

Modern Slavery Statement 2024

Introduction

Enotria is committed to acting ethically and with integrity and transparency in all business dealings. This statement is made on behalf of Enotria Winecellars Ltd, its parent company Enotria Wine Group, and its subsidiaries, which make up Enotria in the UK as a whole (together, referred to as Enotria in this statement). Those subsidiaries of Enotria that are required to make their own statement under the Modern Slavery Act 2015 have adopted this statement.

This statement is made in accordance with Section 54(6) of the Modern Slavery Act 2015 and sets out the steps taken to ensure that our business and supply chain are free from modern slavery and human trafficking.

Approval of statement
This statement has been approved by the Board of Directors on 1 January 2024 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2023. This statement will be reviewed on an annual basis and will be updated if necessary.

Julian Momen
Chief Executive
1 January 2024

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Our Structure, Business and Supply Chain

Enotria is a market-leading wholesale distributor of wine and spirits, selling in the UK and to a small number of countries around the world. Enotria has the following brands:

Enotria & Coe is the premium supplier of wine and spirits in the UK, sourcing premium products from all over the world to create the most comprehensive and inspired portfolio in the UK, we work in partnership with our customers to add value to their businesses. Enotria & Coe also sells wine and spirits internationally.

Spirits Beacon is an editorial website with a mission to educate and entertain readers interested in the world of drinks. It believes that good spirits are more than just distilled flavour. They are about the people, place, the process and passion. These are brought to life through their articles.

The Great Wine Co. is the retail branch of Enotria Winecellars, selling wine and spirits from our shop in Bath and online across the UK.

Spirits Kiosk is a digital retail site selling spirits online across the UK.

Enotria currently employs approximately 300 staff in the UK, most of which are based at the company's headquarters in Park Royal, London. Enotria works with over 500 suppliers globally, who supply goods and services to support our operations. We also indirectly hire, and work with, more people including contractors.

Our policies on slavery and human trafficking

We have a zero-tolerance policy with respect to modern slavery and our polices are focused on eliminating the risk of modern slavery in our supply chain. We want our customers to be confident that we and our suppliers, treat their employees fairly, with respect for human rights and are not exposed to unsafe working conditions, or in any way forced to work under conditions of modern slavery.

Our internal policies illustrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our company values are:

We are PASSIONATE about what we do and PROUD of how we do it	**We are OPEN, HONEST & APPROACHABLE**	**We show HUMILITY and RESPECT**	**We CARE about people's SAFETY and WELLBEING**	**We GROW TOGETHER**

These values are embedded in our culture, processes and activities to create a fun, inclusive culture with inspired, empowered employees who exceed expectations by trusting each other, being connected with each other and taking ownership. We ensure we recruit, develop and performance manage our staff based on our values.



Employee code of conduct
The company handbook makes it clear to employees the actions and behaviour expected of them at work. The company strives to maintain the highest standards of employee conduct and ethical behaviour in all of its activities, including when operating abroad and managing its supply chain.

Whistleblowing
Enotria encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chain, of the company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The company's whistleblowing procedure is designed to make it easy for workers to make disclosures without fear of retaliation.

Recruitment
Enotria uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. We conduct robust checks on any new employee including eligibility to work in the UK to safeguard against human trafficking or individuals being forced to work against their will.

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Due Diligence processes for slavery and human trafficking

We contract with suppliers to ensure we have the best portfolio of wines and spirits to offer to the UK market. It is our intention to only work with suppliers who can satisfy our standards with regard to labour and welfare conditions or have a commitment to achieve these standards.

As part of the onboarding process, suppliers are subject to approval and are required to complete a Supplier Approval Questionnaire which assesses, amongst other things, their ethical trading standards. Suppliers are also required to register with Sedex, complete the self-assessment ethical questionnaire and give us access to their data through the on-line database.

Suppliers are only engaged when we are satisfied that safeguards are in place to prevent any modern slavery or human trafficking from taking place in their own operations or supply chain. If we proceed to contract with higher risk suppliers following our due diligence exercise, we may require suppliers to undertake a SMETA audit against the Ethical Trading Initiative Base Code.

We have zero tolerance to slavery and human trafficking. We expect all our suppliers and contractors to comply with our values.

We are registered with the Alcohol Wholesale Registration Scheme and as part of our commitment only trade with suppliers who are registered and demonstrate compliance with the scheme.



Risk Assessment and Training

Risk Assessment
We will mitigate against the risk of modern slavery within our supply chain by working closely with our suppliers to ensure they understand our position and that they have adequate processes in place. We will also continue to review our policies and processes throughout the year. Our Buying and Technical teams will continue to visit our suppliers to further our working relationship and involvement within our supply base. We are committed to increasing the transparency within our supply chain each year.

Training
Key stakeholders within the business receive appropriate training and have responsibility for developing and implementing company procedures relevant to the issue. Further and wider training will be provided as and when identified.

All staff receive Health & Safety, Equality & Diversity, Anti-Bribery and Environmental Health & Safety training. Further relevant training will be provided annually to ensure all staff are aware of their responsibilities.

