



ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT
(1ST APRIL 2016 TO 31ST MARCH 2017)

Introduction

Our organisation maintains relationships with many different organisations in the supply chain as well as employing over 120 members of staff. We have a zero tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place.

Our Business and Supply Chains

We are an international wine supplier that imports, makes, bottles and delivers a great range of wines in both branded and private label formats to both the On and Off Trades in the UK and Overseas. Our supply chains include the sourcing of raw materials principally related to the provision of wine.

Due Diligence Processes for the Prevention of Modern Slavery and Human Trafficking

- We engage with our suppliers to inform them of our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses. As part of the tender process suppliers are required to complete an Ethical Trading Questionnaire for pre-screening on this important subject.
- All team members have an obligation to familiarise themselves with our Anti-Slavery and Human Trafficking Policy Statement which is included in the Employee Handbook forming part of their contract of employment.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.
- We provide ethics training to relevant members of staff to ensure a good understanding of the risks of modern slavery and human trafficking in our supply chains and our business.
- All Directors have been briefed on the subject and ultimately responsibility for the prevention of modern slavery rests with the Company's leadership. This policy will be reviewed by the Company's Board of Directors on an annual basis.

This constitutes our Company's Anti-Slavery and Human Trafficking statement for the current financial year.

Related documents:

Ethical Trading Policy

Use of Agency Temporary Workers

Ethical Trading Questionnaire

Signed by CEO:

Dated:

J.M. LANSLEY
27th April 2016