Modern Slavery Act: Slavery and Human Trafficking Statement

Financial Year Ended 30th April 2024

Introduction

Corney and Barrow fully supports the United Kingdom stance on combating human trafficking and modern slavery and is pleased to update the action that we have taken during our financial year ended 30th April 2023 to help tackle these abhorrent crimes.

Our business is over 240 years old and we are one of the longest established Independent Wine Merchants in the UK. The company is privately owned and has grown nationally and internationally with offices in the UK, Hong Kong, Singapore and China. We also run shops in Newmarket and Ayr.

We offer carefully selected, fairly-priced wines to our customers that not only deliver quality and value for money but also a sense of place. As such, where possible, we aim to build exclusive relationships with our suppliers, meaning that we develop good knowledge of their operations and business practices, putting us in a strong position to identify malpractice.

Our approach to business is an ethical one and to support this we have maintained the following policies which may serve to combat the causes or effects of Modern Slavery:

- Our 5 Corporate Values: Relationships, Spirit, Excellence, Independence and Integrity
- Modern Slavery and Human Trafficking Policy
- Criminal Finances & Anti-Money Laundering (incorporating Due Diligence and Preventative Measures) Policy
- An Anti-Bribery & Corruption Policy
- A Fraud Policy
- A Code of Conduct for Members of Staff
- Disclosures in the Public Interest (Whistleblowing) Policy

Company policies are reviewed annually or biennially or sooner if there are significant changes in legislation which govern particular policies.

Our structure

During the last financial year to 30 April 2024, Corney and Barrow Group Limited, a private limited company, acted as a holding company with one UK trading subsidiary (Corney and Barrow Limited) that in turn operated through a branch in Singapore and two wholly-owned subsidiaries in Hong Kong & China (collectively the "Group"). The principal activity of the group is that of a wine and spirit merchant.

Assessing and Managing Risk

The management of risk across the Group falls under the overall scrutiny of the Board of Corney and Barrow Group Ltd. Modern slavery & human trafficking has appeared as an agenda item for both the Corney and Barrow Ltd and Corney and Barrow Hong Kong Ltd Boards and will continue to do so in the future. Responsibility for implementing the firm's activities to counter modern slavery lies with the Group Board. We are members of the Wine and Spirit Trade Association. We support their efforts to encourage member companies to develop relationships with their supply chains so that information about modern slavery and human trafficking risks can be identified and appropriately shared.

Action taken in the year ended 30th April 2024

- Corney and Barrow has always taken a collaborative approach with producers and suppliers, only partnering with those who share the company's core values in order to ensure effective management of both best practice and legislative compliance.

- During the year ended 30th April 2023, the company had already taken decisive steps to identify and understand labour practices and standards in a cross section of wine producers in different territories. During this first phase, producers along with our principal warehouse, were invited to join the Sedex[1] organisation and complete a self-assessment questionnaire ("SAQ") that included questions concerning their employment practices and site health and safety.
- Despite challenges with local country legislation and available resourcing at respective producer sites, a pleasing number of in scope suppliers responded to a satisfactory level.
- An update and staff issue of the company's Modern Slavery and Human Trafficking Policy was undertaken, which included high-level guidance to buyers on how to categorise suppliers in relation to their potential exposure to Modern Slavery. Considerations include a supplier's susceptibility to high risk factors (outside of their direct control) in their country of origin, as well as expected purchase volumes.
- As stated in the previous year's statement ended 30th April 2023, the company planned to expand its buying team to provide the resource necessary for thorough analysis and understanding of producer data and ESG processes. This resource was delivered in July 2023 with the arrival of a new employee who has taken the project forward.
- This next phase of due diligence development involved a thorough review of the sectorial and geographical factors increasing the risk of modern slavery in each producing country, harnessing the Sedex platform to do so. Every producer self-assessment questionnaire (SAQ) has since been reviewed and analysed, to gain a comprehensive understanding of the producer's approach to the four key 'pillars' of the Sedex system – Labour Standards, Business Ethics, Health & Safety, Environment. The SAQ data has supplemented the company's existing knowledge and understanding of respective producers, building on long-standing business relationships and knowledge of business practices gleaned from regular meetings and site visits.
- Whilst no areas of concerns have been found during the due diligence process, the company continues to dialogue with its producers and suppliers to ensure that they understand the risks of modern slavery and the need to work collaboratively to eradicate those risks.

Action to be taken over the coming year.

- Building on existing due diligence processes and the enhanced sectorial/geographical knowledge gleaned from the SEDEX platform, the company's buying team is the process of developing a new supplier policy, in collaboration with producers, to provide a clear and thorough understanding of their labour practices. This will put in place clear guidelines for producers in terms of our expectation of their business practices within the context of legislation within their respective countries.

- We shall continue to monitor and evaluate our action to counter modern slavery and human trafficking at Board level.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for our last financial year. This statement has been approved by the Board of Directors and signed on behalf of the Board of Directors:



Adam Brett-Smith - Director. 30th October 2024.

[1] a data insights and exchange platform that allows supply chains to share ESG reports.