

**Appleberry Foods Limited
Temple Bar
London
WC2R 2PH**

Our policy on responsible retailing of alcohol

Last updated: 01/02/2020

Our approach

We recognise that some products we sell, such as alcohol, tobacco, energy drinks, knives, and products containing corrosive substances can be harmful if misused or unhealthy if consumed too often. It is an issue our customers care about and we take our responsibility as a retailer of these products seriously.

To support our customers and the communities we serve there are products that are age restricted, which means that customers may be required to verify their age when making a purchase in store or online. Some of these restrictions are required by law, such as alcohol and tobacco, whereas in other areas we have taken a voluntary approach to achieve this aim, for example on energy drinks and painkillers.

We also want to ensure customers are informed about the effects of these products and our approach to tackling potential misuse. We have outlined our approach to the responsible retail of age restricted products below, which is driven through our partnerships with local communities, government, health bodies and the wider industry.

Providing information

We are committed to providing clear information to customers. All our labels on branded alcoholic products have on-pack information that include unit and calorie content, portion guidelines, NHS guidelines, and a warning about drinking when pregnant. We support colleagues and customers through providing information on responsible drinking in-store and online.

We do not position adverts containing alcoholic products in outdoor spaces within 100m of schools. As part of our responsible approach to advertising where appropriate we will include non-alcoholic drinks in visuals as well as alcoholic drinks.

Preventing under-age sales

We clearly communicate to our customers that alcohol is a product for adults. We have strong systems in place to ensure we do not sell to underage customers, including our 'Challenge 25' policy to help staff know when to ask for ID and refuse a sale where appropriate. We also use checkout prompts, including a date of birth, to support our colleagues when checking ID on alcoholic and low alcoholic and alcohol-



free variants of alcoholic brands. Our colleagues are trained to understand their responsibilities and this training is reviewed regularly. We also use mystery shoppers to test whether our cashiers and delivery drivers are correctly challenging customers to prove their age.

Partnership

While we recognise our responsibility as a retailer to encourage responsible drinking, we cannot do this alone and so we engage in several industry-wide initiatives. This includes abiding by the Portman Code, participating in the Campaign for Smarter Drinking, working with our retail and product brand partners.

Working with communities

We understand the need to be responsible retailers in the communities we operate in and play an active role in tackling problem underage drinking in local communities. We work with local authorities and police forces to address issues of alcohol-related anti-social behaviour in and around our stores and facilities.

Third party contract monitoring and due diligence

We work with a number of third parties to source, transport and deliver alcohol. Our policy requirements are embedded in our contracts with the third parties. We have a robust contract monitoring system in place to ensure all our trade partners demonstrate the same level of commitment towards responsible sale or supply of alcohol when their employees are working in our stores or providing transportation and delivery services.

Abdool Rohomon

From: Bobby Nakum [REDACTED]
Sent: 06 December 2020 20:06
To: Abdool Rohomon
Subject: Re: [External]: Re: Licence application - Sherlock Street, Birmingham
Attachments: Responsible retailing of alcohol policy.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Abdool,

Please see the attached policy on responsible retailing of alcohol.

Bobby Nakum
Mobile: [REDACTED]

On Mon, 30 Nov 2020 at 14:23, Abdool Rohomon <a.rohomon@west-midlands.pnn.police.uk> wrote:

Bobby,

I am rather amazed that me asking you questions about this application has led to such a stark response from you.

If you are going to make allegations that we are taking a prejudicial stance, maybe you should back this serious claim up with some evidence.

We do trust licenses we have many thousands and having done this for a long time I know what to look for. You are supposed to look at the operation and consider the implications and then propose conditions. This has not been done against the basic questions I have asked, to which you have not provided any answers. Company policies around such things can be disclosed to us, as we see many of them, so I do not accept what you say.

When you provide such information then conditions can be looked at, or we can get the licensing committee to consider it.

Abs Rohomon. BEM

PC 4075 Rohomon. BEM

BW Licensing

Police headquarters

Lloyd House

Colmore Circus

Birmingham

B4 6NQ

Internal : 801 1631

External : 0121 626 6099

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West Midlands Police

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Website: www.west-midlands.police.uk

Twitter: www.twitter.com/brumpolice

Facebook: www.facebook.com/westmidlandspolice

YouTube: www.youtube.com/westmidlandspolice

Vision statement - Serving our communities, protecting them from harm

From: Bobby Nakum [mailto:████████████████████]

Sent: 30 November 2020 13:55


To: Abdool Rohomon

Subject: Re: [External]: Re: Licence application - Sherlock Street, Birmingham

Dear Abdool,

Should you wish to put forward conditions on the licence, we will be happy to accept them. We cannot go in to the company's day to day operations and business administration. The authorities need to trust their licensees and allow them to do business in a competitive manner without prejudicing and in the event of non compliance, you have the option to review the premises. Therefore, I am happy to accept conditions you may propose but I feel that the Police is taking prejudicial stand against my client.

Kind regards

Bobby Nakum


On Mon, 30 Nov 2020, 1:45 pm Abdool Rohomon, <a.rohomon@west-midlands.pnn.police.uk> wrote:

Thank you Bobby,

Your actual application in very light on any such detail, and we need to make sure the conditions are appropriate and promote the objectives especially as the alcohol is out of their control.

I get that the public will not be allowed to the premise, so that does not concern me

You say all deliveries are actively tracked and monitored – what does this mean, by whom, by what means, it needs details, what is the company policy (can we have a copy)

You then say contingency plans for night time, again what are they, what is the company policy.

How are you going to ensure this is the same for third party delivery companies – who will you use, do you have their policies, are you only using ones you have signed contracts with?

What training do the in house staff have, what is it, when is it done, when is it refreshed.

How will you know a refusal to deliver has happened?, where will this be documented?

How will you know and detail the drivers collecting the alcohol, and if this information is needed by a responsible authority how will that be achieved and in what time frame

These need to be considered and then conditions offered to us, so can I ask you do this and come back to me please

Regards

Abs Rohomon. BEM

PC 4075 Rohomon. BEM

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Vision statement - Serving our communities, protecting them from harm

From: Bobby Nakum [mailto:████████████████████]

Sent: 29 November 2020 17:30

To: Abdool Rohomon

Subject: Re: [External]: Re: Licence application - Sherlock Street, Birmingham

Dear PC Rohomon,

Immediate deliveries will be done by both in house and third party. I am also the company's consultant for compliance, training, and contract monitoring, I am a legally qualified licensing practitioner and trainer.

All deliveries are actively tracked and monitored. There are contingency procedures for nighttime deliveries. Furthermore, no members of the public will be allowed on the premises. No alcohol will be supplied directly to members of the public at the premises. There will be a clear warning at the point of order that alcohol will only be delivered to someone over the age of 18 and that appropriate identification is requested. Off sales will be handled by a nationally recognised delivery company that employs the 'Challenge 25' age verification policy. All sales of alcohol will be online for mail order delivery only. Storage areas will be individually alarmed and can only be accessed by authorised personnel with PIN code entry. The company has due diligence and contract monitoring in place for third party delivery contracts and regular audits are carried out.

I hope this answers your concerns.

Bobby Nakum

Mobile: ██████████

On Thu, 19 Nov 2020 at 10:08, Abdool Rohomon <a.rohomon@west-midlands.pnn.police.uk> wrote:

Bobby,

Thank you, so in terms of the Immediate deliveries who is doing them? In house or third party?

Who is doing the training for the in house staff, where is this recorded and how often do they do it. What procedures are in place for in house delivery, what do they have to do when the goods are delivered.

What extra control measures are in place for late night delivery as the risk is higher

The application is very light on these details so I would be grateful for more information

Thanks

Abs Rohomon. BEM

PC 4075 Rohomon. BEM

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Vision statement - Serving our communities, protecting them from harm

From: Bobby Nakum [mailto:████████████████████]
Sent: 16 November 2020 14:22
To: Abdool Rohomon
Subject: [External]: Re: Licence application - Sherlock Street, Birmingham

CAUTION: This email originated from outside of West Midlands Police. Do not click links or open attachments unless you are sure the content is safe.

Dear PC Rohomon,

Delivery will be done by in house staff as well as contracted companies. The company also delivers specialty foods and non alcoholic beverages from other units depending on temperature requirements. Express deliveries will be immediate, other deliveries can have lead time depending on delivery service chosen by the customer. Speciality wines such as Beaujolais Nouveau need to be delivered very fresh as required by EU wine appellation requirements therefore, deliveries on such items will take priority.

Kind regards

Bobby Nakum

Licensing Agent

Mobile: ██████████

On Mon, 16 Nov 2020 at 13:55, Abdool Rohomon <a.rohomon@west-midlands.pnn.police.uk> wrote:

Dear Mr Inamdar,

I am currently looking through your licence application for the above premises.

Could you clarify for me please who actually does the delivery of the alcohol and is it only alcohol that you sell?

Can the delivery be for immediate dispatch (as in straight away) or is there a delay in the alcohol being dispatched (if so how long)

It would be appreciated if you could answer these for me please so I can fully assess this application

Kind regards

Abs Rohomon. BEM

PC 4075 Rohomon. BEM

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