Ethical Trading Statement

Introduction

As a small privately business we take the issues of ethical trading and the elimination of bribery and corruption, modern slavery and human trafficking seriously and expect our employees to raise any concerns they have, or observe, with their immediate manager or a Director of the Company. We are also committed to taking all reasonable steps to uphold and promote responsible business practices related to all of these topics. The purpose of this Statement is to outline our position in relation to ethical trading, but this should also be read in conjunction with our other policies relevant to ethical behaviour (see below). It is intended that all employees of Staffordshire Brewery are informed of and abide by the principles laid out within this Statement. In addition, we will over time, communicate to and seek to encourage all of our tenants and suppliers to comply with the principles of this Statement.

Our Business Structure

Staffordshire Brewery Ltd is a small privately owned business based in Cheddleton and operating throughout the UK.. Our core business and our business activities are built around the brewing and contract packaging of beer. All of our employees are employed within the United Kingdom and, as a minimum, are employed on terms protected by United Kingdom employment and health a safety legislation. Much of our supply chain for our brewing and packaging activities, together with food used in the Pubs we manage directly, is also sourced from within the UK or EU and thus their workforces will also be protected by the same legislative requirements

Core principles of Ethical Trading

- 1. Employment is freely chosen
- 2. Freedom of association and the right to collective bargaining are respected.
- 3. Working conditions are safe and hygienic.
- 4. Child labour shall not be used.*
- 5. Living Wages are paid.
- 6. Working hours are not excessive.
- 7. No discrimination is practised.
- 8. Regular employment is provided.
- 9. No harsh or inhuman treatment is allowed.

*(where employees are under the age of 18 they are only employed in accordance with UK law, they are free to leave at any time and thus any employment undertaken will in no way impinge upon their opportunity for full time education.

If at any time we identify we are falling materially short in any area we will take immediate action to rectify matters and if we identify similar shortfalls in third party stakeholders such as suppliers, we will inform them of our concerns, encourage them to take rectification action and if this is not forthcoming, take action to cease our relationship with them as soon as is reasonably practical.

Training & Communication

This Statement will be communicated to all employees at Robinsons and where necessary, training will be provided. A copy of this Statement will also be put on the Company's website, head office and brewery noticeboards, the CPL bookshelf and supplied to any third party stakeholders when it is considered appropriate to do so.

Policies

We will maintain a zero tolerance approach to unethical and illegal trading practices and will expect our third party stakeholders to adopt a similar approach to this issue. Company policies are in place to support our stance on this and to assist us in the assessment, prevention, and elimination of such issues in our organisation or its supply chain. These policies include:

• Anti-Slavery Policy • Anti-Bribery and Corruption Policy • Grievance Policy • Whistle Blowing Policy

• Health and Safety Policy

Name

Position

Date