

# HALEWOOD

Wines & Spirits

## Halewood International Limited

### Modern Slavery Statement

Modern Slavery Statement for Financial Year 1 July 2017 – 30 June 2018:


Halewood International is committed to ensuring that there is no modern slavery or human trafficking in our business or throughout our supply chains. We act ethically, transparently and with integrity in all our business relationships.

Halewood International has implemented the following steps to reduce the risk of slavery and human trafficking within the business and our supply chains:

- Holding regular meetings of the Modern Slavery Action Team (comprising of the internal Legal department, Head of HR, the Operations Director, and the Purchasing Director (Procurement)) to discuss areas within the business and its supply chains which are most likely to be at risk of modern slavery, and develop appropriate strategies for addressing these risks.
- The Action Team identified a risk of forced labour in Halewood International's production line workforce, and in particular staff who are employed via external agencies. This is because Halewood International does not have control of the recruitment process for staff recruited via a third party agency and so cannot assess the circumstances under which employees have come to work for the business. To address this, the business has incorporated an MSA audit into the ethical audit which it carries out annually on recruitment agencies used by the business, ensuring that these agencies are aware of and understand the MSA and requesting confirmation that they have policies in place to protect against the risk of modern slavery. For FY 2017/18, HIL has identified a number of new recruitment agencies which have supplied staff to the business, and has implemented audits of these agencies.
- Additional key suppliers who present a possible modern slavery risk have been identified. Accordingly a letter has been out to those suppliers (and to suppliers contacted in previous years):
  - setting out the detail of the MSA;
  - requesting a copy of their Modern Slavery Statement (for those suppliers directly impacted by the MSA); and/or
  - requesting confirmation that they have policies in place to eradicate the risk of human trafficking (for those not directly impacted by the MSA).

- Posters have been created highlighting the warning signs that an employee may be a victim of human trafficking, and advising employees to contact their line manager in confidence if they have any concerns. These posters are placed around the Halewood International factory work area and have also been placed across any sites owned or operated by the Halewood corporate group. As Halewood employs staff and/or operates businesses across a number of countries, the posters have been translated into Polish, Romanian and Chinese.
- A Modern Slavery policy document has been placed on the Intranet, accessible to all employees.
- Halewood International's Standard Terms of Purchase and Standard Terms of Sale now include an obligation on parties with whom the business trades to comply with the Modern Slavery Act 2015.
- Halewood International's precedent agreements (for example supply of goods, distribution) have been updated to include an obligation on the other party to comply with the Modern Slavery Act 2015.

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 June 2018.

Signed by:  \_\_\_\_\_

for and on behalf of Halewood International Limited

Date: 18.01.2019