



BROWN-FORMAN

# LIVING OUR VALUES

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THE BROWN-FORMAN CODE OF CONDUCT

## LIVING OUR VALUES – INTEGRITY TRUST RESPECT TEAMWORK EXCELLENCE

### - ALCOHOL RESPONSIBILITY

Reputational Risk / Alcohol Abuse

### - ANTI-CORRUPTION AND GLOBAL TRADE

Books and Records / Third-Party Due Diligence / Facilitating Payments / Gifts / Imports, Exports and Trade Sanctions / Customs

### - ANTI-HARASSMENT AND ANTI-DISCRIMINATION

Diversity / Fair Employment Practices / Abusive Conduct

### - COMMUNICATING ON BEHALF OF B-F

Media Inquiries / Social Media

### - COMMUNITY RELATIONS

Building Goodwill / Professional Development

### - COMPETITION AND ANTITRUST

Fair Dealing / Improper Agreements / Competitive Intelligence

### - CYBERSECURITY

Phishing / Network Access / Secure Passwords

### - ENVIRONMENT

Sustainability / Pollution Prevention

### - FINANCIAL INTEGRITY

Accurate Recordkeeping / Expense Reporting / Anti-Money Laundering

### - HEALTH, SAFETY AND SECURITY

Injury Prevention / Workplace Violence Prevention

### - HUMAN RIGHTS

No Forced Labor/Third Party Due Diligence

### - INSIDER TRADING

Inside Information / Blackout Periods

### - POLITICAL ACTIVITIES

Personal / Lobbying

### - PRIVACY

Responsible Collection, Use, Management and Disposal / Data Breaches

### - PRODUCT QUALITY

Product Recall

### - PROTECTING ASSETS

Proprietary Information / Intellectual and Physical Property / Records Management

### - RESPONSIBLE ADVERTISING AND MARKETING

Transparency / Marketing Guidelines

### - WORKING WITH SUPPLIERS AND BUSINESS PARTNERS

Due Diligence / Conflicts of Interest / Human Rights / Gifts



## LIVING OUR VALUES

INTEGRITY, RESPECT, TRUST, TEAMWORK, AND EXCELLENCE ARE OUR CORE VALUES AND THE FOUNDATION FROM WHICH WE BUILD AND GROW—AND EVERY BROWN-FORMAN EMPLOYEE PLAYS A CRITICAL ROLE IN ENSURING THAT THE COMPANY’S ETHICAL FOUNDATION REMAINS FIRM.



Each and every day, I see our values in action. Being named one of the World’s Most Ethical Companies is a global recognition of our commitment to **integrity**. Our diversity and inclusion journey has elevated the importance of **respect**. **Trust** is non-negotiable in our relationship with business partners, consumers, and one another. **Teamwork** is essential to generating the best ideas and results. We strive for **excellence** in everything we do and being our best. Our core values are interconnected, and each one must be understood and applied to enable the enduring success of our company.

The events of the past two years have reinforced that when we live our values, the right decisions come more easily and those decisions, in turn, establish a clear path forward. In today’s dynamic and demanding business environment, there remain times when we will be tested. As we strive to ensure there is “Nothing Better in the Market” than Brown-Forman, we are fortunate to have our values guide our way.

With appreciation and respect,



Lawson Whiting  
Chief Executive Officer



## LIVING OUR VALUES (CONT.)

### THIS CODE IS THE FRAMEWORK FOR CONNECTING OUR VALUES TO THE JOB YOU DO EACH AND EVERY DAY.

Brown-Forman operates in a complex business environment, where it is important that each employee understands what is expected of them. Brown-Forman's Code of Conduct translates our core values into guidance that is relevant and important to any role. The Code of Conduct is not only a document, but a toolkit of resources, including policies, procedures, training, and access to subject matter experts. It is important that every employee understands the critical part they play in ensuring values drive our decisions.

When you sign the Code of Conduct each year, you are agreeing to:

- 1) Comply with the Code of Conduct and referenced policies;
- 2) Escalate potential code violations ("knot in the stomach" situations); and
- 3) Willingly Cooperate with an investigation of a code violation.

We take this responsibility seriously, and waivers of the Code are seldom permitted. Any waiver of the Code on behalf of an executive officer or a member of the Board of Directors must be approved by the Board or a designated Board Committee.

The standards are high, but we are starting from a position of strength. Internal anonymous survey responses demonstrate that 94% of employees agree or strongly agree that they use Brown-Forman's core values to make decisions, and that managers do as well. That is why we encourage you to consult with your manager or other B-F colleagues when you need help making decisions consistent with our values. Our shared values support our shared success.

If you have a question or concern regarding the Code of Conduct, my door is always open. You can also raise a concern anonymously by accessing [Ethicspoint](#). I want to assure you that Brown-Forman forbids retaliation in any form when issues are raised in good faith.

Thank you for your commitment to Brown-Forman.



**Jerry Kral**  
*Chief Ethics, Compliance  
 and Risk Officer*



## ALCOHOL RESPONSIBILITY

### WHICH STATEMENT REFLECTS OUR VALUES?

“I know alcohol responsibility is important to Brown-Forman. However, it’s not clear to me what I am expected to do, so I just focus on my work.”

“Although I’ve made a private and personal decision not to drink, I feel respected by my colleagues and business partners. At every Brown-Forman event, there is an array of alcohol-free drink options to choose from and no one ever asks why I’m not drinking alcohol.”



#### LEARN MORE

- [Alcohol Responsibility One-Pager](#)
- [Brown-Forman.com/responsibility](#)
- [Bystander Intervention Panel Discussion](#)
- [Consumer Research – Legal Drinking Age \(690\)](#)
- [Employee Assistance Program \(235\)](#)
- [Responsible Consumption and Service of Beverage Alcohol \(400\)](#)
- [Global Alcohol Responsibility Website](#)
- [Global Alcohol Responsibility Training](#)

Our mission is to empower mindful choices around beverage alcohol. We strive to create a responsible drinking culture both inside and outside of Brown-Forman, and we’re proactive to ensure everyone feels welcome and has a positive experience with Brown-Forman and our brands. We model responsible behaviors, abide by legal requirements and take action to prevent alcohol-related harm. We do this by engaging in initiatives such as the Pause Campaign, safe ride programs, brand programs, the SPIRIT ERG, education tools and partnerships with organizations working on alcohol responsibility.

As a Brown-Forman employee, you are a champion of responsibility. When our values are put into action, it helps ensure the long-term sustainability of Brown-Forman. If you choose to consume or serve alcohol in any setting, whether personal or business, you are expected to act responsibly. If you choose not to drink, we respect your choice. We encourage everyone to explore their unique relationship with alcohol and to take advantage of the educational tools and support provided through the SPIRIT ERG and other programs available through our Employee Assistance Program (EAP).

## ANTI-CORRUPTION AND GLOBAL TRADE

### WHICH STATEMENT REFLECTS OUR VALUES?

“My supervisor suggested offering an additional payment to help expedite the customs clearance process.”

“When a container is stuck at the border, we work with the authorities to understand the issue and address their concerns, even if it means product is delayed and incurs storage fees.”



#### LEARN MORE

Anti-Corruption (605)

Gifts and Hospitality Involving Business Partners and Other Third Parties (610)

Trade Laws Compliance (606)

Travel, Entertainment and Related Expense (660)

Anti-Corruption Training

Ethics and Compliance Website

Our success is based on the quality of our products and the hard work of our people. We do not exchange bribes or kickbacks, or engage in other corrupt behavior to advance our business. Each employee, officer and director must always strive to deal fairly with the Company’s customers, suppliers, competitors and employees. None should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice. We follow the laws of the countries where we operate, including import, export and customs laws, and if a local law or practice conflicts with our Code or our policies, we always follow the stricter standard.

Don’t offer or accept anything of value in exchange for a business favor. Remember, a bribe can be something other than cash – a gift, free product, meals or entertainment; even a trip could be considered a bribe if it’s offered in exchange for favorable treatment. If you’re not sure whether an offer is OK, check our policies or ask for guidance before you make or accept it.

We are responsible for the actions of those who represent us, so make sure our business partners and suppliers don’t offer or accept bribes either. Follow our due diligence procedures, and accurately record all payments and expenses. Take care to avoid even the appearance of impropriety, and speak up if you see or suspect bribery or corruption, in any form.

## ANTI-HARASSMENT AND ANTI-DISCRIMINATION

### WHICH STATEMENT REFLECTS OUR VALUES?

“My coworker was assigned to a special project because he is single – my supervisor assumed he could better handle the travel involved.”

“My supervisor invited me to work on a new project team based on my past performance.”

We believe that diversity and inclusion make better, stronger, more successful teams. We value and celebrate the unique contribution that every person brings to Brown-Forman, and we promote an open and inclusive culture where people – all people – are treated with fairness, dignity and respect.

Give everyone an equal chance to succeed. Maintain zero-tolerance for any form of abuse or harassment. And speak up about any breach of respect or any work-related decisions that are inconsistent with our values.



#### LEARN MORE

Equal Employment Opportunity (115)

Hiring, Promotion and Employment Classification (105)

Discrimination, Sexual Harassment and Other Harassment, and Retaliation Prevention (135)

Workplace Harassment Prevention for Managers

Workplace Harassment Prevention for Employees

## COMMUNICATING ON BEHALF OF B-F

### WHICH STATEMENT REFLECTS OUR VALUES?

“If I see bad information posted on social media about Brown-Forman, I always correct it. People should hear from someone who works here.”

“Whenever I speak about Brown-Forman on social media, I make it clear that my views are my own.”



#### LEARN MORE

Communications to Employees (405)

Communications, Corporate Image and Logo Use (410)

Social Media (704)

Statements to the Media (620)

We’re proud of the stellar reputation that generations of Brown-Forman employees have built, and we work hard to preserve it. One inadvertent comment to the press, one sarcastic blog post, one impulsive comment directed at a consumer – all can have serious repercussions for Brown-Forman and the reputation we’ve worked so hard to earn. That’s why we have designated individuals to serve as official Brown-Forman spokespersons.

Unless you are authorized to do so, don’t make any public statements on behalf of Brown-Forman. Forward inquiries to Corporate Communications to ensure that accurate and complete information is conveyed to the public, to regulatory authorities and others.

Be responsible in your use of social media. Make sure that any opinions you express are identified as your own, and not those of Brown-Forman. And don’t post anything that would violate our policies, such as confidential information or the logos of Brown-Forman or its affiliates.



## COMMUNITY RELATIONS

### WHICH STATEMENT REFLECTS OUR VALUES?

“I have important work projects that are due, but they will have to wait as my volunteer commitments come first.”

“I’m personally committed to nonprofits that align with my interests, and I balance my community service with my work priorities.”



#### LEARN MORE

[Guide to Nonprofit Board Service](#)

[Charitable Contributions Policy](#)

[Product Donation Guidelines](#)

[Solicitation of Employees \(425\)](#)

A vibrant and thriving community is core to Brown-Forman’s purpose of enriching the experience of life. We believe it is vital that we invest in the communities and locations where our employees live and work around the world by thoughtfully deploying our time, talent and resources. This approach to community relations reinforces Brown-Forman’s culture of caring, builds goodwill and engages consumers with our brands and even provides professional development for our employees to help us attract, retain and engage exceptional talent.

We collaborate with a variety of mission-driven organizations focused on enhancing intellectual and cultural living, ensuring essential living standards and empowering responsible and sustainable living. You are encouraged – but not required – to participate in Brown-Forman community relations initiatives that are the most meaningful for you. Take care to ensure that your participation doesn’t negatively affect the time, energy, passion and delivery of results you bring to your job.

## COMPETITION AND ANTITRUST

### WHICH STATEMENT REFLECTS OUR VALUES?

“When interviewing candidates who work for competitors, I try to get as much information about pricing and costs as possible.”

“A candidate I was interviewing tried to share a competitor’s pricing strategies. I told her it was proprietary and changed topics.”



#### LEARN MORE

[B-F Europe Legal Website](#)

We put our brands to the test in the marketplace and let our superior products – not unethical practices – drive our success. We follow competition and antitrust laws and compete fairly, knowing that any conduct that limits (or even appears to limit) competition can violate not only these laws, but our sense of what’s right.

Don’t let a casual conversation with other industry players turn into something improper or unlawful. Avoid any agreements with competitors that could restrict competition. Make sure we bid fairly in any competitive bidding situation. And, in gathering information about our competitors, use only lawful and ethical methods and publicly available sources.

## CYBERSECURITY

### WHICH STATEMENT REFLECTS OUR VALUES?

“The vendor I’m working with is on vacation and suggested I send some confidential contracts to him using WhatsApp. Since I need them reviewed immediately, I’ll prioritize speed over security and do as he suggests.”

“I got an email from my friend asking me to check out a cool video. I clicked on it and it showed me nothing. I realized that I fell for a phish! I contacted the IT Service Desk immediately and they were able to contain the malware.”



#### LEARN MORE

Corporate Mobile Device (720)

Data Incident Reporting (750)

Responsible Data Handling (740)

Data Privacy and Cyber Security Training

We are good stewards of data and conscientious about data security, ensuring our information and systems are protected from unauthorized access, modification or loss. The internet is filled with threats, from phishing emails to malicious websites. Careless activities online can put Brown-Forman at risk, so we err on the side of caution and contact IT Security if we become aware of any suspicious activity.

Observe good cybersecurity practices. Keep your password updated and secure. Never open emails from unknown senders or emails that are inconsistent in tone or subject matter, even if you believe the source. Don’t install unauthorized software, applications, hardware or storage devices on your Brown-Forman-issued device(s), and don’t conduct business over unauthorized applications or devices. Immediately report to IT Security any situation in which systems or data security may have been compromised.

## ENVIRONMENT

### WHICH STATEMENT REFLECTS OUR VALUES?

“While visiting a supplier, I saw some employees dumping waste into the sewer. Since they are our low-cost supplier, I decided not to say anything to my manager.”

“I had an idea that would reduce waste at our office so I told my manager about it and volunteered to help implement it. It’s a small improvement, but I wanted to do my part.”



#### LEARN MORE

[Environmental Performance \(685\)](#)

[Environmental Sustainability at Brown-Forman](#)

[Environmental Sustainability Website](#)

Caring for natural resources and the climate isn’t simply a business concern for us. From the fields that grow our grains, agave, and grapes, to the water we transform into our spirits, to the oak for our barrels, we depend on the earth’s bounty. We work diligently in all we do – from package design to office design, to transporting our products around the globe, and from waste reduction to reuse and recycling - we are committed to the environment that sustains us, caring for the resources we share with our community, and nurturing what we have for those that come after us.

Do your part to help us protect and conserve the natural resources we rely on. Comply with internal policies and procedures as well as local environmental laws and regulations. Cooperate with officials charged with enforcing regulations designed to protect and sustain our natural resources and environment.

## FINANCIAL INTEGRITY

### WHICH STATEMENT REFLECTS OUR VALUES?

**“I’m really busy and can’t find my receipts. I regularly use the missing receipt affidavit when filing my expense reports.”**

**“When I create my expense report, I verify that the entries are accurate and the required receipts are attached.”**

We manage our finances responsibly and rely on every employee – not just those in Accounting and Finance – to create and maintain records that are accurate and complete. Financial integrity ensures we meet our financial commitments and establishes confidence in our systems and reporting. It empowers us to make good business decisions that impact each one of us and drive Brown-Forman’s long-term success.

Be honest. Be transparent. Provide supporting documentation and obtain all necessary approvals. Whether you’re coding an invoice, filling out an expense report, or filing a financial statement or any other “record,” follow our internal controls and processes. Be alert for any suspicious financial transaction to guard against crimes like fraud, embezzlement and money laundering. And check our Records Management Policies to make sure you’re storing, managing and disposing of information properly.



#### LEARN MORE

- Code of Ethics for Senior Financial Officers
- Conflicts of Interest (600)
- Ethical Financial Conduct (640)
- Financial Authorization Guidelines
- Global Procurement (670)
- Petty Cash Funds (645)
- Records Management (615)
- Travel, Entertainment and Related Expense (660)
- Responsible Travel and Expense Management Training

## HEALTH, SAFETY AND SECURITY

### WHICH STATEMENT REFLECTS OUR VALUES?

“If I’m in a meeting during an emergency drill, I just continue with the meeting. I see no point in canceling my meeting when it is only a drill.”

“With the frequency of emergencies on the rise due to violence, natural disasters, or civil disturbances, I need to be prepared to act to protect myself and my team.”



#### LEARN MORE

[Health and Safety \(415\)](#)

[Workplace Aggression \(140\)](#)

[Crisis Management Website](#)

[Workplace Violence Awareness–Active Shooter Response Quick Reference](#)

[Workplace Violence: Awareness, Prevention and Response Training](#)

We recognize that our most important asset is our people. We have policies and procedures in place designed to keep Brown-Forman injury-free, but a healthy and safe work environment requires a team effort.

Observe safe work practices. Follow our policies and the law to reduce risk and to keep Brown-Forman in compliance with health and safety regulations. Speak up about any potential hazards, near misses or injuries. If you should experience a work-related injury, please contact HR, Risk Management or the Health and Safety Team for guidance as soon as possible. If you are unsure if something is risky, please contact Risk Management.

Keep our workplace violence-free, too, by being alert to what is going on around you and speaking up about any threats, intimidation, behaviors of concern or property damage. Follow all security policies for your location, especially those that relate to wearing your badge and escorting visitors.

## HUMAN RIGHTS

### WHICH STATEMENT REFLECTS OUR VALUES?

“I read in a news article that one of Brown-Forman’s suppliers was accused of unfair labor practices. The story didn’t mention Brown-Forman, so I assume I shouldn’t worry about it.”

“We are engaging a new branded merchandise supplier with manufacturing facilities in high-risk markets. To better understand if there are concerns from a human rights perspective, I escalated the proposed engagement to Compliance, and together we conducted appropriate due diligence before moving forward with the engagement.”



#### LEARN MORE

[Global Human Rights \(470\)](#)  
[Supplier Code of Conduct](#)  
[Human Rights Panel Discussion](#)

At Brown-Forman, we respect and support human rights in our workplace, in our relationships with business partners, and in our communities. We are a signatory to the United Nations Global Compact and are committed to operating in ways that are consistent with fundamental responsibilities in the area of human rights.

We value diversity and inclusion, and we strive to provide a healthy and safe workplace that is free from harassment, discrimination, aggression, and all forms of forced labor.

Due diligence on proposed business partners helps us mitigate human rights-related risk. We communicate our policies and expectations to our suppliers via our Supplier Code of Conduct and pursue partnerships with those who share our commitment to respecting human rights.

Remember that human rights risk is not limited to certain countries or types of engagements. Each of us is responsible for escalating concerns if we suspect or become aware of potential violations of human rights.

## INSIDER TRADING

### WHICH STATEMENT REFLECTS OUR VALUES?

“I just saw an internal report that said our sales were way up last month. It’s a good time for me to buy shares of Brown-Forman”

“I keep inside information confidential and I never buy or sell stock based on it.”



#### LEARN MORE

Corporate Disclosure Policy

Insider Trading (590)

Related Person Transactions (595)

Responsible Information Handling and Insider Trading Training

We recognize that we often possess material nonpublic (“inside”) information about Brown-Forman or companies with which we do business; we never take advantage of that. We’re in a position of trust, so we never buy or sell Brown-Forman stock based on this information or “tip” off others so they may trade. Insider trading is not only unfair and a violation of our Code, it’s illegal.

Make sure you know what kind of information is considered inside information and protect it. It can include news or information about a merger or acquisition, significant new products, business performance, earnings guidance or other events that may impact Brown-Forman’s stock price.

If you’re not sure if information is considered inside information, ask before trading. If you’re not sure if information has been released to the public, treat it as though it is still confidential. And if you are subject to a trading window or blackout period, don’t trade until the restriction has been lifted.



## POLITICAL ACTIVITIES

### WHICH STATEMENT REFLECTS OUR VALUES?

“While at work, I am asking my colleagues to donate money to candidates from the political party I support.”

“At a recent school board meeting, the mayor asked me about Brown-Forman’s position on a controversial local tax proposal. I told her that I was unable to speak on behalf of the company and referred her to Brown-Forman’s Public Affairs office.”



#### LEARN MORE

[Social Media Policy \(704\)](#)

[Political Involvement Training](#)

Brown-Forman recognizes that employees have personal views and that there are sure to be differing political perspectives between employees. In the spirit of living our core value of “respect,” the best advice is for personal discussion on political topics to occur outside the work environment, and on your personal time.

We encourage employee involvement in their communities. We believe our employees’ politics are their own choice and must remain separate from the work they do for Brown-Forman. Brown-Forman’s political activity is managed by Public Affairs, and only Public Affairs is authorized to engage in any type of political activity on behalf of Brown-Forman. In any of your civic or political activities, ensure that you’re not giving the impression that your actions or opinions represent Brown-Forman.

If you decide to become a candidate for public office, talk to your manager to ensure that your political activities will not impact your ability to do your job, and inform the Public Affairs office. Brown-Forman cannot fund your political activity, either directly or indirectly, so Brown-Forman will not reimburse you for expenses or contributions to candidates. Additionally, using Brown-Forman’s resources, such as email, copiers, postage or phones for political campaigning, regardless of the candidate or issues involved, is prohibited by law. Laws governing political activities are complex, please reach out to Brown-Forman’s Public Affairs office for assistance.

## PRIVACY

### WHICH STATEMENT REFLECTS OUR VALUES?

“When reaching out to our promotional contractors, I send group emails. I put transparency and efficiency over concerns for privacy.”

“My sister is starting up a new business and asked for names and email addresses of attendees at a recent promotion. I told her I couldn’t provide that information.”



#### LEARN MORE

Data Incident Reporting (750)

Employee Records and Employee Privacy (100)

Records Management (615)

Responsible Data Handling (740)

Employee Privacy Notices

Data Privacy and Cyber Security Training

We respect the privacy of our consumers, coworkers, business partners and suppliers and handle their personal information with care and in accordance with applicable laws. We recognize the sensitivity of this information and the critical responsibility we have to collect, store, use, share and dispose of their personal data in a way that won’t put it at risk.

Know the kind of information that’s considered “personal information.” Use it in the way it’s supposed to be used, follow our data handling policies when handling it, and don’t share it with anyone – inside or outside of Brown-Forman – who doesn’t have a legitimate business need for it. Be proactive. Report any suspected data breaches to the Privacy Compliance Officer.

## PRODUCT QUALITY

### WHICH STATEMENT REFLECTS OUR VALUES?

“I have so many deadlines to make, even if it puts quality at risk, I’ve got to take this shortcut just to get it all done.”

“There may be an issue with one of the bottling processes at my facility. I’ll let my supervisor know right now, so it can be looked into.”



#### LEARN MORE

Product Recall Policy

George Garvin Brown raised the bar in our industry when he introduced the first bottled whiskey in 1870. That passion to innovate and the drive to assure quality are at the core of who we are as a company, and in the 150 years that followed, quality, craftsmanship and authenticity have guided everything we do.

As Jack Daniel said, “Every day we make it, we make it the best we can.” Do your part to make sure our brands meet or exceed our internal standards as well as the standards set by laws, regulations and our industry. Be sure to monitor quality across our entire supply chain, too. If you become aware of anyone or anything compromising the integrity of our product, share your concerns immediately with your manager.

## PROTECTING ASSETS

### WHICH STATEMENT REFLECTS OUR VALUES?

“My cousin wants to use a modified version of the Jack Daniel’s label as the logo of his new landscaping business. I told him that would be a great way to show support for the brand.”

“My friend asked me for a jpeg of the Old Forester label so she can sell personalized labels online. I know our logos and labels are Brown-Forman’s (or our affiliate’s) intellectual property so I told her I could not provide it.”



#### LEARN MORE

Communications, Corporate Image and Logo Use (410)

Conflicts of Interest (600)

Data Incident Reporting (750)

Employee Records and Employee Privacy (100)

Hunting Counterfeits Video

Records Management (615)

Responsible Data Handling (740)

Data Privacy and Cyber Security Training

We passionately protect all of the things that make us Brown-Forman. From intellectual property (like trademarks, trade secrets and business methods) and information assets (like marketing plans, product costs and pricing plans) to technology and tools (like our networks and data) and physical assets (like your Brown-Forman-issued smartphone), we believe all serve to give us a competitive advantage in the marketplace. Conversely, theft, carelessness and waste have a direct impact on the Company’s profitability and threaten its competitive advantage. To guard against such negative impacts, employees, officers and directors must protect the Company’s assets and ensure their efficient use for legitimate business purposes.

Remember that one breach, one misstep, one unfortunate choice – even if unintentional – can provide our competitors with an advantage, harm our reputation and erode the trust of our stakeholders and consumers. Employees, officers and directors are required to maintain the confidentiality of information entrusted to them by the Company or its customers, except when disclosure is authorized or legally mandated. Confidential information includes all nonpublic information that might be of use to competitors, or harmful to the company or its customers, if disclosed. Do not share confidential information with anyone outside of Brown-Forman and only share with those inside Brown-Forman who need to know. Similarly, employees, officers and directors may not (a) take opportunities for themselves that are discovered through the use of corporate property, information or position; (b) use corporate property, information, or position for personal gain; or (c) compete with the company. Employees, officers and directors owe a duty to the company to advance its legitimate interests when the opportunity to do so arises.

Disposing of assets is just as important as keeping them safe. Check our Records Management Policies to make sure you’re storing, managing and disposing of information properly.

## RESPONSIBLE ADVERTISING AND MARKETING

### WHICH STATEMENT REFLECTS OUR VALUES?

“We’re sending an email newsletter to consumers and we’d like to include a few photographs. I’m assuming everyone depicted is of legal drinking age, but I can’t really be sure.”

“Before I send out any type of communication, whether it’s for employees or consumers, I make sure anyone depicted in photographs is of legal drinking age.”



#### LEARN MORE

Social Media Policy (704)

Brown-Forman Marketing Guidelines

Distilled Spirits Council (DISCUS) Code of Responsible Practices for Beverage Alcohol Advertising and Marketing

We are committed to selling our products to adults of legal drinking age in a manner that is both responsible and appropriate. To meet this commitment, we are fair, truthful and transparent in our marketing and advertising, and we comply with laws as well as industry guidelines and standards in all countries where we do business when it comes to brand advertising, consumer communications, promotional events, packaging, labels, and distribution and sales materials.

If your job responsibility includes marketing or advertising our brands, follow both the letter and the spirit of our policies and all applicable guidelines.

Be sure to seek help anytime you’re unsure about what’s required.

## WORKING WITH SUPPLIERS AND BUSINESS PARTNERS

### WHICH STATEMENT REFLECTS OUR VALUES?

“Once I conduct my due diligence in selecting a supplier or business partner, I rest assured and never bother checking to see if anything may have changed.”

“I do my best to choose suppliers and business partners that share our values. Then I monitor them to ensure they live up to their reputation.”

We recognize that ethical partnerships – ones built on trust, transparency and mutual respect – are a key part of our success. So we choose business partners and suppliers who meet their contractual obligations, honor our values and maintain high business standards. Brown-Forman can be held responsible for the actions of its business partners and suppliers, so it’s critical to know who we are engaging with and for what purpose.

Source responsibly. Make decisions based on objective factors like quality, price and reliability, and do so in a transparent manner.

Be especially alert to potential conflicts of interest, human rights abuses and acts of bribery and corruption – any conduct that reflects poorly on our partners, reflects poorly on us. Report all potential conflicts immediately.



#### LEARN MORE

Conflicts of Interest (600)

Gifts and Hospitality Involving Business Partners and Other Third Parties (610)

Global Human Rights (470)

Global Procurement (670)

Supplier Code of Conduct

Travel, Entertainment and Related Expense (660)

## DIRECTORY OF RESOURCES

### POLICIES, PROCEDURES, GUIDES AND WEBSITES

Alcohol Responsibility One-Pager

Anti-Corruption (605)

[Brown-Forman.com/responsibility](https://www.brown-forman.com/responsibility)

[Brown-Forman Europe Legal Website](#)

[Brown-Forman Marketing Guidelines](#)

Charitable Contributions Policy

Code of Ethics for Senior Financial Officers

Communications, Corporate Image and Logo Use (410)

Communications to Employees (405)

Conflicts of Interest (600)

Consumer Research – Legal Drinking Age (690)

Corporate Disclosure Policy

Corporate Mobile Device (720)

Crisis Management Website

Data Incident Reporting (750)

Discrimination, Sexual Harassment and Other Harassment, and Retaliation Prevention Policy (135)

Distilled Spirits Council (DISCUS) Code of Responsible Practices for Beverage Alcohol Advertising and Marketing

Employee Assistance Program (235)

Employee Privacy Notices

Employee Records and Employee Privacy (100)

Environmental Performance (685)

Environmental Sustainability at Brown-Forman

Environmental Sustainability Website

Equal Employment Opportunity (115)

Ethical Financial Conduct (640)

Ethics & Compliance Website

Financial Authorization Guidelines

Global Alcohol Responsibility Website

Gifts and Hospitality Involving Business Partners and Other Third Parties (610)

Global Human Rights (470)

Global Procurement (670)

Guide to Nonprofit Board Service

Health and Safety (415)

Hiring, Promotion and Employment Classification (105)

Insider Trading (590)

Petty Cash Funds (645)

Product Donation Guidelines

Product Recall Policy

Records Management (615)

Related Person Transactions (595)

Responsible Consumption and Service of Beverage Alcohol (400)

Responsible Data Handling (740)

## DIRECTORY OF RESOURCES

### POLICIES, PROCEDURES, GUIDES AND WEBSITES

Social Media (704)

Solicitation of Employees (425)

Statements to the Media (620)

Supplier Code of Conduct

Trade Laws Compliance (606)

Travel, Entertainment and Related Expense (660)

Workplace Aggression (140)

Workplace Violence Awareness–Active Shooter Response Quick Reference

### TRAINING

Anti-Corruption Training

Bystander Intervention Panel Discussion

Data Privacy and Cyber Security Training

Global Alcohol Responsibility Training

Hunting Counterfeits Video

Human Rights Panel Discussion

Political Involvement Training

Responsible Information and Insider Trading Training

Responsible Travel and Expense Management Training

Workplace Harassment Prevention for Employees

Workplace Harassment Prevention for Managers

Workplace Violence: Awareness, Prevention and Response Training

### CONTACTS

Anti-Corruption Compliance Officer

Antitrust Compliance Officer

Chief Accounting Officer

Chief Information Security Officer

Chief Ethics, Compliance and Risk Officer

Director of Environmental Health and Safety

Director of External Communications

Director of Global Community Relations

Director of Global Security

Director of Global Environmental Sustainability

Equal Employment Opportunity Compliance Officer

Global Alcohol Responsibility Manager

Global Director of Corporate Health, Safety and Crisis Management

Global Director of Quality Assurance

Global Public Affairs Director

Human Resources

Intellectual Property Compliance Officer

Privacy Compliance Officer

Securities Law Compliance Officer

Trade Regulations and Marketing Practices Compliance Officer



**TALK**  
To your  
Line Manager



**CONTACT**  
EthicsPoint to  
share your concern  
anonymously by  
phone or email

**ENGAGE**  
With Jerry Kral  
directly by phone  
at +1-502-774-7839  
or email at  
[ethics@b-f.com](mailto:ethics@b-f.com)



**REACH OUT**  
To HR, Internal Audit or  
any Senior Leader



Brown-Forman prohibits retaliation against employees who report acts inconsistent with our core values and Code of Conduct.

