



## **Butcombe Brewery Limited**

### **Anti-slavery and human trafficking statement**

#### **Organisational structure and supply chains**

Butcombe Brewery Limited was established in 1978 and is part of a Group of Companies within the Liberation Group which has several associated companies in the United Kingdom and Channel Islands (in particular Guernsey and Jersey).

We are predominately involved in the manufacturing of beers and the provision of public houses, bars and eateries throughout the UK and the Channel Islands.

We use a wide variety of local, national and international suppliers to source goods, services and equipment for the operation of our business. In particular we work with brewing, alcohol and food manufacturers. We recognise that the nature of our supply chain can make checking for illegal activity challenging. However as explained below, there are a number of checks and safeguards we will put in place to reduce the risk of modern slavery and human trafficking occurring in our supply chain.

#### **Our policy on modern slavery and human trafficking**

We have an absolute zero tolerance policy to modern slavery. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place any where in our supply chains.

We understand that modern slavery encompasses:

1. Forced work, through mental or physical threat;
2. Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
3. Being dehumanised, treated as a commodity or being bought or sold as property; and/or
4. Being physically constrained or to have restriction placed on freedom of movement.

#### **Commitment**

1. We acknowledge our responsibilities under the Modern Slavery Act 2015 and we are committed to preventing slavery and human trafficking within our businesses and our supply chains. We understand that this requires an ongoing review of our internal practices and continual due diligence of our supply chains.
2. As part of our zero tolerance policy, we will not enter into business, and will discontinue any current business with any other organisation which knowingly supports or is found to involve itself in slavery, servitude or forced or compulsory labour.
3. We will strive to ensure that no labour provided to us in the provision of our services is obtained by means of slavery or human trafficking. We will strictly adhere to the standards required of us in relation to our responsibilities under relevant employment legislation in the United Kingdom and the Channel Islands.

## **Our due diligence processes**

To ensure that this policy is adhered to, we will introduce the following processes:

1. Conducting risk assessments to identify which parts of our businesses and supply chains are most at risk from modern slavery;
2. Engaging with all our major suppliers to convey the contents of this policy to them, and asking them to confirm they have read and understood our policy and will adhere to it;
3. Surveying our suppliers to establish what steps, measures and practices they have implemented to prevent modern slavery occurring in their organisations;
4. Introducing contractual provisions into our supply contracts where appropriate to confirm that our suppliers adhere to and accept our policy; and
5. Discontinuing business with any first-tier supplier found to have been involved in modern slavery.

To facilitate these processes, we maintain an accurate supplier list including key contact details. We also encourage the use of our whistleblowing policy to report any concerns regarding modern slavery and we will investigate any complaints thoroughly.

## **Our effectiveness in combating slavery and human trafficking**

As our attitude to modern slavery is zero tolerance, we have not adopted any key performance indicators as any instance of modern slavery or human trafficking in our supply chain would be an unacceptable breach of our policy.

However, we will monitor our internal compliance with this policy by recording:

1. Which of our suppliers have read and agreed to adhere to our policy;
2. Which of our suppliers have implemented their own policies and procedures with prohibitions against modern slavery;
3. Which of our suppliers place obligations on their own employees to comply with their modern slavery policies;
4. What steps our suppliers have taken to control and monitor the risk of contravention of the Modern Slavery Act 2015.

Where our suppliers do not yet have modern slavery policies and procedures in place, where appropriate we will ask for confirmation as to the likely timescale for their introduction.

## **Responsibility for our policy**

Our Commercial Director is responsible for compliance with this policy, and is the person to whom all queries or concerns regarding modern slavery should be addressed. They will take responsibility for undertaking an annual review of our obligations towards eradicating modern slavery within our organisation and supply chains.

## **Training**

All of our employees have an obligation to familiarise themselves with our policy to help in the identification and prevention of modern slavery. Adherence to our policy forms part of all our employees' obligations under their contract of employment. This policy will be publicised internally to raise awareness. New employees will receive training on this policy as part of their

induction process. In addition, all of our employees responsible for compliance or procurement will be trained on the requirements of this policy.

### **Review**

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2010 and applies to all companies within and associated to The Liberation Group of Companies ("the Group"). It will be reviewed for each financial year.

This statement relates to the 2023/2024 financial year and is approved by the Board.

Signed:

A handwritten signature in blue ink, appearing to read 'Jonathan Lawson', is written over a faint, light blue circular stamp or watermark.

**Jonathan Lawson**

CEO, Liberation Group, Butcombe Brewery Limited