

**CVH SPIRITS LIMITED (“CVH”)**

**SLAVERY AND HUMAN TRAFFICKING STATEMENT – FOR THE YEAR ENDED 30<sup>TH</sup> JUNE 2024**

**Introduction**

CVH’s success is intrinsically linked to the way we conduct our business in line with our values of responsibility and integrity. These behaviours apply both within the business and in our dealings with suppliers.

CVH is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business through fair employment practices in line with our values, practices, and relevant labour legislation. These reflect 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.

We adopt a zero-tolerance approach to slavery and human trafficking and are committed to taking all reasonably practicable steps to ensure that slavery and human trafficking is not present either in our business or in our supply chains. In order to achieve this, we seek to identify and tackle slavery and human trafficking risks.

We expect the same standards from all those we work with, including business partners, contractors and suppliers. CVH is committed to working with our suppliers to ensure that slavery and human trafficking risks are identified and managed proactively.

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.



Since the Modern Slavery Act 2015 came into force, we have built on our existing commitment by:

- taking external legal advice.
- holding discussions with our Human Resources and Supply Chain teams to identify key slavery and human trafficking risks in our business and our supply chain.
- identifying the legal team as the responsible department and the Head of Legal as the person with day-to-day responsibility for anti-slavery and human trafficking compliance.
- ensuring our onboarding for suppliers covers compliance with anti-slavery and human trafficking and that contracts include a compliance clause.
- continuing to review our supplier contract terms to identify compliance opportunities.

### **Structure, business and supply chains**

CVH's principal activities are the distillation, blending, bottling, marketing and sale of Scotch Whisky and the production, marketing and sale of other alcoholic beverages. We have our head office in Scotland. CVH's immediate parent company is Distell Group (Proprietary) Limited, a company registered in South Africa, and the ultimate holding company of CVH is Capevin Holdings (Proprietary) Limited ("Capevin"), also a South African registered company. The ultimate and controlling shareholder of Capevin is Remgro Limited, a company registered in South Africa. CVH employs approximately 328 people across the world and owns 3 distilleries and a state of the art blending and bottling site.

We are committed to treating people in a way that respects their human rights in all our activities and in compliance with both the letter and spirit of applicable laws. It is also what our stakeholders expect from us and this goal is reflected in our Values. We are committed to upholding The South African Constitution, The Universal Declaration of Human Rights and the UK Modern Slavery Act in our business behaviours. These National and International principles guide the manner in which we engage, promote and uphold human rights.

### **Supply chain**

From a review of CVH's business and its supply chains in regard to modern slavery, we believe that we are low risk. Most of our suppliers are based within the UK and are subject to regular audits as part of our quality and supplier management regime. Where we believe there are risks in areas such as agency labour provision, we carry out detailed audits of those suppliers. The goods and services we procure are typically from larger, established suppliers with operating systems and practices which meet the ethical standards we expect. We monitor and assess our suppliers against international human rights standards.

Our supply contracts include obligations on our suppliers to conduct their business in accordance with all applicable anti-slavery and human trafficking laws, statutes, regulations, and codes from time to time in force (Anti-Slavery Laws). We contractually commit our suppliers to inform us of any breach of Anti-Slavery Laws, and to implement due diligence procedures across their supply chains to ensure that there is no slavery or human trafficking taking place.

Our New Vendor Application Form and Due Diligence Questionnaire is used to screen our suppliers both prior to working with them, and on an ongoing basis. The World-Check Portal system red flags any legal and reputational risks associated with any third parties, including any breach of legislation anywhere in the world and / or reputational issues which we should be aware of. This allows us to review any legal or compliance risks associated with the third parties we interact with prior to engaging them and throughout their engagement with CVH. This screening process also includes a mandatory compliance questionnaire which third parties are required to complete to confirm details in respect of their own compliance processes and policies.

We always comply with standards and rules set by regulatory authorities and by national and international standards authorities. Our processes include:

- Anti-bribery policy and processes, including engagement and assurances from medium and high risk service providers.
- Cross-functional “Know Your Customer” checks before we work with new customers and distributors.
- Full compliance with the UK’s HMRC Department requirements, including supply chain due diligence.
- Membership of Supplier Ethical Data Exchange (SEDEX) from which we are independently audited against those standards for ethical trading.
- Fair trade certification.

### **Policies on Slavery and Human Trafficking**

We will always comply with local employment laws. Our range of HR policies and ways of working ensure that our employees are treated fairly in terms of:

- Pay and benefits.
- Health & safety, working environment and conditions.
- Treatment in the workplace.
- Diversity, inclusion and engagement.



- The ability to speak up confidentially if issues arise.
- Access to clear written terms of employment.
- Clear expectations of and ways of working with our partner recruitment agencies for temporary staff.

We continue to review all of our employment policies on a regular basis to ensure we are compliant with any legislative changes.

### **Staff Education and Communication**

The company has policies in place related to ethical conduct, which are communicated to all staff so that they understand the ethical standards and behaviours required of them by the company. There is also a whistleblowing line and process, operated by an independent third party company, which enables staff to raise concerns anonymously, without fear of reprisal.

We will continue to review our staff policies and build on our training programmes in this area.

### **Further Steps**

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking within our organisation or supply chains, we intend to take the following further steps to combat slavery and human trafficking:

- Continue to implement and enforce effective systems and controls to prevent slavery and human trafficking in our supply chains.
- Continue to monitor and review the effectiveness of our wider compliance regime.

Our regular audits by various 3<sup>rd</sup> parties, such as ISO and our retail customers serve as a testament to the Company's commitment to operating at the highest standards all of which has helped contribute to the Company attaining ISO 9001 certification on top of BRC AA+ accreditation.

The UK Government launched its registry for Modern Slavery Act 2015 (MSA) statements. In support of the Government's mission for transparency, we have voluntarily published our own modern slavery statements on this registry.



This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 30<sup>th</sup> June 2024.

A handwritten signature in black ink, appearing to read 'Nathan', written in a cursive style.

**Steven Nathan**  
**CEO**  
**CVH Spirits Limited**

**Date:** 17th December 2024