

## 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 no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 January 2023 to 31 December 2023.

F+R continues to take steps to ensure that slavery and human trafficking are 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 Asia, Continental Europe, the UK, and the USA. We employ eighty-five 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 source products from suppliers globally; however, many 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 Vice President of People + Compliance 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.

## Risks

To date, no instances of modern slavery have been identified. However, we recognise that our supply chain is our most significant area of risk or exposure to modern slavery. We manage the risks by having robust policies in place.

## 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:

## Modern Slavery Statement 2023

- **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.
- **Employee Code of Conduct.** Our code clarifies 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 equal opportunities are embedded in our employment practices and procedures and are 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 various independent wine producers, traders, and distributors worldwide. Third parties are contracted to import, export, and transport 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 implementing a supplier portal within the business to ensure suppliers adhere to our terms and conditions.

Our procurement process requires all suppliers and contractors to comply with the Modern Slavery Act 2015, and we expect them to demonstrate a zero-tolerance approach to exploitation.

### 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;
- carry out regular reviews on all aspects of the supply chain based on the supply chain mapping;

## Modern Slavery Statement 2023

- 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 guide all employees directly responsible for the relevant supply chains. Ensuring they know our anti-bribery policy and zero-tolerance approach to bribery and corruption.
- Continue to evaluate suppliers before they enter the F+R supply chain.
- 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.

### 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 identifying signs of human rights violations and their role in upholding our commitment to human rights.

### Governance + Compliance

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

### Director's signature:



### Director's name:

Patrick O'Connor

### Date:

14<sup>th</sup> May 2024