



This statement is made in accordance with obligations under the UK Modern Slavery Act 2015 and sets out the actions Britvic has taken during the year ended 30th September 2021 ('2021') to understand potential modern slavery risks and prevent modern slavery and human trafficking in its business and supply chain. This statement covers the activities of all relevant companies in the Britvic plc group, as listed on pages 176 – 177 of the 2021 Annual Report and Accounts.

# Modern Slavery Act Statement

Transparency Statement 2021



# Modern Slavery Act Transparency Statement 2021

## Our commitment

As a business with a complex global supply chain we recognise that we have a responsibility to take a robust approach to preventing slavery and human trafficking. Britvic is committed to ensuring all our businesses and partners are free from slavery and human trafficking.

## Operations and supply chain

Britvic is the largest supplier of branded still soft drinks and the number two supplier of branded carbonated soft drinks in Great Britain (GB), and it is an industry leader in Brazil, Ireland and France.

Headquartered in the UK, we have manufacturing operations in GB, Ireland, France and Brazil where we produce our iconic brands, including Robinsons, Tango, J2O, MiWadi, Ballygowan, Teisseire, Maguary and Dafruta. In addition, in GB and Ireland, we produce and sell a number of PepsiCo's soft drinks brands, including Pepsi, 7UP, Lipton Ice Tea and Rockstar, under exclusive agreements with PepsiCo.

We directly employ over 4,500 people and have a diverse supply chain of approximately 1,700 supplier organisations, sourcing ingredients, materials and services from over 50 countries. These suppliers range in size from small and medium-sized enterprises to large multinationals, each of which has its own supply chain. We are committed to producing high quality soft drinks which are sourced and manufactured in a fair, ethical and environmentally responsible way.

## COVID-19 Response

We have continued to prioritise the safeguarding of our employees as the COVID-19 pandemic continued into 2021. Throughout 2021, the controls we have put in place to keep our people and our business partners safe from the spread of COVID-19 have become our everyday custom and practice. Maintaining a COVID-safe environment across all our locations and operational activities is a priority and we will continue to follow local Government, Public Health and World Health Organisation (WHO) advice as measures alter over time. Where restrictions allowed, we re-opened our offices to provide a safe working environment for those who wanted it, while allowing others to continue to work from home using enabling technology solutions and working flexibly around their domestic circumstances.

For those employees unable to work from home, primarily our factory-based teams, we continued with our key controls, including temperature checking, mask wearing, social distancing and additional cleaning regimes, to ensure the safety of our people. We also put in place additional measures to support the health and wellbeing of all our employees in these uncertain times, such as our group of volunteer Wellbeing Warriors, who are Britvic employees trained to help other employees access the support tools that Britvic offers.

During the pandemic, we have endeavoured to collaborate with our suppliers as much as possible to ensure continuity of supply. Where necessary we temporarily relaxed lead times on a case by case basis. We also worked with suppliers to try to simplify order demands, for example by reducing order quantities or the number of different product types within each order, to allow suppliers to focus on priority deliveries. We also amended specifications for a limited period to make it easier for suppliers to meet our production timelines.



Where we unfortunately had to cancel production orders in the Out of Home section of the business due to the impact of COVID-19, we stood by our obligations and covered all raw material costs to protect the suppliers from these unfortunate circumstances.

Britvic also promoted and supported the use of Sedex virtual audits to continue the assessment of our supply base throughout the pandemic. We have been able to revert to on site audits since the lifting of restrictions.

## Governance

We recognise that having the right governance framework to address human rights and ethical behaviours is fundamental to managing the risk of modern slavery in our business and supply chains. In 2017, Britvic established a Modern Slavery Prevention Group (the Group), made up of representatives from across the relevant business functions including risk, supply chain, procurement, HR and sustainability. The Group is responsible for overseeing Britvic's approach to preventing modern slavery and reviewing the effectiveness of our policies and processes. It is jointly sponsored by the Chief People Officer and Chief Procurement Officer. It is chaired by the Deputy Company Secretary, and the activities of the group are monitored by the Environment, Social and Governance Committee.

Ethical scorecard updates that measure and report progress against our responsible sourcing KPIs are included when appropriate in Quality, Health, Safety, Environment and Wellbeing reports to the Executive Team and Board. Modern slavery issues are also considered during risk assessments at all levels throughout the business and are covered in principal risk reviews of Supply Chain, International Expansion and Legal & Regulatory. (See the description of Principal Risks and Uncertainties on pages 64 – 66 of the 2021 Annual Report and Accounts at [britvic.com/annualreport](http://britvic.com/annualreport).)

## Policies in relation to safeguarding people

Britvic has developed a suite of policies that relate to ensuring ethical business practices are followed and these are supported by further procedures and guidance. Our approach is guided by international conventions and standards, including the United Nations (UN) Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the Ethical Trading Initiative (ETI) Base Code.

### Code of conduct

The Britvic Code of Conduct sets out Britvic's core values and how we work. It explains what 'doing the right thing' means for Britvic, including with respect to human rights and speaking up about concerns. The code applies to Britvic's worldwide workforce regardless of their role or seniority.

### Ethical Business Policy

The Ethical Business Policy sets out the appropriate ethical and legal behaviour that an individual is expected to adopt when doing business on behalf of Britvic, along with a set of ethical business standards expected of both Britvic operations and our suppliers. This policy was updated during 2021 to incorporate previously separate ethical business standards and include clearer guidance in areas such as reporting conflicts of interest.

It states that we:

Respect and protect human rights by ensuring that we and our suppliers work in a clean and safe environment, have proper standards of employment, comply with local laws and don't oppress or exploit anyone.

This policy applies to the whole Britvic workforce and to all third parties acting on behalf of Britvic including secondees, advisors, agency workers, contractors and other companies.

The policy includes a statement that:

Standards of employment must comply with the UK Modern Slavery Act 2015 which forbids the employment of anyone under conditions of: 'forced labour' 'compulsory labour', 'slavery' or 'servitude' or the exploitation of any person by human trafficking.

A version of the Ethical Business Policy, called the Ethical Trading Policy, is tailored to be appropriate to suppliers rather than our direct workforce. All our suppliers, as part of the onboarding process, are required to read and confirm adherence to the Ethical Trading Policy. Failing to do so will result in the vendor not being accepted as a supplier to Britvic.

## Ethical Trading Initiative (ETI) Base Code Labour Standards

Employment is freely chosen	Freedom of association and the right to collective bargaining are respected	Working conditions are safe and hygienic
Child labour shall not be used	Living wages are paid	Working hours are not excessive
No discrimination is practised	Regular employment is provided	No harsh or inhumane treatment is allowed

### Speak-Up Code

This code sets out various methods by which employees, suppliers and third parties can raise concerns about working practices that they believe breach any Britvic policies or the law. Britvic provides a confidential hotline via both phone and web, which is available 24/7 and 365 days a year. The hotline is operated by an independent external organisation.

Any concerns reported via the hotline or through line management are referred to the Company Secretary and the Director of Audit and Risk, and all matters are treated in the strictest confidence. Concerns can be reported anonymously and are investigated as quickly and thoroughly as possible, and the position of the person reporting the concern is protected, regardless of the outcome of the investigation. The Board receives reports on all concerns raised and progress towards resolving them at every Board meeting.

During 2021, the policy was updated to use clearer language and emphasise the confidentiality and independence of the reporting service. New translations were implemented in France and Brazil. This was accompanied by an awareness poster campaign in the UK, Ireland, France and Brazil covering all our manufacturing and distributions sites, in local languages as appropriate. Digital versions were promoted on the Company intranet and as a screen saver throughout August.

No concerns related to Modern Slavery were raised in 2021.

Find the Britvic policies here:  
[britvic.com/policies](https://britvic.com/policies)

## Modern Slavery Act Transparency Statement 2021 **continued**

### Other policies relating to Modern Slavery

One of our 2021 goals was to conduct a gap analysis of our policies to identify any gaps in our current policy set. The analysis did not identify the need for any new policies, but we added some additional references in our existing policies to ensure that modern slavery is covered sufficiently.

Britvic has policies in place which contain terms relating to the principles of ethical business, including the Work Experience and Young People Manager Guidance, the Diversity & Inclusion Policy and the Harassment & Bullying Policy.

Britvic is working closely with AIM- PROGRESS to develop a plan for the potential new EU Human Rights Due Diligence legislation, which will form the basis of a Human Rights Policy and processes for monitoring human rights throughout the Britvic supply chain.

### Policy implementation, compliance and training

Each policy is assigned to a Global Policy Owner who is responsible for ensuring the policy is kept up to date and is properly implemented. Local policy owners are responsible in different countries to ensure that policies are amended in line with requirements of local regulation. Each market has its own approach to implementing, communicating and training on our global policies.

Britvic has a Compliance function responsible for overseeing the compliance agenda, including working with policy owners to ensure that individual policies form a coherent framework across the business. One of the objectives of this function is to ensure that policies remain relevant and new policy areas are identified and addressed and communicated in a way that is clear and understood by our employees.

On joining the business, new starters are required to read key Britvic policies, which include the Code of Conduct and the Ethical Business Policy. Key personnel in functions such as procurement and research and development are given extra training to raise awareness of the associated risks within the supply chain (see Training section on page 7).



## Due diligence and assessment of suppliers and supply chain

### Sedex

#### Sedex

Sedex is a not-for-profit organisation and the largest collaborative platform for sharing ethical supply chain data.

It is dedicated to driving improvements in ethical and responsible business practices in global supply chains and has more than 60,000 members in over 180 countries (as reported on [www.sedexglobal.com](http://www.sedexglobal.com) in October 2021). It has a secure, online database which allows members to store, share and report information about labour standards, health & safety, the environment and business ethics.

We continue to proactively contribute to the Sedex data platform and its continuous improvement. Britvic has been a member of Sedex since 2005 and we contribute to the development of the SMETA 4 Pillar audit (see page 5) at the Sedex Stakeholder Forum.

### AIM PROGRESS

#### AIM-PROGRESS

Britvic is one of the founding members of AIM-PROGRESS which started in 2007. AIM-PROGRESS is a global fast-moving consumer goods manufacturer and supplier forum whose goal is to positively impact people's lives through combined leadership of robust responsible sourcing practices throughout our supply chains. AIM-PROGRESS members exchange views and share learnings that help us to develop best practice and continually enhance our ethical processes.

Further information can be found at:  
[www.aim-progress.com](http://www.aim-progress.com)

We are a part of the Mutual Recognition working group whose aim is to enable the social and ethical audits conducted by AIM-PROGRESS members to be recognised and accepted by other fellow members.

ecovadis

### EcoVadis

EcoVadis is an online platform which provides assessments of a company's sustainability performance across four pillars: environment, ethics, labour & human rights, and sustainable procurement. EcoVadis works with over 75,000 companies, across more than 160 countries and over 200 industries.

Further information can be found at [www.ecovadis.com](http://www.ecovadis.com)

We have partnered with EcoVadis to collaborate with our priority direct and indirect suppliers\*, to assess sustainability performance using a common platform and scorecard. This will be monitored regularly and benchmarked to encourage continued improvement in the relevant areas across our supply base. We will require all our priority suppliers to complete the EcoVadis self-assessment and to share their ratings with us over the next 12 months. This will be used in our supplier development conversations to encourage continuous improvement in sustainable sourcing and to ensure a responsible supply chain.

### Our suppliers

Britvic assesses the ethical risks in our supply chains by asking all our direct suppliers\* to join Sedex, complete the Sedex self-assessment ethical questionnaire and permit us access to their data through the on-line database. We assess each supplier's risk using the platform risk assessment tool which identifies the likelihood of an issue occurring. The risk score is calculated using Sedex's new inbuilt risk assessment tool. It calculates a supplier risk rating based upon inherent risk and the management proficiency by capturing the risk associated with a supplier's country and the inherent risk associated with the sector.

Britvic requires all direct suppliers\* identified as 'high-risk' to have a SMETA 4 Pillar audit (Sedex Members Ethical Trade Audit), which assesses and verifies compliance against:

- Labour Standards (including absence of forced labour),
- Environmental Standards,
- Business Ethics (including absence of Bribery & Corruption)
- Health & Safety.

As part of our sustainable sourcing programme we have engaged with over 100 of our priority direct and indirect suppliers\* on sustainability. This supplier engagement involved supplier questionnaires to understand sustainability performance and capability within their companies, as well as key supplier meetings held virtually to share Britvic's sustainability strategy and to discuss collaborative solutions to achieve our sustainability targets.

\* Direct suppliers are those who supply raw materials, defined as any items that end up in the completed products on sale. This includes ingredients and packaging. Indirect suppliers cover everything else including temporary labour, office supplies, machinery and technology.

From this supplier engagement activity we are developing 4 – 5 year sustainable roadmaps for each of our key supply chains across direct & indirect suppliers\*. These roadmaps include initiatives on reducing Scope 3 carbon emissions, sustainably sourcing key raw materials (packaging & agro-commodities), water stewardship and ethical sourcing. This includes, but is not limited to, sourcing supply chain mapping technology to complement the work we do with Sedex, Aim-Progress and EcoVadis, to help further our supply chain visibility from "farm to fork".

These audits also include confidential interviews with a percentage of the workforce and are carried out by independent auditors from internationally recognised audit bodies. If any issues or non-compliances with the audit standard are identified during an audit, the supplier is required to prepare a corrective action plan and remediate them within an agreed period.

### Our own business

As part of our commitment to meet the same standards that we are asking of our supply chain, all our manufacturing sites in GB, Ireland, France and Brazil have completed the Sedex self-assessment questionnaire and successfully completed SMETA 4 Pillar audits. All Britvic manufacturing sites are regularly receiving SMETA audits.

Since the outbreak of the COVID-19 pandemic Britvic has ensured that all its sites have undergone on-site audits following the lifting of local Government restrictions.

In fulfilment of one of our 2021 goals, we carried out an audit of the human resources data within our own business to search for indicators of forced labour. This audit checked for warning signs, such as multiple unrelated employees living at a single address. The audit showed some warning signs and follow-up checks were conducted. This is now a regular exercise carried out by our HR department.



## Risk assessment

We aim to understand the potential risks to human rights such as forced labour within our supply chain by using tools such as SEDEX. We use the Sedex platform to monitor the modern slavery risk in our supply chain. The online database enables its members to share their ethical data about their businesses. This requires Britvic to encourage a collaborative approach with our suppliers to share their business data.

Each SEDEX member's risk is calculated by using the inherent risk profile which includes the nature of the industry and the country of origin. This risk rating then determines the requirement for a SEDEX Member's Ethical Trade Audit (SMETA).

The SMETA assesses manufacturing sites and highlights any signs of forced labour. This is a requirement for all direct suppliers to complete before being fully onboarded as a new supplier to Britvic. Certain industries such as agriculture, construction and apparel manufacturing are more prevalent to forced labour, as are certain countries. Examples of forced labour indicators detected by the SMETA include practices like the retention of identity documents, excessive overtime, and

withholding of wages. Britvic uses SMETA to ensure company-wide awareness of the more common risks associated with our supply chain to help select good suppliers with responsible practice.

One of our 2021 goals was to develop a risk map of the forced labour in our supply chain. We have used the our suppliers data along with their audit results to establish the highest risk areas around the globe among our suppliers and the type of forced labour indicators most prevalent with the suppliers, as shown below.

## Measuring progress

Britvic is committed to making measurable progress each year on our journey of responsible sourcing. During 2021, Britvic has assessed 252 supplier sites and ensured 100% of our suppliers identified as high-risk have been audited.

To ensure we keep moving forward on our responsible sourcing journey, we are developing new metrics for measuring our ethical business practices. These KPIs may include, but are not limited to:

- Supplier diversity
- Migrant labour and seasonal/temp labour numbers in our own operations
- Forced labour index within direct supply chain
- Speak Up calls citing Modern Slavery concerns

**Sedex**

136

Total Indicators

90

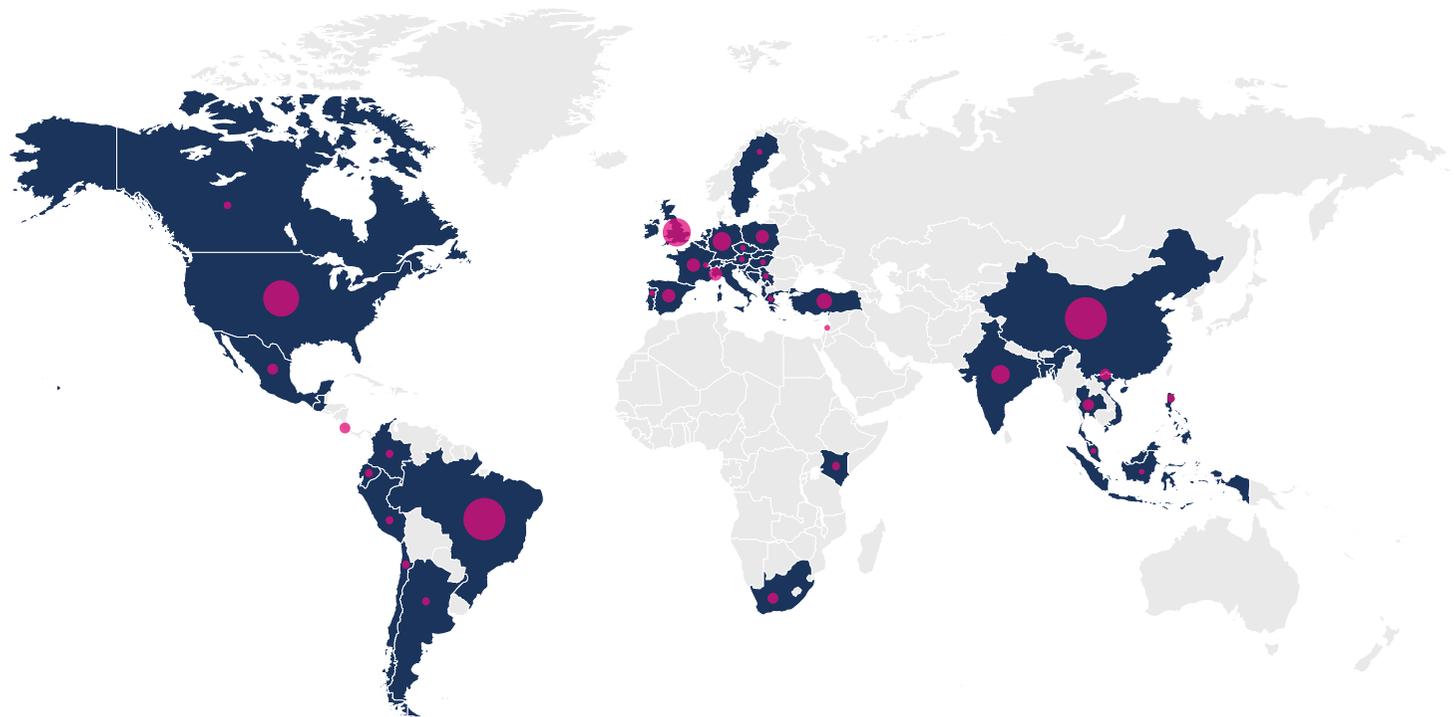
Total Audits

44

Total Audits with indicators

46

Total Audits without indicators



## Healthier people

At Britvic, we take positive actions to maximise the wellbeing of our employees.

Britvic's wellbeing framework is made up of the following interconnected elements:

- Promoting good health, energy and physical wellbeing.
- Building emotional health, resilience and mindfulness.
- Promoting dynamic working.

We have trained employees who have volunteered as Wellbeing Warriors and Mental Health First Aiders and the myLife app, which is supported by a suite of resources, including a comprehensive digital resource hub and a 24/7 confidential employees assistance support phone line.

Our business-wide inclusion and diversity programme is designed to value every individual's unique and different contributions and everyone is encouraged to be their true selves at work.

Since the start of this programme, we have launched four network groups across the business. Our B-Empowered network is focused on supporting, developing and retaining great female talent within Britvic. Our B-Proud network represents our LGBTQ+ community. Our B-Seen network represents diverse abilities across our organisation, and our B-Diverse network represents colleagues from all ethnic minorities.

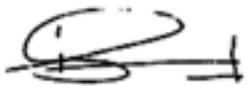
## Training

Britvic has created a Modern Slavery e-learning module, developed by qualified instructional designers using information from the Modern Slavery Act and various anti-modern slavery Non-Governmental Organisations (NGOs), for example Anti-Slavery and the Modern Slavery Partnership. We plan to roll this out across the business in 2022. Targeted training is planned for Procurement teams, such as Ethical Purchasing Practices Training, Stronger Together training for Human Resources and key members of our operations facilities.

## Next steps

The Modern Slavery Prevention Group will continue to identify areas of focus to drive progress and provide assurance that our practices and those of our suppliers are conducted ethically for 2022.

This statement has been approved by the Board of Directors of Britvic plc.



**Simon Litherland**  
Chief Executive Officer  
November 2021

## 2022 Goals

Implement Human Rights monitoring in supply chain



Develop capability to measure effectiveness of steps taken using appropriate KPIs



Continue to raise awareness within the business on modern slavery (including posters in factories and our digital e-learning module)



Review contracts with our temporary labour providers, including specific legal clauses on tackling modern slavery



Roll out EcoVadis across our key direct and indirect suppliers



Roll out Speak Up hotline awareness into our supply chain

