

Slavery & Human Trafficking Statement

Introduction

Slavery and human trafficking is a global and growing issue given the rapid rise of global migration. Golf Holdings Limited has a zero-tolerance approach to slavery and is committed to preventing acts of slavery and human trafficking from occurring within both its business and supply chain, and imposes those same high standards on its contractors, suppliers and other business partners.

Our structure

Golf Holdings Limited (**the Group**) has its head office in Northern Ireland. The Group has over 1,650 employees and a turnover of more than £185 million per annum.

Three of the Group's subsidiaries have an annual turnover in excess of £36 million. This statement covers James E McCabe Ltd, Property Management Services (N.I.) Ltd and Philip Russell Ltd.

Our business

Golf Holdings Limited is the parent company of a number of companies and the principal activities of the Group are that of wholesaling and retailing of beers, wines and spirits, distiller's agents and convenience store retailing in the Northern Ireland market.

The Group's subsidiary companies' activities form part of its supply chain or business.

As such, Golf Holdings Limited has a broad supply chain. We work with a wide range of different suppliers, subcontractors and partners each of which will have their own subcontractors, affiliates and associate entities. Golf Holdings Limited therefore is connected to multiple entities through numerous contractual relationships, predominantly within the UK.

Our supply chains

Our supply chains include the sourcing of materials principally related to the provision of food and drink.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects 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. This policy is available on request.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we:

- Expect our suppliers to have suitable anti-slavery and human trafficking policies and processes in place within their own businesses and to cascade those policies to their own suppliers;
- Have completed an analysis of existing suppliers and partners and followed up where relevant;
- The procurement team follow the advice and guidance in relation to the Modern Slavery Act set out in the Chartered Institute of Purchasing and Supply (CIPS) code of professional conduct;
- Provide regular training in respect of the Modern Slavery Act to our procurement team;
- Operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work;
- Encourage staff to identify and report any potential breaches of Golf Holdings Limited's anti-slavery policy statement;

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year ending 31st December 2019.



ROBERT DAVIS
MANAGING DIRECTOR
GOLF HOLDINGS LIMITED

DATE: 26TH MARCH 2019