

ANTI-SLAVERY AND HUMAN TRAFFICKING - COMPANY STATEMENT

Introduction

This statement sets out the actions of the Artisanal Spirits Company plc (“ASC”) together with its subsidiaries (the “Group”) 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 our business and its supply chains. This statement relates to actions and activities during the financial year 1 January 2022 to 31 December 2022.

The Group operates in a low-risk sector and in low-risk geographies, however, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

Our Company 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.

Organisational structure and supply chains

This statement covers the activities of the Group

The Artisanal Spirits Company plc and its subsidiaries are the leading curator and provider of premium single cask Scotch malt whisky for sale primarily online to a discerning global membership.

We currently primarily operate in the following geographic areas:

- United Kingdom
- EU
- USA
- Japan
- China
- Australia

Most of the Group’s procurement is from suppliers based in the UK, with the remainder are largely based in the EU.

High-risk activities:

We consider that we currently have no high-risk activities.

Responsibility

Responsibility for our anti-slavery initiatives is as follows:

Policies: The H.R. Manager in conjunction with the senior team is responsible for putting in place and ensuring the implementation of relevant policies and procedures.

Risk assessments: The Company will, on an on-going basis, consider and carry out any relevant risk assessments in relation to the potential of slavery and human trafficking in our business operations.

Investigations/due diligence: There are no known instances of slavery or human trafficking. The Managing Director will appoint an investigation officer should any such allegation(s) arise.

Training: The Company will commit to ensuring that employees, members, suppliers and all other stakeholders are aware of our Policy on anti-slavery and human trafficking and adopt a zero-tolerance approach.

Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Whistleblowing policy: We encourage all our workers, members and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, members or others who have concerns can [use our confidential helpline/complete our confidential disclosure form].

Employee code of conduct: Our code makes clear to employees the actions and behaviour expected of them when representing our Company. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating globally and managing our supply chain.

Recruitment Agency policy: We use 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. Agencies are required to provide their terms of conditions of operation including their commitment to a zero-tolerance operational approach.

Training

We require all relevant staff within our organisation to complete training on modern slavery.