

Modern Slavery and Human Trafficking Statement

This statement sets out the steps that Liberty Wines has taken during our previous financial year ending 31st March 2025 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.

Liberty Wines acknowledges its responsibilities to the Modern Slavery Act 2015 and the related definitions set out within. Liberty Wines has zero tolerance policy towards all forms of modern slavery and is committed to ensure that human rights are respected and upheld throughout our business and our supply chain.

Organisational structure and activities

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

We operate throughout the UK and Ireland with our head office in London. We employ c.250 people and are committed to treating our staff fairly. We conduct robust checks as to new employees right to work in the UK to detect human trafficking or individuals being forced to work against their will.

Our supply chain

We import wine directly from over 400 suppliers in over 25 countries across Europe, South Africa, North and South America, Asia, Australia and New Zealand.

According to the International Labour Organisation those working in agriculture and seasonal workers are particularly at risk of forced labour. We recognise that both of these categories of workers are typically involved in the harvesting of grapes for wine. We remain live to the increased risk that these workers face and we continue to maintain responsible sourcing in line with our Ethical Trading Policy.

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 help to determine associated risk, detection and prevention of modern 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.



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- To complete regular reviews of all our suppliers and an established process of supplier approval.
- To confirm that the business will not forge commercial relationships with any business knowingly involved with slavery or human trafficking.
- 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.
- We are in the process of undertaking an in-depth risk assessment with the Buying and Brand Management departments who work closely with our wine suppliers across the globe.

Our Policy on Modern Slavery and Human Trafficking

We are committed to trading ethically and responsibly and we expect all those in our supply chain to uphold the same standards and comply with the Modern Slavery Act 2015 at a minimum.

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 but are not limited to:

- *Modern Slavery Policy*
- *Producer selection and quality control Policy*
- *Whistle-blowing Policy*
- *Ethical Trading Policy*

Approval

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

 05/08/25

Name: Tom Platt

Position: Chief Executive Officer



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