

Document title:	Anti-Slavery & Human Trafficking Statement
Statement Aim:	The following statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Whyte and Mackay Group Limited's slavery and human trafficking statement for the financial year ending 31 December 2024.

1 Our Organisation

Whyte and Mackay Group Limited, a company registered in Scotland (SC221954), is home to an award-winning collection of Single Malt Whisky. Whyte and Mackay produce a portfolio of premium spirits in Scotland that are enjoyed around the world. We are the fifth largest Scotch whisky manufacturer in the world, with products distributed in over 100 countries.

Whyte and Mackay are headquartered in the heart of Glasgow, employing over 700 people and operating 8 sites across Scotland, including Production, Supply Chain, Distribution, our 5 distilleries, and a state-of-the-art bottling plant.

We are a part of the Emperador Inc. group, and our ultimate parent company is Alliance Global Group Inc. which has its head office in the Philippines.

2 Our Commitment

We have a zero-tolerance approach to modern slavery and human trafficking. We are committed to acting ethically and with integrity in all our business relationships and to implementing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our operations or supply chains.

3 Governance and Responsibilities

The Responsibility for this statement and our anti-slavery efforts rests with our Chief Executive Officer and Executive Team. Our HR team leads on policy development and process oversight, while our Procurement team supports supplier engagement and risk management.

All colleagues are encouraged to report concerns, and managers are expected to act promptly and appropriately. We operate a Whistleblowing Policy to support confidential reporting.

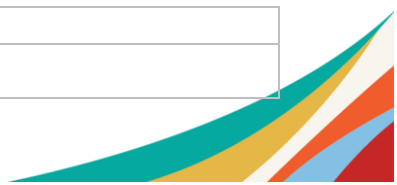
4 Supply Chains

Our supply chain spans raw materials, packaging, logistics, and services. We recognise that certain sectors and geographies carry higher risks of modern slavery. We require all new suppliers to complete a Supplier Declaration Document, confirming their commitment and what action has been taken within their organisation in relation to the prevention of modern slavery. This forms part of our onboarding process and is embedded in all new supplier agreements.

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We continue to explore opportunities to collaborate more closely with supply chain partners to share best practices and strengthen collective action against modern slavery.

5 Due Diligence and Risk Assessment

We undertook a risk assessment of our global supply chains, identifying where they extend into sectors and territories that are higher risk in terms of the potential presence of slavery and human trafficking. As part of our ongoing due diligence for new and existing suppliers we continually seek to identify any possible risks in these areas and take appropriate corrective action.

Our recruitment practices include right-to-work checks, identity verification, and reference checks. We expect the same standards from our agency partners.

6 Policies and Procedures

We have policies in place that reflect our commitment to ethical conduct and compliance with the Modern Slavery Act, including:

- Preventing Hidden Labour Exploitation
- Whistleblowing
- Anti-bribery and Corruption statement
- Gift and Hospitality policy
- Anti-Bullying and Harassment

These policies are reviewed regularly and communicated to colleagues.

7 Training and Awareness

A key part of Whyte and Mackay's modern slavery and human trafficking risk mitigation strategy is to promote a high level of understanding and awareness of the risks through training and colleague communication.

8 Monitoring Effectiveness

While we do not currently use formal KPIs to measure the effectiveness of our anti-slavery efforts, we continue to monitor our compliance regime and will strengthen it where appropriate. We are considering enhanced supplier auditing and improved data collection to support future reporting.

9 Progress and Developments in 2025

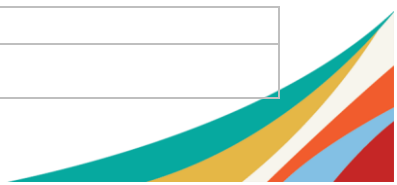
During 2025, Whyte and Mackay took further steps to strengthen our approach to preventing modern slavery and human trafficking:

- We met with a peer organisation of similar scale to share best practices and benchmark our approach.

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- We began updating our supplier onboarding process to enhance controls and ensure stronger compliance with anti-slavery standards.
- We are actively exploring a new accreditation framework with a 3rd party that will enable a more robust auditing of suppliers, with a focus on risk-based prioritisation and improved visibility across our supply chain.

These actions reflect our commitment to continuous improvement and collaboration in tackling modern slavery risks.



Bryan Donaghey

Chief Executive Officer
Whyte and Mackay Group Ltd

Date: 12 December 2025

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