

V BEVERAGES LTD. ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

V Beverages Ltd. takes its responsibilities as a business to prevent slavery and human trafficking very seriously; we remain committed to conducting our business in a transparent manner including in relation to our obligations introduced as a result of the Modern Slavery Act 2015.

We pride ourselves to achieve best practice with respect to ethical trading and to ensure that there is no modern slavery or human trafficking in our business or our supply chains.

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by V Beverages Ltd. and other relevant group companies to prevent modern slavery and human trafficking in its business and supply chains.

Introduction

Slavery and human trafficking are abuses of a person's freedoms and rights. They are however a growing issue across the world, in every region and every economy. We recognise that we have a responsibility to prevent modern slavery and human trafficking both within our business and our supply chain. We are committed to making a positive contribution to society by developing and implementing business practices that allow us to deliver financial success whilst conducting our business strategy and operations in a responsible manner.

Our Business

Our wholly owned production subsidiary MaxChater Ltd. was founded in 2015 with our V Beverages headquarters located in Mayfair, London.

Our Policies

We have adopted a code of conduct which sets out a number of principles with which we comply and that we expect our suppliers to comply with. These include statements that all employees shall be free to choose their employment and shall not be forced to work against their will, and that there shall be no forced, bonded or involuntary prison labour or human trafficking.

For our employees, failure to comply with the provisions of the Code may result in disciplinary action which could result in their immediate suspension or the termination of their employment.

We also operate a whistle blowing policy, aimed at our employees, which encourages staff to report any wrongdoing, including human rights violations such as modern slavery or human trafficking. Any reports of this nature will be fully investigated and appropriate remedial actions taken.

In relation to our suppliers, we believe that transparency is vital to a successful business relationship. We are committed to building long-term relationships with suppliers and value open and honest communication with them. In the event of non-compliance with our Code of conduct, we expect our suppliers to be committed and engaged in remedying the issue within a time-frame set out in a corrective action plan to be agreed with the supplier. We reserve the right to terminate any agreements should a supplier decide that compliance with the Code is impossible or where a supplier shows repeated disregard for the provisions of the Code.

Our Supply Chain

Our suppliers vary enormously in terms of their size and expertise and many of those will themselves be reliant on their own supply chain, potentially across many countries, in order to be able to supply relevant goods or services to us.

Current and proposed due diligence processes for modern slavery and human trafficking

We have started work on establishing a range of due diligence processes to enable us to identify and assess potential risk areas in our business and our supply chain.

We expect all major suppliers to have suitable anti-slavery and human trafficking policies and processes in place. Significant suppliers and those in businesses perceived to be most at risk have been asked to confirm their compliance with our code of conduct or to confirm that they have their own equivalent arrangements. This will be rolled out to our other smaller suppliers over time. As set out above, we reserve the right to terminate any agreement should a supplier decide that compliance is impossible or where a supplier shows repeated disregard for our code's provisions.

Our effectiveness in combating slavery and human trafficking

We understand that the risks of modern slavery and human trafficking are growing, and we will continue our approach to mitigating this risk in the year ahead.

This statement was approved by the board of V Beverages Ltd. and covers the following subsidiary entities:

MaxChater Ltd.