

Modern Slavery & Human Trafficking Statement for financial year 2018

Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Fine + Rare 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 2018 to 31 December 2018.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Fine + Rare 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

Fine + Rare is an online fine wine merchant operating in the UK and Hong Kong, we employ over 80 employees across the two countries. The company was founded and has been trading since 1994. We work with a network of agents, reservists, traders independent wine merchants and private clients across the globe to source, supply, store and sell wine internationally.

Our Commitment to the Principles of the Modern Slavery Act 2015

Fine + Rare is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and trafficking. As an equal opportunities' employer, Fine + Rare 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:

- Whistleblowing policy
- Anti-Bribery
- Bullying and Harassment Policy
- Equal opportunities policy
- Recruitment and selection policy

Our Suppliers

Fine + Rare 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 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 undertake due diligence when considering taking on new suppliers, and regularly reviews our existing suppliers.

Fine + Rare's due diligence and reviews includes:

- Mapping the supply chain broadly to assess geographical risks of modern slavery and human trafficking;

FINE+RARE

- Evaluating the modern slavery and human trafficking risks of each new supplier
- Identify, assess the potential risk areas in our supply chain
- Where practical, mitigate the risk of slavery and human trafficking occurring in our supply chain
- Review on a regular basis all aspects of the supply chain

We employ staff in the UK and Hong Kong and ensure that all prospective employees are legally entitled to work in either the UK or Hong Kong. All new employees must produce, on their first day, their right to work documentation which is checked and certified by the HR Manager.

Training

We understand the importance on building compliance across the business and we are working to engage with our employees to create awareness on modern slavery. Training will be provided on modern slavery to all employees and it will also form part of the staff induction process going forwards.

Looking Ahead

Over the course of the next financial year we will continue to build on the work we have carried out which will include:

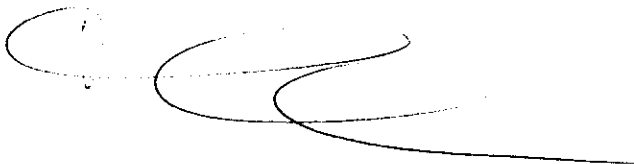
- Provide clear guidance to employees on what they need to do should they need to flag a potential slavery or human trafficking issues and what external help is available, for example through the Modern Slavery Helpline
- Introduce a Modern Slavery Policy for all employees to refer to
- Continue to engage with our suppliers and be vigilant when assessing areas of potential risk within our supply chain and when engaging with new suppliers

This statement was approved on 5th April 2019 by the business's Board of Directors, who review and update it annually. The statement has been signed by the CEO on behalf of the board.

Signature:

Name: Patrick O'Connor

Date:



5/4/2019