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SLAVERY AND HUMAN TRAFFICKING STATEMENT

3rd December 2018

Marston's recognises the opportunity created by the Modern Slavery Act 2015 (the "Act") for large organisations to play a part in reducing the exploitation of people around the world. We recognise that the economic benefit of a global supply chain carries with it a responsibility to consider how goods and services are produced and delivered ethically and without the exploitation of vulnerable persons. Marston's is committed to respecting the human rights of our people and those with whom we interact.

We recognise our responsibility to identify and address potential or actual human rights infringements linked to the products and services we provide. We encourage our suppliers to uphold the same standards as we apply to ourselves.

OUR STRUCTURE

The manner in which Marston's operations are structured is explained on our website www.marstons.co.uk. With the exception of beer exportation all of our activities are in the UK.

Marston's is a UK brewer, retailer and distributor of drinks, pub and lodge operator, as well as a large scale property owner. These operations focus upon our two key strategic objectives:

- › (1) Operating high quality pubs and lodges offering great places to drink, eat and stay
- › (2) Operating a best in class beer business with a wide range of premium and local brands and great service

Given these operations human rights issues could arise within our UK or overseas supply chain concerning:

- › food (fresh, ready prepared, ingredients)
- › drink brands (wines, spirits, soft drinks, beverages)
- › beer ingredients (malt, sugar and hops)
- › consumables
- › uniforms and cleaning
- › building materials and furnishings
- › plant and equipment

We protect all people working within our pubs, depots and breweries from any form of exploitation. Compliance with all aspects of UK employment law is a priority within our business, and is expected from all our suppliers.

We understand the agencies which supply people to work on our premises, including the supply of packaging operatives at our breweries, security guards at our depots, door staff for our pubs, as well as kitchen workers and cleaners.

OUR SUPPLY CHAIN

Marston's purchases goods and supplies almost exclusively from the UK or from European companies. Workers' rights are legally protected within Europe, and therefore we have a high level of expectation that those people employed by our European suppliers are not being exploited.

Despite Marston's buying from European companies a high proportion of the food, goods and resources, which our business depends upon, originates from countries outside of Europe e.g. chicken, beef, cooking oil, uniforms, beer kegs, and diesel.

During the tendering of our main suppliers we carry out due diligence in order to understand how their employees are treated, and how they source their own services, goods and resources. Marston's expectation on the treatment of employees is communicated to suppliers during the tender.

OUR EXPECTATION OF SUPPLIERS

Marston's expects its key suppliers to follow the Corporate Code of Ethics published by CIPS (Chartered Institute of Procurement and Supply) www.cips.org/en-GB/who-we-are/governance/cips-code-of-conduct/.

The expectation that our suppliers will operate in accordance with the CIPS Code of Ethics is communicated to companies tendering to supply Marston's.

The Code sets out the values, business culture and practices which all organisations can adopt. The Code requires a commitment to the eradication of unethical business practices, including bribery, fraud, corruption and human rights abuses, such as modern slavery and child labour.

During 2018 we contacted 130 of our higher and medium risk suppliers (55 contacted last year). The risk assessment takes into account the industry and geographical location of the supplier. Each of the suppliers were given a questionnaire so we could enquire about how they audited themselves and their supply chain in regard to modern slavery, and what remediation they take. We also asked what documentary evidence of such audits they have retained.

In 2019 we will continue to contact our suppliers, and we will evaluate how ethical audit information can be best sourced across a wider coverage of our supply chain.

We review the Modern Slavery Statements of our food and drinks suppliers (across all categories of drinks) and the

construction companies building our pubs and lodges. We contact them where necessary with more specific questions, if not answered in their statements. We contact suppliers if we consider their modern slavery statement content is significantly below the expectation of the Modern Slavery Act in terms of detail, or the statement is non-compliant with the Act.

In 2018 we revised our Food Supplier Charter (<http://www.marstons.co.uk/docs/responsibility/food-supplier-charter.pdf>) in order to communicate the high standards and ethical business practices expected, including in respect of employment practices and modern slavery. The Charter forms part of trading terms between us and the companies supplying food to our pubs. We carry out audits at suppliers' premises, which include the consideration of whether the standards in the Charter are being met.

Marston's Food Supplier Charter (excerpt – page 21)

<http://www.marstons.co.uk/docs/responsibility/food-supplier-charter.pdf>

Forced Labour

- All work must be conducted on a voluntary basis and free from the imposition of any penalties or sanctions. We absolutely do not agree to purchase any products from any supplier produced through forced, bonded or involuntary labour. We will not tolerate slavery and human trafficking by any of our suppliers for Marston's, or any other purpose, and fully expect our suppliers to take active steps in ensuring the same
- Suppliers must allow their employees the right to leave after giving reasonable notice. Workers must not be required to lodge deposits or I.D papers unless it is a legal requirement to do so. In all circumstances these must be returned promptly upon cessation of employment

OUR PEOPLE

Marston's is compliant with all aspects of UK employment law, particularly those aspects of the law which protect individuals from exploitation. Important controls in this context are:

- carrying out identity checks on new workers
- ensuring that new workers have the right to work in the UK
- retaining copies of documentation as proof of identity
- auditing our payroll process

AGENCIES SUPPLYING STAFF TO OUR PREMISES

Agencies supplying staff to all our pubs, production sites, depots and distribution centres operate within UK employment law.

We continue to form long term relationships with the agencies supplying workers to our sites to constantly improve our understanding of their businesses and their own compliance to employment law.

Agencies supplying staff to our production and distribution sites are audited twice a year by our HR team. The audit includes making direct contact with a random sample of agency staff to confirm their terms of employment.

OUR POLICIES

Marston's builds and maintains long term relationships with its suppliers, and we are diligent throughout these relationships in understanding their businesses.

Marston's Group Purchasing Policy is applicable to purchasing contracts over £50k, and ensures that the negotiation of all such new supplies involves our Group Purchasing team. This policy supports the due diligence process of understanding our customers.

Our Ethical Purchasing Policy is operated throughout the business, and our purchasing team look for compliance with it.

SUPPLIER AUDITING

We carry out periodic site visits at our key food and drink suppliers.

Our food suppliers are audited by an independent consultant. The audit is primarily for food safety purposes, however the audit programme does make ethical enquiries, including the risks of modern slavery in the supplier's extended supply chain.

MODERN SLAVERY POLICY

We do not have a separate policy on modern slavery but are working to include direction on this issue within appropriate corporate policies:

- ▶ Pub Food Supplier Policy - <http://www.marstons.co.uk/docs/responsibility/food-supplier-charter.pdf>
- ▶ Human Rights Policy (expected to be published in 2019)

KPIS

In 2019 we will consider appropriate KPIs to adopt in order to track progress made within our supply chain to report and respond to the issue of modern slavery.

TRAINING

The purpose of this statement is explained to our Exec Committee, Corporate Responsibility Committee, and the Risk and Compliance Committee.

The Modern Slavery Act has been explained to the managers responsible for the majority of our purchase streams, who have in turn considered the risks of modern slavery in our supply chain, and the appropriate wording of this statement.

Our managers have considered and support our future intentions as stated above so that we may continually improve our approach on this important matter.

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 29 September 2018.

Ralph Findlay Chief Executive Officer
MARSTON'S PLC
Marston's Trading Limited
Marston's Operating Limited
Marston's Pubs Limited
Marston's Pubs Parent Limited

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