



McMULLEN & SONS, LIMITED
(the “Company”)

SLAVERY AND HUMAN TRAFFICKING STATEMENT

INTRODUCTION FROM THE MANAGING DIRECTOR

Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them.

ORGANISATION'S STRUCTURE

We are a manufacturer of beer and a provider of pub and restaurant facilities. McMullen & Sons, Limited is the parent company of a wholly owned subsidiary, McMullen's of Hertford Limited. The group has its head office in the UK and all trading outlets are in the UK.

The group has an annual turnover in excess of £36m.

OUR BUSINESS

Our business is organised into four business units: Managed Retail, Tenancy, Production / Distribution and Property.

OUR SUPPLY CHAINS

Our supply chains includes the sourcing of raw materials principally related to the provision of food and drink.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our 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.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk -

- Where viable, we run licenced premises as managed houses to ensure optimum control of the work environment;
- We limit the geographical scope of our licenced premises to ensure optimum supervision of the use of our properties;
- Where possible we build long standing relationships with local suppliers and tenancy customers and make clear our expectations of business behaviour;
- With regards to national or international supply chains, our point contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the food chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us

(and every other participant in the chain) to have a direct relationship with all links in the food chain, ultimately to the field or utility generator.

- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

The Tenancy, Commercial and Retail Directors are responsible for compliance in their respective departments and for their supplier relationships.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of House Audits by Area Managers and Business Development Managers;
- Use of labour monitoring and payroll systems; and
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year

Tom McMullen
Joint Managing Director
McMullen & Sons, Limited

Heydon Mizon
Joint Managing Director
McMullen & Sons, Limited

End of last financial year: 30.09.18
Approved by the Board on 02.10.18