



Modern Slavery & Human Trafficking Statement

1. Introduction

This statement sets out Refresco Beverages UK's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

As part of the manufacturing industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

2. Organisational structure and supply chains

This statement covers the activities of Refresco:

Refresco is an independent bottler of soft drinks and fruit juices for retailers and A-brands in Europe and the US. With production in the Benelux, Finland, France, Germany, Iberia, Italy, Poland, the UK and US our global sourcing and local R&D capabilities offer an almost unlimited variety of products, manufactured to customer specifications and requirements.

High-risk activities

The following activities are considered to be at high risk of slavery or human trafficking:

- Recruitment; number of agency workers used in the organisation particularly relating to lower skilled job roles.

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** Put in place by HR and Supply Chain.
- **Investigations/due diligence:** HR Recruitment team in conjunction with the onsite recruitment agency (PrimeTime).
- **Training:** Human trafficking video supplied by Stronger Together played at the new starter induction each month, video posters put up November 2016 and briefing for managers to recognise signs of human trafficking communicated in January 2017. Workshops to be developed and rolled out during 2017.



3. Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistle blowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our Group confidential helpline.
- **Employee code of conduct** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier/Procurement code of conduct** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment/Agency workers policy** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

4. Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking
- using industry tools where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular.

5. Training

The organisation's modern slavery training covers the following areas:

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative.

6. Awareness-raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by putting up posters across the organisation's premises a circulating a key message document to managers.

The posters explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

Board Approval

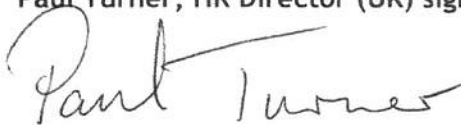
This statement has been approved by the organisation's UK Managing Director and HR Director, who will review and update it annually.

David Saint, Managing Director (UK) signature:



25/1/17

Paul Turner, HR Director (UK) signature:



Date: 25th January, 2017.