



**CORNEY &
BARROW**
INDEPENDENT WINE MERCHANTS-1780

Modern Slavery Act: Slavery and Human Trafficking Statement

Financial Year Ended 30th April 2025

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 2025 to help tackle these abhorrent crimes.

We offer our customers carefully selected, fairly-priced wines from all over the world, wines that not only deliver quality and value for money but also offer a sense of place and respect for the environment. Our aim is to build close working partnerships with our suppliers and their teams, through which we develop a sound knowledge of their operations and business practices. This puts 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
- Fraud (prevention) Policy
- Anti-Bribery & Anti-Corruption Policy
- An Employee Code of Conduct
- Recruitment Policy including Right to Work in the UK
- Notice Period Termination of Employment Policy
- Dignity at Work Policy and Equal Opportunities Policy
- Disclosures in the Public Interest (Whistleblowing) Policy

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

Our structure

During the last financial year to 30 April 2025, 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 ESG Committee which includes managers from Buying, Supply Chain and Compliance under the supervision of the Group Board. We are members of SEDEX, and we are informed by their inherent risk data in combination with producer supplied site information in addition to our own onsite producer visits. Suppliers covering over 50% of the purchase volume of wine have been subject to self-assessment and analysis.

Identification of high-risk activities

Corney and Barrow have identified the potential for higher risk to workers of modern slavery in the following areas:

- The use of seasonal workers during the grape harvests.
- The employment of agency workers by our top tier logistics and transport service providers and sub-contractors.
- Direct and indirect recruitment of warehouse staff and contract leaning service providers.
- The potential for Modern Slavery to thrive in IT and IT services industries that have complex global supply chains.

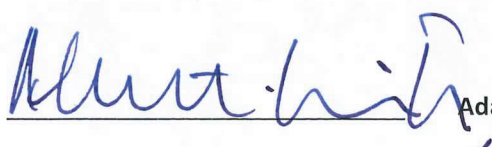
Action taken in the year ended 30th April 2025

- 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.
- In the year up to 30th April 2025, significant progress was made by the Buying team, in terms of analysis of producer data and ESG processes, harnessing the Sedex platform and processes to review the sectorial and geographical factors increasing the risk of modern slavery in each producing country. The project has involved the review and analysis of every producer's self-assessment questionnaire (SAQ), providing comprehensive insights into the producer's approach to the four key 'pillars' of the Sedex system - Labour Standards, Business Ethics, Health & Safety, Environment. It is pleasing to see a fresh iteration of producers' SAQs a year on, giving us insights into enhancements made to processes and thereby improving their risk scores and standing within the system. Such insights continue to provide the company with supplementary data, from which to develop a greater understanding of our 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 in the process of developing a new supplier policy ('Supplier Charter') enshrining the company's approach to Modern Slavery. This policy is intended to be collaborative, encouraging producers to provide us with a clear and thorough understanding of their labour practices. It also incorporates clear guidelines for producers in terms of our expectation of their business practices, within the context of local legislation as well as global best practice.
- 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, 6th August 2025.