

# **C&C GROUP PLC**

## **('C&C' or the 'Group')**

### **MODERN SLAVERY ACT POLICY STATEMENT for the financial year ending 28 February 2021**

This statement sets out the steps taken by C&C during the financial year to ensure our business and supply chain are free from slavery and human trafficking and is made pursuant to Section 54 of the Modern Slavery Act (the 'Act'), which was passed into law by the UK Parliament in 2015 with the objective of encouraging greater transparency for all stakeholders on the measures taken to combat slavery and human trafficking within businesses and their supply chains.

#### **Group policy on slavery and human trafficking**

C&C 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. The Group's overall commitment to safeguarding 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 does not tolerate forced, bonded or involuntary labour.

The Group is 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 business, including our manufacturing and supply chain. Our workers are encouraged to report any concerns they may have, and management is required to act upon them.

#### **Our Business**

C&C is a leading, vertically integrated premium drinks company which manufactures, markets and distributes branded beer, cider, wine, spirits, and soft drinks across the UK and Ireland. The 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; exclusive distribution of the AB InBev portfolio in Ireland including Budweiser, the fourth largest LAD brand; as well as a range of fast-growing, super-premium and craft ciders and beers, such as Heverlee, Menabrea, Five Lamps; Innis & Gunn and Orchard Pig.

C&C exports its Magners and Tennent's brands to over 40 countries worldwide.

C&C has owned brand and contract manufacturing/packing operations in Co. Tipperary, Ireland; and in Wellpark, Glasgow, Scotland.

C&C is the No.1 independent drinks distributor to the UK and Ireland hospitality sectors. Operating under the Matthew Clark, Bibendum, Tennent's and Bulmers Ireland brands, the Group supplies over 35,000 pubs, bars, restaurants and hotels, and is a key route-to-market for local and international beverage companies.

#### **Recruitment and whistleblowing**

As part of our commitment to ensuring that there is no modern slavery or human trafficking in our business or supply chain, we implement 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 – all of our employees have access to an externally facilitated whistleblowing hotline that enables them to raise any concerns that they might have confidentially and without fear of reprisal. No reports were registered via the whistleblowing line in the financial year relating to modern slavery or human trafficking.

### **Supply chain due diligence and risk assessment**

We understand the potential risk of modern slavery taking place in our supply chain. To mitigate any unethical behaviour, as part of our supplier on-boarding 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).

### **Employee awareness and training**

All Executive Committee members together with colleagues across all business units, including in our Procurement and Human Resources teams receive training on a periodic basis to ensure that they understand the importance of ethical behaviour and the risks of modern slavery and human trafficking, such that it remains at the forefront of their minds when carrying out their duties.

An externally facilitated training module, designed to raise colleagues' awareness of modern slavery and human trafficking and to help colleagues recognise their role in identifying and reporting any concerns, has been rolled out to over 430 colleagues in the past year.

### **Compliance with this policy**

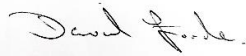
This policy applies to all colleagues, but also to consultants, contractors and agency staff in relation to their work for, or on behalf of, C&C or any company within the Group. 50% owned joint ventures are expected to put in place policies consistent with this policy. Failure to comply with this policy 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 to safeguarding human rights, including the Group's approach to forced, bonded or involuntary labour. To ensure adherence to and continual improvement of this policy, we reserve the right to visit and assess our suppliers' commitment to the policy. 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.

The Group confirms there were no concerns raised in FY21 regarding modern slavery, child labour or human trafficking.

### **APPROVAL OF THIS STATEMENT**

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



**David Forde**

**Group Chief Executive Officer**

**C&C Group Plc**

**Date: 7 May 2021**

**This statement applies to the following UK subsidiaries of C&C Group plc:**

Bibendum Off Trade Limited

Matthew Clark Bibendum Limited

Magners GB Limited

Tennent Caledonian Breweries UK Limited

Tennent Caledonian Breweries Wholesale Limited

Gleeson N.I. Limited

Tennent's NI Limited