

Modern Slavery & Human Trafficking Statement for financial year 2019

Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that FINE+RARE Wines (F+R) has taken and is continuing to take to ensure that modern slavery and human trafficking is not taking place in our business or in our supply chain. This statement relates to actions and activities during financial year 1 January 2019 to 31 December 2019.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. F+R has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

About FINE+RARE Wines

F+R is a leading online fine wine and spirits merchant, buying and selling fine wines and spirits alongside providing cellar management for our customers. We currently operate in the UK, Asia & Italy and employ 80 employees across the global markets. The company was founded and has been trading since 1994.

We work with a network of producers, agents, reservists, and private clients across the globe to source, supply, store and sell fine wine and spirits internationally.

Our Commitment to the Principles of the Modern Slavery Act 2015

F+R is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and trafficking. As an equal opportunities' employer, F+R is committed to creating and ensuring a non-discriminatory and respectful working environment for its staff.

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

- Anti-Bribery
- Bullying and Harassment policy
- Code of Conduct
- Equal Opportunities policy
- Grievance policy
- Recruitment and Selection policy
- Whistleblowing Policy

Our Suppliers

F+R uses a wide range of independent wine producers, traders, and distributors across the world. The importing, exporting and transportation of the products we buy, sell and store is contracted out to third parties.

We have a zero-tolerance to slavery and human trafficking. We have carefully reviewed the risks that these supply chains can present and whilst we consider our exposure to modern slavery and human trafficking to be limited, we expect our suppliers and contractors to demonstrate a zero-tolerance approach to exploitation.

We encourage anyone including, colleagues, contractors, suppliers, and clients to report in good faith any issue or concern about potential unethical business practices, such as fraud and bribery or slavery and human trafficking.

Due Diligence

We continue undertake due diligence when considering taking on new suppliers, and regularly reviewing our existing suppliers.

F+R due diligence and reviews include:

- Mapping the supply chain broadly to assess geographical risks of modern slavery and human trafficking
- Evaluating the modern slavery and human trafficking risks of each new supplier
- Where practical, mitigate the risk of slavery and human trafficking occurring in our supply chain
- Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping.

We employ staff in the UK, Asia & Italy and ensure that all prospective employees are legally entitled to work in the country they are based. All new employees must produce, on their first day or before, their right to work documentation which is checked and certified by the Head of People & Talent or a Director.

Training

We understand the importance on building compliance across the business and over the past financial year we have continued to create awareness and provide guidance to those employees who have direct responsibility for relevant supply chains.

Training will continue to be provided on modern slavery to all employees and we will look to create a Modern Slavery Act Guidance document for employees to refer to on the staff intranet.

Looking Ahead

Over the course of the next financial year we will continue to build on the work we have carried out and enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers, and in relation to our own operations.

Approval

This statement has been formally approved by the business's Board of Directors, who review and update it annually.

Signature:



Patrick O'Connor
CEO
FINE+RARE Wines Ltd

Date: 24th March 2020