



Corby Spirit and Wine Limited

Modern Slavery Act Report

Fiscal Year 2025

1. Introduction

The *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) requires that an entity report upon the steps taken during the previous fiscal year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity. This is a joint report for Corby Spirit and Wine Limited (“Corby”), its parent company Hiram Walker & Sons Limited (“Hiram Walker”), and certain of Corby’s subsidiaries¹ which have an obligation to publish a report under the Act (collectively, “Corby and Hiram Walker”). This report describes steps taken by Corby and Hiram Walker in the fiscal year ended June 30, 2025.

Corby, as a majority-controlled Pernod Ricard S.A. (“Pernod Ricard”) subsidiary, and Hiram Walker, as a wholly-owned Pernod Ricard subsidiary, substantially rely upon the efforts of Pernod Ricard, for the purposes of managing and monitoring supply chain operations and compliance programs. Pernod Ricard is a world leader in the spirits and wine industry, renowned for its premium products, commitment to diversity and inclusion, and promotion of responsible alcohol consumption. Within this document, Pernod Ricard and its affiliates are denoted as the “Group”.

Corby and Hiram Walker align with Pernod Ricard's values of quality, sustainability, and responsible business practices. We recognize our responsibility in ensuring the respect and protection of the human rights of all people who support and intersect with our business, comprised of colleagues and employees in our production facilities and workers, in our supply chain network. Our customers trust that the products we offer come from suppliers that provide safe, fair, and ethical working conditions for workers; this expectation is addressed in our Code of Business Conduct, the Group’s Global Human Rights Policy and the Supplier Standards.

2. Structure, Activities and Supply Chain

1. Structure

Established in 1859, Corby is a leading Canadian manufacturer, marketer and distributor of spirits, wines and ready-to-drink beverages (“RTDs”). We own or represent many of the 25 top-selling brands in the country. In addition to sales across Canada, Corby products are also exported for sale to the United States (the “US”), Europe and other international markets. Corby is a publicly traded company based in Toronto, Ontario, and listed on the Toronto Stock Exchange under the trading symbols CSW.A and CSW.B. We are affiliated with Pernod Ricard, a global leader in the spirits and wine industry. This partnership has helped expand our portfolio, strengthen our operations and buying power, and leverage international know-how and best practices for the benefit of all Corby stakeholders. Through acquisitions, Corby owns three operating subsidiaries: Ace Beverage Group Inc. (based in Toronto, Ontario), Ungava Spirits Co. Ltd. (based in Cowansville, Quebec), and The Foreign Affair Winery Ltd (based in Niagara, Ontario).

Established in 1858, Hiram Walker is a subsidiary of Pernod Ricard and holds a majority interest in Corby. Hiram Walker is a leading Canadian manufacturer of spirits, with a tradition of blending quality ingredients, processes and highly skilled people that continues at the Windsor, Ontario based production facility. Hiram Walker’s customers are located in Canada, the US, and other international markets.

2. Activities

- a. As a leading Canadian manufacturer, marketer, and distributor of spirits, wines and RTDs, Corby derives its revenues predominantly from the sale of its owned-brands, as well as earning

¹ Corby Spirit and Wine Limited’s subsidiaries included in this report are: Ace Beverage Group Inc.

commission income from the representation of selected non-owned brands in Canada. Corby sources more than 90% of its spirits production requirements from Hiram Walker at its production facility in Windsor, Ontario. Corby's wholly-owned subsidiary, Ungava Spirits Co. Ltd. operates the Cowansville, Quebec production facility. Corby's wholly-owned subsidiary, The Foreign Affair Winery Ltd., operates the winery and vineyard, based in Ontario's Niagara region. Corby's 90%-owned subsidiary, Ace Beverage Group Inc., develops product recipes in-house at its innovation lab in Toronto, Ontario and partners with various third-party manufacturers across Canada for its production requirements. The company's remaining production requirements have been outsourced to various third-party manufacturers², including in the United Kingdom ("UK"). The UK site blends and bottles Lamb's products destined for sale in countries located outside North America. Hiram Walker is a leading Canadian manufacturer of spirits and spirit-based products with sales to customers located both inside and outside Canada. Hiram Walker has interests in a number of privately-held subsidiaries located in Canada, the US and internationally.

- b. In most provinces, Corby's route to market in Canada entails shipping its products to government-controlled liquor boards. The liquor boards then sell directly, or control the sale of, beverage alcohol products to end consumers. Exceptions to this model include Alberta, where the retail sector is privatized. In this province, Corby ships products to a bonded warehouse that is managed by a government-appointed service provider who is responsible for warehousing and distribution into the retail channel. Other provinces have aspects of both government-controlled and private retailing, including British Columbia, Saskatchewan, Ontario, Manitoba and Quebec.
 - c. In addition to a focus on efforts to open new international markets, Corby's international business is concentrated in the US and the UK, and the company has a different route-to-market for each. For the US market, Corby manufactures its products in Canada and ships to third-party US distributors. For the other international markets, Corby products are manufactured and/or distributed by Pernod Ricard affiliates or third-parties.
3. *Supply Chain*
- a. Corby and Hiram Walker, in collaboration with Pernod Ricard, strategically manage their supply chains to source a diverse range of products, including exclusive brand offerings. With a focus on quality and innovation, Corby collaborates with Hiram Walker and third-party vendors to develop and manufacture products that align with its brand portfolio.
 - b. The sourcing activities encompass a network of suppliers across various countries. Through meticulous sourcing practices and partnerships, Corby and Hiram Walker ensure the availability of premium products that meet the expectations of its discerning customers and consumers.

3. Company policies and due diligence processes in relation to forced labour and child labour

Corby, Hiram Walker and Pernod Ricard have established several policies including codes of conduct, stringent compliance standards, and a robust governance framework for employees and suppliers.

1. *Code of Business Conduct and the Group's Global Human Rights Policy*

- a. Corby and Hiram Walker's approach to human rights encompasses the prevention of forced labour and child labour, as outlined in the [Code of Business Conduct](#) (the "Code") and [Global](#)

² To the company's knowledge, its UK manufacturer complies with the UK modern slavery reporting requirements.

[Human Rights Policy](#) for colleagues and suppliers, which are publicly available to ensure transparency and accountability. These governing documents articulate the companies' responsibilities and expectations in upholding human rights standards across their operations and supply chains. Specifically, section 1.7 of the Global Human Rights Policy addresses child labour by prohibiting the employment of individuals below the legal working age, and section 1.8 prohibits any form of forced labour, ensuring that all work is voluntary and employees have the freedom to leave their employment.

- b. Corby and Hiram Walker are committed to safeguarding human rights, underpinned by a strong commitment to ethical practices and a pledge to foster a safe and inclusive environment for all stakeholders involved in their value chains. The Group's Global Human Rights Policy is guided by internationally recognized standards, including:
- Universal Declaration of Human Rights;
 - United Nations Guiding Principles on Business and Human Rights ("UNGPs"); and
 - International Labour Organization eight fundamental conventions.
- c. Following the implementation of the European Corporate Sustainability Reporting Directive ("CSRD"), the Group performed a double materiality assessment to estimate the environmental, social and governance impacts as well as risks and opportunities. Following this, the Group launched its first corporate-level Human Rights Impact Assessment ("HRIA") focusing on upstream activities. This deepened the identification of actual and potential impacts on workers and communities, including vulnerable and marginalized groups. The assessment includes: a) stakeholder mapping across the upstream value chain; b) heatmap of human rights impacts; and c) prioritization of impacts based on severity and likelihood. Key outputs will inform mitigation and remediation plans, with progressive expansion of HRIA coverage to own operations and downstream activities.
- d. FY24, the Group organised a human rights capacity building workshop facilitated by Shift, the leading centre of expertise on the UNGPs. The objectives of the workshop were to raise awareness on the UNGPs, develop a common understanding of the expectations of Pernod Ricard in respecting human rights, and identify next steps. Some of the next steps identified included the building of a strong governance and human rights culture across the organization, reinforcement of due diligence processes and the review of coalitions and partnerships and the exploration of new ones.
- e. In FY25, the Group formalized the [Global Social Policy](#), relying on already existing Human Resources processes rolled-out across the Group. This consolidated policy applies to our entire workforce. It is approved at the highest level by the Executive Vice President of Human Resources. Oversight is provided by global bodies such as the Group's Executive Committee, Board of Directors and Integrity Committee, which are regularly informed of important updates. The policy covers a number of topics designed to address our key employee-related impacts, risks and opportunities. They include equal opportunities, learning, fair compensation and benefits, social dialogue, discrimination, preventing violence and protecting human rights. The Global Social Policy reinforces the Group's zero-tolerance approach to human rights violations and strengthens alignment with international standards, including the UN Guiding Principles on Business and Human Rights and International Labour Organization conventions.

2. *Supplier Standards*

- a. All suppliers are required to adhere to the [Supplier Standards](#) which are now automatically incorporated into supplier contracts as part of the supplier engagement and compliance process for Corby and Hiram Walker. These standards outline the companies' expectations and guidelines for suppliers regarding forced labour and child labour. These standards apply to all suppliers, including domestic and international producers, manufacturers, agents, brokers, and other third-parties engaged in business with Corby, Hiram Walker and Pernod Ricard. By engaging in business with us, suppliers and related parties are required to adhere to the Supplier Standards, affirming their commitment to compliance with all applicable laws, including regulations concerning forced labour and child labour. The Supplier Standards emphasize the importance of upholding worker rights and protections, with a specific focus on prohibiting child labour, forced labour, and human trafficking. Additionally, suppliers are expected to prevent any forms of discrimination, intimidation, abuse, harassment, or violence against workers. Compliance with laws regarding workers' freedom of association and collective bargaining rights, including fair compensation and working hours, is also mandated by the Supplier Standards.
- b. The Group's Supplier Standards are overseen locally by the applicable Sustainability & Responsibility ("S&R") and Procurement Departments at Corby, Hiram Walker and Pernod Ricard, with reviews and updates as needed, to ensure alignment with our commitment to ethical business practices and compliance with international standards and regulations.
- c. In 2025, the Supplier Standards were updated to strengthen and review requirements, including those related to social sustainability. The update aims to better reflect the most recent guidance, notably on compensation, living standards and income, free and informed prior consent, respect for human rights defenders, and equal opportunities. These updated standards will be communicated to suppliers during calls for tender and included in all Purchasing Orders and Purchasing T&Cs before signing a contract. The Supplier Standards are based on internationally recognized instruments and address different human rights issues including trafficking of human beings, forced labour and child labour.

3. *Focus on Corby and Pernod Ricard's own employees and operations*

In fiscal year 2021, Pernod Ricard launched an assessment questionnaire through its Human Resources network to embed a UNGPs approach. The assessment focused on the Group's own employees and internal practices. In addition, an independent external country-level screening and mapping of potential human rights risks was conducted in parallel. With these two tools, the goal was to help affiliates raise awareness on human rights related risks, identify gaps in relation to the eight commitments to the Group's employees in the Human Rights policy and develop appropriate action plans. Overall, the findings demonstrated the implementation of several best practices.

The Group continues to assess human rights risks across its own operations using Human Resources' tools, country-level risk screening and internal assessments aligned with the UNGP framework. These processes were complemented by a Group level HRIA in FY25, which provides a deeper understanding of impacts on workers in operations and will progressively expand to downstream value chain activities. Findings are used to identify gaps, strengthen internal controls and reinforce alignment with the Group's Human Rights Policy commitments.

4. *The Blue Source Process; Group approach to responsible sourcing*

- a. The Blue Source process has historically been implemented throughout the Group to apply responsible procurement strategy locally, including at Corby and Hiram Walker. This framework established the foundation for supplier risk mapping, assessment, and monitoring across the value chain.
- b. All suppliers are required to adhere to the Group's Supplier Standards, which were updated in 2019 and are embedded in purchasing processes. As of fiscal year 2025, these standards have been formally integrated into all Purchase Order Terms & Conditions and supplier contracts. Corby, Hiram Walker and Pernod Ricard reserve the right to suspend or terminate relationships with suppliers who fail to comply or provide equivalent commitments.
- c. Under the Blue Source framework, supplier risk is assessed based on defined criteria, including the nature of goods or services, supplier size, geographic footprint, annual spend, business dependency, and inherent social, environmental, and supply chain risks. Supplier risk levels determine the frequency of reassessment (every three years for low-risk suppliers, two years for medium-risk suppliers, and annually for high-risk suppliers).
- d. The Group asks for reassessments of its high and medium-risk suppliers to identify areas for improvement and review the effectiveness of action plans. Such reassessments include a sustainability assessment using the EcoVadis platform around four key topics: environment, labour, ethics and supply chain; social and ethical audit standards in line with the SMETA (Sedex Members Ethical Trade Audit) standards, and any other similar audits covering the same criteria of analysis.
- e. In FY22, to reinforce the Responsible Procurement program, the Group launched the Amazon Project, which aims to enhance procurement-related risk management. It is divided into two phases:
 - i. A diagnosis phase with the objective to understand the program maturity, challenge the existing model and get best practices and recommendations adapted to the Pernod Ricard Group;
 - ii. A preparation phase to implement the Pernod Ricard Responsible Procurement model that began in FY23 which includes the following workstreams:
 - Risk Data Providers: select and implement external sources and databases for an automated supplier risk rating,
 - Risk Mapping Methodology: review and update the Pernod Ricard's risk mapping methodology and update of supplier risk questionnaires,
 - Suppliers onboarding: review of risk arbitration rules within the Group supplier onboarding process,
 - Supplier standards: conduct benchmark and review of stakeholder's expectations to identify best practices and gaps,
 - Governance: work on role and responsibilities for the coordination and the implementation of the programme,
 - Evaluation and audit strategy: conduct benchmark and identify best solutions for risk assessment,
 - Engagement: build engagement plan (training, support documentation etc.) externally (for suppliers) and internally (internal stakeholders).

By the end of FY24, the Group decided to add the Supplier Standards in the Terms and Conditions (T&Cs) and Contracts with the suppliers. This is part of the simplification and reinforcement of its Responsible Procurement ambition. This is fully integrated as of March 2025.

- f. As part of this evolution, the Group has strengthened its supplier due diligence approach through enhanced tools and processes. In fiscal year 2025, the updated supplier onboarding and due diligence platform (“Partner Up 2.0”) was launched to support supplier risk identification and data collection. This platform requires suppliers to complete due diligence questionnaires and enables automated risk profiling based on sector, geography, and activity. External data sources are also increasingly leveraged to support supplier risk analysis, including financial and business resilience assessments.
 - g. The Group’s supplier due diligence process is structured around three key steps: risk identification, assessment, and mitigation. Suppliers identified as medium or high risk are subject to further evaluation through third-party assessments such as EcoVadis and SMETA audits, or equivalent certifications where applicable. Where risks or non-conformities are identified, suppliers are required to implement corrective action plans within defined timelines.
 - h. The Group continues to strengthen oversight of procurement practices through internal audits and supplier performance monitoring, supporting the effective implementation of procurement policies and continuous improvement across the supply chain.
5. *Risk Mapping of Priority Agricultural Sourcing*
- a. To manage risks within agricultural supply chains, address its duty of care and achieve its ambition of nurturing terroirs, the Group has implemented a three-level action plan. The action plan helps with the mapping of the various terroirs to achieve traceability, assess environmental and social risks to these terroirs, and implement sustainability programmes, according to their level of importance. Since fiscal year 2021, 60 terroirs have been identified as strategic priorities under the action plan as they account for the largest share of Group annual purchases (92% of annual spend) and represent key raw materials. All terroirs so identified have been subject to a full risk-mapping analysis exploring environmental and social issues. As part of the Group, Corby and Hiram Walker participate to ensure a detailed risk mapping of all key raw materials. This risk mapping process allows the company to assess environmental and social issues which includes the potential risk of forced labour and child labour occurrences, enabling targeted interventions and risk mitigation measures to be implemented effectively.
 - b. To this end, the Group aims to certify all its key raw materials according to recognised sustainability standards. The Group developed a benchmarking tool to help select the best standards, in line with its [Sustainable Agriculture Key Principles](#), while also allowing affiliates to develop their own standards with their local partners to best account for local specificities. All chosen standards must undergo verification by third-parties and are selected to cover most of the high and medium-risks identified through terroir risk mapping. During fiscal year 2024 the Group worked with its terroirs to identify tailored certifications, taking into account local cultures, work habits and the potential for transforming practices. Moreover, the Group updated and published its Sustainable Agriculture Key Principles. This document guides all affiliates with a set of best practices related to landscape management, biodiversity, plant health and soil life, water, human rights, and relations with suppliers. It also covers all the various contexts and agricultural systems as part of a continuous improvement process.
6. *Partnerships for human rights*
- a. From fiscal year 2018 to fiscal year 2022, the Group contributed to the United Nations’ Global Compact’s Decent Work in Global Supply Chains Action platform, an alliance of companies committed to upholding human rights and fundamental labour rights and principles. These

companies work through their supply chains, taking collective action to foster decent work conditions. This partnership has informed and contributed to the Group's own endeavours regarding the sustainability of its supply chain.

7. *Whistleblowing Mechanism*

- a. Corby and Hiram Walker maintain mechanisms such as a whistleblower program, [Speak Up platform](#), to address any breaches of policies or unethical conduct, underscoring our commitment to integrity and accountability in all business practices.
- b. The Speak Up platform plays a crucial role in fostering a culture of trust and transparency within our organizations. The Speak Up platform, calls on all employees and stakeholders to report any ethical concern as they may relate to practices or situations deemed contrary to, or inconsistent with the Code, associated policies, or any laws or regulations. Managed by the Legal and Compliance teams, Speak Up is a Group-wide system, which provides stakeholders a safe and confidential channel to report potential misconduct. It is hosted by an independent third party and available 24/7. Reports deemed to have been filed in good faith are investigated. If the allegations are deemed to be substantiated, the applicable company examines their severity and issues recommendations as to the appropriate mitigation, remediation and/or disciplinary measures against the offending party. Moreover, the Group has a zero-tolerance policy regarding retaliation against parties who, in good faith, have reported misconduct, made an allegation, or supported an investigation. The Group has led dedicated workshops on how to manage whistleblowing cases and conduct investigations. Such efforts are complemented by communications campaigns to raise awareness and educate employees on what can be reported and how alerts are processed.

8. *Contractual provisions*

Corby's Legal department maintains comprehensive records of all contractual agreements and parties on behalf of both Corby and Hiram Walker. The majority of supplier contracts include provisions for compliance with laws, enforcement, audit rights, and termination clauses in case of a material breach of contract. With minor exceptions, such provisions are typically included in new supplier contracts and renewals of contracts with existing suppliers.

9. *Disciplinary and corrective measures*

1. *Zero-Tolerance Policy*

- i) Should a breach of the Code be confirmed following an internal investigation, a wide range of remediations and mitigating measures may be decided by management, including disciplinary sanctions on any employee responsible for such misconduct. The Group promotes a zero-tolerance policy regarding breaches of internal rules and values and may – in accordance with local labour laws - decide to apply sanctions up to termination of employment.

2. *Supply Chain*

- i) As part of the Supplier Standards process, the Group has established mechanisms to address issues of forced labour and child labour effectively. Reports of violations related to supplier standards may be received through various channels, including supply chain audits, internal reporting systems including the Speak Up platform, external stakeholders, or media sources. The Group's Supplier Standards mandates suppliers to actively monitor and uphold compliance with the stipulated standards across their operations and related entities. Suppliers are obligated to share the Supplier Standards with all relevant parties and

promptly report any instances of non-compliance to designated channels within Pernod Ricard.

- ii) Upon receiving reports of violations, the cases are escalated to the Compliance department for further investigation and action as necessary. In cases where a supplier fails to adhere to the Supplier Standards, the Group reserves the right to enforce corrective measures. If a supplier persists in non-compliance or fails to implement corrective actions, the Group may decide, at its discretion and without further obligation, to suspend or terminate its relationship with the supplier, either partially or entirely.

4. Risk of forced labour or child labour being used and the steps we have taken to assess and manage that risk

Corby, Hiram Walker and Pernod Ricard recognize the inherent risks of forced labour and child labour within our global supply chains. Specifically, in sourcing goods from a supplier (wet and dry goods; POS; etc.), there is potential for risk of forced labour and child labour at processing facilities, plants, farms, vineyards, packing or other facilities, in addition to the transportation of the goods.

In fiscal year 2025, as part of the Group, Corby and Hiram Walker continued various measures to prevent and reduce the potential risk of forced labour or child labour within their operations and supply chain globally. These actions align with the companies' commitments to uphold human rights standards and ensure ethical practices throughout their business activities.

1. Governance

- a. Corby and Hiram Walker uphold a robust governance framework to ensure the effective implementation of ethical and sustainability initiatives. Oversight at the executive level is integral, with dedicated structures, such as a Legal department overseeing compliance, regulatory adherence and ethical practices. A specialized S&R Steering Committee and Supply Chain department play key roles in driving Corby and Hiram Walker's commitment to responsible business practices. Board-level supervision is provided by the Audit and Corporate Governance & Nominating Committees of Corby's Board of Directors and the Hiram Walker Board of Directors, tasked with overseeing enterprise risk management and regulatory compliance, amongst other things.
- b. The Group's risk management approach is increasingly informed by the Group's HRIA, launched following the Double Materiality Assessment conducted as part of European CSRD reporting. The HRIA strengthens the identification of actual and potential forced labour and child labour risks across upstream activities by mapping vulnerable worker groups, assessing severity and likelihood of impacts, and defining priority mitigation areas. Findings are used to guide prevention, mitigation and remediation actions and will progressively be integrated into supplier risk management processes and relevant policies.
- c. The Group's Human Rights Due Diligence framework is aligned with the UNGPs and is designed to ensure continuous identification, prevention, mitigation and accounting for risks related to forced labour and child labour across the value chain. This includes a risk-based approach that prioritizes high-risk geographies, commodities and supplier categories.

2. Awareness-Raising and Training:

Corby and Hiram Walker are dedicated to ensuring that employees are well-informed and trained to recognize and address issues related to environmental, social and governance ("ESG"),

including forced or child labour within our operations and supply chain (see section 7 below for more information). Supplier risk identification is conducted using a combination of internal tools and external data sources, including supplier geography, sector exposure, commodity risk profiles, and third-party intelligence. This enables prioritisation of higher-risk suppliers for enhanced due diligence, audits, and mitigation actions.

3. *Supply Chain Audits and Human Rights Assessments:*

- a. The Blue Source process (described above) is used throughout the Group for affiliates to apply a responsible procurement strategy locally within their supply chain. The Group has conducted assessments through its Human Resources' network to help affiliates raise awareness, identify gaps in human rights policy and develop appropriate action plans.
- b. The Group level HRIA findings are expected to progressively inform supplier segmentation and prioritization for enhanced due diligence, including deeper audits, targeted engagement and corrective action planning for suppliers linked to higher forced labour or child labour risks.

4. *Tracking and Monitoring:*

- a. Pernod Ricard has continued to raise awareness, communicate, and monitor its integrity reporting mechanisms, such as the Speak Up platform, to encourage employees to report any concerns related to ethical practices, including forced labour or child labour. Visual guidance and communication materials have been displayed across various company locations to emphasize the importance of reporting any violations.
 - a. Where potential or actual instances of forced labour or child labour are identified, cases are escalated to Human Resources and Security teams and logged in Intelix as part of the Group's "Security Incident Reporting". In coordination with this team, immediate and fair remedial action will be taken. Where applicable, corrective action plans are required from suppliers with defined timelines and follow-up monitoring. In cases of persistent non-compliance, the Group reserves the right to suspend or terminate the supplier relationship.

5. Remediation of forced labour or child labour and loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains

There have been no identified instances of forced labour or child labour in our activities or supply chain, nor any identified/reported instances of loss of income to vulnerable families that resulted from measures taken to eliminate the use of such forced labour or child labour. We have therefore not taken any measures to remediate these issues during the fiscal year ended June 30, 2025.

However, the Group has established remediation processes to address any potential cases should they arise. These include investigation and escalation through the Speak Up mechanism and Integrity Committee processes, with substantiated cases subject to appropriate corrective actions. These may include immediate cessation of the harmful practice, implementation of corrective action plans, disciplinary measures where relevant, and updates to internal policies or procedures to prevent recurrence.

Where supplier-related impacts are identified, corrective action plans are required with defined timelines and follow-up monitoring, and the Group reserves the right to suspend or terminate the supplier relationship in cases of persistent non-compliance.

The Group also maintains protections against retaliation for individuals reporting concerns in good faith, ensuring that all remediation processes are conducted in a safe and confidential manner.

6. Training provided to employees on forced labour and child labour

Corby and Hiram Walker are dedicated to ensuring that employees are well-informed and trained to recognize and address issues related to ESG, including forced or child labour within our operations and supply chain. The companies' commitments to human rights and ethical practices are embedded in the Code and Supplier Standards. As a global organization, Pernod Ricard entrusts its affiliates to adopt and promote these policies, with internal audit teams conducting evaluations during affiliate visits.

- a. The Code and related mandatory training course were refreshed in May 2023 to train employees through a 'learning by doing' approach. Employees across all Pernod Ricard entities, including Corby and Hiram Walker, were required to complete their Code training and confirm their compliance with the Code by end-December 2024. It also forms a mandatory part of the on-boarding process for new employees. The Code refers to the Group's Global Human Rights Policy, Supplier Standards and S&R Strategy and discusses working responsibly with third-parties, emphasizing the importance of respecting human rights and prohibiting forced labour and child labour practices within the organizations and their supply chains.
- b. As part of its Responsible Procurement process, Pernod Ricard makes several training tools available to employees in the procurement function. A mandatory "Responsible Procurement" e-learning which includes human rights topics, was launched in 2022. This e-learning is an integral part of the "iGrow Procure Program" which is a mandatory program over several months intended to upskill the procurement function and create a strong "PR Procure" community. The Responsible Procurement e-learning indicates what actions employees can take to mitigate risks with their

suppliers. For example, Pernod Ricard offers an online learning module covering all fundamental aspects of S&R applied to procurement, which includes interactive explanations of what "buying responsibly" means, why it is an important topic for the Group and how the employees can practice responsible procurement locally. In addition, other trainings are offered in various formats throughout the year, including individual calls with procurement teams, specific workshops and seminars to strengthen Pernod Ricard's affiliates adoption of the Blue Source process (described above).

- c. In fiscal year 2025, all employees at Corby and Hiram Walker were assigned a mandatory, one- hour Canadian Anti-Harassment Training in May 2025, with a completion deadline of August 2025. The Group recognizes that a safe, respectful and inclusive workplace is essential to supporting the rights of all individuals and is foundational to preventing all forms of exploitation. Consistent with that responsibility, all employees must complete mandatory training on our Company's harassment policies annually, which will provide the tools needed to identify inappropriate conduct, report it, and foster a respectful workplace. This new course has been designed to address situations faced in today's modern world.
- d. Other S&R related e-learnings are available to all employees with some being mandatory depending on the topic (for example, "Sustainability & Responsibility", "Health & Safety – Care by Learning", "Sustainable Packaging", "Nurturing Terroir").

7. Effectiveness assessments to ensure that forced labour and child labour are not being used in our business and supply chains

To reduce and prevent the risk of forced and child labour within our operations and supply chains, we assess the effectiveness of our actions to continuously improve our human rights program.

1. Assessments/Audits

The Group conducts reassessments of its high and medium-risk suppliers to identify areas for improvement and review the effectiveness of their action plans. Such assessments include: sustainability assessment using the EcoVadis platform around four key topics: environment, labour, ethics and supply chain; social and ethical audit standards in line with the SMETA (Sedex Members Ethical Trade Audit) standards and any other similar audits covering the same criteria of analysis. Please see section 3 for further details.

2. Supply Chain Audits and Human Rights Assessments

The Blue Source process (described above) is used throughout the Group for affiliates to apply a responsible procurement strategy locally within their supply chain. The Group has conducted assessments through its Human Resources' network to help affiliates raise awareness, identify gaps in human rights policy and develop appropriate action plans.

3. Governance & Enterprise Risk Management

The Code is reviewed and acknowledged annually. In addition, the Group Internal Audit department conducts periodic enterprise risk management audits with the objective to: understand Pernod Ricard affiliates', including Corby and Hiram Walker's, main risks; to prioritize and ensure measures are in place regarding our exposure to those risks; and to ensure the risks are considered when making future strategic decisions.

Approval and Attestation

This report was approved pursuant to subparagraph 11(4)(b)(ii) of the Act by the Board of Directors of Corby Spirit and Wine Limited for itself, Ace Beverage Group Inc., Ungava Spirits Co. Ltd., and The Foreign Affair Winery Limited and pursuant to subparagraph 11(4)(b)(i) of the Act by the Board of Directors of Hiram Walker & Sons Limited.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Lucio Di Clemente

Lucio Di Clemente
Chair of the Board of Directors
Corby Spirit and Wine Limited
May 25, 2026
I have authority to bind Corby Spirit and Wine Limited

Steve Moynahan

Steve Moynahan
Director & Vice President, North America Accounting
Hiram Walker & Sons Limited
May 25, 2026
I have authority to bind Hiram Walker & Sons Limited