

Modern Slavery and Human Trafficking Transparency Statement

This statement is made pursuant to Section 54 (1) of the UK Modern Slavery Act 2015 and is reviewed annually and published. Previous yearly versions of this statement are available.

Who we are

We are Ian Macleod Distillers, a Scottish, family-owned spirits company, rooted in traditional values of independence, quality and customer service. We have a strong focus as an international, entrepreneurial, brand-led, successful and respected family company. Supported by the other key business areas of private labelling and bulk trading, our business is multi-faceted and we have a variety of departments within our 4 key functions: Operations; Finance & Central Services; HR; and Sales & Brand. We have our main office base in Broxburn, West Lothian and visitor centres across Glasgow and Edinburgh, with production sites in Glasgow (Glengoyne), Edinburgh (Edinburgh Gin), Speyside (Tamdhu) and soon to be Falkirk (Rosebank). Over 95% of our workforce is based in the UK, and we employ both permanent and seasonal workers.

Our aim is to offer our customers a choice of top quality spirit brands. By continually investing heavily in our exquisite portfolio to build a range of strong, niche brands, we are creating long term value.

International market demand for premium spirits is at an all-time high and in a marketplace increasingly dominated by a few multi-national companies with global brands, as an entrepreneurial and family business, we are thriving through customer demand for our products with heritage, history and quality. Aligned to our own overarching cultural ethos, we are fully supportive of the aims of the Modern Slavery Act 2015 and as such remain wholly committed to tackling slavery and human trafficking wherever possible. We continue to expect the same high standards from all of our partners, distributors and suppliers and expect that these standards are in turn applied throughout their own supply chains.

We do at times work with third parties, suppliers, distributors and other customer bases across national and international markets. We therefore recognise potential risk and proactively endeavour to engage in business only with partners who reflect our own values, culture and approach in all of these regards. We promote corporate social responsibility in all aspects of our business' operating models and have a core commitment to ensuring that where possible, we meet all industry best practice guidelines and processes.

Key progress updates

Within our employee handbook, we had previously set out a number of our expectations for our staff in terms of general standards and conduct and we have now cascaded to our employees an information and awareness raising pack. This pack is made available to new starts and on an ongoing basis remains easily accessible to all existing staff members via our employee self-service system.

We have a new dedicated quality and compliance function within the business and we have been evolving our key sales and supplier business processes. We previously made a commitment to develop our supplier code of conduct and we are aiming to have the first version of this code released in December 2018. Our further milestones across 2019 then include a structured roll out of this code to all of our key suppliers, and an ongoing review, and where applicable refresh, of key processes in support of our supplier code of conduct.

Our ongoing commitments

Our continuing aim is to ensure a zero tolerance approach to modern slavery and human trafficking, and to act ethically and just, in all of our business relationships. We continue to

- Encourage all of our customers to have their own suitable anti-slavery and trafficking policies and processes;
- Cascade information to our employees to help them understand the importance of, and our zero tolerance towards, any type of modern slavery and/or human trafficking;

- Encourage employees to report potential concerns;
- Report on our commitments in tackling slavery and human trafficking as part of board discussions and in line with annual business reporting;
- Assess risk and where applicable table recommendations, actions and follow up as required;
- Empower our business areas to readily complete appropriate due diligence in regards to engagement with new customers and maintaining business relationships with existing customers in line with these principles

We remain wholly committed as a business, to not support or deal with, any business or individuals knowingly involved in slavery or human trafficking

Ian Macleod Distillers
30th November 2018