

Modern Slavery Statement

Admiral Taverns (Admiral) is an independent tenanted and leased pub company which operates in England, Wales and Scotland only and works on a financial year from 1st June to 31st May. This statement is pursuant to the financial year ending 31st May 2016.

Our commitment

We are committed to identifying, preventing and monitoring risks of slavery, human trafficking and forced labour in our supply chain and operation. We have a zero tolerance approach to such practices.

The Admiral business model is the letting of pubs to independent, self-employed licensees. We ensure by carrying out credit checks on each prospective tenant that they are who they say they are and that they have a right to work in the United Kingdom through their national insurance number. We also try to visit each of our sites on a quarterly basis through their Business Development Manager so we retain an awareness of what is happening at each pub.

Admiral suppliers and contractors range from large drinks manufacturing companies, to professional advisers and agents and on to more regional and local contractors who provide services to the Admiral pubs. All of our suppliers and contractors are based in England, Wales and Scotland. Admiral writes to all of its suppliers and contractors on an annual basis advising that we have a Modern Slavery Policy and that we are committed to working only with suppliers and contractors who treat their obligation to Modern Slavery with the utmost importance. Admiral will not work with any organisation that refuses to display the corresponding commitment to the subject of Modern Slavery.

Admiral has a Modern Slavery policy and will ensure annual training and awareness of this policy through its Human Resources team and Compliance Manager.

Admiral writes to its suppliers and contractors on an annual basis to advise that we require compliance with this area and will identify to any supplier or contractor any suspicions that we have with regard to non-compliance.

The Executive Directors of Admiral believe that ensuring there is no form of modern slavery within our supply chains is a fundamental to the aims and values of Admiral and accordingly have approved this statement and Modern Slavery policy.

This statement and policy will be reviewed on an annual basis unless it is believed that there is some degree of risk or non-compliance in which case an earlier review will be held.

ADMIRAL TAVERNS MODERN SLAVERY POLICY

1. POLICY STATEMENT

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants and third-party representatives.
- 1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. RESPONSIBILITY FOR THE POLICY

- 2.1 Andrew Clifford (Executive Director) has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2.2 Mark Brown, our in-house solicitor and Compliance Manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and ensuring

there are adequate internal control systems and procedures to ensure they are effective in countering modern slavery.

- 2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- 2.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Compliance Manager.

3. COMPLIANCE WITH THE POLICY

- 3.1 You must ensure that you read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 You must notify your immediate line manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. If you are unable to notify your line manager for whatever reason then please notify the Compliance Manager.
- 3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier at the earliest possible stage.
- 3.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager as soon as possible. You should note that where appropriate, we will give notice to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.
- 3.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Compliance Manager.
- 3.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any

detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found at the Company Handbook.

4. COMMUNICATION AND AWARENESS OF THIS POLICY

- 4.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.
- 4.2 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5. BREACHES OF THIS POLICY

- 5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.