

LIBERTY WINES

Liberty Wines Ltd - Modern Slavery and Human Trafficking Statement

This statement sets out the steps that Liberty Wines has taken during our financial year 2017-2018 to ensure that to the best of our knowledge, modern day slavery and human trafficking does not occur in our organisation or in our supply chains. This statement will be reviewed annually.

The Company acknowledges its responsibilities to the Modern Slavery Act 2015 and the relating definitions set out within.

Organisational structure and activities

Liberty Wines is a privately-owned business that purchases wine from across the world to sell in the UK and Republic of Ireland.

We operate throughout the UK and Ireland with our head office in London. Current turnover is in excess of £36 million and the company directly employs c.150 people. All our employees are paid above the living wage and are subject to rigorous checks as to their right to work in the UK and Republic of Ireland.

Our supply chain

With regard to employment law, human rights and the Modern Slavery Act 2015, we will continually review our existing compliance and risk management process. This will determine associated risk, detection and prevention of modern day slavery and human trafficking within our supply chain for products and services to the organisation.

Due diligence process

As part of the company's due diligence process into slavery and human trafficking, we have assessed that the biggest area of risk is with the wine producers with whom we work. Our producer approval process incorporates the following commitments:

- To work with well-established and reputable producers.
- To visit wineries regularly where procedures and controls are reviewed.
- To remain a member of SEDEX, as are a significant number of our higher volume suppliers.
- To complete regular reviews of control of all our suppliers and an established process of supplier approval.
- While our wines suppliers are predominantly EU based and we would expect these entities to have applicable anti-slavery and human trafficking policies and procedures, we do import products from sources outside the EU. These may potentially operate with an increased risk for slavery and human trafficking issues. The management control of these suppliers will be continually monitored.
- To confirm that the business will not forge commercial relationships with any business knowingly involved with slavery or human trafficking.

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- To expect all who have or seek a commercial relationship with us to familiarise themselves with the Modern Slavery Act and our anti-slavery values and to act consistently within these.
- To encourage the reporting of concerns and the protection of whistle blowers.

Effectiveness and communication

Using key performance indicators to measure the effectiveness of our policy we will:

- Complete regular reviews of our supply chain predominantly via personal visits to ascertain their understanding and compliance and to set standard expectations.
- Ensure our Board and staff understand what is meant by modern slavery and they are committed to our zero tolerance policies towards it.
- Provide appropriate training to relevant members of staff.

Our Policy on Modern Slavery and Human Trafficking

Our attitude to Modern Slavery and human trafficking is zero tolerance and we expect all those in our supply chain to comply with our values.

If a supplier is found to be demonstrating unacceptable practices they will be investigated and provided with guidance regarding immediate required improvements.

If no improvement is implemented, or they indicate an unwillingness to cease unacceptable practices, they will be reported to the appropriate authorities and ultimately trading with this supplier would cease.

Company policies assist the organisation to assess, prevent and mitigate the risk of modern slavery existing in the organisation and its supply chains. These include:

- *Modern Slavery policy*
- *Purchasing Policy*
- *Grievance policy*
- *Whistle-blowing policy*

Approval

This statement has been approved by the company's board of directors.

Name: D Gleave

Position: Managing Director