

## II. Responsibility for the Code and Compliance

### To whom does this Code apply?

This Code refers to a number of policies and procedures in place within the Pernod Ricard Group. This Code and the policies referred to in this Code apply to all employees of the Group in addition to any similar policies in place within your affiliate. You are all expected to be familiar with this Code and also with any particular policies that apply to your function within Pernod Ricard.

As a global group, Pernod Ricard is subject to many laws, some of which apply to conduct in more than one country. By following the principles set out in this Code and in the Group's policies, you are helping Pernod Ricard comply with these laws.

### What if I am unsure about how the Code or a policy applies?

It's impossible for this Code to address every situation in your daily work that may pose you a legal or ethical problem. If you have a question and you can't find the answer in this Code, or have any other questions on how this Code or

one of the policies mentioned in this Code should be applied, seek help and guidance. There are a few people you can talk to:

- Your local in-house lawyer, your Regional legal director or the Group General Counsel.
- Your Line Manager or your Human Resources department.



You are all expected to be familiar with this Code.

## What do I do if I think someone is acting improperly?

If you have a serious good faith concern that any behaviour by an employee or third party is against this Code or any Group policies, **we encourage you to speak up.**

Who you speak to depends on the circumstances. In some cases, specific people need to be notified as set out in this Code. If not, you should think about talking to your Line Manager (N+1), your Human Resources department or someone from the Legal Department.

Pernod Ricard is committed to protecting employees that come forward to report issues in good faith. Such issues will be dealt with in confidence. We will not

accept any retaliation or discrimination against an employee who reports conduct that he or she believes violates this Code, a Group policy or the law.

## Who is responsible for this Code?

We are all responsible for complying with this Code and the policies referred to in this Code.

**The Legal Department** is responsible for implementing this Code, and **will also provide guidance to any employee who has a question about it.**

The Group General Counsel is responsible for maintaining this Code and for proposing to the Executive Board (*Bureau Exécutif*) amendments to the Code that

may be required as a result of changes in law or where it is necessary in order to protect the interests of Pernod Ricard. In the event that it is necessary or advisable for a compliance matter to be decided at the Group level, he or she should refer the matter to the Group General Counsel. As necessary, the Group General Counsel will convene the Group Executive Committee on Ethics for a resolution of the matter. The **Group Executive Committee on Ethics** is comprised of:

- The Group General Counsel;
- The Group Managing Director – Human Resources and Corporate Social Responsibility; and
- The Group Managing Director – Finance.

