

# Enotria&Coe

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## Modern slavery and human trafficking statement

This statement is made pursuant to s.54 of the *Modern Slavery Act 2015* and sets out the steps that *Enotria Winecellars* has taken, and is continuing to take, to ensure that modern slavery or human trafficking is not taking place within its business or supply chain. Modern slavery encompasses slavery, servitude, human trafficking and forced labour. *Enotria Winecellars Limited* is committed to acting ethically and with integrity and transparency in all business dealings.

### Our Business

*Enotria Winecellars Limited* is a market-leading wholesale distributor of wine and spirits, selling in the UK and in 10 countries around the world. *Enotria Winecellars Limited* has two brands; *Enotria&Coe* and *Great Western Wine*. *Enotria&Coe* is the premium supplier of wine and spirits in the UK. Sourcing premium products from all over the world to create the most comprehensive and inspired portfolio in the UK, we work in partnership with our customers to add value to their businesses. *Enotria&Coe* also sells wine and spirits internationally. *Great Western Wine* is the retail branch of *Enotria Winecellars Limited*, selling handcrafted wine from our shop in Bath and online across the UK. *Enotria Winecellars Limited* currently employs approximately 300 staff in the UK, most of which are based at the company's headquarters in Park Royal, London.

### Our policies on slavery and human trafficking

*Enotria Winecellars Limited* recognises there is scope for slavery in its supply chain and aims to address this risk. We want our customers to be confident that our business partners treat their employees fairly, with respect for human rights and are not exposed to unsafe working conditions, or in any way forced to work under slavery. In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free, we have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues:

**Employee code of conduct** - The company handbook makes it clear to employees the actions and behaviour expected of them when representing the company. The company strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

**Training** - Key stakeholders within the business will receive appropriate training and have responsibility for developing and operating company procedures relevant to the issue. Further and wider training will follow as and when identified.

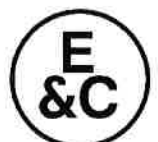
**Whistleblowing** - *Enotria Winecellars Limited* encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chain of, the company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

**Recruitment/Agency workers** - *Enotria Winecellars Limited* uses 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. We always complete a Right to Work check on all employees, and require agencies to carry out this check on all agency workers.

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Enotria&Coe  
Enotria House  
23 Cumberland Avenue  
Park Royal  
London NW10 7RX  
T: 020 8961 4411  
E: info@enotriacoe.com  
www.enotriacoe.com

Reg. Name: Enotria Winecellars Ltd  
Registered in England & Wales No. 1071904  
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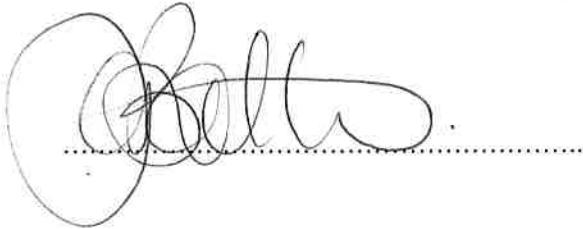
### **Due diligence processes for slavery and human trafficking**

We engage with our suppliers to inform them of our Anti-Slavery policy and conduct a risk assessment, supplemented with access to SEDEX, to understand which supply chains may be at a higher risk of modern slavery. This may be due to the country of origin, the product or industry characteristics (such as seasonal lifecycles) or workforce characteristics (such as migrant workers).

In order to ensure our suppliers meet our standards, we audit higher risk sites using approved external auditors or our own internal team. We audit against the Ethical Trading Initiative Base Code which gives us insight into the working conditions and labour standards of the sites that supply our products. In addition to this, we collaborate with other buyers using SEDEX to share audits and reduce audit fatigue for suppliers.

### **Supplier adherence to our values**

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.



**Gemma Bolton**

*Director of Human Resources*

January 20<sup>th</sup> 2017

