



BROWN-FORMAN

LIVING OUR VALUES

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

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Due Diligence / Conflicts of Interest / Human Rights / Gifts



DIRECTORY OF RESOURCES

LIVING OUR VALUES

I BELIEVE THAT “LIVING OUR VALUES” IS WHAT SETS BROWN-FORMAN APART FROM OTHER COMPANIES.

At Brown-Forman, our values are much more than words on paper. From the very beginning, our founder, George Garvin Brown, demonstrated our core values – Integrity, Trust, Respect, Teamwork and Excellence – when he introduced the first bourbon to be sold in sealed glass bottles back in 1870. We continue to uphold these values today, in every aspect of our business and in every market around the world.

Since our company was founded, our values remain our true north, guiding every action we take, every relationship we make and every brand we build. Our values are the primary driver of our strong corporate culture, and one of the reasons for our long-running success.

“Living Our Values” is not always easy. There may be times when short-term business gains tempt us to violate our Code of Conduct. In these moments, I encourage you to stop and reconsider your actions or ask for guidance. Rest assured, you have my support and the support of the Executive Leadership Team to live our values above all else. And if you see someone who does not seem to be living our values, I trust you to share your concerns.

Each day, wherever you work, please remember to uphold our values and our Code of Conduct. I believe that if each and every one of us lives our values, Brown-Forman will thrive and endure for another 150 years and beyond.

Thank you for your commitment to living our values each and every day.



Lawson Whiting
Chief Executive Officer



LIVING OUR VALUES (CONTINUED)

THIS CODE IS YOUR RESOURCE, YOUR STARTING POINT FOR CONNECTING OUR DEEP-ROOTED VALUES TO THE JOB YOU DO EACH AND EVERY DAY.

Use this Code as your reference. It doesn't have the answer to every question you may face, but it will guide you to the right questions to ask and the right place to go for more guidance. In every situation, make sure the action you're contemplating reflects our values. Ask yourself: Is it legal? Is it consistent with our values? Would you be proud to share the decision on social media or with family and friends?

We expect all our employees, as well as members of our Board of Directors, to live our values and make decisions that will preserve the trust that others have placed in us. We also expect suppliers and other business partners who conduct business on our behalf to follow the spirit of our Code.

We believe that when one person violates our Code, it affects us all. So, we take violations seriously. Anyone who is proven to violate our Code, our policies or the law (or fails to report a violation) will face disciplinary action, which may include termination. Waivers of our Code for Executive Officers or Directors may only be granted by the Board, or an authorized Committee of the Board, and will be promptly disclosed where required.

In addition to the resources listed throughout the Code, [EthicsPoint](#) provides a confidential means for you to share your concerns. We prohibit retaliation against anyone who makes a good faith report or assists in an investigation into alleged misconduct. Regardless of whom you contact, you can be confident that you're doing the right thing.

Thank you for living our values as you grow yourselves, your team and Brown-Forman.



Jerry Kral

*Chief Ethics, Compliance
and Risk Officer*

Jerry_Kral@b-f.com



ALCOHOL RESPONSIBILITY

WHICH STATEMENT REFLECTS OUR VALUES?

“At a team event, I ordered several rounds of shots for everyone. This is a fun industry and I want all of us to have a good time. And it’s a great way to do teambuilding!”

“If I host an event where alcohol is served, I ensure no one under-age is served alcohol, offer non-alcoholic beverages, serve plenty of food, have water available and offer safe ride options.”



LEARN MORE

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

Consumer Research – Legal Drinking Age (690)

Employee Assistance Program (235)

[OurThinkingAboutDrinking.com](https://www.ourthinkingaboutdrinking.com)

Responsible Consumption and Service of Beverage Alcohol (400)

[Responsibility.org](https://www.responsibility.org)

Responsibility Toolkit

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 safe ride programs, brand campaigns, the SPIRIT ERG, education tools and partnerships with organizations working on alcohol responsibility.

Be a champion of responsibility, put our values into action and help 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 behave responsibly. If you choose not to drink, for whatever reason, we respect your choice. If you feel you have an unhealthy relationship with alcohol, please take advantage of employee support through mechanisms such as 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 \(610\)](#)

[Travel, Entertainment and Related Expense \(660\)](#)

[Anti-Corruption Training](#)

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. 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.”



LEARN MORE

Equal Employment Opportunity (115)

Hiring, Promotion and Employment Classification (105)

Sexual Harassment and Other Harassment (135)

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.

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.”



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Communications to Employees (405)

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 the corporate communications team 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.”



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Brown-Forman Guide to Nonprofit Board Service

Matching Contributions – Educational Institutions (630)

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.”

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?

“I’ve used the same password for years – I just change out the last digit when it’s time to reset. It’s easy for me to remember and I use it on all of my devices.”

“I received an email with a link to reset my password. I didn’t recognize the sender, so I asked IT about it first.”



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Data Incident Reporting (750)

Information Security (760)

Responsible Data Handling (740)

Responsible Data Handling 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 know the source. Don’t install unauthorized software, applications, hardware or storage devices on your Brown-Forman-issued device(s), and don’t access our network through unauthorized applications or devices. Immediately report to IT Security any situation in which data security may have been compromised or consumers’ personal information may have been stolen.

ENVIRONMENT

WHICH STATEMENT REFLECTS OUR VALUES?

“One of our pollution control devices broke, but my supervisor told me to keep the line running. I knew it was wrong, but I always do whatever she asks me to do.”

“We had a breakdown that caused a hazardous material to spill on the floor. It was small, but I contacted my supervisor right away.”



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[Brown-Forman.com/environmental-sustainability](https://brown-forman.com/environmental-sustainability)
Environmental Performance (685)

We rely on the natural world for the high-quality ingredients we use to create our premium brands, including grains, grapes, agave, clean water and white oak. Being good stewards of the environment is part of who we are, and a critical part of Building Forever. 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 – to sustain the natural world that serves us so well.

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?

“My manager knows me well and is OK if my expense report is missing a few details or receipts.”

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



LEARN MORE

- Code of Ethics for Senior Financial Officers
- Ethical Financial Conduct (640)
- Financial Authorization Guidelines
- Indirect Purchasing (672)
- Petty Cash Funds (645)
- Records Management (615)
- Travel, Entertainment and Related Expense (660)

- Responsible Travel and Expense Management Training

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 filling out a sales order or 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.

HEALTH, SAFETY AND SECURITY

WHICH STATEMENT REFLECTS OUR VALUES?

“Even though I’m not a qualified mechanic, sometimes I just do a quick fix of malfunctioning equipment because asking for help usually takes too long and slows down production.”

“Whenever a health and safety concern comes up, I reach out to my manager – together, we come up with a safe and productive solution.”



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Safety (415)

Workplace Aggression (140)

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. Working together to keep everyone safe and secure at work is critical to our future success.

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.

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

INSIDER TRADING

WHICH STATEMENT REFLECTS OUR VALUES?

“I overheard a senior leader mention a possible merger – it’s a good time for me to buy shares of Brown-Forman stock.”

“If I overhear inside information that doesn’t relate to my job, I keep it confidential, and never buy or sell stock based on it.”



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Corporate Disclosure Policy

Insider Trading (590)

Related Person Transactions (595)

We recognize that we’re often insiders and 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 when it comes to this information, so we never buy or sell Brown-Forman stock based on it 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 the kind of information considered inside information and protect it. It can include news or information about a merger or acquisition, significant new products, 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 hasn’t been. 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?

“I’m using Brown-Forman’s copiers to run 500 flyers for my friend who is running for public office.”

“I want to support a friend of mine who’s running for local political office, and I plan on using my evenings and Saturdays to volunteer.”



LEARN MORE

Telephone / Email for Personal Business (650)

We know that people who work for Brown-Forman are engaged in their communities, and many are politically active. We believe our employees’ politics are their choice and so should remain separate from the work they do for Brown-Forman. Brown-Forman political activity is managed by Government Affairs, and only Government Affairs is authorized to engage in any type of political activity on behalf of Brown-Forman.

Make sure your political activity is legal, that it does not interfere with your work and that you’re not giving the impression that your actions represent Brown-Forman. By law, Brown-Forman cannot fund your political activity, either directly or indirectly, so Brown-Forman will not reimburse you for expenses or contributions to candidates. Using Brown-Forman’s resources, such as email, copiers, postage or phones for political campaigns is also prohibited by law.

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)

Electronic Communications (705)

Employee Records and Employee Privacy (100)

Records Management (615)

Responsible Data Handling (740)

Responsible Data Handling 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.”



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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 nearly 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?

“I often let my brother use pictures from our advertising campaigns on his photography website.”

“A friend asked for a jpeg of the Jack Daniel’s logo to make t-shirts to sell. I know our logos are Brown-Forman’s (or our affiliates’) intellectual property, so I told him I couldn’t provide it.”



LEARN MORE

Communications, Corporate Image and Logo Use (410)

Data Incident Reporting (750)

Employee Records and Employee Privacy (100)

Records Management (615)

Responsible Data Handling (740)

Responsible Data Handling 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.

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. Be a good steward. Do not share confidential information with anyone outside of Brown-Forman and only share with those inside Brown-Forman who need to know. Use our assets in the way they’re meant to be used. And protect all of our assets from misuse, mishandling, fraud and theft.

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.”

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.



LEARN MORE

[Brown-Forman Marketing Guidelines](#)

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

[International Alliance for Responsible Drinking \(IARD\) Guiding Principles: Self-Regulation of Marketing](#)

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

Corporate Purchasing Guidelines (670)

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

Global Human Rights (470)

Indirect Purchasing (672)

Supplier Guiding Principles with Respect to Human Rights Travel, Entertainment and Related Expense (660)

U.S. Procurement / Purchasing Policy with Respect to Minority Supplier Purchases (671)

DIRECTORY OF RESOURCES

POLICIES, PROCEDURES, GUIDES AND WEBSITES

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[Brown-Forman.com/environmental-sustainability](#)

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DIRECTORY OF RESOURCES

POLICIES, PROCEDURES, GUIDES AND WEBSITES

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Workplace Aggression (140)

TRAINING

Anti-Corruption Training

Responsible Data Handling Training

Responsible Travel and Expense Management Training

CONTACTS

Anti-Corruption Compliance Officer

Antitrust Compliance Officer

Chief Accounting 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 Government Relations

Director of Global Security

Equal Employment Opportunity Compliance Officer

Global Alcohol Responsibility Manager

Global Director of Corporate Health, Safety and Crisis Management

Global Director of IT Security

Global Director of Quality Assurance

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

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.

