



Modern Slavery and Human Trafficking Transparency Statement

2023

This statement is made pursuant to Section 54(1) of the UK Modern Slavery Act 2015.

About Us & Our Commitment:

Broxburn Bottlers Limited is a leading third-party alcoholic drinks bottler, founded in 1984, providing an end-to-end spirits storage, aging, blending, compounding, bottling and warehousing service to leading drinks brands and smaller independent brands. We provide employment to around 300 to 500 employees depending upon the season and customer demand, employing both permanent and Temporary workers.

We hold all relevant compliance accreditations including HMRC approval and BRC Grade A. We invest in our staff to ensure we keep up to date with the most modern manufacturing practices and to deliver excellent service at all times. We are dedicated to playing our part in the eradication of slavery and human trafficking and ensuring compliance with the UK Modern Slavery Act. We expect the same high standards from our partners including customers, distributors, agencies and suppliers and expect that these standards are in turn applied throughout their own supply chains. We strive to work with customers who reflect our own values and approach in all of these regards. We promote corporate social responsibility in all aspects of our business operations and dealings.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion. We ensure that our 3rd party recruitment partners follow the same processes.

We do not enter into business with any organisation which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Our Aim:

- *To provide large scale, flexible, great quality, reliable third-party bottling and associated services for alcoholic drinks in Scotland.*
- *We will be the alcohol bottling partner of choice in Scotland by:*
 - *being responsive to the needs of our customers*
 - *consistently delivering high quality products*
 - *delivering great customer service*
- *Broxburn Bottlers will be a business where everyone can be proud of our company, the products we make and their personal contribution.*
- *We will focus on continually getting better at what we do and ensure that everyone gets the chance to share in our success.*

OUR HR POLICIES

Broxburn Bottlers complies with employment law and our HR policies and ways of working ensure that our employees are treated fairly in terms of:

- *Pay and benefits.*
- *Health & Safety, working environment and conditions.*
- *Treatment in the workplace.*
- *Clear expectations of BBL ways of working with our partner recruitment agencies for temporary staff.*
- *Diversity, inclusion and engagement.*
- *Being able to speak up confidentially if issues arise through our internal policies and external partner SafeCall.*
- *Access to clear written terms of employment.*

We review all of our employment policies on a regular basis to ensure we are compliant with all legislative changes and the requirements of the Modern Slavery Act 2015 are reflected in these policies and procedures.

OUR DUE DILIGENCE PROCESSES

At Broxburn Bottlers we set high standards for our business, ensuring partners we work with have Modern Slavery and Human Transparency Statements in place.

Our processes include:

- *Anti-bribery policy and processes within our Company Handbook and online training in staff inductions and periodic refresher training.*
- *Checks before we work with new partners around their supply chain and periodic updates and reviews.*
- *Currently audited under the Supplier Ethical Data Exchange (SEDEX) framework on behalf of our customers.*

Our Ongoing Commitments:

We have a zero-tolerance approach to modern slavery and human trafficking, and act ethically in all of our business relationships.

We will:

- *Encourage all of our customers to have their own suitable anti-slavery and trafficking policies and processes;*
- *Join the Supplier Ethical Data Exchange (SEDEX). SEDEX provides a platform that allows us to upload and store our own data on responsible practice, including audits, certificates and corrective action plans, as well as run reports on data relating to our suppliers' ethical status.*
- *Cascade information to our employees to help them understand the importance of, and our zero tolerance towards, any type of modern slavery and/or human trafficking;*
- *Encourage employees to report potential concerns;*
- *Report on our commitments in tackling slavery and human trafficking as part of board discussions and in line with annual business reporting;*
- *Assess risk and where applicable table recommendations, actions and follow up as required;*



- *Complete appropriate due diligence in regards to engagement with new customers and maintaining business relationships with existing customers in line with these principles.*
- *Train our employees to recognise and appropriately respond to any suspected breaches.*

This statement has been approved by the Executive Management Team and will be reviewed annually.

A handwritten signature in black ink, appearing to read "Bryan McCluskey". The signature is fluid and cursive, with the first name "Bryan" being the most prominent.

Bryan McCluskey
Managing Director
Broxburn Bottlers Limited