

Modern Slavery Statement 2025

Executive Summary

FINE+RARE Wines Ltd (F+R) is committed to conducting business ethically and with integrity, and to preventing modern slavery and human trafficking across our operations and global supply chain.

During 2025, we continued to strengthen our approach to identifying and addressing modern slavery risks. Our focus has been on enhancing supply chain visibility, strengthening due diligence processes, and increasing awareness across the organisation, particularly in higher-risk areas such as logistics and sourcing.

This statement is made in compliance with Section 54 of the Modern Slavery Act 2015 and approved by The Board of Directors.

Introduction

This statement sets out the steps taken by F+R during the financial year 1 January 2025 to 31 December 2025 to prevent modern slavery and human trafficking within our business and supply chains.

We recognise that modern slavery remains a significant global issue and that businesses operating across international supply chains must take proactive, risk-based steps to mitigate exposure. F+R is committed to continuous improvement in this area.

Organisational Structure and Supply Chains

F+R is a global online marketplace specialising in fine wine, spirits, and collectible experiences. We operate across the UK, Europe, Asia, and the USA, employing 76 people worldwide.

Our supply chain includes wine producers, agents, distributors, logistics providers, and private clients. While a significant proportion of our suppliers are based in Europe, we operate internationally and therefore engage with suppliers across a range of jurisdictions with varying levels of inherent risk.

We take a group-wide approach to managing modern slavery risks, applying consistent standards across all entities regardless of local legislative requirements.

Governance and Responsibility

F+R maintains a zero-tolerance approach to modern slavery and human trafficking.

Responsibility for overseeing our modern slavery framework sits with the Vice President, People & Compliance, supported by the Executive team. The Board of Directors retains overall accountability and reviews this statement annually.

Where potential issues are identified, we are committed to investigating promptly and working with relevant parties to implement appropriate corrective actions. Where standards are not met, we will take appropriate steps, which may include termination of business relationships.

Risk Assessment

During 2025, we continued to assess and monitor modern slavery risks across our operations and supply chain.

We recognise that certain areas present higher inherent modern slavery risks, particularly:

- Agricultural production (including vineyard labour)
- Logistics, warehousing, and international freight
- Supply chains involving higher risk geographies

Our ongoing risk assessment work informs our due diligence approach and prioritisation of supplier engagement activities.

Policies and Controls

We maintain a framework of internal policies designed to promote ethical conduct and mitigate modern slavery risks. These include:

- Employee Code of Conduct
- Anti-Bribery and Corruption Policy
- Whistleblowing Policy
- Recruitment and Selection Policy
- Equal Opportunities Policy
- Bullying and Harassment Policy

These policies support a culture of transparency, accountability, and respect, and are communicated to employees through onboarding and ongoing training.

Suppliers and Due Diligence

F+R works with a diverse network of independent producers, traders, and logistics providers worldwide.

We expect all suppliers to operate in line with applicable laws and to meet our ethical standards, including providing safe working conditions, treating workers with dignity and respect, and ensuring labour is freely chosen.

Our due diligence processes include:

- Risk-based assessment of new suppliers
- Ongoing review of existing supplier relationships
- Supply chain mapping to identify higher risk areas
- Contractual requirements relating to compliance with modern slavery legislation
- Engagement with relevant industry initiatives, including *Stronger Together*

During 2025, we progressed the development of our global supplier portal, which remains in development and is intended to strengthen oversight, improve transparency, and support consistent supplier compliance once implemented.

Modern Slavery Statement 2025

Monitoring and Effectiveness

We assess the effectiveness of our approach through a range of indicators, including:

- Supplier screening and onboarding processes
- Employee training completion
- Identification and management of higher-risk suppliers
- Use of whistleblowing channels and outcomes

We continue to review and refine these measures to ensure they remain effective and aligned with evolving best practices.

No substantiated instances of modern slavery were identified within our operations during the reporting period.

Training and Awareness

We provide training to employees on modern slavery and ethical business practices, with a particular focus on those involved in sourcing and supply chain management.

All new employees receive onboarding that includes guidance on our policies and expectations relating to modern slavery and human rights.

Looking ahead

We are committed to continuous improvement. Our priorities for the coming year include:

- Launching and embedding our supplier compliance portal
- Expanding risk-based supplier monitoring and engagement
- Enhancing contractual controls and supplier expectations
- Delivering more targeted training for high-risk roles
- Continuing to improve supply chain transparency

Approval

This statement has been approved by the Board of Directors in accordance with Section 54(1) of the Modern Slavery Act 2015.

Signed:



Patrick O'Connor
Director

Date: 12 May 2026