



In compliance with Section 54 of the Modern Slavery Act 2015, this annual statement outlines the steps that the Whirley-DrinkWorks! Family of Brands has taken, and is continuing to take, to ensure that modern slavery, human trafficking, and other human rights violations are not occurring within our business or supply chain.

Our Commitment

Whirley-DrinkWorks! uses fair employment practices and strives to provide a safe and productive work environment for its employees and contract workers. The company expects its suppliers to also maintain fair employment practices— specifically:

1. Fair working conditions
 - a. Suppliers are expected to adhere to relevant national, state, and regional employment laws, including those related to maximum hours of daily labor, rates of pay, minimum age, privacy, and other fair working conditions.
 - b. Communication must be available for employees in their native language.
 - c. Employees must be permitted to leave the premises at any time.
2. Humane treatment
 - a. Equal treatment is required for all employees.
 - b. Discriminatory treatment, abuse, or harassment, whether consciously or unconsciously, will not be tolerated.
 - c. It is suggested that employees be able to adjust their schedules to accommodate freedom of religious expression.
 - d. Employees should be provided the freedom of association.
3. Child labor will not be tolerated in our supply chain.
 - a. Employees cannot be less than 15.
 - b. Employees may not be less than region's age minimum.
 - c. An ID verification system must be in place.
 - d. A remediation plan is required to be in place, in case an employee is hired in error and is below the minimum age.
 - e. Suppliers are encouraged to provide special protection for young workers, ages 15-17, including:
 - i. No exposure to toxic materials
 - ii. Health checks provided
 - iii. No heavy lifting
 - iv. No night hours for students
 - v. No over-time hours

vi. An agreement should be in place between the student (employee), school, and factory

vii. The wage should be same as other employees with same duties

4. Freedom of engagement

a. There is a zero-tolerance policy for the use of slavery, servitude, bonded labor, forced or compulsory labor, human trafficking, or involuntary prison labor.

b. Personal documents belonging to the employees will not be kept by the employers. Workers must have access to their passports and other documents at any time.

5. Working hours

a. Productivity generally goes down if there is excessive over-time, and therefore, it is suggested that work hours be capped at 60 hours per week. Employees should not be penalized for failure to work over-time hours.

b. Employees are encouraged to have one day off per week.

c. Employees must have reasonable break times, suggested at a minimum of 20 minutes

d. Employees should be offered reasonable sick leave without job loss, and must at a bare minimum meet regional requirements.

6. Wages and benefits

a. All employees must know what they are being paid.

b. Workers must be paid for any required activities.

c. Minimum wages for the region must be paid, at a minimum.

7. Diversity: Suppliers are asked to exercise diversity when selecting employees and subcontractors

Our Structure and Supply Chain

The Whirley-DrinkWorks! Family of Brands provides goods and services globally and works with trusted suppliers.

Policies and Due Diligence

We have implemented the following policies and procedures to combat modern slavery and human trafficking:

1. Code of Conduct – A document outlining our expectations for ethical behavior by all employees and suppliers will be distributed to all suppliers.
2. Legal Compliance - We expect our suppliers to comply with all applicable laws, including laws relating to employment, human rights, the environment, and health and safety. Whirley-DrinkWorks! reserves the right to decline to deal with suppliers who do not comply with the law.

3. Supplier visits – New foreign suppliers and their associated manufacturing facilities will be visited by a third-party consulting team retained by the Whirley Family of Brands or by an authorized employee of the Whirley Family of Brands. During the visits, the representative will review the business practices of the supplier, safety and social compliance measures and adherence, manufacturing capabilities, quality, and their supply chain partners. Social, environmental, and technical performance standards will be discussed and agreed upon, in addition to other general business terms and conditions. Frequent international on-site in process inspections will be performed by our own independent audit team, who is trained to look for red flags.
4. Good Manufacturing Practices (GMP) Compliance - Factories are expected to follow GMP, and may be required to participate in annual audits, depending on customer requirements. All representatives of the Whirley Family of Brands will vigilantly review GMP adherence during any site visit. Concerns shall be addressed with the supplier immediately.

Training and Awareness

We provide training to employees, particularly those involved in procurement and supply chain management to ensure they can identify and respond to modern slavery risks. They also receive copies of our Supplier Code of Conduct and International Trade Policies to reference and adhere to, and appropriate corrective measures will be agreed upon and executed.

Continuous Improvement

In the past year we have:

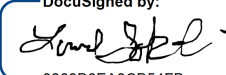
1. Established and published Supply Chain Guiding Principles and Social Responsibility policies.
2. Enhanced our supplier monitoring processes to improve transparency.
3. Established a Human Rights Risk Assessment audit and associated processes.

In the next year we will:

1. Increased training and awareness programs across our organization.
2. Increased training and awareness programs with our suppliers.

This statement has been approved by the Whirley-DrinkWorks Family of Brands Board of Directors and will be reviewed and updated annually.

Whirley Family of Brands Board of Directors Representative
January 20, 2025

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