

SUNTORY GLOBAL SPIRITS' GLOBAL CITIZENSHIP POLICY

At Suntory Global Spirits, corporate values are an essential element of continuing success in the marketplace. These values – integrity, leadership, teamwork and accountability – are vital to the success of the Company. The Company's corporate success is dependent on our reputation with our co-workers, suppliers, investors and the communities where we work and live. Suntory Global Spirits' Global Citizenship Principles support our corporate values by providing guidelines to ensure that the Company and its employees respect human rights, workplace safety and protection of the environment in every community where the Company is located. Suntory Global Spirits expects the same of our Company's suppliers and contractors so that we demonstrate our leadership within the business community together. Further, we enhance each of our brands, improve our ability to attract and retain the best talent, and provide better supply chain management and performance.

SUNTORY GLOBAL SPIRITS' GLOBAL CITIZENSHIP POLICY ELEMENTS

1. Working Conditions/Health and Safety
2. Child Labor
3. Forced Labor
4. Discrimination
5. Working Hours
6. Wages and Benefits
7. Environmental
8. Management Systems
9. Suppliers and Contractors

WORKING CONDITIONS/HEALTH AND SAFETY

- Employees must be provided with a safe and healthy working environment. The Company will take adequate steps, as appropriate, to reasonably minimize accidents and injuries within the workplace. The Company will provide adequate means of evacuation and train employees in emergency preparedness.
- Personnel should receive appropriate training on safety and health concerns in the workplace.
Such training should be documented and include newly hired and reassigned employees.
- If provided, the Company will ensure that dormitory facilities are clean, safe and meet the basic needs of employees

CHILD LABOR

- All workers must meet or exceed the local minimum age law requirements, but in no event shall workers under 15 years of age be employed. Depending on the nature of the work being performed, the Company may seek to limit employment to workers over 18 years of age.

FORCED LABOR

- The Company will not allow the use of forced, bonded or involuntary prison labor.

DISCRIMINATION

- The Company prohibits engaging in or supporting discrimination in hiring, remuneration, access to training, promotion, termination or retirement based on race, national origin, caste, sexual orientation, religion, age, gender, disabilities, political affiliation or veteran status.
- The Company respects employees' observance of tenets or practices relating to race, national origin, caste, sexual orientation, religion, age, gender, disabilities, political affiliation or veteran status.
- The Company prohibits behavior, including gestures, language and physical contact, that is sexually coercive, threatening, abusive or exploitative. These abuses include, but are not limited to, sexual harassment, corporal punishment, mental or physical coercion and physical abuse.
- The Company's position is that it is not necessary for a union to exist between the Company and its employees in order to establish terms of employment. However, the Company respects its employees' rights to enter into collective bargaining units and does not discriminate based on union membership.

WORKING HOURS

- The Company will comply with applicable local laws and industry standards on working hours; however, employees must not work more than 12 hours in a day and 6 days in a week for more than 3 consecutive weeks.

WAGES AND BENEFITS

- The wages and benefits offered to employees must meet or exceed the local legal minimum laws and standards.
- Deductions from wages will not be made for disciplinary purposes. However, suspensions without pay will be permitted when warranted.
- Employees must be provided with clear information about their wages and benefits on a regular basis.

ENVIRONMENTAL

- The Company will conduct its business such that it is in compliance with applicable environmental laws, norms and regulations.

- The Company promotes protection of the environment and the conservation of natural resources.

MANAGEMENT SYSTEMS

- Management will communicate this Policy to all employees. Any local policy must be consistent with the requirements set forth in this Policy.
- The management system shall include practices to include investigating, addressing and responding to the concerns of employees with regard to compliance with this Policy. The Company shall refrain from disciplining or otherwise discriminating against any employee for providing information in good faith concerning the Company's compliance with the Policy.
- Management will periodically review the adequacy, suitability and continuing effectiveness of the systems implemented to meet the requirements of this Policy. The Company will implement appropriate corrective actions to address any identified material non-conformance.

SUPPLIERS AND CONTRACTORS

- The Company will periodically evaluate select suppliers and contractors on their ability to demonstrate evidence of substantial conformance with this Policy, subject to local rules and customs.
- The Company will maintain reasonable evidence that this Policy is substantially being met by suppliers and contractors that have been evaluated, subject to local rules and customs. This evidence may include certification forms, written questionnaires, inspections or other appropriate documentation.