

Hawthorn is an ambitious community pub company with an energetic, people-focused culture. We are proud to serve our local communities, working with great partners and operators to run some of the best pubs in England, Scotland and Wales. We own and manage more than 700 leased, tenanted and operator managed community pubs in suburban locations, residential neighbourhoods, towns, city centres and communities around the UK. The origins of Hawthorn go back to the original acquisition in 2013 when the NewRiver Community Pub Company acquired 202 pubs from Marstons. In May 2018, NewRiver acquired Hawthorn and its 298 community pubs.

The Hawthorn community – our Pub Partners, community heroes, and our central team - works in partnership. Our many years of pub industry knowledge and experience helps and supports our pub partners and tenants run successful, sustainable businesses. We are committed to continuing to invest in our pub portfolio and our people, and we will continue to grow and invest in our estate while striving to be the best community pub company in the UK.

Being UK focused, the Company considers its geographical risk of slavery and human trafficking as being very low. However, we are pro-active in ensuring that we are making our contractors and suppliers aware of areas of potential risk and we are working to raise awareness and monitoring processes.

Our Employees

The Company has less than 120 direct employees and undertakes employment document checks to ensure that these employees are in the UK legally. Our HR strategy places people at the heart of our business, enabling us to attract and retain our staff.

We have numerous staff policies that protect our directly employed employees and we enjoy a high level of staff retention. The Company has established a staff forum, which meets periodically, to liaise with the Board and to create an environment to raise and discuss issues. We also have a Whistleblowing policy that encourages Staff to report any suspected wrongdoing or concerns. There have never been any concerns raised through the whistleblowing process or through any other process. We are working towards developing compliance training for employees on our online training programme which includes specific reference to slavery and human trafficking.

The Company has also written to its Pub Partners and Operators to ensure that they are aware of their legal obligations to undertake the necessary checks on the staff that they employ.

External Suppliers

Our external suppliers mainly include managing agents, developers and building contractors. The Company has engaged with these suppliers to confirm that they have policies in place, copies of which have been provided to the Company, to ensure that they comply with their legal obligations and that they undertake the necessary checks in their organisations and supply chains with regards to slavery and human trafficking.

Supplier Code of Conduct and a Modern Slavery Act 2015 Compliance Confirmation Statement

In 2019 we developed a Supplier Code of Conduct and a Modern Slavery Act 2015 Compliance Confirmation Statement reviewed and updated by the Board. These documents were circulated to our pub landlords and suppliers and are available on our website.

All new suppliers are now required to acknowledge that they will conform with our Supplier Code of Conduct. Through our tendering and contracting procedures, suppliers are required to uphold the



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THE COMMUNITY PUB CO.

requirements of the Supplier Code of Conduct and ensure any subcontractors they appoint do the same. These obligations are reflected in our contractual documentation.

This statement is made as required by section 54(1) of the Modern Slavery Act 2015 and constitutes Hawthorn, the Community Pub Co. slavery and human trafficking statement for the financial year ended 31 March 2021.

Signed: _____

Name: Mark Davies
Chief Executive Officer