Modern Slavery & Human Trafficking Statement

Modern Slavery & Human Trafficking Statement

This statement sets out Hallgarten Wines' actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year ending March 2025.

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

Organisation Structure and Supply Chain

Hallgarten Wines is a leading UK based, wine only, wholesale distributor of wines. We sell to premium restaurants, national grocers, hotels and independent retailers nationwide. We also sell to a number of International customers. Our extensive supply chain is sourced from the premium producers around the world, from a mix of developed and developing countries.

Our Policy

We have a zero tolerance approach to Slavery & Human Trafficking and have direct control over our commercial activities in the UK. We are happy to give a 100% assurance that every person directly employed within our business is done so legally. We only work with specified, reputable agencies to source staff and we run checks on new employees including eligibility to work in the UK to safeguard against human trafficking or any individual being forced to work against their will.

We are reliant upon third-party organisations in two key areas of our operations:

1. Wine producing businesses across the world – currently 24 countries and 298 suppliers

2. Transportation of wines from source (normally outside the UK) to the UK, storage of the same wines in UK warehousing and finally onward delivery of these wines to our customer-base nationwide.

With these third-party organisations, we have systems in place to identify and mitigate risk which include:

- Ensuring that all wine suppliers comply with our Code of Conduct which includes a statement from them confirming that they abide by the Modern Slavery Act.
- Remaining a member of SEDEX.

- Engaging with our key (high volume) logistics suppliers to convey our Anti-Slavery policy to gain written assurance from them that they abide by our Code of Conduct. This group of suppliers includes four major service providers: London City Bond (contracted to warehouse and deliver all of our UK stocks), Wineflow, one of our shippers, Albatrans, one of our shippers, and Hellman, one of our shippers.
- Protecting any whistleblowers internal or external to our company
- Putting in to place a rolling programme of review which includes visits to suppliers

Other Relevant Policies

Supplier Code of Conduct
Whistleblowing Policy
Eco standard

Additional Statement: It is worthy of note that the majority of wine producers world-wide are reliant upon employing a large number of casual seasonal workers during the highly labour-intensive period of harvest each year. This fact – common across our industry - presents challenges to Hallgarten Wines in terms of being able to systematically verify that all seasonal pickers and workers employed by our suppliers are done so legally and subject to the terms and spirit of the Modern Slavery Act. Nevertheless, Hallgarten, is seeking assurances from all suppliers and working with them to identify how best to give us the level of assurance that we require. We believe this policy is appropriate to our business.

This statement has been approved by the organisation's Board of Directors who review and update it annually.



Signed: Andrew Bewes, Director, 11th June 2025