

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 put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business and our supply chains. This statement relates to actions and activities during the financial year 1 January 2020 to 31 December 2020.

We recognise that we have a responsibility to take a robust approach to slavery and human trafficking and we continue to take our responsibility very seriously during the coronavirus pandemic.

F+R is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking. As an equal opportunities' employer, we are committed to creating and ensuring non-discriminatory and respectful working environment for our staff.

Organisational structure and supply chains

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 66 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.

Responsibility

Responsibility for our anti-slavery initiatives including company policies, risk assessment, due diligence and training is lead and managed by the Head of Talent + Performance with support for the CEO and Leadership Group.

Relevant policies

We operate the following internal policies 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 in an ethical and transparent manner. These include:

- **Anti-Bribery Policy.** Our policy makes it clear 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 Policy.** 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 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 Policy.** Our policy ensures the equality of opportunities is embedded in our employment practices and procedures and are adhered to at all times.

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- **Recruitment and Selection Policy.** We use only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.
- **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.

Our Suppliers

F+R use 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 carried out a risk assessment on our supply chain to assess any risks towards modern slavery and human trafficking taking place and we believe this to be limited.

We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to 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 introducing a supplier code of conduct to allow us to work with suppliers to ensure that they meet the standards of the code.

Due diligence

We continue to undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. Our due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis 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 have reviewed our key performance indicators (KPIs). As a result, we:

- continue to create awareness and provide guidance to all employees who have direct responsibility for the relevant supply chains. We will also look to expand training on modern slavery to all employees within the business during 2021.
- Continue to evaluate suppliers before they enter the F+R supply change.
- Implement a Supplier Code of Conduct for our suppliers to adhere to.
- Review all existing suppliers regularly based on risk throughout 2021.

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Training

We require all staff within our organisation to complete training on modern slavery with particular emphasis on managers and employees who work directly with our supply chain.

Our modern slavery training covers:

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation;
- what external help is available, for example through the Modern Slavery Helpline,

Awareness-raising programme

As well as training staff, we have raised awareness of modern slavery issues by putting up posters across our head office and providing information our company intranet.

Approval

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

Director's signature:



Director's name:

Patrick O'Connor

Date:

28th April 2021