



Modern Slavery Statement 2019

This statement is published in accordance with section 54(1) of the Modern Slavery Act 2015. It sets out the approach taken by HEINEKEN UK Limited and its group companies during the year ending 31st December 2019 to prevent modern slavery in its business and supply chains.

This statement applies to all Heineken UK Limited group companies. At the time of publication the following group companies meet the reporting threshold contained in the Modern Slavery Act 2015:

Heineken UK Limited
Red Star Pub Company (WR III) Limited
Punch Taverns (Jubilee) Limited
Punch Partnerships (PTL) Limited
Blue Star Pub Company Limited

A handwritten signature in black ink, appearing to read "Lynsey Nicoll", written over a horizontal line.

Name: Lynsey Nicoll
Position: Head of Legal
Date: 30th June 2020

What is Modern Slavery?

Modern slavery describes situations where someone is being exploited and controlled by a person or organisation, without the ability to leave or change their situation, such as forced labour, debt bondage or bonded labour, human trafficking and child slavery. It can affect people of any age, gender or race. Most commonly, slavery affects people and communities who are vulnerable to being taken advantage of.

HEINEKEN UK is committed to the highest standards of business conduct, ethical behaviour and integrity throughout its business. We have adopted a zero-tolerance approach to modern slavery in our organisation, and are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our organisation or within our wider supply chain network.

Modern Slavery World Wide

40.3 million people worldwide are considered to be living in modern slavery.

10 million of the people living in modern slavery are children.

30.4 million of the people living in slavery are situated in the Asia-Pacific region.

16 million slavery victims are exploited in economic activities.

4.1 million People living in slavery are exploited by governments.

[International Labour Organization - Global Estimates of Modern Slavery: Forced Labour and Forced Marriage Report](#)

Modern Slavery in the UK

In the year to March 2019 there were 5,144 modern slavery offences recorded in the England and Wales.

There was a 51% increase in modern slavery offences reported in England and Wales for year ending March 2019

6,985 potential victims were referred to the National Referral Mechanism.

23% of the potential victims referred to the National Referral Mechanism were UK Nationals.

[ONS - Modern slavery in the UK: March 2020](#)

Our Business and Supply Chain

We are the UK's leading pub, cider and beer business and the name behind iconic drinks brands such as Strongbow, Bulmers, Heineken, Fosters, Amstel and Desperados, together with a full range of speciality brands. We employ 2,319 people in the UK and have breweries, cider plants and offices in Edinburgh, Tadcaster, Manchester, London, Hereford and Ledbury. We also own a nationwide pub estate of around 2,500 outlets.

Our end-to-end supply chain comprises many different elements:



We work with suppliers across our brewing, on trade, off trade and other commercial operations. We recognise that there is always a risk of modern slavery occurring in our supply chain and have taken steps to understand and to mitigate those risks (as further detailed below).

Our Human Rights Policy

Respect for human rights is embedded throughout our business. Our Human Rights policy has been in place since 2012 as part of our [Code of Business Conduct](#) which applies across the entire worldwide HEINEKEN organisation.

Our policy is aligned with international standards including the Universal Declaration of Human Rights, the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO), the Guidelines for Multinational Enterprises of the Organisation for Economic Cooperation and Development (OECD) of 2010, and the United Nations (UN) Guiding Principles on Business and Human Rights, and incorporates the following 10 key human rights standards as a foundation to help us to understand, avoid and address human rights-related risks:

- Health and safety
- No forced labour
- Child protection
- Rest and leisure
- Access to water
- Non-discrimination
- No harassment and violence
- Freedom of association and collective bargaining
- Fair wages and income
- Respect for human rights in high risk contexts

Our Human Rights Policy can be viewed [here](#).

Risk Management

In order to comply with the high standards we have set for our business and supply chain, we are constantly reviewing and assessing our processes. We take a risk based approach to identifying and eradicating modern slavery and human rights abuses. Some of the measures we adopt are set out below.

A. Supplier Code

We require all of our suppliers to abide by our Supplier Code which outlines the key behaviours we expect of our suppliers, including ensuring safe working practices, fairly remunerating employees, and complying with the standards set by the International Labour Organisation. Suppliers must confirm that they will agree to abide by our Supplier Code before they are permitted to enter into the tender process.

B. Risk Assessing Suppliers

When engaging a new supplier, we assess the supplier against set key criteria to determine their risk factor with regards to modern slavery and human rights. If we deem a supplier as being higher risk then we will insist that the supplier take part in an audit to be performed by an independent third party auditor (currently [EcoVadis](#)). EcoVadis performs an independent audit across the themes of Environment, Fair Labour & Human Rights, Ethics, and Sustainable Procurement. The audit model used by EcoVadis is built on international standards, including the Global Reporting Initiative, the United Nations Global Compact, and the ISO 26000, covering 190 spend categories

and 150 countries. We do not enter into working relationships with suppliers who decline to take part in the EcoVadis audit. We are currently reviewing our auditing procedures and full details of our new process will be contained in the Modern Slavery Statement for 2020.

C. Speak Up Policy

We have embedded a [Speak Up](#) policy across the HEINEKEN organisation. If anyone (whether it be an employee, supplier, customer or consumer) has a concern about a possible violation of our Code of Business Conduct, including any of the underlying policies, they can report their concerns anonymously online or over the phone. We actively promote our Speak Up policy across the organisation and encourage individuals to report any concerns, including any possible human rights violations, through this channel.

The Evolution of Our Approach

Set out below are some of the actions and events that have taken place in 2019.

Brand Promoters Policy

As part of our commitment to human rights, 2019 saw the implementation of our Brand Promoters Policy. Mandatory training for all Commerce, Procurement and HR employees was rolled out in 2019. The Brand Promoters Policy outlines key principles that we expect any supplier who engages brand promoters (brand promoters provide samples, serve or sell drinks in bars, restaurants, shops or at events) to adhere to, such as:

- ensuring the safety of Brand Promoters at all times;
- providing support to Brand Promoters and making them aware of our Speak Up policy; and
- requiring Brand Promoters to complete mandatory training provided by HEINEKEN so that they are clear on what is and what is not expected of them;

The Brand Promoters Policy was rolled out across the global HEINEKEN organisation in 2019 and has been successfully implemented in the UK.

Chartered Institute of Procurement and Supply (CIPS) Ethics Course

In 2019 all procurement personnel in our organisation successfully completed the [CIPS Ethics Course](#). The course covered a wide range of human rights and ethical topics, including:

- Corruption, fraud, bribery and exploitation;
- Human rights and forced labour in supply chains;
- Ethics and transparency in procurement; and
- Environmental awareness.

Our certification is noted in the [CIPS Corporate Ethics Register](#) and we have been awarded an Ethics Kite Mark from CIPS. The certification and the training will be renewed and updated annually.

Wider Industry Engagement

We have engaged with other industry leaders to discuss what precautions they are taking to ensure that their organisations remain free of modern slavery and other abuses of human rights. We believe that modern slavery is best tackled with a collaborative approach from the industry as a whole.

We are committed to continuing to work with our peers and competitors to stay on top of what is considered best practice and to share in each other's learnings as to how to eradicate modern slavery from our business and supply chains.

Assessment of Effectiveness

This statement constitutes our modern slavery statement for the financial year ending 31 December 2019. We will continue to assess the effectiveness of the measures we take and we will regularly review and refine our policies and procedures in relation to modern slavery and human rights.

This statement has been approved by the Management Team of HEINEKEN UK Limited. A revised statement, detailing the steps taken and improvements made, will be published on our website each year at www.heineken.co.uk.