



Ethical Trading Statement

Introduction

As a family-owned business we take the issues of ethical trading and the elimination of bribery and corruption, 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 also committed to taking all reasonable steps to uphold and promote responsible business practices related to all of these topics.

The purpose of this Statement is to outline our position in relation to ethical trading, but this should also be read in conjunction with our other policies relevant to ethical behavior (see below).

It is intended that all employees of Robinsons are informed of and abide by the principles laid out within this Statement. In addition, we will over time, communicate to and seek to encourage all of our tenants and suppliers to comply with the principles of this Statement.

Our Business Structure

Frederic Robinson Ltd (incorporating Individual Inns Limited) 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 Public Houses. All of our employees are employed within the United Kingdom and, as a minimum, are employed on terms protected by United Kingdom employment and health and safety legislation.

Much of our supply chain for our brewing and packaging activities, together with food used in the Pubs we manage directly, is also sourced from within the UK or EU and thus their workforces will also be protected by the same legislative requirements.

Core principles of Ethical Trading

We are regularly audited under the terms of the Supplier Ethical Data Exchange (SEDEX), and as such we are required to comply with the terms of the Ethical Trading Initiative Base Code (ETI Code) namely:-

1. Employment is freely chosen
2. Freedom of association and the right to collective bargaining are respected.
3. Working conditions are safe and hygienic.
4. Child labour shall not be used.*
5. Living Wages are paid.
6. Working hours are not excessive.
7. No discrimination is practised.
8. Regular employment is provided.
9. No harsh or inhuman treatment is allowed.

*(where employees are under the age of 18 they are only employed in accordance with UK law, they are free to leave at any time and thus any employment undertaken will in no way impinge upon their opportunity for full time education.)

In addition to our SEDEX accreditation, we hold the British Retail Consortium (BRC) Global Standard for Food Safety accredited (AA rating), which also requires us to comply with certain standards related to supplier sourcing and employee protection.

If at any time we identify we are falling materially short in any area we will take immediate action to rectify matters and if we identify similar shortfalls in third party stakeholders such as suppliers, we will inform them of our concerns, encourage them to take rectification action and if this is not forthcoming, take action to cease our relationship with them as soon as is reasonably practical.



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Due Diligence

It is the role of the Board, as advised by their Human Resources team to ensure that all employees abide by and are protected by the principles of the ETI Code.

As a business we will, as far as is reasonably practicable, given the resources available to us seek to:-

- Assess the level of risk of exposure to us from any third party stakeholder
- Instigate a process to ensure that any high risk stakeholders identified understand and are encouraged to comply with the principles of the ETI Code
- Not knowingly trade with any organisation where there are clear breaches of the ETI Code

We will continue to work with SEDEX, and the BRC to improve and maintain our procedures and results.

Training & Communication

This Statement will be communicated to all employees at Robinsons and where necessary, training will be provided. A copy of this Statement will also be put on the Company's website, head office and brewery noticeboards, the CPL bookshelf and supplied to any third party stakeholders when it is considered appropriate to do so.

Policies

We will maintain a zero tolerance approach to unethical and illegal trading practices and will expect our third party stakeholders to adopt a similar approach to this issue.

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

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

Approval of this Statement

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

Name: Oliver Robinson
Position: Managing Director Beers Division

Name: William Robinson
Position: Managing Director Pubs Division

Date: 1st May 2020