SLAVERY AND HUMAN TRAFFICKING STATEMENT

Statement for Financial Year ENDING 30 JUNE 2019

OVERVIEW

Our success at Pernod Ricard UK Limited ("PRUK") is intrinsically linked to the way we conduct our business in a responsible and ethical manner. These behaviours help to foster a culture of mutual trust and ethics both within the business and with our suppliers. PRUK adopts a zero-tolerance approach to slavery and human trafficking. We are committed to taking all reasonably practicable steps to ensure that slavery and human trafficking are not present either in our business or in our supply chains. In order to achieve this, we seek to identify and tackle slavery and human trafficking risks.

1. Our commitment

1.1 About us
PRUK is the UK affiliate of Pernod Ricard, the world’s number two in the wines and spirits sector worldwide. Our parent company, Pernod Ricard, has its head office in France. Further information about our parent company, business and organisational structure can be found at:


1.2 Our standards
Since 2003, Pernod Ricard has been a participating company in the United Nations Global Compact and is therefore committed to respecting and promoting the core principles.

As part of the Pernod Ricard Group, PRUK is accordingly committed to eliminate forced labour and compulsory labour and to effectively abolish child labour.

This includes International Labour Organisation conventions 138 & 182 on the prohibition of child labour and 29 & 105 on the elimination of forced or mandatory labour.

We expect the same standards from all those we work with, including business partners and suppliers. PRUK is committed to working closely with our suppliers to ensure that slavery and human trafficking risks are identified and managed proactively.

1.3. Our actions
Since the Modern Slavery Act 2015 came into force, we have built on our existing commitment by:

- taking legal advice on the steps necessary to support compliance;
- identifying and monitoring key slavery and human trafficking risks in our business and in our supply chains;
- adopting a specific Anti-Slavery Policy (which has been approved by the PRUK of Directors) and continuing implementation within PRUK;
- continuing to operate our cross-functional team responsible for implementing this policy (which continues to meet on a quarterly basis to monitor and review the effectiveness of our Anti-Slavery Policy);
- maintaining our existing training programme to directly support compliance with our Anti-Slavery Policy;
- continuing to deliver tailored training to staff with responsibility for managing supplier contracts;
continuing to review our supplier contract terms to identify compliance opportunities;
ensuring that bespoke contracts continue to include a compliance clause;
maintaining a website link for suppliers to easily access our supplier CSR policies;
ensuring that our existing supplier due diligence and audit processes continue to support compliance with our Anti-Slavery Policy.

2. Our policy

2.1. About our Anti-slavery Policy

We are committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to prevent slavery and human trafficking in our supply chains. Our Anti-Slavery Policy:

• applies to all staff and suppliers working for, or on our behalf, in any capacity;
• builds upon Pernod Ricard’s existing policies (including our Procurement Code of Ethics, Code of Business Conduct and Responsible Procurement Policy);
• includes guidance to our staff with examples of unusual behaviour displayed by workers which may be indicative of someone experiencing slavery or human trafficking;
• makes it clear that PRUK will support anyone who raises genuine concerns in good faith, even in circumstances where it transpires that those concerns are mistaken.

2.2 Working with our suppliers

To identify and mitigate the risk of slavery and human trafficking being present in our product supply chains, we employ sourcing strategies such as:

Informing our suppliers of the standards that we expect through our Supplier CSR Commitment [https://www.pernod-ricard.com/en/sr/](https://www.pernod-ricard.com/en/sr);

Assessing suppliers using tools such as [the EcoVadis platform](https://www.ecovadis.com) (which includes scoring based on factors such as health & safety, child labour, slavery and payment of the minimum wage).

2.3 Training our people

Training on PRUK’s Anti-Slavery Policy and the risks of modern slavery and human trafficking in our business and in our supply chains is available:

as part of the induction process for individuals who work for us; and

as part of a tailored training program for those with responsibility for managing supplier contracts

3. Ensuring effectiveness

3.1. Measuring our success

We use the following key performance indicators to measure how effective we have been in combatting slavery and human trafficking:

Training is incorporated in all staff inductions and made available to all relevant existing staff.

Policy breaches are reported to PRUK within three business days of occurring.

Policy breaches are assessed within one week of being reported and further investigations concluded as soon as possible thereafter.

We will continue to monitor the effectiveness of our compliance regime and take necessary steps to address any identified instances of slavery and human trafficking.

3.2. Our next steps

Following a review of the effectiveness of the steps we have taken to manage the risks of slavery and human trafficking in our supply chains, we intend to take the following further steps to combat slavery and human trafficking:
we will continue to provide upfront and ongoing training to staff on our Anti-Slavery Policy, including tailored training to those with responsibility for managing our supplier contracts.

We will look at ways in which to enhance our supplier due diligence processes in order to continue to maintain an effective compliance regime; we will continue to monitor and review the effectiveness of our wider compliance regime;

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 30 June 2019.

David Haworth
Managing Director
Pernod Ricard UK Limited,
1 July 2019