

Anti-Slavery Statement

Issued April 2019

Introduction

Frederic Robinson Ltd has issued this statement is in accordance with Section 54 of the Modern Slavery Act 2015.

This Statement relates to the 2018 Financial Year ending 31st December 2018

As a family owned business we take the issues of modern slavery and human trafficking seriously and expect our employees to raise any concerns they have, or observe, with their immediate manager or a Director of the Company. We are committed to taking all reasonable steps to ensure our business is free from modern slavery and human trafficking at all levels.

Our Business Structure and Supply Chain

Frederic Robinson Ltd is an independent family business based in Stockport and operating across North West England and North Wales.

Our core business and our business activities are built around the brewing and packaging of beer, and the operation either directly or indirectly of approximately 300 Public Houses and/or Hotels. We directly employ approximately 600 employees within our Beer and Pubs Divisions.

Much of our supply chain for our brewing and packaging activities, together with food used 1 the Pubs we manage directly, is sourced from within the UK or EU. We also obtain wines from various countries around the world along with items of clothing, point of sale merchandise, and promotional materials.

Policy and Ethical Audits

We have in place an Anti-Slavery Policy which is available to all employees via our Company Intranet and in general via our Company Website.

In addition we participate in an Ethical Audit undertaken by Brands Direct every 4 years, alongside regularly maintaining and updating Company data via the Supplier Ethical Data Exchange (SEDEX).

Due Diligence

The fact that all of our employees are subject to the rights and protections associated with United Kingdom employment law and we source much of our supplies from UK-based organisation is in itself, a significant risk mitigation factor. We have in place processes and procedures to ensure that all our employees are legally entitled to work within the UK and are paid in accordance with the rates of pay that are no less than the statutory legal minimums. We endeavour to pay employees only into a bank account held in their own name.

We have recently recruited a specialist Purchasing Manager and part of their role is to review and enhance our supplier approval process that will require:

- That we assess the level of risk of exposure to us from that supplier/country/or region
- That our suppliers confirm that they understand the compliance measures required under the Act
- That we will not knowingly trade with any organisation where slavery or human trafficking are involved in the supply chain at any point

We will continue to work with Brands Direct, SEDEX, and the British Retail Consortium (BRC) to improve and maintain our procedures and results.



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Training & Communication

Managers and staff in positions that may come across modern slavery or human trafficking will be briefed upon the Act and undertake training as is necessary to their role.

Employees will be advised of the Act as part of our induction for all new employees, as well as via our Company Intranet.

Policies

We will maintain a zero tolerance of slavery and human trafficking and will expect our suppliers to comply with this requirement.

Company policies are in place to support our stance on this and to assist us in the assessment, prevention, and elimination of modern slavery in our organisation or its supply chain. Such policies include:

- Anti-Slavery Policy
- Anti-Bribery and Corruption Policy
- Grievance Policy
- Whistle Blowing Policy

Approval of this Statement

This statement has been approved by the Board of Directors at the April 2019 Board Meeting

Name: Oliver Robinson

Position: Managing Director Beers Division

Date: 25 421 2019