

## C&C GROUP PLC ('C&C' or the 'Group')

### MODERN SLAVERY ACT STATEMENT ("Modern Slavery Statement") for the financial year ending 28th February 2025

#### Introduction

The Group recognises that modern slavery is a serious crime and a violation of human rights where individuals are exploited by others for personal or commercial gain. Modern slavery can take various forms including, human trafficking, forced labour or child labour.

C&C has a zero-tolerance approach to all aspects of modern slavery in all its different forms in its business and supply chain.

This Modern Slavery Statement details the approach and 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 2015.

The objective of this Modern Slavery Statement is to encourage and introduce greater transparency for all stakeholders on the measures taken to combat slavery and human trafficking within businesses and their supply chains.

This Modern Slavery Statement sets out:

- Our business
- Group policy on slavery and human trafficking
- Assessing and managing the risk in modern slavery
- Compliance with this Modern Slavery Statement
- Board review and approval.

#### 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.

- C&C'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, premium and craft ciders and beers, such as Heverlee, Menabrea, Five Lamps 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 Glasgow, Scotland.
- C&C is the No.1 drinks distributor to the UK and Ireland hospitality sectors. Operating through the Matthew Clark, Bibendum, Tennent's and Bulmers Ireland brands, the Group has a market leading range, scale and reach including an intimate understanding of the markets it serves. Together this provides a key route-to-market for major international beverage companies.

C&C is a publicly listed company headquartered in Dublin and listed on the London Stock Exchange.

#### 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 has in place the following policies and procedures in respect of this commitment:

- An Anti-Bribery and Corruption Policy which outlines our zero-tolerance approach to bribery.
- A Sustainable and Ethical Procurement Policy which the Group is in the process of refreshing.
- 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.
- During this financial year, the Group introduced a Human Rights Policy which complements the Code, which again outlines that we categorically reject forced and compulsory labour in any form.
- We also have in place a Whistleblowing Policy, and associated app which allows individuals to speak up about any concerns they may have on a confidential basis (more information on these is set out below).

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.

### **Assessing & managing the risk of Modern Slavery**

As part of our commitment to ensuring that there is no modern slavery or human trafficking in our business or supply chain, the Group assesses and manages the risk of modern slavery in its business operations and supply chain using the following tools:

#### **Recruitment**

- We conduct Right to Work Checks on all employees to ensure they have the legal right to work in the UK and Ireland.
- We do not employ anyone under the age of 18 years old (unless employed as part of an apprenticeship scheme where the minimum age will be 16 years, or via school age work experience agreements).
- The Group only uses reputable organisations to source staff and we pay employees a fair wage for safe and legal working hours.

#### **Whistleblowing**

- We have a zero-tolerance policy for all forms of bullying, harassment and discrimination, and we want to ensure that everyone has the ability to speak up about injustices they may experience or witness.
- We operate 'Vault' which is a simple, safe and confidential app and online platform that allows employees to raise any concerns they may have about wrongdoing.
- No reports have been registered via Vault 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 covers human rights and labour standards policies.
- we use SEDEX (which is a system to identify, assess and prioritise environmental and social risk and impacts in our supply chain) for a proportion of our suppliers (this includes an audit process). Our intention is to roll this out more widely within our supplier group.

During financial year 2025 the Group has taken steps to confirm that its supply chain has either agreed to comply with the Code or has in place policies or codes of conduct which are materially as robust as the Code.

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

Our manufacturing site based at Wellpark, Glasgow undergoes routine SMETA (Sedex Members Ethical Trade Audits), as a requirement of our SEDEX membership for that site. Our intention is to begin the process to roll this out to our other manufacturing site in Clonmel, Ireland in the coming year.

### **Employee awareness and training**

All Executive Committee members together with colleagues across all business units, including in our central 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.

We use an externally facilitated training module, designed to raise colleagues' awareness of modern slavery and human trafficking to help colleagues recognise their role in identifying and reporting any concerns.

### **Compliance with this Modern Slavery Statement**

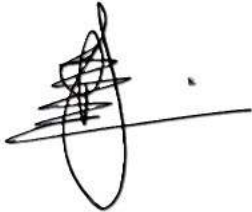
This Modern Slavery Statement applies to all colleagues, but also to consultants, contractors and agency staff in relation to their work for, or on behalf of, C&C or any company within the Group. Failure to comply with this policy may result in disciplinary action being taken against any colleagues concerned 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 values outlined in 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 fails to comply with the provisions of this policy or meet the standards expected of the Group.

The Group confirms there were no concerns raised in financial year 2025 regarding modern slavery, child labour or human trafficking.

## Board Review and Approval

This Modern Slavery Statement has been reviewed and approved by our Board of Directors on behalf of C&C and the subsidiary companies listed below.



**Roger White Chief Executive Officer C&C Group plc**

Date: 26 March 2025

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

Bibendum Off Trade Limited  
C&C Management Services (UK) Limited  
Matthew Clark Bibendum Limited  
Magners GB Limited  
Tennent Caledonian Breweries UK Limited  
Tennent Caledonian Breweries Wholesale Limited  
Tennent's NI Limited

\*C&C Group plc acquired Drygate Brewing Company Limited ("**Drygate**") on 27<sup>th</sup> February 2025, the Group intends to take steps during the coming year to ensure that Drygate is compliant with this Statement alongside the entities listed above.