



BY APPOINTMENT TO
HER MAJESTY THE QUEEN
WINE MERCHANTS
CORNEY & BARROW LIMITED
LONDON



BY APPOINTMENT TO
HIS MAJESTY THE PRINCE OF WALES
WINE MERCHANTS
CORNEY & BARROW LIMITED
LONDON

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

Modern Slavery Act: Slavery and Human Trafficking Statement

Financial Year Ended 30th April 2021

Introduction

Corney and Barrow fully supports the combating human trafficking and modern slavery and is pleased to update the action that we have taken during our financial year ended 30th April 2021 to help tackle these abhorrent crimes.

Our business is 240 years old and is 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 and Singapore. We also run shops in Newmarket and Ayr.

We offer carefully-selected, honestly-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 directly or indirectly connect to causes or symptoms 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. Sooner if there are significant changes in legislation which govern particular policies.

Our structure

During the last financial year to 30 April 2021, Corney and Barrow Group Limited, a private limited company, acted as an investment holding company with one UK trading subsidiary (Corney and Barrow Limited) that in turn operated through a branch in Singapore and a wholly-owned subsidiary in Hong Kong (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.

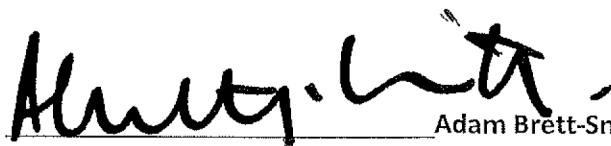
Action taken in the year ended 30th April 2021

- Corney and Barrow has 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.
- For the year just ended, compliance to publish a Modern Slavery Statement was met by 87% of qualifying suppliers in all categories who, in our view, meet the criteria that requires them to publish annual Modern Slavery Statements. This is slightly down on last year but we feel sure that it just a question of businesses catching up after the pandemic. It is the policy for Corney & Barrow that we will firstly highlight concerns directly with suppliers who appear to be non-compliant with the legislation before we would ultimately suspend or cease working with them.
- During the year, our Supplier Code of Conduct was reviewed and published. This document details the minimal expectations we have of our suppliers.

Action to be taken over the coming year

- We will continue to monitor and evaluate our action to counter modern slavery and human trafficking at Board level.
- The pandemic did delay intended activities during the year that is the subject of this current report however, we can indicate that certain activities that are currently underway and that they will continue up until our year ending 2022 and beyond. Activities include:
 - Extending our membership and use of the SEDEX ethical data exchange by starting to introduce our vendors to the platform and inviting them to submit self-assessments. Progress on this to be updated in the next report. From this information, we can identify future goals and key performance indicators.
 - Departmental responsibility for looking into potential key areas of concern such as the to the use and welfare of seasonal workers used in during the production of wine and employment and contractual practices within our transport supply chain.
 - Our people will have a key role in helping to mitigate, if not eradicate risk within supply chains through vendor liaison and management of compliance standards. In order to support them in that task, we are issuing a review of staff training and awareness material, which will include new videos and guidance leaflets on identifying and understanding modern slavery.

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. 27th Oct 2021.