

Modern Slavery and Human Trafficking Statement

This statement covers all activities of Joseph Holt Ltd and Joseph Holt Group. As required under the Modern Slavery Act 2015, we detail below the steps we have taken to ensure that slavery and human trafficking have no place in our business.

Joseph Holt Ltd and the Joseph Holt Group are committed to ensuring that modern slavery and human trafficking have no place in our organisation or in any part of our supply chain. We believe every person deserves to live and work with dignity, respect and freedom. Our zero-tolerance approach to exploitation reflects who we are as an independent family business and how we treat the people we work with, which is integral to our values and operations.

This statement reflects activities undertaken during the financial year 1 January 2024 to 31 December 2024.

Who We Are

Joseph Holt, established in 1849, is an independent family business in its sixth generation. We have been brewing and packaging beer on the same site in Manchester since 1860. We operate an estate of 127 pubs across the North West of England. Of these pubs, 8 have hotel bedrooms and 34 serve food. We also have a growing Free Trade department, supplying pubs and venues outside of our estate. We employ just over 400 people and remain proud of the local communities we serve.

Our Supply Chains

We value long term and supportive relationships with our suppliers, who share our values, which includes our approach to modern slavery and human trafficking. Most of our suppliers are located in the UK, though we do source some brewing ingredients and specialist materials from Europe and Worldwide that cannot be grown or produced in the UK. Our main supplier categories are food and drink, brewing ingredients, uniforms, consumables, building materials, furnishing and equipment.

We expect all suppliers to uphold strong ethical standards and help us ensure exploitation is never present in the products and services we purchase.

Our Commitment to Tackling Modern Slavery

Joseph Holt is committed to acting ethically and with integrity in everything we do. We continue to implement and enforce effective systems and controls to prevent slavery and human trafficking in any aspect of our operations or supply chains.

Steps Taken to Mitigate Risks

Supply Chain Management

We expect our suppliers to uphold the same high standards we set for ourselves. Where risks are identified, we work collaboratively to drive improvement or take appropriate sanctions

To ensure our suppliers align with our zero-tolerance approach, we take the following actions:

- Include contractual clauses requiring suppliers and subcontractors to comply with all applicable anti-slavery laws, including the Modern Slavery Act.
- Expect suppliers to implement appropriate systems for due diligence, audits, and training to mitigate risks within their supply chains.

- Expect suppliers to develop their own modern slavery statements.
- Require any new suppliers to our business to sign our modern slavery statement and agree to adhere to our zero-tolerance policy.

Internal Process Controls

We have established processes to ensure compliance with the Modern Slavery Act:

- Maintain a Modern Slavery and Human Trafficking Policy
- Verify the eligibility to work in the UK for all employees to ensure compliance with employment laws
- Promote whistleblowing through our Employee Handbook, encouraging employees to raise concerns.
- Provide face to face, refresher and virtual training to employees to raise awareness of modern slavery risks, including customer safety and recognising signs of slavery and trafficking.
- Deliver specific briefings to senior management to enhance leadership awareness and accountability.
- Review and address potential risk areas within current and future supply chains.

Policies Supporting Our Commitment

Our zero-tolerance stance on modern slavery and human trafficking is reinforced through the following company policies:

- **Anti-Bribery Policy**
- **Grievance Policy**
- **Whistleblowing Policy**

These policies support our efforts to identify, prevent, and eradicate modern slavery within our organisation and supply chain.

Ongoing Actions

Continuous improvement is vital to us and we remain committed by:

- Strengthening relationships with suppliers to ensure alignment with our values.
- Regularly evaluating and refining our policies and processes.
- Providing ongoing training to employees and management to sustain awareness and vigilance.

By taking these steps, Joseph Holt affirms its dedication to ethical operations, respect for human rights, and compliance with the Modern Slavery Act.

This statement was approved on 17 November 2025 by the organisation's Board of Directors, who review and update it annually.

A handwritten signature in black ink, appearing to read "Richard Kershaw". The signature is fluid and cursive, with a large, stylized "K" and a long, sweeping underline.

Richard Kershaw, Chief Executive