



CONTROLLED DOCUMENT

<b>Title: Modern Slavery Act Statement</b>				<b>Page 1 of 4</b>
<b>Record No.</b>	<b>Issue No.</b>	<b>Issue Date</b>	<b>Prepared By</b>	<b>Authorised By</b>
HRM2.24	1	02/09/2024	Michael Adams	Shona Blythe

## Norbev Modern Slavery Statement

### Introduction

Norbev is committed to eliminating the risk of modern slavery and human trafficking throughout the business operations and the supply chain and we are also committed to acting ethically and with integrity in all our business operations and relationships. Modern Slavery and Human Trafficking are unacceptable practices exploiting the most vulnerable people in society. Norbev actively supports efforts to eradicate such practices.

### Norbev Business

Norbev are a Northern Irish contracts drink manufacturer based in Ballymena. Norbev employ approximately 100 people. Our vision is to be the most trusted partner in soft drinks manufacturing. We achieve this by focusing on developing our people, safeguarding the environment, advancing our processes, and fostering strong partnerships.

### Scope

This scope of this statement applies to all of Norbev's business and employees.

### Our Commitment

Norbev adopt a zero tolerance approach towards the use of forced, bonded, indentured or involuntary labour in our own operations or in any activities. Norbev is committed to acting responsibly and in the interest of all our stakeholders. In keeping with the United Nations' Guiding Principles on Business and Human Rights, which are the fundamental principles and rights at work developed by the International Labour Organisation, Norbev is committed to the principles of respect, diversity, fair treatment, fair pay, compensation and benefits and acquisition practices.

We are committed to working with our suppliers in accordance with our objectives in areas of compliance, performance, risk management, social responsibility and governance to maintain transparent and long term relationships with suppliers. We audit our suppliers on their compliance and against our supply chain standards and we work with them to improve where they fall short.

### Our Policies

All employees, agents and anyone acting on Norbev's behalf must comply with company policies and procedures in particular:

- Ethical Trading Policy
- Whistleblowing Policy



CONTROLLED DOCUMENT

<b>Title: Modern Slavery Act Statement</b>				<b>Page 2 of 4</b>
<b>Record No.</b>	<b>Issue No.</b>	<b>Issue Date</b>	<b>Prepared By</b>	<b>Authorised By</b>
HRM2.24	1	02/09/2024	Michael Adams	Shona Blythe

- Anti Corruption & Bribery Policy
- Terms of Supply (Goods and Services) Procedure
- Modern Slavery Policy

## Human Rights Policy

This policy highlights Norbev's commitment to managing its business in accordance with its values;

- To eradicate forced employment and human trafficking
- To eradicate child labour
- Wages
- Hours of work
- Valuing diversity
- Safe and healthy working environment
- Workplace security
- Freedom of association and collective bargaining
- Community and stakeholder engagement

## Whistleblowing

This policy enables employees (and others), either anonymously or not, to report breaches or potential breaches without fear of retaliation via a confidential whistleblowing box which is available twenty four hours a day, seven days a week.

## Modern Slavery Policy

This policy reiterates our commitment to eradicating modern slavery and human trafficking and outlines internal measures and checks taken to do this.

## Training

Norbev ensure all management and employees receive training in Modern Slavery and are aware of the warning signs so they may react and report appropriately.

Our policies are available to employees and updated as required for any relevant changes.

## Supply Chain and Suppliers Code of Conduct (inc Terms of Supply & Anti Corruption and Bribery)

Norbev source raw materials from numerous suppliers around the world and is committed to only working with suppliers who share our commitment to eradicating modern slavery and human trafficking. We will not tolerate any modern slavery or human trafficking in the supply chain and we will measure the suppliers' performance in relation to this.



CONTROLLED DOCUMENT

<b>Title: Modern Slavery Act Statement</b>				<b>Page 3 of 4</b>
<b>Record No.</b>	<b>Issue No.</b>	<b>Issue Date</b>	<b>Prepared By</b>	<b>Authorised By</b>
HRM2.24	1	02/09/2024	Michael Adams	Shona Blythe

Norbev identify and mitigate risk by conducting audits of our suppliers and potential suppliers on a regular basis to assess and monitor potential risk areas.

Under this responsible sourcing procedure, we will not work with suppliers who do not share our values in respecting human rights and our commitment to eliminating human slavery and human trafficking.

Norbev aims to prevent any instances of bribery and corruption and strictly forbids any employee, consultant, agency worker, agent, or any other person connected to its business from offering or receiving any reward that may amount to a bribe.

### **Monitoring Performance**

Norbev use independent social and ethical compliance audits of our facilities to ensure that forced or involuntary labour does not exist. Norbev is a member of SEDEX (Supplier Ethical Data Exchange), an ethical supply chain database.

Our operations are audited against ethical and human rights standards on a risk based frequency usually in the form of a SMETA audit (SEDEX Member Ethical Trade Audit) based on the ETI base code and UK local laws.

Our culture of openness and transparency is vital in helping us to ensure we do not have any ethical or human rights related issues at our production facilities.

It is essential that we continuously identify risks, areas for improvement, and implement actions. We recognise that modern slavery is a complex area and to mitigate risks in this area we will:

- Continue the work of implementing human rights through due diligence and monitoring processes
- Raise awareness of the issues of modern slavery and human trafficking through training and increased communications
- Promote farmer engagement and awareness
- Highlight the terms of supply policy and correct purchasing behaviour to increase the usage of preferred suppliers
- Monitor the internal checking and monitoring processes for our employees to identify possible instances (red flag alerts) or risk areas
- Internally audit on a regular basis, our external labour suppliers
- Protect whistleblowers and anyone who raises an issue or potential issue relating to modern slavery and human trafficking



CONTROLLED DOCUMENT

<b>Title: Modern Slavery Act Statement</b>				<b>Page 4 of 4</b>
<b>Record No.</b>	<b>Issue No.</b>	<b>Issue Date</b>	<b>Prepared By</b>	<b>Authorised By</b>
HRM2.24	1	02/09/2024	Michael Adams	Shona Blythe

Norbev is committed to reviewing the effectiveness of our current policies and procedures and is focused on improving our measures to assess the management of the risks that are identified.

### **Remediation Processes**

Our Human Rights and Whistleblowing policies ensure that our employees are afforded the opportunity to report actual or potential issues and they outline the process for doing so. Protection is also given to employees for raising any such issues.

This statement has been approved by Shona Blythe, Managing Director and is made in accordance with Section 54 of the Modern Slavery Act 2015 and refers to the financial year ending December 2023.