QUINTESSENTIAL BRANDS GROUP

# Modern Slavery Statement

QB Group

We are **Team Spirits**

Modern Slavery Statement: 2nd April 2025

# Modern Slavery Statement

**Quintessential Brands Group**

This statement sets out the actions taken by Quintessential Brands Group of companies (the "Company") to understand all potential modern slavery risks related to its businesses and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business or its supply chains. This statement relates to actions and activities during the financial year 1st January 2025 through to 31st December 2025.

As part of the Company's dealings with numerous suppliers worldwide, both those who are a part of the drinks industry and those outside, it is recognised that the Company has a responsibility to take a robust approach to slavery and human trafficking. The Company is committed to preventing slavery and human trafficking in its 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 Company in the UK and overseas. The Company works within the alcoholic spirits industry, producing, bottling, branding and warehousing spirit products.

The Company currently operates in the following countries:

- UK - producing, bottling and warehousing spirit product as well as managing sales and marketing of products.
- Ireland- producing, bottling, and warehousing spirits and liqueurs in addition to managing sales and marketing of products.
- France - producing, bottling, and warehousing spirits and liqueurs in addition to managing sales and marketing of products.
- USA - managing the sales and marketing of products.

The Company uses the following processes to ensure our supply chain is free from slavery and human trafficking:

- QBG Sedex AB membership and the use of Sedex Register to assess if a supplier is (SMETA) audited, approved, and working to a high ethical standard.
- QBG Vendor Questionnaires are issued, prior to the commencement of trading with a supplier, requiring confirmation of their processes to ensure they are free from slavery & human trafficking in their supply chains.
- Where suppliers are not Sedex members, they are required to comply with and sign the Quintessential Brands Social and Ethical policy or submit a copy of their own Ethical policy. This evidences compliance with the ETI base-code.
- Site Quality Teams and Group Procurement will review any new information to consider if risks have changed to the supply chain.
- As a general Group Procurement principle, our primary aim is to avoid sourcing from countries/ areas that exhibit an inherent risk.

If it is identified that a supplier is breaching Modern Slavery principles, the Company reserves the right to either:

- develop a remedial time bound action plan to mitigate concerns, which must be embedded within 30 days of being notified. In such circumstances, a follow up, physical site audit will take place to confirm actions have been fully addressed and closed out; or

- terminate the contract/s with the supplier

Responsibility for the Company's anti-slavery initiatives are as follows:

- **Policies -** Group Procurement is responsible for putting in place and reviewing policies in relation to the supply chain and the process to maintain slavery free supply chain.

  Human Resources are responsible for internal policies and ensuring that no slavery or human trafficking happens through the employment channels at the Company's locations of employment.
- **Risk Assessments** - The risk analysis for human rights and modern slavery is the responsibility of procurement.
- **Investigations and Due Diligence –** Site Quality teams and Group Procurement are responsible for completing due diligence and/ or investigations in relation to known or suspected instances of slavery or human trafficking.
- **Training –** Internally, we provide staff training through team meetings and online learning, where we explain and emphasise what an employee's responsibility is in preventing modern slavery and human trafficking, as well as signals to watch out for and how to report anything they observe.

**Company Policies**

The Company operates the following policies that describe its approach to the identification of modern slavery risk and steps to be taken to prevent slavery and human trafficking in its operations:

- **Human Rights Policy** – This policy applies to all permanent and temporary, full-time, and part-time employees of the Quintessential Brands Group (QB Group), agency workers, contractors, consultants and suppliers and outlines our unwavering commitment to the UN Guiding Principles on Business and Human Rights.
- **Whistleblowing policy –**The Company encourages all its workers, customers and other business partners to report any concern related to the direct activities, or the supply chain of the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's Whistleblowing policy is designed to make it easy for employees to make disclosures without fear of retaliation.
- **Recruitment Procedure** - the Company uses 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.
- **Child Labour Remediation Policy –** This policy outlines the Company's obligations and actions in case at any of our sites, or in our Supply Chain, any employment of underage workers is found.

**Due Diligence**

The Company undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. The Company's due diligence and reviews include:

- Mapping the supply chain broadly to assess materials or geographical risks of modern slavery or human trafficking, this includes the use of Sedex or GSI.

- Risk assessment reviews of all aspects of the supply chain for each supplier. Conducting supplier audits and spot assessments through internal resources who have a high degree of focus on slavery and human trafficking.
- Creating a risk profile of each supplier by collating country of origin data through product and raw material specifications
- Taking steps to improve and support those with substandard supplier practices, which includes providing advice and giving notice of required changes within a set time period;
- Using Sedex and GSI, where suppliers and geographical areas can be checked for their labour standards, compliance in general and modern slavery and human trafficking.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of business relationships.

**Performance Indicators**

The Company has reviewed its processes in light of the introduction of the Modern Slavery Act of 2015, as a result the Company is;

- Requiring all HR professionals, Executives, Plant Leads and Procurement colleagues to have completed training on modern slavery.

**Awareness raising programme**

As well as training staff, the Company has raised awareness of modern slavery issues by distributing posters across the Company's noticeboards and circulated information via our internal intranet.

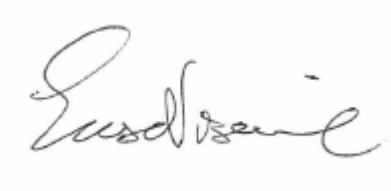
The communication explains to workers:

- The basic principles of the modern slavery act of 2015
- How employees can identify and prevent modern slavery or human trafficking
- What external help and support is available from third parties

**Executive Approval**

This statement has been approved by the Company's Chief Executive Officer and will be reviewed and updated annually.

**Date:**



**Chief Executive Officer's name:** **Enzo Visone**

If you have any questions relating to this policy, please send these to the HR team at hr@quintessentialbrands.com

The information enclosed in this policy is not contractual and is subject to change. Every effort will be made to ensure that all colleagues have access to the latest version.