

Introduction

This statement sets out FINE+RARE Wines Ltd (F+R) actions to understand all potential modern slavery risks related to its business and to implement steps to ensure there is no slavery or human trafficking in our business and our supply chains. This statement relates to actions and activities during the financial year 1 January 2022 to 31 December 2022.

F+R continues to take steps to ensure that slavery and human trafficking is not taking place in our supply chains or any part of our business.

Organisational structure and supply chains

F+R is a leading online fine wine and spirits merchant. We buy and sell fine wines and spirits and provide cellar management for our customers. We are a private limited company incorporated in England and Wales with a presence in the UK, Asia, and Europe. We employ eighty 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 worldwide to source, supply, store, and sell fine wine and spirits internationally. We do source products from suppliers globally; however, a considerable number are European-based companies.

Although not all F+R entities are subject to the requirements of the UK Modern Slavery Act 2015, F+R has taken a group-wide approach to advancing human rights and combatting slavery in all its forms.

Responsibility

We have a zero-tolerance position on violations of the UK's anti-human trafficking and anti-modern slavery laws. If there are any breaches of these laws within our supply chain, we would immediately investigate and, together with the relevant supplier, develop corrective action plans to resolve detected issues.

As an equal opportunities employer, we are committed to creating and ensuring a non-discriminatory and respectful working environment for our staff.

The Director of People + Talent leads and manages responsibility for our anti-slavery initiatives, including company policies, risk assessment, due diligence, and training, with support from the CEO and the Executive team.

Relevant policies

We operate the following internal policies and procedures that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking to ensure we are conducting business ethically and transparently. These include:

- **Anti-Bribery.** Our policy clarifies that bribery is a criminal offence and is prohibited. The policy actively encourages employees or persons working on behalf of F+R to report any suspected act of bribery, even if the individual has not been personally involved.
- **Bullying and Harassment.** We are committed to ensuring employees have the right to work in an environment free from abuse, bullying and, harassment, or degrading treatment.



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- **Employee Code of Conduct.** Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Equal Opportunities.** Our policy ensures that equal opportunities are embedded in our employment practices and procedures and is always adhered to.
- **Recruitment and Selection.** We source labour from only specified, reputable employment agencies and always verify the practices of any new agency before accepting workers.
- **Whistleblowing Policy.** We encourage all our workers, customers, and other business partners to report any concerns related to the direct activities or the supply chains of our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures without fear of retaliation.
- **Remuneration and reward.** We carry out an annual review on pay and rewards across the global business.
- **Procurement.** We have a robust process for working with our suppliers.

Our Suppliers

F+R uses a wide range of independent wine producers, traders, and distributors worldwide. Third parties are contracted out for the importing, exporting, and transportation of the products we buy, sell, and store.

We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers must demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. With this in mind, we are in the process of implementing a supplier portal within the business to ensure suppliers adhere to our terms and conditions.

Due diligence

We continue to undertake due diligence when considering new suppliers and regularly review our existing ones. Our due diligence and reviews include the following:

- mapping the supply chain broadly to assess product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing regularly all aspects of the supply chain based on the supply chain mapping;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular "Stronger together" initiatives.

Performance indicators

We review our key performance indicators on an ongoing basis. As a result, we:

- continue to create awareness and provide guidance to all employees directly responsible for the relevant supply chains.
- Continue to evaluate suppliers before they enter the F+R supply change.

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- Review all existing suppliers on an annual basis based on risk.
- Evaluate enhancements to our policies, processes, and procedures as appropriate in light of evolving best practices.

To date, no instances of modern slavery have been identified.

Training

To increase awareness and education on modern slavery, we provide periodic training to our employees on modern slavery and human trafficking with a particular emphasis on managers and employees who work directly with our supply chain.

All new joiners attend an induction session that provides information and training on relevant policies, which include measures to minimize the risk of modern slavery and human trafficking where appropriate.

Looking ahead

We plan to continue taking steps to strengthen our commitment to the Act and prevent slavery and human trafficking in our business and our supply chains. This will include raising awareness and educating our employees and suppliers on how to identify signs of human rights violations and their role in upholding our commitment to human rights.

Approval

This statement has been approved by the business's Board of Directors, who review and update it annually in accordance with The Act.

Director's signature:



Director's name:

Patrick O'Connor

Date:

22nd March 2023