



## Modern Slavery Act Disclosure Statement 2025

### Understanding Modern Slavery

Despite significant efforts to eliminate modern slavery and human trafficking, these issues persist in many countries, impacting global supply chains and businesses worldwide. Influential companies have a responsibility not only to prevent these practices but also to work towards their eradication when necessary.

SA Damm, hereinafter referred to as Damm, issues this Statement in line with its commitment to the Modern Slavery Act and in accordance with Section 54 of the law. This statement and therefore Damm's commitment to human rights is overseen by Gabriel Pretus, Director at Damm 1876 LTD and approved by the Audit, Control and Sustainability Committee of the Board of Directors at SA Damm.

### Company structure and operations

Damm 1876 LTD is part of Damm and is a company in the United Kingdom that imports, brews, and wholesales some of the company's beer brands within the country. The company employs more than 140 people and it operates a brewery located in Bedford.

Our comprehensive supply network includes elements such as agriculture, malting, brewing, or transportation. For more information, please refer to our Annual Report published on our corporate website. To ensure that human rights are respected in all the supply chain, we have implemented measures to identify and reduce these risks (as detailed below).

### Policies and governance

Damm 1876 LTD applies the principles of honest treatment, non-discrimination, and respect for human rights, ensuring that relationships between all collaborators and the companies, entities, and organizations it interacts with in the course of its activities are characterized by fair, polite, and respectful treatment.

Specifically, the corporate Code of Conduct, which applies to all Damm companies, including Damm 1876 LTD, includes respect for the principles contained in the Universal Declaration of Human Rights and Labor Rights, aligned with the principles of the International Labour Organization. The Code of Conduct also references the elimination of forced and compulsory labor and child labor.

Damm's commitment to human rights is also emphasized in Damm's corporate Sustainability policy, which includes principles of sustainability. These principles include,

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among others, integrity and transparency in business practices and commitment to people and society. Additionally, it is aligned with the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, the ILO Fundamental Conventions, and the ten Principles of the Global Compact.

## Risk assessment and due diligence

Damm's Supplier Code of Conduct includes clauses committing suppliers to respect human rights. These principles are mandatory for all supplier companies and are essential in the approval process. Additionally, their performance in this area is monitored through the EcoVadis platform, and the implementation of measures and reconciliation within their workforces is evaluated.

The vast majority of contracts signed with international distributors include clauses requiring compliance with international standards to prevent slavery and human trafficking. Furthermore, Damm conducts an annual evaluation of supplier companies, holds follow-up meetings, and integrates new criteria, including social compliance issues.

Damm has an Internal Information System - Whistleblowing Channel that allows reporting, under legal protection, any irregularity that may constitute a serious or very serious criminal or administrative offense and takes place in the framework of Damm's business activities. This channel is available to collaborators, freelancers, contractor employees, subcontractors, suppliers, volunteers, interns, or individuals in the selection process.

## Communication and training

Individuals hired by Damm must sign the Code of Conduct, which is also available on the intranet and corporate website. As a sign of our continuous efforts to improve performance in this matter, we have an ESG training plan that applies to all employees and includes matters related to human rights and our Code of Conduct.

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