

SLAVERY AND HUMAN TRAFFICKING POLICY

Introduction

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers and can take various forms such as slavery, servitude, forced or compulsory labour and human trafficking.

Lanchester Group is committed to the steps we have taken to combat slavery and human trafficking and we are committed to constantly reviewing and improving our practices.

The company expects the same high standards from all its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery, and expects that its suppliers will in turn hold their own suppliers to the same standards.

About Us

Formed in the 1980's, The Lanchester Group now comprises of seven companies, each with very different specialities, but constantly working together providing a truly unique service for our customers.

- **Lanchester Wines** is a major supplier of wines and spirits, bonded warehousing and distribution. We source wines from producers and suppliers from all over the world, supplying both the on and off trade as well as creating our own brand ranges. We also have a Warrington based division dealing exclusively with bulk wine orders, supplying some of the UK's major high street retailers and supermarkets.
- **Spicers of Hythe** is a major drop ship supplier of wine and food gifts and hampers to internet based businesses and high street retailers. We can create gifts to meet most price points, pack and deliver to home addresses in the UK as well as drop ship and supply in bulk.
- **Greencroft Bottling** specialises in packaging wines and spirits. We pack a wide range of products in a variety of packaging including bottles, bag in box, pouches, kegs and cans. We pride ourselves in our constant re-investment in the latest technology, keeping us at the forefront of the wine packaging industry.
- **Lanchester Energy** is aimed at developing renewable energy sources, beginning with the Lanchester Group's own wind turbines. We're now investigating possible new forms of renewable energy generation, including solar and waste conversion.
- **Lanchester Properties** owns and maintains our Co. Durham site. Set up in 2000, we have heavily invested in renewable energy and were constantly improving facilities on site.
- **Full Circle** is our local brewery, tap room and off-licence based in Ouseburn, Newcastle. Through the online ordering system we can deliver products across the UK, and in some case around the world.

- **Bon Bons (Wholesale) Ltd** are an independent confectioner based in West Yorkshire, concentrating entirely on hand-packed luxury confectionery.

Our Policies on Slavery and Human Trafficking

Our policy reflects our commitment to acting ethically and with integrity in our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our labour supply chains. We are committed to ensuring:

- employment is freely chosen
- freedom of association and the right to collective bargaining for all
- conditions of work are safe and hygienic
- there is no child labour in our businesses or supply chain
- that living wages are paid
- working hours are not excessive
- no discrimination takes place in our organisation
- regular employment is provided
- no harsh or inhumane treatment is allowed

Responsibility for the Policy

The Board of Directors has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations. The HR Manager has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems, policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we monitor ethical standards across the business on a regular basis both internally and via external third party audits. As a B member of SEDEX we are subject to unannounced periodic SEDEX members Ethical Trade Audits as well as individual customer audits. Sedex reports are published and shared with our Customers.

Remediation

Should slavery, and more concerning child slavery, be found in our businesses or supply chain, we are committed to adopting industry best practice to make sure we do the right thing for any young or vulnerable person we find.

This means that if an underage worker is found working in a factory we source from, we will report them to the appropriate authorities and ensure their immediate safety. We will then continue to

work with our suppliers and authorities, wherever possible, to them find a school, secure housing and where possible, financial support until they reach the legal age of work.

We expect our supplier to adopt these principles should an underage worker be found in their employment.

Our Supply Chains

As a responsible employer we strive to ensure that any labour providers we use are recruiting responsibly and not using third party suppliers whereby the risk of trafficking and slavery is greater.

As a company we use Labour Providers to supply a percentage of our workforce. Each Labour Provider is audited against our own Labour Provider audit standard by trained auditors every 6 months. Within these audits, the ETI Base Code and controls around Modern Slavery are reviewed.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff as part of their induction. Our HR team has attended the 'Stronger Together – Tackling Modern Slavery in Supply Chains' workshop and the Stronger Together data is shared across our sites during induction in order that both our permanent and temporary labour is fully aware of our commitment to preventing slavery and human trafficking in our business, and along our supply chain. We also have various "campaign posters" displayed across the site.

This year we committed to reviewing the induction training material to ensure across the group, the message is up to date and consistent.

Raising Concerns

The Company aims to encourage openness and to support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith, their suspicion that modern slavery is or may be taking place in any of its businesses or supply chains.

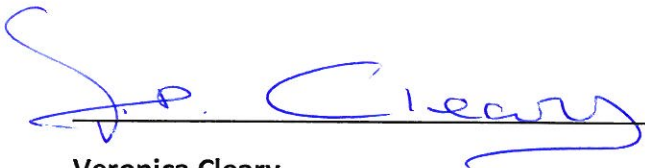
Concerns should be raised directly to the HR Manager. In their absence, to a Senior Manager. Concerns will be investigated and if necessary, reported to the authorities for immediate action. Safety and confidentiality of any individuals is paramount and measures will be taken to protect vulnerable persons.

Breach of the Policy

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and / or are found to have been involved in modern slavery.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 30th June 2021.



Veronica Cleary

Director

SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

The Company is committed to the steps we have taken to combat slavery and human trafficking and we are committed to constantly reviewing and improving our practices to ensure it is not taking place in its supply chains.

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Our Policies on Slavery and Human Trafficking

Our Recruitment Policy reflects our commitment to acting ethically and with integrity in our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our labour supply chains.

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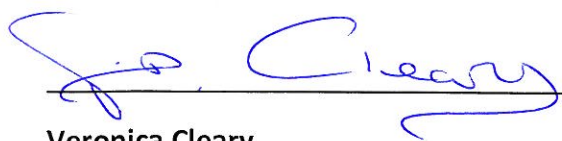
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