Modern Slavery and Human Trafficking Statement

This statement outlines Joseph Holt's commitment and actions to address potential risks of modern slavery and human trafficking within our business and supply chains. As required under the Modern Slavery Act 2015, we detail below the steps we have taken to ensure that slavery and human trafficking have no place in our operations. This statement covers all activities of Joseph Holt Ltd and Joseph Holt Group.

We are dedicated to treating all staff equally, without discrimination, and with respect for their human rights. Our zero-tolerance approach to modern slavery is integral to our values and operations. This statement reflects activities undertaken during the financial year 1 January 2023 to 31 December 2023.

Organisational Structure and Supply Chains

Joseph Holt is an independent family business established in 1849, focused on brewing and packaging beer. We own 128 pubs across the North-West of England, with eight offering hotel accommodations and around 43 serving food. Additionally, we have a strong national sales and free trade department, selling our beers in venues outside of our direct ownership. We employ just over 600 people.

Our supply chain primarily consists of food, drink, beer ingredients, consumables, uniforms, building materials, furnishings, and equipment, with the majority of suppliers located in the UK. We occasionally source from the EU and globally, and we aim to maintain long-term relationships with our suppliers to foster mutual understanding of our values, including our zero-tolerance stance on modern slavery.

Our Commitment to Tackling Modern Slavery

Joseph Holt is committed to acting ethically and with integrity across all business relationships. We continue to implement and enforce effective systems and controls to prevent slavery and human trafficking in any aspect of our operations or supply chains.

Steps Taken to Mitigate Risks

Supply Chain Management

To ensure our suppliers align with our zero-tolerance approach, we take the following actions:

- Include contractual clauses requiring suppliers and subcontractors to comply with all applicable anti-slavery laws, including the Modern Slavery Act.
- Encourage suppliers to develop their own modern slavery statements.
- Require new suppliers to sign our modern slavery statement and agree to adhere to our zero-tolerance policy.
- Expect suppliers to implement appropriate systems for due diligence, audits, and training to mitigate risks within their supply chains.

Internal Process Controls

We have established processes to ensure compliance with the Modern Slavery Act:

- Regularly review and update commercial contract terms to include obligations and sanctions for suppliers regarding anti-slavery compliance.
- Maintain a Modern Slavery and Human Trafficking Policy to guide our efforts in addressing and resolving any issues.
- Verify the eligibility to work in the UK for all employees to ensure compliance with employment laws.
- Promote whistleblowing through our Employee Handbook, encouraging employees to raise concerns.
- Provide training to employees to raise awareness of modern slavery risks, including customer safety and recognising signs of slavery and trafficking.
- Deliver specific briefings to senior management to enhance leadership awareness and accountability.
- Conduct periodic refresher training on the Modern Slavery Act and the definitions of slavery and human trafficking.
- Regularly review and address potential risk areas within current and future supply chains.

Policies Supporting Our Commitment

Our zero-tolerance stance on modern slavery and human trafficking is reinforced through the following company policies:

- **Anti-Bribery Policy**
- **Grievance Policy**
- **Whistleblowing Policy**

These policies are designed to support our efforts to identify, prevent, and eradicate modern slavery within our organisation and supply chain.

Ongoing Actions

We remain committed to continuous improvement in addressing modern slavery risks. This includes:

- Strengthening relationships with suppliers to ensure alignment with our values.
- Regularly evaluating and refining our policies and processes.
- Providing ongoing training to employees and management to sustain awareness and vigilance.

By taking these steps, Joseph Holt affirms its dedication to ethical operations, respect for human rights, and compliance with the Modern Slavery Act.

This statement was approved on 13 December 2024 by the organisation's Board of Directors, who review and update it annually.



Richard Kershaw, Chief Executive