

## **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.

The 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 in turn will hold their suppliers to the same standards.

### **About us**

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

- **Lanchester Wines** is a UK based wine importer and wine merchant supplying a wide range of quality and premium wines to the trade with customers ranging from pubs, clubs, bars and hotel chains through to high street retailers, supermarkets and national pub and restaurant operators. We operate over 1 million square feet of bonded warehouse across five sites, holding the BRCGS AA accreditation for Storage and Distribution which ensures the quality and safety of products during their storage and distribution throughout the supply chain.
- **Greencroft Bottling** is one of the UK's top contract wine packers with a relentless passion for innovation, personal service and superb quality. BRC AA+ accredited, we believe that bottling in the UK brings enormous benefits for wine producers, consumers and the environment. Our goal is to ensure that, whilst in our care, the brand owner's vision is brought to the bottle as brilliantly and authentically as possible. Greencroft Two is our new home for Greencroft Bottling, A sustainable wine bottling facility powered by renewable wind and solar energy.
- **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 delivery to home addresses in the UK as well as drop ship and supply in bulk. Spicers also holds the BRCGS AA accreditation for Storage and Distribution.
- **Bon Bon's (Wholesale) Ltd** provides speciality confectionery for high-end independent retailers and visitor attractions including the good food range. Salsa accredited, our offering features products we produce in-house under the Bon Bon's brand alongside a hand-picked selection of items sourced from the finest producers in the UK and Europe.

- **Full Circle Brew Co** was founded in 2019 and is based in Byker, Newcastle upon Tyne. They have gained huge popularity from their no-nonsense range of high-quality pales, IPAs and lagers. Salsa accredited, FCBC also produce a wide range of seasonal beers including stouts, sours and many other styles and are best known for their flagship Looper IPA which has won numerous awards across the world. Full Circle Brew Co's beers are exported to 12 countries and also available online, in select supermarkets and at Newcastle Airport.
- **The Wine Fusion** is our wine import business based in London. It specialises in developing bespoke bulk wine solutions for high volume, fast-moving mail order customers.
- **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 on site facilities including our three wind turbines.

### **Our Policies on Slavery and Human Trafficking**

Our policy reflects our commitment to acting ethically and with integrity in our business relationships and implementing, enforcing effective systems and controls, as far as we reasonably can, 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 Group 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 to ensure their immediate safety.

We expect our suppliers 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.

## **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 with to the Group HR Manager [hr@lanchesterwines.co.uk](mailto:hr@lanchesterwines.co.uk). 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.

### **Resources**

- ETI Base Code [ETI Base Code | Ethical Trading Initiative \(ethicaltrade.org\)](#)
- Gangmasters & Labour Abuse Authority [GLAA](#)
- Stronger2gether [Stronger Together, tackling modern slavery in supply chains \(stronger2gether.org\)](#)

### **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.

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*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 30<sup>th</sup> June 2026.*



**Veronica Cleary**

**Director**