



# A CLEAN SPIRIT

THE CONSCIOUS CHOICE

A CLEAN SPIRIT ApS & PARTNER  
**CODE OF CONDUCT**



# A CLEAN SPIRIT

BE RESPONSIBLE

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Please contact us regarding any questions concerning A Clean Spirit Aps.  
If you have any concerns or complaints regarding our code of conduct, our commitments  
in regards to sustainability or compliance with laws and regulations relating to A Clean  
Spirits business please also do not hesitate to contact us.

You can contact us directly through:  
[contact@acleanspirit.dk](mailto:contact@acleanspirit.dk)



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## PERSONAL STATEMENT

from Bintu Singh  
Founder of A Clean Spirit.

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I created A Clean Spirit for two reasons. Firstly, because I have a passion and respect for spirit production, and secondly because I truly believe that in some aspects, production can be become greener and more sustainable by implementing alternative methods. I believe that as a business owner it is my responsibility to make greener choices, because they are available. I want to change the way we enjoy spirits, so that we can enjoy them with a clear conscience. I can't see a reason why great taste and sustainability can't co-exist; I personally believe that the two are mutually dependent. Quality spirits need quality ingredients and quality ingredients need great care and respect. So, whether you have chosen to make the conscious choice for the sake of the planet, the future generations, or simply for yourself I thank you for choosing A Clean Spirit.

Bintu Singh, Founder, 30-06-2023

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## PERSONAL STATEMENT

from Mark Winslow  
CEO of A Clean Spirit.

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At A Clean Spirit we believe that the future of spirit production is green and conscious. We therefore take care to ensure that our entire chain of production is not only environmentally sustainable, but also socially and ethically conscious. To achieve this, we have made an ethical business approach and sustainable methods of production our top priority without compromising on commercial opportunity, taste or quality. This way you can enjoy our spirits, knowing that they have made their way to your glass through an ethical and eco-friendly journey.

Therefore, the following overall aspects of business practice are crucial for us:

- Sustainability is a keyword in our production, and we conduct our business with trust, respect and social responsibility as our core values.
- As a global corporation we work under the regulations and laws of the individual countries in which we operate. We choose to comply with the principles of ethical and sustainable development set by the UN through their Sustainable Development Goals number 8, 12 and 13
- We carefully select our business partners, distilleries and production facilities to ensure that they comply with our own beliefs and core values.
- We are probably not perfect, but we genuinely always want to improve and try to do it the right way - not opting for the easy one. This is why we make a conscious effort to find the most appropriately sustainable solution for every situation all the time.
- We actively select and wish to work with those who share our principles of legal and ethical behavior, which are outlined below as follows:

Mark Winslow, CEO, 30-06-2023

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# A CLEAN SPIRIT & SUPPLIER CODE OF CONDUCT

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## **1. Compliance with all laws, regulations and company guidelines**

At A Clean Spirit, we expect that our Partners comply with all applicable laws and regulations, including anti-bribery legislation and contractual agreements with A Clean Spirit.

We have a no tolerance approach to corruption including violations of anti-bribery legislation and human rights. Any non-compliance of our Partners will lead to appropriate action where necessary.

We comply with EU and other national competition laws where relevant. Our Partners are also expected to compete in a fair manner adhering to any applicable antitrust laws and regulations.

## **2. A Legal and Ethical business approach**

At A Clean Spirit, we are committed to a transparent and ethical approach in our business practices, we expect the same of our Partners.

We expect that no employee or any 3rd party acting on our behalf offers or promises anything with the intent to inappropriately influence an agreement or secure preferential treatment with inappropriate advantages.

All gifts, business invitations and other forms of hospitality must be justified, align with our approach to an ethical business practice and be reasonable in terms of frequency and financial value reflecting ordinary local business customs.

## **3. Working conditions**

At A Clean Spirit, we promote and support equal opportunities for all regardless of their ethnic origin, skin color, gender, age, marital status, disability, religion, nationality, sexual orientation, social background, pregnancy, political orientation, military status or any other characteristic protected under law.

We are against modern slavery, human trafficking, child and forced labor. We expect all our partners to prohibit and refrain from any kind of this within their own or affiliated organizations.

We support and expect our Partners as well to respect the rights of their employees to organize, nominate employee representations and enter into collective bargaining schemes in line with national laws and regulations. We also follow and expect our Partners to fully comply with any applicable national law and regulation on working time and remuneration.

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#### **4. Environmental Sustainability and Protection**

At A Clean Spirit, our products come from all across the globe and we take our responsibility as a global and local business very seriously. We are and expect our Partners to always be committed in protecting, minimizing the impact of activities and always working to improve the business in supporting environmental sustainability.

The commitments on impact and activity outlined here are viewed within a principle of proportionality versus risk- and impact. We strive for but know everything can not always be 100% perfect. Nonetheless the requirements and constant push to improve and make things better are set forth in relation to what is realistically applied in a manner that is appropriate, taking into account the type of challenge ie. the nature, cost, scope and complexity of the activities.

We and our Partners must always secure that any required certificates or permissions are available and updated to meet relevant requirements and can be made available for review within a reasonable amount of time for all the use of products and materials in A Clean Spirit' portfolio.

#### **5. Health and safety**

A Clean Spirit is committed and support a safe and healthy environment for all employees. We expect our Partners to do the same and to meet all applicable workplace health and safety regulations.

#### **6. Conflict of interests & Money laundering**

We expect our Partners to comply with all applicable regulations regarding the prevention of money laundering activities and be objective in their decision making to avoid conflicts of interest based on private, business or other factors in relation to all business conducted with or on behalf of A Clean Spirit.

#### **7. Actions as a result of Non-Compliance**

Non-compliance by the Partners in relation to any of the principles and overall belief outlines in this Code of Conduct will be viewed as a violation of the Partners commitment and business contractual or other agreement with A Clean Spirit. A Clean Spirit reserves the full right without further explanation to immediately stop any business relationship, contractual or other following a violation of the principles in this Code of Conduct by the Partner.

A Clean Spirit always reserve the right to audit and access any relevant documentation to confirm or if a breach with any of the principles in this Code of Conduct is suspected. Equally A Clean Spirit reserves the right to review the Supplier's compliance within the principles and requirements as laid out in this Code of Conduct at any time.

A Partner review format is decided at the discretion of A Clean Spirit but could as examples be a request and confirmation of self-assessments, On-Site audits by A Clean Spirit or an appointed third party acting with and on our behalf to contact the Supplier and ask for permission to verify compliance.

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# CLOSING STATEMENT

At A Clean Spirit, we actively communicate and build all our business relationships in adherence to this Code of Conduct. We expect nothing less than our Partners do the same concerning their own and any activities conducted for or on the behalf of A Clean Spirit.

Last update: June 2023



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