



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



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HRH THE PRINCE OF WALES  
WINE MERCHANTS  
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# CORNEY & BARROW

INDEPENDENT WINE MERCHANTS-1780

## Modern Slavery Act: Slavery and Human Trafficking Statement

Financial Year Ended 30<sup>th</sup> April 2019

### Introduction

Corney and Barrow fully supports the United Kingdom's stance on combatting human trafficking and modern slavery and is pleased to update the action that we have taken during our financial year ended 30<sup>th</sup> April 2019 to help tackle these abhorrent crimes.

Our business is 230 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, wherever 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 developed and published:

- 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) (Dec 2018)
- An Anti-Bribery & Corruption Policy
- A Fraud Policy
- A Code of Conduct for Members of Staff
- Disclosures in the Public Interest (Whistleblowing) Policy (Dec 2018)
- A Sales Code of Conduct (updated April 2019)

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

We currently hold two Royal Warrants as suppliers to HM Queen Elizabeth II and HRH The Prince of Wales. We are members of 'The Bunch', a group of Britain's leading independent wine merchants, which champions the causes of both the independent wine trade and individual 'grower-made' wines. Established in 1993, membership is limited to seven merchants of which Corney and Barrow Ltd is one. This small, select group has created and adheres to its own Code of Practice.

### Our structure

During the last financial year to 30 April 2019, Corney and Barrow Group Limited, a private limited company, acted as an investment holding company with one trading subsidiary: Corney and Barrow Limited (the "Company"). The principal activity of the Company is that of a wine and spirit merchant.

### Assessing and Managing Risk

The management of risk within the Company falls under the scrutiny of the Board of Corney and Barrow Group Ltd. Modern slavery & human trafficking has therefore appeared as an agenda item for the Board and will continue to do so in the future. Responsibility for implementing the firm's activities to counter modern slavery lies with the Group Commercial Director. 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**

- Further to last year's report, wine producers' geographical locations were modelled against the Global Slavery Index to better understand any potential risks in key countries of production. In addition, an investigation also looked to identify local country legislation in parallel to the UK's which would support a more collaborative approach with our wine producing partners – most of which would not meet the turnover criteria for the UK legalisation being smaller family owned businesses. Legislation in other countries, where it exists, does vary in reach in terms of size of business required to take action and in culpability for inaction. Corney & Barrow only partners with producers who share the Company's core values and we will continue to discuss developments in staff welfare and workers' rights to ensure business practices align with our own. Reports of such discussions are held on file for review.
- During the financial year there was evidence of improved compliance with the Modern Slavery Act in the non-wine producing sectors e.g. distribution service partners, IT hardware and software suppliers, general office suppliers etc. We found more than 80% of these suppliers having published current statements. A review and monitoring mechanism is being developed as part of progress plans for next year.
- A Staff Bulletin was issued to all staff during the year as a shortened supplement to the Modern Slavery Policy. This explained what modern slavery is, provided an example of where it might exist in our industry together with the importance of due diligence checks on all categories of supplier.
- The Company updated its Environmental and Ethical Trading Policy Statement during the year.
- In September 2017 we joined Sedex – a global membership organisation driving improvement in ethical and responsible business practices. Although our Self-Assessment Questionnaire was updated during the financial year in question, further updates are required as the company looks to use this tool to aid transparency in our supply chain and business practices as well as to drive continuous improvement.

#### **Action to be taken over the coming year**

- Complete the review of other supplier categories i.e. HR recruitment, welfare and training; repairs, maintenance and utilities services; marketing service providers.
- Finalise the development and implementation of new modern slavery compliance status fields in the Company's ERP system including recording of supplier turnover along with the import of supplier statements. This will facilitate annual monitoring for compliance since we have noticed some organisations had complied with the first year of introduction but have not revisited it.
- Further engagement with the Sedex platform, to assist with the company's aim to demonstrate transparency in our supply chain.
- We will 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:



**Paul Masters - Group Commercial Director** FCA AIWS. 17<sup>th</sup> Sept 19.