

## **JW LEES STATEMENT ON EFFORTS TO COMBAT SLAVERY AND HUMAN TRAFFICKING IN OUR BUSINESS AND SUPPLY CHAIN.**

**JW Lees are committed to treating everyone in our business and supply chain with dignity and respect. We work hard to safeguard the well-being of the people who help make our products.**

### **JW Lees - Modern Slavery and Human Trafficking Statement**

- This statement sets out the steps that JW Lees has taken during our financial year to ensure that modern day slavery and human trafficking is not occurring in our organisation or in our supply chains. This statement will be reviewed annually.
- The Company acknowledges responsibility to the Modern Slavery Act 2015 and the relating definitions set out within.

### **Organisational structure and activities**

JW Lees is an independent family business. Our core business is built around brewing and packaging of beer and a provider of Public House and Hotel facilities. Our operations are located in the North West of England and North Wales and turnover is in excess of £60 million.

The business is organised into three business units: Pubs, Hotels & Inns and Sales.

We maintain many relationships with different organisations in our supply chain, as well as directly employing approx. 1,400 employees throughout the business (@ April 2018).

### **Our Supply Chain**

With regard to employment law, human rights and including the Modern Slavery Act 2015, we will continually review our existing compliance and risk management process. This will determine associated risk, detection and prevention of modern day slavery and human trafficking within our supply chain for products and services to the organisation.

### **Due Diligence Process**

As part of the company's due diligence process into slavery and human trafficking the supplier approval process incorporates:

- A regular Ethical Audit review of controls of all our suppliers and an established process of supplier approval.
- Whilst our supply chain is predominantly UK and EU based and we would expect these entities to have applicable anti-slavery and human trafficking policies and procedures, we do import a small percentage of products and services from sources outside the UK and EU. These may potentially operate with an increased risk for slavery and human trafficking issues. The management control of these suppliers will be continually monitored.

- The business will not forge commercial relationships with any business knowingly involved with slavery or human trafficking.
- We will expect all who have, or seek a commercial relationship to familiarise themselves with The Modern Slavery Act and our anti-slavery values and act consistently within these.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

### **Effectiveness and Communication**

- Using key performance indicators to effectively measure the effectiveness of our policy we will:
- Complete regular audits of our supply chain (questionnaires/ personal contact) to ascertain their understanding, compliance and set standard expectations.
- We will provide training to relevant members of staff
- Our Directors will champion its understanding and implementation within the business and ensure JW Lees is compliant with our policy.

### **Our Policy on Modern Slavery and Human Trafficking**

Our attitude to modern slavery and human trafficking is zero tolerance and we expect all those in our supply chain to comply with our values.

If a supplier is found to be demonstrating unacceptable practices they will be investigated and provided with guidance regarding immediate required improvements.

If no improvement is implemented or they indicate an unwillingness to cease unacceptable practices they will be reported to the appropriate authorities and ultimately trading with this supplier would cease.

Company policies assist the organisation to assess, prevent and mitigate the risk of modern slavery existing in the organisation and its supply chains. These include:

- *Modern Slavery policy*
- *Ethical Code*
- *Grievance policy*
- *Whistle-blowing policy*

### **Approval**

**This statement has been approved by the company's board of directors.**

**William Lees-Jones**

**Managing Director**