

# SBFE MODERN SLAVERY & HUMAN TRAFFICKING POLICY

This policy was last amended on 6 June 2024.

## 1. Introduction

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- 1.1 Suntory Beverage and Food Europe ("SBFE") is a part of Suntory Beverage and Food, a member of Suntory Group, and includes:
  - 1.1.1 Lucozade Ribena Suntory Ltd ("LRS");
  - 1.1.2 Orangina Schweppes Holdings B.V. ("OSH");
  - 1.1.3 Suntory Beverage & Food Kenya ("SBFK");
  - 1.1.4 Suntory Beverage & Food South Africa ("SBFSA"),and all of their subsidiaries (the "Business Units"). The use of "we", "us", "our" and SBFE in this document are references to SBFE, LRS, OSH, SBFK, SBFSA and all or any one of the Business Units.
- 1.2 At SBFE we are committed to maintaining the highest level of ethical standards in the conduct of our business affairs. In view of the nature, scale and geographic reach of SBFE's activities, it is important that we address the risk of modern slavery and human trafficking to ensure that we are meeting both the ethical standards we set ourselves, as well as our legal obligations. This document sets out our policy in relation to modern slavery and human trafficking.

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## 2. Policy Statement

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- 2.1 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. Human trafficking describes the practice of illegally transporting someone from one area or country to another, usually for the purposes of being sold into modern slavery. A person does not need to be taken out of their home country to be considered a victim of human trafficking.
- 2.2 Here at SBFE, we operate in various markets around the world and many different people are impacted by what we do. Our supply chains include suppliers from across the world, and we work with other business partners across a wide range of countries. Modern slavery and human trafficking are happening across the markets that SBFE operate in right now, and they can affect all kinds of businesses.
- 2.3 We believe in fairness, respect, and equality for all. At SBFE we are committed to:
  - 2.3.1 taking a zero-tolerance approach to modern slavery and human trafficking - modern slavery and human trafficking will not be tolerated in our business nor will we tolerate those with whom we do business engaging in such activity;

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- 2.3.2 acting fairly, honestly, openly and with integrity in all our business dealings and relationships wherever we operate;
- 2.3.3 upholding national and international laws and regulations relevant to countering modern slavery and human trafficking wherever we operate; and
- 2.3.4 implementing and enforcing effective systems within SBFE to counter the risk of modern slavery and human trafficking in our own business or in any of our supply chains.

An important part of achieving these commitments is to make sure that our people are aware of our compliance responsibilities and the role that we expect them to play in meeting these responsibilities.

- 2.4 We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery and human trafficking throughout our supply chains. We expect the same high standards from all of our contractors, suppliers and other business partners, including distributors and customers, and we expect that they will hold their own suppliers and other business partners to the same high standards.
- 2.5 We publish an annual Modern Slavery Statement which discloses information about modern slavery risks within the business and the preventative actions we have taken in response to them. Our past and current Modern Slavery Statements can be accessed [here](#).

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### 3. About this policy

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- 3.1 The purpose of this policy is to:
    - 3.1.1 set out our responsibilities, and the responsibilities of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking; and
    - 3.1.2 provide information to those working for and on our behalf on how to identify and report concerns regarding modern slavery and human trafficking.
  - 3.2 This policy applies to all persons working for us or on our behalf in any capacity, including all employees at all levels, directors, officers, agency workers, seconded workers, interns, partners, freelancers, vendors, agents, contractors, external consultants, suppliers, distributors and other business partners.
  - 3.3 This policy supports our modern slavery and human trafficking commitments. It sets out in practical terms how you should behave and what you should do if you are confronted with or have concerns about either. You are expected to adhere to the policy at all times in all aspects of your work.
  - 3.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.
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### 4. Responsibility for the policy

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- 4.1 The SBFE Ethics and Compliance Committee, supported by any Ethics and Compliance Committees in each Business Unit, has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 4.2 The SBFE Legal team has primary and day-to-day responsibility for implementing this policy and dealing with any queries about it, working closely with other teams across the business. The SBFE GRCL team as a whole will monitor its use and effectiveness, and audit internal control systems and procedures to ensure they are effective in countering modern slavery and human trafficking.
- 4.3 Management at all levels across SBFE are responsible for ensuring those reporting to them understand and comply with this policy.
- 4.4 All employees, directors, officers, agency workers, seconded workers, interns, partners, freelancers, vendors, agents, contractors, external consultants, supplier and other business partners are responsible for complying with this policy.
- 4.5 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 SBFE Legal Director or sent to [sbfe.compliance@suntory.com](mailto:sbfe.compliance@suntory.com).

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### 5. Your Responsibility & How to raise a concern

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- 5.1 You must ensure that you read, understand and comply with this policy.
- 5.2 The prevention, detection and reporting of modern slavery or human trafficking in any part of our business or supply chains is the responsibility of all of us. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 5.3 Key signs of modern slavery or human trafficking to watch out for include staff not being able to speak the local language, not being seen to take breaks, sleeping in accommodation where they work, being unwilling or unable to make eye contact or talk to people, seeming malnourished and tired, having untreated injuries, or wearing unsuitable clothes for the work or weather, as well as high staff turnover, domineering or bullying by managers, and only being able to pay for a service of any supplier in cash.
- 5.4 You must notify your manager, a member of your legal team or the Ethics and Compliance Hotline as soon as possible if you believe or suspect that a breach of this policy has occurred, or may occur in the future. Our Ethics and Compliance Hotline Policy can be found here [\[Add link\]](#) and includes details on how to make a report.

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- 5.5 You should raise concerns about any issue or suspicion of modern slavery or human trafficking in any parts of our business or any parts of the supply chains of any supplier (of any other business partner) at the earliest possible stage.
- 5.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions constitutes any of the various forms of modern slavery or human trafficking, or if you ever encounter a situation where you are feeling something is off or is making you uncomfortable, you should raise it with your manager, your local legal team or via the Ethics and Compliance Hotline.
- 5.7 Any individuals covered by this policy who are not our employees should notify their business contact within SBFE or a member of the SBFE legal team or P&C team (as appropriate) as soon as possible if they believe or suspect that a breach of this policy has occurred or may occur in the future. They may also report the concern using our Ethics and Compliance Hotline, details of which can be found [here](#).
- 5.8 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 or human trafficking 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 a member of the P&C Team or Legal Team immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the grievance procedure applicable to your market.

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### 6. Training & Communication

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- 6.1 Training on this policy, and on the risk our business faces from modern slavery and human trafficking in its supply chains, is provided on a regular basis to members of our People & Culture, Quality, Legal, Procurement and External Affairs teams, as well as our leadership teams and others as appropriate. This training is mandatory for anybody asked to complete it.
- 6.2 Our zero-tolerance approach to modern slavery and human trafficking in our business and supply chains must be communicated to all suppliers, contractors, distributors and other business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis.

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### 7. Breaches of this policy

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- 7.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

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- 7.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

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### 8. Further Information

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- 8.1 If you have any questions about this policy, modern slavery or human trafficking, or require any further support, please contact your Legal team or email [sbfe.compliance@suntory.com](mailto:sbfe.compliance@suntory.com).