

Slavery and Human Trafficking Statement (for the financial year ended 1 April 2024)

Introduction

We strive to always conduct our business honestly and with integrity. We believe that it is not acceptable to put profit above the welfare and wellbeing of our employees and those working on our behalf. As a result, we take steps to combat modern slavery seriously, and efforts to prevent abuses are embedded across all departments throughout our organisation to ensure we play our part in helping to stamp out slavery and human trafficking.

This statement sets out the steps we have taken during our financial year that started on 4 April 2023 and ended 1 April 2024 to ensure that modern slavery does not occur in our supply chains or in our own organisation (which, for this purpose, includes those of our subsidiaries that own or rent property from which we carry on our business¹). It has been prepared for the purpose of complying with section 54 of the Modern Slavery Act 2015 (the Act) and is to be interpreted in accordance with it.

When we refer to **we**, **our** or **us** in this statement, we mean Young & Co's Brewery, P.L.C. and other subsidiary companies within the Young & Co's Brewery, P.L.C. group. Further, references to **our business** are to the management and operation of a pub estate (which includes a pubs with rooms division) and the selling of food and drink through it. It also refers to the management and operation of tenanted and unlicensed properties, and our head office.

Our structure and activities

We are a public company listed on AIM, the alternative investment market. Our head office is in London. Our activities are limited to England and Wales, principally London and the South.

Our supply chains

Our supply chains include the sourcing of finished and raw materials, principally related to the provision of food and drink, and goods and equipment to be used in our pubs and Copper House. These are rationalised to ensure we have a limited number of suppliers, thus allowing us to have considerable insight into our product source. We have over 2,000 suppliers ranging in size and complexity, the majority of which are based in the United Kingdom. We have long term relationships with many of our key suppliers and we seek to work with them and maintain an open communication to ensure that they have a clear stance on modern slavery which is aligned to our values and expectations.

¹ Reference to ensuring that slavery and human trafficking is not taking part in any part of an organisation's supply chain does not mean that the organisation in question must guarantee that the entire supply chain is slavery free. Instead, it means an organisation must set out the steps it has taken in relation to any part of the supply chain (that is, it should capture all the actions it has taken). [Source: "Transparency in Supply Chains etc. A practical guide" (issued under the Act)]

Supplier Ethical Data Exchange (SEDEX)

Increasing our understanding of our supply chain is a key focus for us moving forward, striving towards greater transparency and traceability through the products we serve. Thus, allowing us to work more closely with our suppliers and support their development as well as our own. We have partnered with SEDEX a leading ethical trade organisation working towards improving supply chains through supplier mapping, analysing business risk, meeting legislative requirements, and supporting the positive impact we have on both people and the planet. We are in the process of identifying which of our key suppliers are registered with SEDEX. Those key suppliers who are not on the SEDEX system will be asked to register in a timely matter.

Our policy on slavery and human trafficking

We do not tolerate, and are committed to preventing, acts of slavery and human trafficking from occurring within our business and our supply chains.

Due diligence and risk management

As part of our commitment to combating modern slavery and human trafficking, we have ‘risk assessed’ our supply chain using various data sources, including the Global Slavery Index, and we have identified three key areas of risk which have helped to evolve our responsible sourcing strategy.

i. Country Risk

Although we are a UK business with the majority of our products sourced within the UK, we know that certain products can only be sourced from overseas. As such we have focused on the medium and high risk countries from which we source which are more susceptible to modern slavery.

ii. Industry Risk

We are aware that certain industries bear a higher risk of modern slavery which often relate to low paid and low skilled workers. Therefore our initial focus is to concentrate on the common areas of labour exploitation, which include food processing, maritime and agriculture, as identified by the Global Slavery Index’s 2023 report.

iii. Product Risk

The environment and how certain products are extracted and manufactured can often be directly linked with modern slavery. We have focussed our attention on the goods which are regularly used within our business or where they are linked to high-risk countries and industries.

We will continue to risk assess our supply chain to consider if certain groups of suppliers are more susceptible to modern slavery and if specific due diligence is required. We are in the process of developing a Responsible Sourcing Statement, which focusses on our key supplier principles. We expect our suppliers to continuously improve their performance to provide safe workplaces, respect human rights, comply with environmental laws and regulations and be fully transparent

in regard to the products and services they supply to us. All of our key and high-risk suppliers will be asked to acknowledge and sign-off on these principles.

Further, to ensure, where practicable, optimum control of the work environment in our business, we do the following:

Management

- communicate to all our pub and hotel general managers an overview of modern slavery and how to identify indicators of modern slavery;
- maintain up to date guidance on the company intranet on how to identify indicators of modern slavery;
- provide our operations managers and directors with access to rota information, allowing them to review employee weekly working hours;
- maintain a whistleblowing policy to encourage members of staff to report concerns about wrongdoing; and
- subject relevant processes and procedures to periodic internal audit, to verify these are operating effectively.

Eligibility to work

- perform a weekly review of relevant documentation to verify all new employees are eligible to work in the UK, including, in most cases, digital online checks;
- mandate the suppliers of our hospitality agency staff check all employees are eligible to work in the UK; and
- inspect payroll data on a weekly basis to confirm all employees are paid on or above the National Minimum Wage and National Living Wage, relevant to their age - the majority of employees are remunerated in excess of these amounts.

Supply chain

- expect all those who have, or seek to have, a commercial relationship with us to familiarise themselves with the Act and our zero-tolerance approach and to act consistently with this; and
- seek to include in our arrangements with suppliers a right to suspend or terminate our arrangements with them where we have reasonable grounds to suspect that there has been a breach of the Act.

Effective actions to address modern slavery

This coming year we intend to continue to:

- verify that our employees are earning, at a minimum, at or above the National Minimum Wage or National Living Wage, relevant to their age;
- enable our operations managers and directors to monitor working hours of each employee;
- ensure each new material supplier is aware of our zero-tolerance stance and our expectations of them in this regard; we will request details of any modern slavery and human trafficking discovered in their supply chains and the actions they have taken;

- distribute this statement to all new permanent suppliers;
- use the Supplier Ethical Data Exchange (SEDEX) tool to assess our key suppliers, and work with those key suppliers who are not currently in the system to ensure they are onboarded in a timely manner;
- provide training to relevant employees and workers within our business;
- risk assess our supply chain, to identify if specific vendors (based on the goods or service they provide) may require additional due diligence: and
- communicate our Responsible Sourcing Statement to our key and high-risk suppliers and request that they acknowledge and sign-off on the statement.

A copy of this statement will be published on our website.

Our board of directors, which has agreed to champion the understanding and implementation of this statement, will be regularly briefed on the actions we have taken.

Approval

This statement is made in accordance with Section 54(1) of the Act and constitutes our slavery and human trafficking statement for the financial year that started on 4 April 2023 and ended on 1 April 2024. It was approved by our board of directors on 13 November 2024 and signed on its behalf by:



Simon Dodd
Chief Executive