



Modern Slavery Statement

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 for the financial year ending 31 December 2019. It sets out the steps that Suntory Beverage & Food Europe (SBFE) has taken and is continuing to take to seek to ensure that modern slavery or human trafficking (as defined in the Modern Slavery Act 2015) is not taking place within our business or supply chains. This statement is made by SBFE on behalf of the companies within the SBFE corporate group but it focusses, in particular, on our UK operating business, Lucozade Ribena Suntory Ltd (LRS).

Our business, structure and supply chains

Our SBFE business units and supply chain stretch across a number of countries around the globe, and many different people are impacted by what we do. We believe in fairness, respect, and equality for all, and strive to create a more diverse and inclusive culture in our workplaces. We are committed to keeping this at the heart of what we do both now and in the future. As a business, we are committed to having a positive impact on the lives of our consumers by providing them with a responsible choice of great tasting drinks and enabling them to lead active lifestyles through our shared vision of enjoyable wellness. We are equally committed to fairness and respect across our work force and supply chain. This zest for life and passion to allow people to be the very best they can be is reflected in our values and our culture.

In the UK, we are best known for our Lucozade, Ribena and Orangina drinks brands, but we also distribute a range of other drinks, for example, Merchant's Heart. Details of each of these brands are set out on the [LRS website](#). For example, made from 100% British Blackcurrants, Ribena is the biggest-selling blackcurrant brand in the UK and accounts for 90% of the British blackcurrant crop. More details on how LRS works with blackcurrant growers around the UK is set out below.

For the purposes of the UK, LRS' products are primarily manufactured at our UK site at the Royal Forest Factory, Rock Lane, Coleford Gloucestershire, although we also work with third parties who produce a small quantity of our products across the UK, France, Spain, Belgium, Germany, Poland and Bosnia.

Our policies and how we do business

Like our consumers and the world around us, we're constantly evolving and adapting to complex changes in the external environment. Growing for Good is our company's promise to provide innovative solutions and take collaborative action to reduce our environmental footprint and deliver sustainable growth with a purpose. For us, this means creating great tasting drinks that people can feel good about. Our approach centres around four key areas: Our drinks, Our Resources, Our Society and Ourselves.

As part of this, at SBFE, we are committed to working with integrity, which is why we have an SBFE Ethics & Compliance programme. Our brands and our products are trusted everywhere we operate and our business is built on this foundation of trust. As a business committed to acting ethically, honestly and transparently, SBFE has a zero-tolerance approach to modern slavery and human trafficking.

At LRS, responsibility for ensuring we meet the standards that SBFE sets itself and us is led by the LRS

Ethics and Compliance Committee, with support from the LRS Board and others across the business, and we encourage all of our people to engage with, and fulfil, our values. We support our employees to feel empowered to raise any concerns they may have of possible misconduct within our workforce, or of suspected modern slavery or human rights issues, and have an Ethics and Compliance hotline policy detailing how employees can report such matters. The hotline is available 24/7 and is operated by an independent organisation who treat matters as confidential.

Our SBFE Procurement Policy is aimed at ensuring our sourcing activities are both ethical and socially and environmentally compliant. It also aims to ensure we manage and monitor our suppliers and service providers in an open and transparent way.

Our global standards on responsible sourcing are based on the Ethical Trading Initiative (ETI) Base Code, an alliance of companies, non-governmental organisations and trade union organisations committed to working together to identify and promote good practice in the implementation of codes of labour practice and key international standards, including the International Labour Organisation's (ILO) fundamental conventions on labour standards.

The risks in our industry, how we choose our business partners, and due diligence

We are aware of the risk of modern slavery and human trafficking within the beverage industry and we are committed to implementing and enforcing effective systems and controls to ensure that it is not taking place anywhere in our own business or in any of our supply chains. We are also committed to ensuring that there is transparency in our own business and in our approach to tackling modern slavery and human trafficking throughout our supply chains.

Our supply chains include suppliers from across the world. At LRS, in order to fulfill our commitment to ensuring that there is no modern slavery or human trafficking in our business and our supply chains, we specifically take the following steps:

- The SBFE Codes of Business Conduct for Employees and Business Partners expressly commits SBFE to safeguarding human rights within its business and within its supply chain. SBFE employees and business partners are prohibited from engaging in, or in any way condoning, involuntary or compulsory labour and our employees are required to identify any suspicion of human slavery or trafficking within the business or the supply chain to the business' legal team immediately;
- Our commitment to acting with integrity, along with the relevant Codes and Policies, are set out on [LRS's website](#);
- Our business partners are vetted for their commitment to the prevention, detection and combatting of modern slavery through questionnaires, due diligence checks, site visits and audits;
- Before commencing relationships with our business partners, they are required to sign a pre-qualification questionnaire confirming that they agree to be bound by our Code of Conduct for Business Partners;
- We have appropriate Modern Slavery Act contractual terms and conditions to ensure that our suppliers commit to meeting the standards that we set;
- The identity and eligibility to work of all our new employees is checked;
- We ensure that all our employees have freely chosen their employment: there is no child, forced, bonded or involuntary labour, and workers are not required to lodge their identity papers or deposits. They are able to leave their employment after reasonable notice; and
- Wages and benefits paid to our employees for a standard working week are never less than the applicable national legal standards.

We use third party due diligence and monitoring tools (including, for example, SEDEX) which help us screen potential and existing suppliers to manage risks in our supply chain. For example, once a supplier has submitted the pre-qualification questionnaire, if there are any concerns the tool facilitates additional checks of the supplier. We are making full use of the world's largest ethical

platform to extend visibility beyond our business to ensure that we maintain an ethical supply chain for our products.

As noted above, Ribena accounts for 90% of the British blackcurrant crop. We recognise that fruit harvesting is an area where there is a potentially higher than average risk of exploitation, due to the frequency of which migrant workers are used to pick fruit by hand. LRS works closely and directly with 36 blackcurrant growers around the UK. These trusted relationships span for generations and are focused on a shared passion for taste and the environment. Around 10,000 tonnes of blackcurrants are harvested each year. All our blackcurrants are harvested mechanically, using machinery utilised by employees of the growers: they are not picked by hand. Further details on the 'Bush to Bottle' journey of Ribena can be discovered [here](#).

Training and support

We have trained relevant staff on the prevention, detection and combatting of modern slavery, and will continue to provide training within SBFE.

In particular, in 2019 we launched an online modern slavery training module to relevant employees across our organisation, including in our procurement, supply chain, human resources and legal teams, amongst others. Relevant employees are required to complete the updated online module in 2020, and we will continually review the training and those who are required to complete it each year. Our aim in delivering this training is to embed an even greater understanding across key business areas of our zero-tolerance approach to modern slavery and human trafficking within our supply chains. The training is targeted at those employees most directly involved in making purchasing decisions or carrying out actions where there is the highest risk of modern slavery issues within our supply chains. We recognise the complex nature of modern slavery and based on the positive feedback from employees who have completed the module, we know the training has been effective and has increased awareness of the risks within our business and wider FMCG industry.

We also continue to communicate the importance of preventing modern slavery in our organisation to our workforce by publishing relevant literature around our UK sites. In addition, we provide training on ethical behavior in the workplace for all our employees across our UK sites.

The importance of ensuring the prevention, detection, and combatting of modern slavery has been discussed and agreed at a senior level within SBFE, including, for example, by the LRS Board, Ethics and Compliance Committee, and Executive Committee, the members of each of which have confirmed their commitment to leading the business in this respect, and are set out on the [LRS website](#).

As noted above, if an employee has concerns with wrongdoing at work, including any concerns regarding modern slavery or other human rights issues in the LRS supply chain, we encourage them to voice these concerns, including through our Ethics and Compliance Hotline.

Looking to the future

As part of our commitment to tackling modern slavery and human trafficking, we will continue to look for ways to improve upon our existing policies and procedures. We expect that our suppliers and our partners share our commitment to tackling modern slavery and human trafficking and that they will seek to ensure that their suppliers do the same.

Approved by the board of Lucozade Ribena Suntory Limited on 22 June 2020 and signed by:



Carol Robert, COO
Lucozade Ribena Suntory Limited

Date: 22 June 2020