?**

**A:** Yes! Encourage your colleague to stop drinking and switch to water or non-alcoholic drinks. Above all make sure your colleague doesn't drive home! In any event, if you believe a colleague has a problem with his/her alcohol consumption, you can always talk to your HR team, or even use Speak Up (in the “alcohol misuse” section).

**Q: I have noticed a spillage in the sea near our production site, my manager does not want to act on it. What should I do?**

**A:** You should report it to the Group as the S&R Roadmap is a key priority and we should prevent any environmental law breach. Please use our “Speak Up” tool to report, in good faith, any potential violation of environmental practices.



### Our S&R performance

Pernod Ricard publishes every year its S&R performance (targets, actions, KPIs) and contribution to the United Nations Sustainable Development Goals (SDGs) and principles in its Universal Registration Document.





Introduction

How we behave

In our business

In our trade

In our workplace

How we uphold our Code

# How we *uphold* our Code

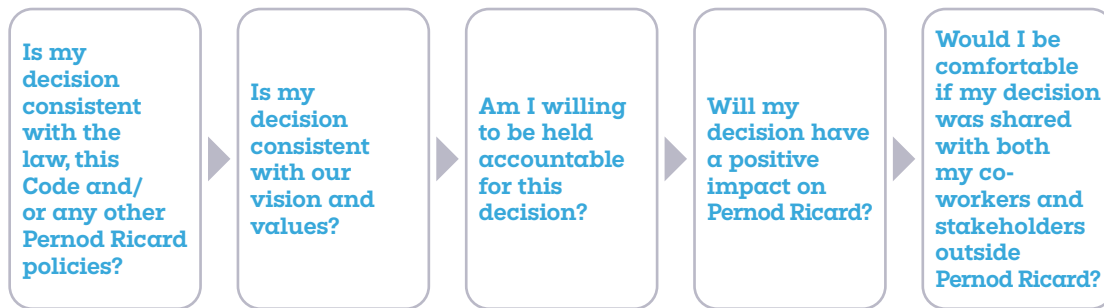




# Seek guidance

We encourage everyone to speak up and seek guidance on the topics covered in our Code. You should feel comfortable asking a question or reporting a good faith concern through any channel. You can be confident that your report will be treated seriously and dealt with as quickly and confidentially as possible.

## Use your judgement, ask yourself:



If the answer to any of these questions is «no», or if you are in doubt, please seek advice.

## Who can I talk to?

- › My manager,
- › My Legal department or Ethics & Compliance team,
- › My Human Resources department.

## Working with the Ethics & Compliance team at Pernod Ricard

The Ethics & Compliance team is a partner to everyone at Pernod Ricard. If you are navigating a grey area where something does not feel right and you haven't found the answer in the Code or other policies, reach out to the team for support.



## Speak Up

Pernod Ricard provides its employees with Speak Up: a 24/7 secure ethics and compliance reporting channel, to enable each employee to report in good faith any violation of this Code of Business Conduct as well as any illegal conduct.

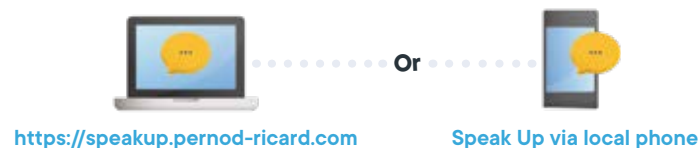


# Report on SpeakUp

Anyone who works with us, whether an employee, an external or occasional collaborator (interns, service providers, etc.) as well as our customers, suppliers and intermediaries can use Speak Up to report a concern.

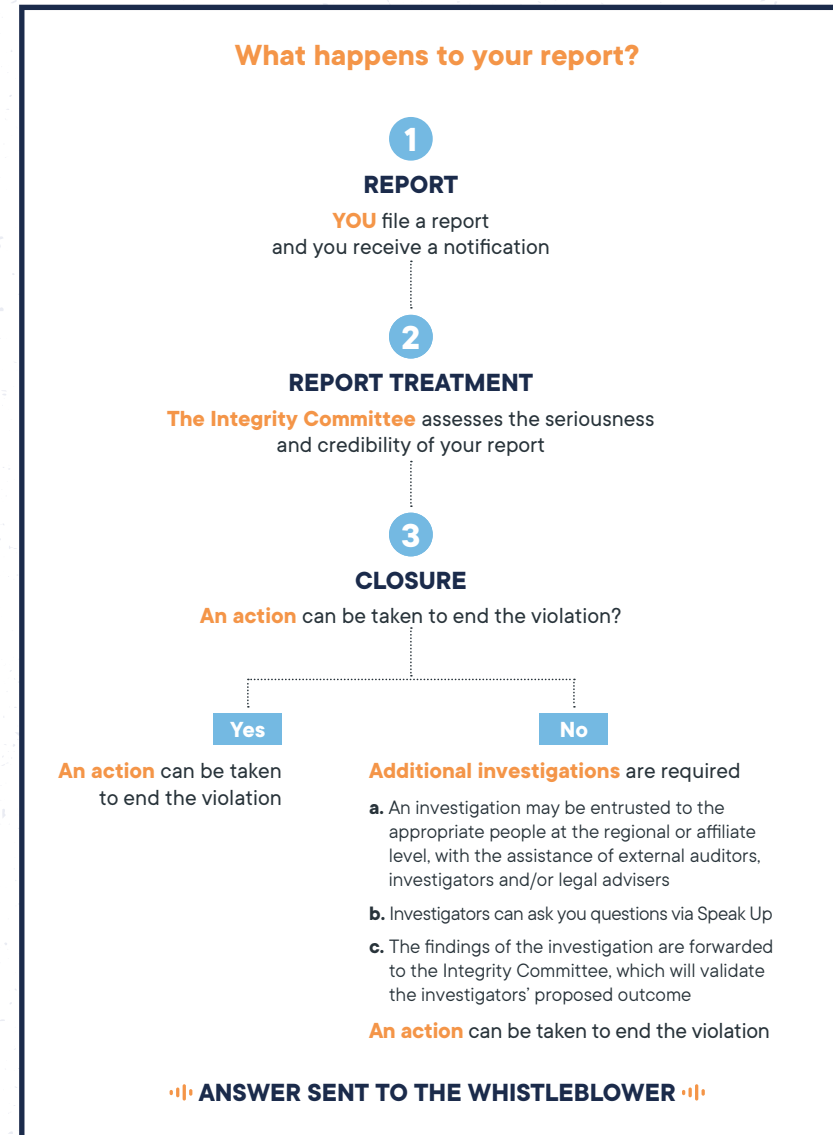
- › Speak Up is open to you if your report is made in good faith and is as accurate as possible to allow effective and operational verification of the allegations raised.
- › Speak Up can receive a wide variety of file types (such as written, photographic, or audio files).
- › Speak Up is available 24/7 in virtually all languages.
- › All reports are secure and kept strictly confidential.

Any employee who makes a report in bad faith may be subject to prosecution and disciplinary sanctions by the Group.



## Trust Pernod Ricard

Pernod Ricard has a zero-tolerance policy on retaliation against anyone who has reported an allegation or supported an investigation in good faith. Any form of retaliation will be treated very seriously and may result in disciplinary sanctions and criminal proceedings, in accordance with local legislation.







# Promote our Code

## *As a Pernod Ricard employee*

### › **Be Knowledgeable**

- › Carefully read the Code of Business Conduct and any other Company policies that relate to your job responsibilities.
- › Understand how to apply this Code and other Company policies to your job.
- › Ask questions.

### › **Be Accountable**

- › Understand your responsibilities by undertaking training.
- › Speak up and raise concerns without fear of retaliation.

### › **Comply with our Code**

- › Violations of the law, this Code or any other Company policies may result in disciplinary action up to and including termination of employment.

## *As a Pernod Ricard manager*

### › **Lead by example**

- › Inspire your team to follow this Code.
- › Foster and maintain a culture of integrity.

### › **Set the tone**

- › Openly discuss the importance of business ethics and integrity.
- › Listen without expressing any judgement when an employee asks a question or raises a concern regarding possible misconduct.

### › **Report issues**

- › Report any misconduct of which you are aware.





# Want to know more?



Available on MyPortal

## How we behave in our business

- › Anti-bribery Policy
- › Lobbying guidelines
- › Global Due Diligence Procedure
- › Compliance clause templates
- › Supplier Standards

## How we behave in our trade

- › Corporate Statements Policy
- › Code for Commercial Communications
- › Global Responsible Drinking Policy
- › Competition Law Policy
- › Anti-Money Laundering Policy
- › Conflict of Interest Policy
- › Tax Policy
- › Code of Conduct for the Prevention of Insider Misconduct
- › Data Privacy Policy
- › Intellectual Property 10 Golden Rules
- › IT Assets Acceptable Policy

## How we behave in our workplace

- › Global Environmental Policy
- › Global Human Rights Policy
- › Global Health & Safety Policy
- › 2030 S&R Roadmap

## Speak Up and whistleblowing

- › Whistleblowing Policy
- › Speak Up Guide





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