Bewley’s Tea and Coffee UK Limited

Modern Slavery and Human Trafficking Statement

Version 2

01/11/2016
### Authorisation

<table>
<thead>
<tr>
<th>Version No.</th>
<th>Author</th>
<th>Approval: Name and Position</th>
<th>Signature</th>
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<tr>
<td>1</td>
<td>Eve West</td>
<td>Michael McAdam – Managing Director</td>
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### Amendments

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<th>Date</th>
<th>Summary of Changes and Reason for Issue</th>
<th>Responsible Person</th>
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<td>01/08/2016</td>
<td>Initial Draft</td>
<td>Eve West</td>
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<td>2</td>
<td>01/11/2016</td>
<td>Update</td>
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### Review

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</tr>
</tbody>
</table>
## CONTENTS

- Purpose ................................................................................................................. 3
- Aims Of Policy ........................................................................................................ 3
- Responsibility for Compliance ............................................................................... 3
- Scope of Policy ....................................................................................................... 3
- Leadership ............................................................................................................... 3
- Organisational Structure and Supply Chains ....................................................... 3
- Due Diligence and Risks ....................................................................................... 4
- Supply Chains ......................................................................................................... 4
- Coffee Supply ......................................................................................................... 4
- Due Diligence Processes for Slavery and Human Trafficking ............................... 4
- Responsibility for the Company’s anti-slavery initiatives is as follows: ............ 5
- Reporting ................................................................................................................ 5
- Associated Policies ................................................................................................. 5
- Associated Documents ........................................................................................... 5
- Training ................................................................................................................... 5
- Contravention of the policy .................................................................................... 5
- Appeal ..................................................................................................................... 5
- Reference legislation ............................................................................................... 6
- More Information .................................................................................................... 6
PURPOSE
Bewley’s Tea and Coffee UK Limited is committed to the practice of responsible corporate behaviour and to complying with all laws, regulations and other requirements which govern the conduct of our operations.

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1st January 2016 to 31st December 2016.

The statement sets down Bewley’s Tea and Coffee UK Limited commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains.

We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

AIMS OF POLICY
The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

RESPONSIBILITY FOR COMPLIANCE
This policy is the responsibility of, and authorised by, the Managing Director.

The HR Manager is responsible for implementation in conjunction with Department Managers.

The Managing Director has responsibility for the human rights, ethical trade and corporate social responsibilities of the business.

SCOPE OF POLICY
This Policy applies to all employees, agents, contractors, subcontractors, consultants, business partners and any other parties (including individuals, partnerships and bodies corporate) associated with the Company or any of its subsidiaries.

LEADERSHIP
The Senior Management Team endorses this policy statement and is fully committed to its implementation.

ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS
This statement covers the business activities of Bewley’s Tea and Coffee UK Limited which are as follows:

Our overall offer covers coffee, tea and drinking chocolate and our brands Grumpy Mule BE, Eros and FRESH offer Fairtrade certified coffees and premium branding to back this up. Alongside this we offer everything that a café operator needs to succeed. We offer a Fairtrade bakery range from One World, Fairtrade juices and smoothies, disposables, and a range of locally produced drinks and snacks.
We partner with world class machine manufacturers, including: La Marzocco, La Spaziale, Marco, Coffetek, Brita and Blendtec. Our service team of over forty engineers are employed directly by us, and they each cover a geographical region, ensuring that call out times are under twenty four hours and we target ourselves with a ninety five percent first time fix KPI.

Our training team is one of the most highly qualified in the coffee industry and they are ALL experts in their field and will share their passion for coffee with your teams, ensuring that the drinks you serve on campus are made with speed and consistency, whilst ensuring a high quality product every time. The training they conduct, will not just “tick a box”, it will challenge and provoke those chosen, in order to achieve the best coffee quality and consistency possible.

**DUE DILIGENCE AND RISKS**

Bewley’s Tea and Coffee UK operates in the United Kingdom.

**SUPPLY CHAINS**

Our Supply chains include:

- Mainly UK Supply:

  Chain Complete Finished Ambient Product, Cold Beverages, Snacking Range, Hot Beverages Supplier Equipment

**COFFEE SUPPLY**

The ETI (ethical trading initiative) base code – Bewley’s require all suppliers as minimum to adhere to the base code, supporting fundamental workers rights.

Suppliers demonstrate that they adhere to the base code through their sustainability policies

Bewley’s would not work with suppliers that do not adhere to the ETI

Bewley’s perform quarterly to annual visits to suppliers, exporters and importers.

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

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.

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

The Company’s due diligence process includes

Completion of the supplier questionnaire which includes questions regarding the Modern Slavery
Building long-standing relationships with suppliers
Making clear our expectations of business partners
Evaluating the modern slavery and human trafficking risks of each new supplier

RESPONSIBILITY FOR THE COMPANY’S ANTI-SLAVERY INITIATIVES IS AS FOLLOWS:

1.1 Policies: The Human Resources Manager is responsible for creating and reviewing policies. The process by which policies are developed is looking at best practice and adapting to the needs of the business.

1.2 Risk assessments: The Quality Coordinator is responsible for risk assessments in respect of human rights and modern slavery by a process of supplier audit.

1.3 Due diligence: The Quality Coordinator is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

REPORTING
Collectively we share the responsibility to give feedback to each other when we fail to live up to our values, or in more serious situation to report inappropriate behaviour. We will never tolerate harassment of any kind including sexual, racial, verbal or non-verbal as well as physical. If you observe unacceptable behaviour, report it. Reporting can be to any Manager, however where possible or appropriate this should be your Line Manager.

ASSOCIATED POLICIES
Code of Conduct
Equality and Diversity
Dignity & Respect at Work Policy - Anti-Bullying, Harassment and Sexual Harassment
Anti-bribery
Recruitment Policy

ASSOCIATED DOCUMENTS
Supplier Self Audit Questionnaire

TRAINING
The company will provide training to all employees to help them understand their duties and responsibilities under this policy.

CONTRAVENTION OF THE POLICY
Failure to comply with any of the requirements of this policy is a disciplinary offence and may result in disciplinary action being taken under the Company’s disciplinary procedure.

APPEAL
You have the right to appeal against any decision made under this policy.
REFERENCE LEGISLATION
Modern Slavery Act 2015

MORE INFORMATION
Stronger Together