

# HALEWOOD

Wines & Spirits

Halewood International Limited

## Modern Slavery Statement

Modern Slavery Statement for Financial Year 1 July 2016 – 30 June 2017:

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:

- Formation of a Modern Slavery Action Team comprising of the internal Legal department, Head of HR and the Operations Director to meet and 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 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.
- Key suppliers have been identified and a letter has been out to those suppliers:
  - 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 a person 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 factory work area and, as Halewood International's workforce comprises employees from across Europe, the posters are translated into relevant languages.

- A Modern Slavery policy document has been created and placed on the Intranet, accessible to all employees via the Intranet.
- 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.

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 2017.

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

Date: 19.12.17 \_\_\_\_\_

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