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

BY APPOINTMENT TO HRH 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 2017

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 30th April 2017 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 sales 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. We want to offer benchmark styles; wines which we believe to be the best examples of a wine style, country, region or sub-region, whether they are wines to drink immediately or wines to lay down. 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
- An Anti-Bribery Policy
- A Fraud Policy
- A Code of Conduct for Members of Staff incorporating a Whistleblowing Policy
- A Sales Code of Conduct

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 six 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 2017, Corney and Barrow Group Ltd, a private company, acted as an investment holding company with three trading subsidiaries:

Corney and Barrow Ltd: The principal activity of the Company is that of wine and spirit merchants.

Corney and Barrow Bars Ltd: The principal activity of the Company was the operation of bars up until 6th July 2016, when the company was sold to a third party

Corney and Barrow Group Services Ltd: The principal activity of the Company was that of provider of management services and facilities to other Group members up until 31st October 2016, when the business was transferred to Corney and Barrow Ltd.

Assessing and Managing Risk

The management of risk within Corney and Barrow 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

During the last financial year Corney and Barrow Ltd has taken the following action to detect and counter the risks of human trafficking and modern slavery taking place within our supply chain:

- We have developed and published a Modern Slavery and Human Trafficking policy which has been sent to all staff. This document includes information to enable them to understand what modern slavery is and to know what to do should they suspect that it might be occurring.
- We have continued the review, update and rationalisation our supplier database, with particular attention to suppliers classified as UK alcohol traders and warehouse / distribution services.
- Following our successful registration with HM Revenue & Customs under the Alcohol Wholesale Registration Scheme (AWRS) we have ensured that all of our UK based alcohol suppliers have also been approved. Registration to AWRS helps to ensure that the wine that we offer for sale originates from verifiable sources and we no longer buy from UK alcohol suppliers who have not been accepted into the scheme.
- Key Haulage, Freight and Warehousing service providers have been asked to complete our Slavery and Human Trafficking Questionnaire designed to identify what third parties are doing to combat Modern Slavery.
- We have reviewed and implemented a new supplier set up process that requires the specific employee responsible for the relationship to provide background information on the new suppler, risk assessment, record verification and management sign off before an order can be placed.

Action to be taken over the coming year

- We will continue to contact and meet with other areas within our supply chain, such as our wine producers, to investigate what steps they are taking to combat modern slavery and human trafficking.
- Further to all staff and new starters being issued with our policy on Modern Slavery and Human Trafficking, this legislation, along with updates to compliance regulation, will form part of our quarterly induction and refresher presentations where staff also have the opportunity to ask questions relating to any policy or training.
- A Supplier Code of Conduct will include a section clearly defining our expectations as to their responsibilities and compliance to the Modern Slavery Act
- Key supplier contacts will be reviewed and updated to include conditions and compliance relating to Modern Slavery.
- 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. **Oct 17.**

To view Corney & Barrow's Slavery and Human Trafficking Statement - 2015/16 financial year, please click here.