Anti-slavery and Human Trafficking Policy

Applicable to Heineken UK Limited and its Subsidiaries
For the purposes of this policy, references to “HUK” are to all Heineken UK businesses, including, for example, Star Pubs & Bars Limited and Scottish & Newcastle Limited.
Commitments

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. HUK has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all of its business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in HUK’s own business or in any of its supply chains.

HUK is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout supply chains, consistent with the disclosure obligations under the Modern Slavery Act 2015. HUK expects the same high standards from all of its contractors, suppliers and other business partners. As part of its contracting processes, HUK includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and expects that its suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for HUK or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

Responsibility for this policy

The Management Team has overall responsibility for ensuring that this policy complies with HUK’s legal and ethical obligations, and that all those under HUK’s control comply with it.

The HR Department has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Compliance with this policy

All HUK employees must read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of HUK’s business or supply chains is the responsibility of all those working for HUK or under its control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

HUK employees are encouraged to raise concerns about any issue or suspicion of modern slavery or any breach of this policy in any parts of our business or supply chains of any supplier tier at the earliest possible stage. Actual or potential breaches of or conflicts with this policy should be reported immediately to either a line manager, any director, a head of department or one of the HUK Trusted Representatives under the ‘Speak Up’ Policy.

If employees do not report inappropriate conduct, HUK may not become aware of a possible violation of this policy and may not be able to take appropriate action. HUK will support anyone who raises
genuine concerns in good faith under this policy, even if they turn out to be mistaken. HUK are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

**Communication and Awareness of this policy**

Training on this policy, and on the risk our business faces from modern slavery in its supply chains will be provided as necessary.

HUK’s zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of its business relationship with them and reinforced as appropriate thereafter. The Suppliers Code of Conduct sets out what HUK expects from suppliers in accordance with this policy.

**Breaches of this policy**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

HUK may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy.