



The Deltic Group Limited

Statement for financial year 2017-2018

This statement is made pursuant to s.54 of the Modern Slavery Act 2015.

It sets out the steps that The Deltic Group Limited (“**Deltic**”) has undertaken - and is continuing to take - to try to prevent modern slavery or human trafficking from taking place within our business or supply chain.

We are committed to acting ethically and with integrity in all our business relationships and this includes taking steps to work towards the removal of slavery and human trafficking from our business and our supply chain. We are implementing effective systems and controls to try and make sure that modern slavery does not take place anywhere within our business. We are a UK based business and we are aware that modern slavery exists even in the UK, so we cannot be complacent when it comes to these issues.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015 (the “**Act**”).

Our organisation

Deltic is the UK’s largest operator of late night bars and clubs, and currently operates 55 premium venues across the country, trading under a number of concepts including PRYZM, Vinyl, Fiction, ATIK and Bar & Beyond. We employ circa 3,000 staff throughout our organisation.

Significant risks in our business

We are aware that the following areas of our supply chain and business are those where there is a particularly high risk of modern slavery occurring:

1. Temporary or agency staff: We make use of temporary staff at our head office. As these are not our employees, we are particularly vigilant in checking for signs of slavery.
2. Operational and marketing consumables: These items are often manufactured in the Far East and in areas of Europe where slavery has been identified in the past.
3. Food and drink suppliers: The total supply chain has a far reach covering a large number of countries including those which have been identified as high risk.

4. Uniform suppliers: Clothing is produced both in the United Kingdom and in the Far East.

Viewing our supply chain as a whole, the key suppliers that we consider represent a high risk of modern slavery and/or human trafficking are found in the Far East, Russia, Brazil, South America, North America, Spain, France, Portugal, Australia and the UK.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. **Anti-slavery policy:** This policy sets out our expectations of all employees and any others who work in our business in relation to slavery and human trafficking issues, including providing guidance on recognising modern slavery, and how employees should raise any concerns they have. This policy can be found here: [Anti-slavery Policy](#)
2. **Whistleblowing policy:** This sets out the whistle blowing policy, so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals. This policy can be found here: [Whistleblowing Policy](#)
3. **Supplier Code of Conduct:** This code sets out the minimum standard we expect all our suppliers to take to work towards eradicating slavery and human trafficking in their business and supply chain. More details on the Supplier Code of Conduct are below. This policy can be found here: [Supplier Code of Conduct](#)

Our suppliers

Our supply chain is varied, but our key tier 1 suppliers are those from whom we purchase our alcoholic and non-alcoholic beverages, food, audio-visual equipment, and consumables. Our supply chain is based globally and our suppliers themselves source globally.

Deltic operates a supplier policy and maintains a preferred supplier list, and we conduct due diligence on all suppliers before allowing them to become a preferred supplier. During the past year we have reviewed our supply chain and obtained statements on compliance with the Act from all relevant suppliers. Those suppliers that were identified as medium-risk or high-risk were sent questionnaires to complete to satisfy our audit requirements. The responses to those questionnaires were reviewed and, where we had concerns, we either met with suppliers to discuss the matter or the suppliers were asked to provide further information until we were satisfied with their compliance with the Act.

Our Supplier Code of Conduct forms part of our contract with our suppliers and they are required to confirm that no part of their business operations contradicts this policy. Suppliers are also required to obtain confirmation from their own suppliers and sub-contractors that they comply with the Supplier Code of Conduct.

The Supplier Code of Conduct requires suppliers to confirm the following relating to their business and supply chain:

1. wages paid to workers are fair;
2. working hours and annual leave comply with national laws and industry standards;

3. no child labour is used;
4. no forced, bonded, compulsory labour or servitude, or any form of human trafficking is practiced;
5. abuse of workers is not tolerated;
6. a secure, safe and healthy working environment is provided;
7. freedom of association and collective bargaining is respected; and
8. local laws relating to discrimination are complied with.

Recent Activity

In addition to the new supplier due diligence processes mentioned above, we have implemented the following measures in the last year:

1. we have reviewed our standard supplier contracts and included provisions requiring compliance with the Act; and
2. we have trained all human resources, procurement and managerial staff in compliance with the Act.

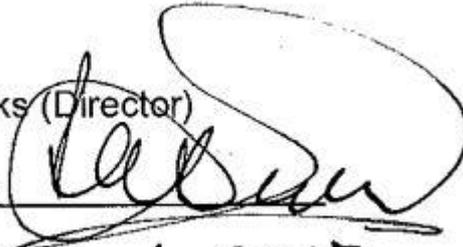
Next Steps

Looking forward to next year, we will continue working with our suppliers to promote awareness of slavery and human trafficking.

Approval for this statement

This statement was approved by the Board of Directors on 19 September 2018.

Peter Marks (Director)

Signature: 

Date: 20 Sept 2018