

## **ANTI-SLAVERY STATEMENT 2015/2016**

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Conviviality Plc has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within its business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Conviviality is committed to acting ethically and with integrity and transparency in all business dealings.

### **OUR BUSINESS**

Conviviality is the UK's leading independent wholesaler and distributor of alcohol and impulse serving consumers through hospitality and food service.

Our business is organised into three divisions; Conviviality Retail, Conviviality Direct and Conviviality Trading all of which are supported through its nationwide distribution network.

Conviviality Retail is the UK's largest franchised off licence and convenience chain with 370 Franchisees and more than 700 retail stores trading primarily under the fascia's of Bargain Booze, Bargain Booze Select Convenience and Wine Rack

Conviviality Direct is the UK's largest independent wholesaler to the on-trade serving 23,000 outlets from national prestige hotel chains to independent food-led pubs and restaurants.

Conviviality Trading is our full service brand and wine agency with activation capability including festivals and events.

### **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

Conviviality is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

As part of Conviviality's commitment to ensuring that there is no modern slavery or human trafficking in its supply chains, Conviviality has the following internal policies to ensure that it is conducting business in an ethical and transparent manner:

- Recruitment – Conviviality conducts robust checks on any new employee including eligibility to work in the UK to safeguard against human trafficking or individuals being forced to work against their will.
- Whistleblowing Policy – Each of our business divisions has a whistleblowing policy so that all employees can raise any concerns that they might have without fear of reprisals.

### **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
  - Mitigate the risk of slavery and human trafficking occurring in our supply chains.
  - Monitor potential risk areas in our supply chains.
  - Protect whistle blowers.

### **SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme. This consists of:

- An initial risk assessment of suppliers
- Managing any risks highlighted with appropriate contractual clauses
- An ongoing review of contractual obligations

We have a dedicated compliance team, which consists of involvement from the following departments:

- Legal
- Human resources
- Procurement

### **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, we will be providing training to our staff.

### **APPROVAL OF THIS STATEMENT**

This statement has been approved by the Board of Directors on 12 September 2016

Name: Diana Hunter

Position: Chief Executive Officer

Signature: 

Date: 12 September 2016