



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

Modern Slavery Act: Slavery and Human Trafficking Statement

Financial Year Ended 30th April 2022

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 2022 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, Singapore and China. 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 or sooner if there are significant changes in legislation which govern particular policies.

Our structure

During the last financial year to 30 April 2022, 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 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 2022

- 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.
- All UK staff were required to review a short Staff Bulletin during November, as a reminder of the ever present risk of Modern Slavery; how to identify when it may be happening and how to report a suspicion. The bulletin also included an introduction to staff about the company's planned expansion if its membership to Sedex, which would facilitate the commencement of a risk assessment programme on the company's supply chain, enabling suppliers and producers to submit details about their labour practices and standards.
- Sedex is a membership organisation that provides one of the world's leading online ethical data exchange platforms for companies to manage and improve working conditions in global supply chains.
- Whilst the company did expand its membership to Sedex and agree a supplier engagement project early 2022, the commencement of the project was delayed until June and it is therefore a matter for the next fiscal year's Modern Slavery Statement.

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.
- Completion of phase one of the supplier engagement project (which will include more of the producers sold to commercial enterprises), is due to be completed at the end of November 2022. This will mark the start of the mapping of our supply chain, granting initial insight into data provided by our suppliers which can be viewed in the context of both country and sectorial risks in relation to an independent 'Forced Labour Index'.
- The forced labour index methodology includes contextual risk indicators such as the supplier's country rule of law, the level of poverty, and legal anti trafficking framework to name a few. Corney & Barrow's aim is to better understand these contextual risks and how our suppliers manage their businesses in light of country and sectorial factors. We will not hesitate to engage with a supplier where we feel there is a matter for concern.

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. 31st Oct 2022.