



The North British Distillery Company Limited

## Slavery and Human Trafficking Statement

Lothian Distillers Limited and its trading subsidiary The North British Distillery Company Limited (“the Company”) are committed to preventing acts of modern slavery and human trafficking from occurring within both its business and supply chain. In accordance with Section 54 of the Modern Slavery Act 2015, we set out below the steps that have been taken by the Company during its financial year ended 31 December 2019 and any proposed steps for the financial year 1 January 2020 – 31 December 2020 to ensure that we strive to prevent slavery and human trafficking in our business and our supply chain.

### **OUR BUSINESS AND SUPPLY CHAIN**

The Company is a producer of Scotch Grain Whisky operating out of its distillery in Edinburgh, Scotland, with its maturation site in Addiewell, Scotland, and works with a wide range of third party suppliers.

### **OUR POLICIES AND PROCEDURES RELEVANT TO OUR COMMITMENT TO ANTI-SLAVERY**

We have robust employment contracts, employment-related policies and procedures and recruitment procedures in place which are updated regularly and no form of modern slavery will be tolerated within our business. The Board adopted an Anti-Slavery and Human Trafficking Policy on 23 March 2016 which sets out the Company’s commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. Our Anti-Slavery and Human Trafficking Policy is available on our website. The Board appointed its Finance Director as Compliance Manager with the responsibility for day-to-day compliance with the Anti-Slavery and Human Trafficking Policy.

### **RISK ASSESSMENT AND DUE DILIGENCE OF SUPPLY CHAINS**

As part of the Company’s efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted the following risk assessment and due diligence procedures:

- In relation to existing suppliers, a risk-assessment exercise has been undertaken taking into account the physical location of the supplier and the nature of the goods/services supplied. Where any existing supplier is considered to fall into the category of high or medium risk as a result of such assessment, the supplier was required to complete and return a due diligence questionnaire to provide further information in relation to its policies and procedures.



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- The risk assessment and due diligence procedures set out above are required for all potential and new suppliers.

We do not consider that our supply chain poses a high risk of slavery or human trafficking. Most of our suppliers are based within the UK and those that are not are in countries which score more favourably than the UK on the Global Slavery Index. Despite this, we appreciate that the business sectors that some of our suppliers are in, such as agriculture and supply of temporary staff, increases the risk and as a result have undertaken the due diligence steps above and obtained confirmation from them that they will comply with our Anti-Slavery and Human Trafficking policy and all modern slavery laws.

### **TRAINING**

We have developed and implemented a training program to educate our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Face-to-face training was undertaken with all key managers and an on-line version of the training was provided to all other staff. Through our training program, employees are encouraged to identify and report any potential breaches of the Company's Anti-Slavery and Human Trafficking policy. As new employees join our business, they will undertake this training as part of their induction process.

### **FUTURE STEPS**

Following the Company's review of our actions to prevent slavery or human trafficking from occurring in our business and supply chain, we intend to continue to monitor this issue during the coming financial year and update as necessary.

### **BOARD APPROVAL**

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes The North British Distillery Company Limited's slavery and human trafficking statement for the financial year ended 31 December 2019. I confirm that this statement has been approved by our Board of Directors who will review and update it annually.

Alan Kilpatrick  
Managing Director