



Responsible Lobbying Policy

Purpose

The purpose of this policy is to ensure that Maker's Mark's engagement in public policy, political affairs, and lobbying activities is transparent, ethical, science and data-based, and aligned with Maker's Mark's commitment to creating positive social and environmental impact.

Scope

This policy applies to:

- All employees, officers, directors, and contractors acting on behalf of Maker's Mark.
- All lobbying activities conducted directly by Maker's Mark.
- Participation in trade associations, business coalitions, industry groups, chambers of commerce, and other intermediary organizations engaged in lobbying activities on behalf of their members.

Principles of Responsible Lobbying

Positive Impact Commitment

Maker's Mark will engage in lobbying activities only when it believes such activities contribute to positive social and/or environmental outcomes and are consistent with Maker's Mark's purpose, values, and sustainability commitments. Maker's Mark will not advocate for policies that knowingly undermine human rights, environmental protection, public health, or the public interest.

Maker's Mark's Purpose is: Honoring our founders' vision and the generations of makers who shaped us, we craft the world's most flavorful bourbon by empowering our team, investing in our community, and leading the transition to regenerative agriculture—ensuring our collective craft betters the world for generations to come.

Maker's Mark will use its unique brand footprint to focus on:

1. Regenerative Agriculture and Regional Soil Infrastructure- advocating for the widespread adoption of regenerative farming practices and development of robust soil health infrastructure.
2. Forestry Preservation & Biodiversity- supporting sustainable forestry initiatives and white oak reforestation efforts.
3. Hospitality and Community equity- promoting workforce resilience, independent venue support and agricultural training programs.



Evidence-Based Advocacy

Maker's Mark will seek to ensure that its lobbying positions are informed by reliable, data-driven, and, where appropriate, scientific evidence. Maker's Mark will make reasonable efforts to validate information used in support of lobbying activities and avoid the use of misleading or knowingly inaccurate information.

Transparency

Maker's Mark is committed to transparently reporting its lobbying activities, political financial and in-kind contributions, and public policy positions. Maker's Mark will publicly disclose this information in accordance with applicable laws and this policy.

Political Contributions

Maker's Mark may make financial or in-kind political contributions only when:

- Such contributions are lawful.
- They are consistent with this policy and Maker's Mark's values.
- They are approved through established internal review processes.

Maker's Mark prohibits the use of political contributions to secure improper business advantages or influences public officials inappropriately.

Maker's Mark will publicly disclose the value and recipient of financial and in-kind political contributions in its annual lobbying report.

Anti-Corruption and Anti-Bribery

Maker's Mark prohibits bribery, facilitation payments, kickbacks, or any other improper inducements in connection with lobbying, government relations, or political engagement.

Employees and representatives acting on behalf of Maker's Mark must comply with all applicable anti-corruption and anti-bribery laws, Maker's Mark and Suntory Global Spirits' [Anti Corruption Policy](#). Any violation may result in disciplinary action, termination of employment or engagement, and referral to appropriate authorities where required.

Engagement Through Intermediary Organizations

Maker's Mark may participate in trade associations, business coalitions, industry groups, and other intermediary organizations that engage in lobbying.

Before joining or renewing participation in such organizations, Maker's Mark will assess whether the organization's material lobbying positions are reasonably consistent with this policy and Maker's Mark's publicly stated commitments.

Where material misalignment exists, Maker's Mark may:



- Engage with the organization to seek alignment;
- Publicly disclose the misalignment;
- Suspend participation; or
- Withdraw membership.

Maker's Mark will maintain oversight processes to help ensure that lobbying conducted through intermediary organizations remains consistent with this policy.

Governance and Oversight

Policy Approval and Review

Maker's Mark's Highest Governing Body is responsible for reviewing and approving this policy.

The policy shall be reviewed at least annually and updated as necessary to reflect changes in law, business activities, stakeholder expectations, or Maker's Mark commitments.

Accountability

Maker's Mark's Highest Governing Body is accountable for implementing, enforcing, and ensuring compliance with this policy across the organization.

Implementation

Maker's Mark embeds this policy into its operations by:

- Communicating the policy to relevant employees and representatives.
- Incorporating policy expectations into government affairs and public policy activities.
- Reviewing significant lobbying positions for consistency with Maker's Mark commitments.
- Maintaining appropriate records of lobbying activities and political contributions.
- Providing training and guidance where relevant.

Risk Management and Compliance

Identification and Management of Risks

Maker's Mark will identify, assess, and manage risks associated with lobbying activities, including:

- Misalignment with Maker's Mark values or sustainability commitments.
- Regulatory non-compliance.
- Reputational risk.
- Risks arising from participation in intermediary organizations.



Appropriate corrective actions will be taken when risks are identified.

Monitoring and Evaluation

Maker's Mark will periodically evaluate compliance with this policy and the effectiveness of its governance and control processes through management review, internal audits, compliance reviews, or other appropriate mechanisms.

Findings and corrective actions will be reported to the Highest Governing Body.

Stakeholder Concerns and Grievances

Employees, stakeholders, and other interested parties may raise concerns regarding lobbying activities, political contributions, or potential violations of this policy through Maker's Mark's grievance mechanism ([Grievance Mechanism](#)).

Reports may be made confidentially and without fear of retaliation. Concerns will be reviewed and investigated in accordance with Maker's Mark's grievance procedures.

Public Reporting

Maker's Mark will publish an annual lobbying disclosure report that includes:

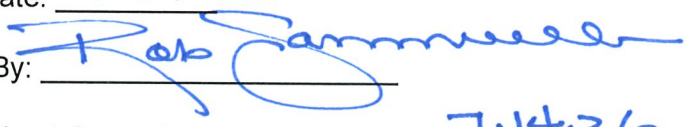
- The value and recipient of financial and in-kind political contributions.
- A summary of material lobbying positions.
- The government entities, policymakers, trade associations, coalitions, or intermediary organizations with whom Maker's Mark engaged on material lobbying matters.

The report will be overseen by Highest Governing Body and will be made publicly available on Maker's Mark's website.

Public Availability

This policy is approved by Maker's Mark's Highest Governing Body and is published on Maker's Mark's website where it is accessible to all stakeholders.

Effective Date: 7.14.26

Approved By: 

Date of Highest Governing Body Approval: 7.14.26