

# Elbrook Cash and Carry Ltd

## Modern Slavery Act Statement 2018

This statement is made pursuant to s.54 of the Modern Slavery Act 2015. It sets out the steps that Elbrook Cash and Carry Ltd ("ELBROOK") has undertaken - and is continuing to take - to ensure that modern slavery is not taking place within our business or supply chain.

ELBROOK has a zero-tolerance approach to any form of modern slavery, which we consider to include different types of exploitation such as forced labour, servitude, child labour and human trafficking. We are committed to acting in an ethical manner, with integrity and transparency in all business dealings. We are also committed to creating effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### **Our organisation**

ELBROOK is a Wholesale company which specialises Alcohol, Confectionery, Snacks and Soft Drinks for the off licence, convenience store and newsagents trade. We collaborate with recognised manufacturers and work closely with suppliers across the UK to offer consumers products at affordable prices. ELBROOK also owns a portfolio of investment properties, film studios known as Elbrook Cash and Carry Ltd T/A West London Film Studios and a Banqueting venue known as Elbrook Cash and Carry Ltd T/A Chak89. We currently have employees based in the United Kingdom only.

### **Our policies**

We operate a number of internal policies to ensure that we minimise the risk of harm associated with modern slavery and related matters such as unsatisfactory working conditions and discrimination. These policies are also designed, more generally, to ensure that we are conducting business in an ethical and transparent manner. The policies include:

- **Supplier code of conduct.** We require all our suppliers to make a number of contractual commitments to us as part of the supplier terms and conditions that they sign. These include that they will adhere to all applicable laws regulating child working and bonded labour, that they will not

under any circumstances engage on any basis any person under the age of 15, and that they will maintain appropriate workplace health, safety and welfare conditions. Breach of these commitments is one of the grounds for termination of the supplier relationship. Our suppliers also agree to assist and cooperate with us on any due diligence checks, audits and inspections that we may undertake to verify their compliance with these commitments. These checks, audits and inspections are further discussed below.

- **Recruitment policy.** We conduct eligibility to work checks for all employees in our offices globally to safeguard against human trafficking or individuals being forced to work against their will.
- **Employee policies.** Our employee handbook includes, among other things, policies on diversity, health and safety, grievance procedures and whistleblowing. The whistleblowing policy in particular ensures that all employees know that they can raise concerns without fear of reprisals.

#### **Our suppliers**

We conduct due diligence checks and inspections on our suppliers, both before we start working with them and on an ongoing basis. Our due diligence activities include the following:

- **Third party audit reports.** We request all new suppliers to provide us with copies of any third party audit reports they have regarding their business processes and internal quality systems. Our quality team reviews all reports submitted, and works with the suppliers to agree and implement appropriate actions to correct any issues identified in such reports.
- **Factory evaluation documents.** We have evaluated the personnel practices and working conditions of a substantial majority of our existing suppliers through a combination of written questionnaires, oral discussions.
- **Visits and inspections:** Our buying and quality teams, who are based in the UK, carry out visits to, and inspections of our suppliers where necessary. None of our due diligence checks and inspections have highlighted any instances of forced labour, servitude, child labour or human trafficking. They have brought to light areas where we believe certain suppliers could make potential improvements in their working conditions. In light of ELBROOK's commitment to being an ethical company, we have taken the opportunity to work with these suppliers to agree appropriate corrective action plans for implementing such improvements.

**Assessment of effectiveness**

We recognise that our commitment to a zero-tolerance approach to modern slavery is a continual journey, and we will continue to review and, where necessary, modify our processes on a regular basis.

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This statement has been approved by the Board of Directors of each of ELBROOK CASH AND CARRY LTD.

*F. W.* 3/4/19

*[Signature]*  
4/4/19