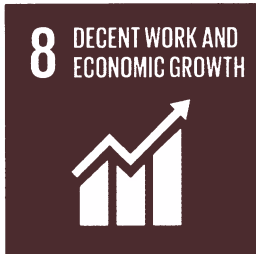


Anti-Slavery & Human Trafficking Statement

Introduction and background



Boortmalt, the trading name of Pauls Malt (registered in England 0088929), is committed to supporting and furthering the United Nations' Sustainable Development Goals. Goal 8 relates providing decent work and economic growth, within this category Goal 8.7 is a commitment *“to take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms”*

This statement describes the Company's commitment to ensure that slavery and human trafficking does not exist in our business or supply chain. It relates to the financial year ending July 2018

Organisation

Boortmalt (the malting business of the agro-industrial French cooperative group Axérial) is the 5th largest malting company globally with more than 1.1 million tonnes of malt sold throughout the world each year. Our 350 employees spread over 7 countries in Europe are focused on producing an extensive range of high-quality malt types in order to meet the exacting requirements of our brewing and distilling customers around the world. By using the most modern production techniques and with our far-reaching logistics capability, we are able to supply world markets both effectively and efficiently.

Business Principles

Boortmalt has five principles of ethical business conduct when dealing with our customers, suppliers employees and all others with whom we work or encounter. They are

- Trust and Integrity
- Accountability
- Compliance
- Openness and Honesty
- Dignity and Respect

These principles are central to our operation and as such we are committed to ensuring that there is no modern slavery and human trafficking in any part of the business or supply chain.

Due Diligence

We are registered with SEDEX and use their Self-Assessment Questionnaire to inform our performance on labour rights, health, safety and the environment. We are periodically independently audited against the SEDEX SMETA standard.

In addition within the last year we have reviewed our arrangements with 3rd party labour suppliers to ensure that each supplier is a suitable business entity and where appropriate ensuring that they hold the appropriate registrations, with the GLAA for example.

It is part of our terms of business with our barley suppliers that they adhere the principles of our Ethics Policy and manage their supply chains through both responsible and ethical practices.

We strive for continuous improvement and endeavour to develop our systems and controls to better understand, identify and assess the risk in our business and supply chain in this respect.

Managing Risk

We have in place a range of policies which complement and support our commitment to ensuring that slavery and human trafficking is not taking place in our business or supply chain. These include our Terms of Business in the Procurement of Barley, our Business Ethics and Integrity Policy, Whistle Blowing Policy and Good Faith Reporting Policy.

Training

Our experience and good practice at different sites has been shared at Operational Management meetings to promote a high level understanding among our Operational Managers of the potential risks of labour abuse, the steps needed to mitigate the risks and the associated legal requirements.

Further training for employees who have direct responsibility for managing our supply chain is a key step to mitigating the risk of labour misuse in our wider supply chain.

Performance Measures

Boortmalt have not put in place performance indicators relating to anti-slavery and human trafficking however, we will continue to monitor the effectiveness of our compliance regime and if appropriate take the necessary steps to strength it.

Review

This statement will be reviewed and updated by 30 November 2019.

Signed

Yvan Schaepman, CEO



01/03/2019