



Slavery and Human Trafficking

STATEMENT FOR FINANCIAL YEAR ENDING 30 JUNE 2017

i OVERVIEW

Our success at World Brands Duty Free Limited (“**WBDF**”) is intrinsically linked to the way we conduct our business in a responsible and ethical manner. These behaviours help to foster a culture of mutual trust and ethics both within the business and with our suppliers. WBDF adopts a zero-tolerance approach to slavery and human trafficking. We are committed to taking all reasonably practicable steps to ensure that slavery and human trafficking are not present either in our business or in our supply chains. In order to achieve this, we seek to identify and tackle slavery and human trafficking risks.

1. OUR COMMITMENT

1.1 About us

WBDF is a subsidiary of Pernod Ricard, the world’s co-leader in wines and spirits. We are the market company for the travel retail channel in Europe, the Middle East and Africa. Our parent company, Pernod Ricard, has its head office in France. Further information about our parent company, business and organisational structure can be found at <https://www.pernod-ricard.com/en/download/file/fid/9777/>.

1.2 Our standards

Since 2003, Pernod Ricard has been a participating company in the [United Nations Global Compact](#) - and is therefore committed to respecting and promoting the core principles.

- As part of the Pernod Ricard Group, WBDF is accordingly committed to eliminating forced labour and compulsory labour and to effectively abolish child labour.
- This includes [International Labour Organisation](#) conventions 138 & 182 on *the prohibition of child labour* and 29 & 105 on *the elimination of forced or mandatory labour*.

We expect the same standards from all those we work with, including business partners and suppliers. WBDF is committed to working closely with our suppliers and business partners to ensure that slavery and human trafficking risks are identified and managed proactively.

1.3 Our actions

Since the [Modern Slavery Act 2015](#) came into force, we have built on our existing commitment by:

- taking external legal advice on the steps necessary to support compliance;
- identifying key slavery and human trafficking risks in our business and in our supply chains;
- adopting a specific Slavery and Human Trafficking Policy (which has been approved by the *WBDF Board of Directors*) and working towards implementation within WBDF;
- updating our existing training programme to directly support compliance with our Slavery and Human Trafficking Policy;
- reviewing our supplier contract terms to identify compliance opportunities;
- reviewing our existing supplier due diligence and audit processes to support compliance with our Slavery and Human Trafficking Policy;
- setting Key Performance Indicators against which to assess our progress;
- updated contracts to provide for the inclusion of a compliance clause; and
- sending our CSR Policy Commitment and Self-Assessment form to Suppliers all new Suppliers who fulfil a certain risk criteria.

2. OUR POLICY

2.1 About our Slavery and Human Trafficking Policy

We are committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business. Our Slavery and Human Trafficking 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 prevent slavery and human trafficking in our supply chains. Our Slavery and Human Trafficking Policy:

- applies to all staff and suppliers working for or on our behalf in any capacity;
- builds upon our existing policies (including our *Code of Business Conduct*);
- includes guidance to our staff with examples of unusual behaviour displayed by workers which may be indicative of someone experiencing slavery or human trafficking;
- makes it clear that WBDF will support anyone who raises genuine concerns in good faith, even in circumstances where it transpires that those concerns are mistaken.
- The Policy is available upon request to:
Legal Advisor
World Brands Duty Free Limited
Building 12, 556 Chiswick High Street
London W45AN

2.2 Working with our suppliers

To identify and mitigate the risk of slavery and human trafficking being present in our product supply chains, we employ a number of sourcing strategies, including:

- Informing our suppliers of the standards that we expect through our [Supplier CSR Commitment](#);
- Identifying potentially at-risk suppliers through key risks (such as the presence of a supplier in an at-risk country, the criticality of the product to our operations and the size of the supplier);
- Communicating concerns to at-risk suppliers;
- Rigorously assessing suppliers using tools such as [the EcoVadis platform](#) and our *Self-Assessment Checklist* (which includes scoring based on factors such as health & safety, child labour, slavery and payment of the minimum wage); and
- Analysing the results of our assessments.

2.3 Training our people

Training on WBDFs' Slavery and Human Trafficking Policy and the risks of modern slavery and human trafficking in our business and in our supply chains is available to all staff.

3. ENSURING EFFECTIVENESS

3.1 Measuring our success

We use the following *key performance indicators* to measure how effective we have been in combatting slavery and human trafficking:

- Training is made available to all relevant existing staff.
- Policy breaches are reported internally within 3 business days of occurring.
- Policy breaches are assessed within one week of being reported and further investigations concluded as soon as possible thereafter.

We will continue to monitor the effectiveness of our compliance regime and take necessary steps to address any identified instances of slavery and human trafficking.

3.2 Our next steps

Following a review of the effectiveness of the steps we have taken to manage the risks of slavery and human trafficking in our supply chains, we intend to take the following further steps to combat slavery and human trafficking:

- We will provide upfront and ongoing training to staff on our Slavery and Human Trafficking Policy, including tailored training to those responsible for managing supplier contract;
- As far as reasonably practicable, we will use external risk management tools (such as the [Global Slavery Index](#) and the [International Labour Organization's Resources on Forced Labour, Human Trafficking and Slavery](#)) to assess and manage geographical and sector risks;
- Send our CSR Policy Commitment and Self-Assessment form to Suppliers all new Suppliers and to existing Suppliers who fulfil a certain risk criteria;
- Develop and maintain a Preferred Supplier System, to ensure that we only continue to carry on business with suppliers who have a proven track record of sharing in our vision of eliminating human trafficking and modern slavery; and
- Incorporate training on Slavery and Human Trafficking into our induction process.

This statement is made pursuant to [section 54\(1\) of the Modern Slavery Act 2015](#) and constitutes our slavery and human trafficking statement for the financial year ending 30 June 2018.



Director

World Brands Duty Free Limited, 28 September 2018