

Enotria Winecellars - Modern Slavery and Human Trafficking Statement

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 and sets out the steps taken to ensure that our business and supply chain are free from modern slavery and human trafficking.

Our Structure, Business and Supply Chain

Enotria Winecellars Limited is a market-leading wholesale distributor of wine and spirits, selling in the UK and to a small number of 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, selling wine & spirits from our shop in Bath and online across the UK.

Enotria Winecellars currently employs approximately 300 staff in the UK, most of which are based at the company's headquarters in Park Royal, London. Enotria Winecellars works with over 600 suppliers/partners globally, who supply goods and services to support our operations.

Our policies on slavery and human trafficking

We recognise that there is scope for slavery within our supply chain and aim to address this risk. We want our customers to be confident that we, and our suppliers, 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.

Our internal policies illustrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains;

- **Corporate Values**

Our employee values are Passion, Respect, Agility, Teamwork and Ownership. Our recruitment policy is to recruit people who can demonstrate that they meet and believe in our values. We regularly measure people's performance against the values through performance reviews and appraisals.

- **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 implementing company procedures relevant to the issue. Further and wider training will be provided as and when identified.
- **Whistleblowing** - Enotria Winecellars 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 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 workers.

Due diligence processes for slavery and human trafficking

It is our intention to only work with suppliers who can satisfy our standards with regards to labour and welfare conditions or have a commitment to achieve these standards.

We engage with our suppliers to inform them of our requirements and conduct a risk assessment, supplemented with access to SEDEX, to understand which supply chains may be at a higher risk of modern slavery. Suppliers are only engaged when we are satisfied that safeguards are in place to prevent any modern slavery or human trafficking from taking place in their own operations or supply chain. If we proceed to contract with high risk suppliers following our due diligence exercise, we may require suppliers to undertake a SMETA audit against the Ethical Trading Initiative Base Code.

We have zero tolerance to slavery and human trafficking. We expect all our suppliers and contractors to comply with our values.

We are registered with the Alcohol Wholesale Registration Scheme (AWRS) and as part of our commitment only trade with suppliers who are registered and demonstrate compliance with the scheme.

Approval of statement

This statement has been approved by the Board of Directors on 28th January for the financial year ending December 2018. This statement will be reviewed on an annual basis and will be updated if necessary.



Gemma Bolton
Director of HR