

# **C&C GROUP PLC**

## **("C&C Group")**

### **MODERN SLAVERY POLICY STATEMENT for the year ending 29 February 2020**

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps taken by C&C Group to ensure that our business and supply chain are free from slavery and human trafficking.

#### **Policy on Slavery**

C&C Group is committed to doing business with respect for human rights and to implementing and enforcing effective systems and controls to guarantee that human rights are not being breached. C&C Group's overall commitment to human rights is set out in the C&C Group plc Code of Conduct (the "Code"), which all employees and business units are required to apply. The Code states that C&C Group does not tolerate forced, bonded or involuntary labour.

#### **Our Business**

C&C Group is an Irish incorporated leading manufacturer, marketer and distributor of branded beer, cider, wine, spirits, and soft drinks across the UK and Ireland.

- C&C Group's portfolio of owned/exclusive brands include: Bulmers, the leading Irish cider brand; Tennent's, the leading Scottish beer brand; Magners the premium international cider brand; as well as a range of fast-growing, super-premium and craft ciders and beers, such as Heverlee, Menabrea and Orchard Pig.
- C&C Group owns brand and contract manufacturing/packing operations in Co.Tipperary, Ireland; Glasgow, Scotland; and Vermont, US, where it manufactures Woodchuck, a leading craft cider brand in the United States.
- C&C is the No.#1 drinks distributor to the UK and Ireland hospitality sectors. Operating under the Matthew Clark, Bibendum, Tennent's and C&C Gleeson brands, the Group supplies over 35,000 pubs, bars, restaurants and hotels, and is a key route-to-market for major international beverage companies.
- C&C Group also has a minority investment in the Admiral Taverns tenanted pub group, which owns over 800 pubs across England & Wales and exports its Magners and Tennent's brands to over 60 countries worldwide.

We are committed to ensuring that we supply high quality products that are sourced and manufactured in a fair, ethical and environmentally responsible way. We have a zero tolerance approach towards modern slavery and human trafficking within our operations and supply chain. Our workers are encouraged to report any concerns they may have and management are required to act upon them.

#### **Recruitment and Whistleblowing**

As part of our commitment to ensuring that there is no modern slavery or human trafficking in our supply chain, we has the following internal policies to ensure that we are conducting business in an ethical and transparent manner:

- Recruitment – we conduct robust checks on any new employee including eligibility to work in Ireland and the UK to safeguard against human trafficking or individuals being forced to work against their will.
- Whistleblowing Code – each of our employees have access to an externally facilitated whistleblowing hotline that enables them to raise any concerns that they might have without fear of reprisals.

### **Due diligence**

We understand the risk of modern slavery taking place in our supply chain. As part of our supplier onboarding process, we carry out a formal supplier approval process across our supply base, which includes a focus upon human rights and labour standards policies. We also carry out audits of our supply base on a periodic basis.

Matthew Clark and Bibendum are registered with the Alcohol Wholesale Registration Scheme (AWRS) and as part of our commitment only trade with suppliers who are registered and demonstrate compliance with the scheme (unless an authorised exemption applies).

### **Training**

All Executive Committee members together with colleagues in our Procurement and Human Resources teams receive training on a periodic basis to ensure that they are qualified to understand the importance of ethical trading and the risks of modern slavery and human trafficking such that it remains at the forefront of their mind when carrying out business activities.

### **Compliance with this Policy**

This policy applies to all colleagues, but also to consultants, contractors and agency staff in relation to their work for, or on behalf of, any Group company. 50% owned joint ventures are expected to put in place policies consistent with this policy. Failure to comply with this policy may result in disciplinary action being taken against any colleagues concerned or the termination of contracts with contractors working for any business unit.

We expect our suppliers to support our commitment, including the Group's approach to forced, bonded or involuntary labour. To ensure adherence to and continual improvement against this policy, we reserve the right to visit and assess our suppliers' commitment to the policy. In the event of non-compliance, we expect our suppliers to be committed and engaged in remedying the issue within a time-frame set out in a corrective action plan to be agreed with the supplier. We reserve the right to terminate any agreements should a supplier decide that compliance with this policy is impossible or where a supplier shows repeated disregard for the provisions of this policy.

### **APPROVAL OF THIS STATEMENT**

**This statement has been approved by the Board of Directors**

**Stewart Gilliland**

**Interim Executive Chairman**

**C&C Group Plc**

**Date: 12 May 2020**