



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

Modern Slavery Act: Slavery and Human Trafficking Statement

Financial Year Ended 30th April 2020

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 2020 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, 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)
- 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 2020, 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 following the incorporation of its Hong Kong branch in June 2020 (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 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 in the year ended 30th April 2020

- 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.
- A mechanism has been developed - using additional data captured from Companies House - to enable Corney and Barrow to monitor supplier compliance with the Modern Slavery Act. This data (annual turnover and financial year end for example) is recorded in the Company's ERP and is used to calculate a target date which is indicative of a particular supplier's annual compliance anniversary.
- For the year just ended, compliance was met by 91% of qualifying suppliers in all categories who, in our view, meet the criteria that requires them to publish annual Modern Slavery Statements. This is up from 80% in the previous year. It is the policy of Corney & Barrow that we will firstly highlight concerns directly with suppliers who appear to be non-compliant with the legislation before we would ultimately cease working with them.
- There are three categories of suppliers that are non-compliant; those that published an initial statement but have not revisited or updated subsequent annual progress; those companies that have recently met the criteria but have yet to publish their first statement and there are still a few who appear not to have realised that compliance is necessary – particularly if their parent company is registered outside of the UK. We will continue to be a standard-bearer and bring these observations to the attention of the organisation concerned.
- All supplier records on the Company's ERP system have a designated status as to their requirement for compliance and whether or not they are up to date. This enables employees to manage spend only with compliant suppliers.
- In September 2017 we joined Sedex – a global membership organisation driving improvement in ethical and responsible business practices. In early 2020 Sedex launched their updated Self-Assessment Questionnaire. Corney and Barrow completed the Assessment with the publication of the necessary documentation 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

- Continued roll out and reiteration of the Supplier Code of Conduct with our producers and suppliers.
- 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 FCA AIWS. **Group Commercial Director** 13th October 2020.