Modern Slavery Act Transparency Statement 2017

This statement is made in accordance with obligations under the UK Modern Slavery Act 2015 and sets out the steps Britvic has taken during the financial year ended 1st October 2017 (FY17) to prevent modern slavery in its business and supply chains.

Operations & supply chain
Britvic is a leading soft drinks company, with manufacturing sites in Great Britain, Ireland, France and Brazil. We also contract manufacture in UK, Europe and the US. Britvic directly employs over 4,500 people and has a diverse supply chain of over 2,500 supplier organisations, sourcing ingredients, materials and services from over 45 countries. We are committed to producing high quality soft drinks which are sourced and manufactured in a fair, ethical and environmentally responsible way.

Policies in relation to modern slavery
We recognise that having the right policies in place and ensuring they are implemented effectively is fundamental to managing the risk of modern slavery in our business and supply chains. Britvic has developed a suite of policies that relate to ensuring ethical business practices are followed and these are supported by further procedures and guidance. Our approach is guided by international conventions and standards, including the United Nations (UN) Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the Ethical Trading Initiative (ETI) Base Code. Britvic has established a Modern Slavery Working Group, made up of representatives from across the relevant business functions, to oversee our approach to preventing modern slavery and review the effectiveness of our policies and processes.

Our Policies
1. Code of Conduct
This sets out Britvic’s core values and how we work. It explains what “doing the right thing” means for Britvic, including with respect to human rights and speaking up about concerns. The code applies to all Britvic employees across all our markets.

2. Ethical Business Policy
This policy sets out the appropriate ethical and legal behaviour an individual is expected to adopt when doing business on behalf of Britvic. It states that we “respect and protect human rights by ensuring that we and our suppliers work in a clean and safe environment, have proper standards of employment, comply with local laws and don’t oppress or exploit anyone”. This policy applies to all Britvic employees across all our markets. It also applies to all third parties acting on behalf of Britvic including secondees, advisors, agency workers, contractors and other companies.
3. Ethical Business Standards

These standards, linked to our Ethical Business Policy, set out the ethical business requirements expected of both Britvic operations and our suppliers. It states that “standards of employment must comply with the UK Modern Slavery Act 2015 which forbids the employment of anyone under conditions of: ‘forced labour’, ‘compulsory labour’, ‘slavery’ or ‘servitude’ or the exploitation of any person by ‘human trafficking’.” Furthermore, Britvic and our suppliers must maintain standards of employment in accordance with the Ethical Trading Initiative (ETI) Base Code, as summarised below:

1. Employment is freely chosen
2. Freedom of association and the right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. Child labour shall not be used
5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practiced
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

The above policies are available at www.britvic.com/sustainable-business/resources.

Implementation

Our policies have been embedded in our GB, Ireland and France business units for a number of years. Employees are required to complete training on its code of conduct and ethical business policy on joining. It is a key business objective to drive compliance to our Ethical Business Policy across all our employees and supply chain.

Modern slavery due diligence

Our suppliers

As part of our responsible sourcing programme and to help us monitor and assess the ethical risks and performance of our supply chain, all suppliers of direct materials (ingredients and packaging) in our GB, Ireland and France business units are required to join Sedex, complete the Sedex self-assessment ethical questionnaire and give us access to their data through the on-line database. We assess each supplier’s risk using the platform risk assessment tool which identifies the likelihood of an issue occurring. The risk score is calculated using inherent risk based on country, product area, sector profile and site function. The programme will be rolled out to our Brazil business unit in 2018.

WHAT IS SEDEX

Sedex is a not-for-profit organisation and the largest collaborative platform for sharing ethical supply chain data. It is dedicated to driving improvements in ethical and responsible business practices in global supply chains and has more than 47,000 members in over 150 countries (as reported on www.sedexglobal.com on 5 March 2018). It has a secure, online database which allows members to store, share and report information about labour standards, health & safety, the environment and business ethics.

Britvic requires all direct suppliers identified as “high-risk” to have a SMETA audit (Sedex Members Ethical Trade Audit), which assesses and verifies compliance against: Labour Standards (including absence of forced labour), Environmental Standards, Business Ethics (including absence of Bribery & Corruption) and Health & Safety. These audits also include confidential interviews with a percentage of the workforce and are carried out by independent auditors from internationally recognised audit bodies. If any issues or non-compliance with the audit standard are identified during an audit, the supplier is required to prepare a corrective action plan and remediate them within an agreed time period.
Our own business

As part of our commitment to meet the same standards that we’re asking of our supply chain, all of our manufacturing sites in GB, Ireland, France and Brazil have completed the Sedex self-assessment questionnaire. During FY17, SMETA 4 pillar audits were completed at three out of four of our GB manufacturing sites and at both of our manufacturing sites in Ireland. Our two Ebba manufacturing sites in Brazil had audits in FY16. Our newly acquired manufacturing site in Brazil, our remaining GB site and all four of our French sites will have SMETA audits in 2018.

Working in partnership

Britvic is committed to continual improvement of our ethical processes, including how they relate to modern slavery. In the financial year ending 1 October 2017, we continued to engage with external partners to meet this objective:

(i) Sedex
We continue to proactively contribute to the Sedex data platform and its continuous improvement. This year, we contributed to Sedex’s 2017 review of the SMETA audit standards. The review focussed on updating the audit standard in line with best practice and emerging issues, including increasing its robustness in assuring the absence of modern slavery at audited manufacturing sites.

(ii) AIM-PROGRESS
Britvic continued our membership of the AIM-PROGRESS initiative in 2017. This is a global FMCG manufacturer and supplier forum whose goal is to positively impact people’s lives through combined leadership of robust responsible sourcing practices throughout our supply chains. AIM-PROGRESS members exchange views and share learnings that help us to develop best practice and continually enhance our ethical processes. Further information can be found at www.aim-progress.com

Simon Litherland
Chief Executive Officer
20 March 2018