

Slavery and Human Trafficking Statement (for the financial year ended 1 April 2019)

Introduction

We seek to conduct our business honestly and with integrity at all times and recognise that it is not acceptable to put profit above the welfare and wellbeing of our employees and those working on our behalf. Steps to combat modern slavery are therefore taken seriously, and efforts to prevent abuses are fully embedded across all departments throughout our organisation to ensure we play our part in helping to stamp out slavery and human trafficking.

This statement sets out the steps we have taken during our financial year that started on 3 April 2018 and ended on 1 April 2019 to ensure that modern slavery is not occurring in our supply chains or in our own organisation (which, for this purpose, includes three of our subsidiaries (580 Limited, Geronimo Inns Limited and Smiths of Smithfield Limited) as they own or rent property from which we carry on our business)¹. It has been prepared for the purpose of complying with section 54 of the Modern Slavery Act 2015 (the **Act**) and is to be interpreted in accordance with it.

When we refer to **we**, **our** or **us** in this statement, we mean Young & Co's Brewery, P.L.C. Further, references to **our business** are to the management and operation of a pub estate (which includes a hotel division) and the selling of food and drink through it, and the management and operation of a tenanted division, an unlicensed estate and our head office.

Our structure and activities

We are a publicly quoted company listed on AIM, the alternative investment market. Our head office is in London. Our activities are limited to England, principally London and the South.

Our supply chains

Our supply chains include the sourcing of finished and raw materials, principally related to the provision of food and drink. These are rationalised to ensure we have a limited number of suppliers, thus allowing us to have a strong grasp on our product source. Over 90% of our beers are supplied by Marston's and we have one primary supplier for each of the following food / drink categories: meat, fruit & veg, bread, fish, wines and spirits. These close partnerships put us in a position of being able to clearly communicate our stance on modern slavery.

Our policy on slavery and human trafficking

We do not tolerate, and are committed to preventing, acts of slavery and human trafficking from occurring within our business and our supply chains.

Due diligence

As part of our commitment to combating slavery and human trafficking, we:

- 'risk assess' our supply chain and have identified building contractors, cleaning companies and coffee suppliers as our highest risk areas - our primary suppliers for these services and products have been contacted specifically to understand their approach and steps taken to ensuring slavery and human trafficking is not occurring in their operations;

¹ Reference to ensuring that slavery and human trafficking is not taking part in any part of an organisation's supply chain does **not** mean that the organisation in question must guarantee that the entire supply chain is slavery free. Instead, it means an organisation must set out the steps it has taken in relation to any part of the supply chain (that is, it should capture all the actions it has taken). [Source: "Transparency in Supply Chains etc. A practical guide" (issued under the Act)]

- ensure, where practicable, optimum control of the work environment in our business;
- communicate to all our pub and hotel general managers an overview of modern slavery and how to identify indicators of modern slavery;
- include a modern slavery awareness section in the new general manager induction programme, including a process to raise concerns regarding modern slavery;
- expect all those who have, or seek to have, a commercial relationship with us to familiarise themselves with the Act and our zero tolerance approach and to act consistently with this;
- ask any new suppliers to confirm that they will not allow slavery or human trafficking in their business or supply chains and that they have implemented policies and procedures to that effect;
- expect, as a minimum, each entity in our supply chains to adopt “one-up” due diligence on the next link in the chain;
- seek to include in our arrangements with suppliers a right to suspend or terminate our arrangements with them where we have reasonable grounds to suspect that there has been a breach of the Act;
- perform a weekly review of relevant documentation to verify all new employees are eligible to work in the UK;
- inspect payroll data on a weekly basis to confirm all employees are paid on or above the National Minimum Wage and National Living Wage, relevant to their age - the majority of employees are remunerated in excess of these amounts;
- produce weekly shift reports by employee to improve visibility of working hours;
- undertake an annual internal audit to ensure all our related processes are in place and are being adhered to; and
- have in place a whistleblowing policy to encourage members of staff to report concerns about wrongdoing and which offers suitable protection for whistleblowers.

Effective actions to address modern slavery

This coming year we intend to:

- re-audit our payroll records to ensure these meet the standards required;
- continue to ensure that our employees are eligible to work in the UK before commencing employment;
- continue to ensure that our employees are earning on or above the National Minimum Wage;
- continue to monitor working hours of each employee;
- carry on liaising with all of our suppliers, making each aware of our zero tolerance stance and our expectations of them in this regard – we will request details of any modern slavery and human trafficking discovered in their supply chains and the actions they have taken;
- continue to include a version of this statement in our ‘new supplier’ set up form so there is no room for doubt as to whether any new supplier has been informed of our policy; and
- continue to deliver training to relevant employees and workers within our business.

A copy of this statement will be published on our website.

Our board of directors, which has agreed to champion the understanding and implementation of this statement, will be regularly briefed on the actions we have taken.

Approval

This statement is made in accordance with Section 54(1) of the Act and constitutes our slavery and human trafficking statement for the financial year that started on 3 April 2018 and ended on 1 April 2019. It was approved by our board of directors on 22 May 2019 and signed on its behalf by



Patrick Dardis, Chief Executive

Note: copies of previous statements are available on request from the company secretary.