



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

Modern Slavery Act: Slavery and Human Trafficking Statement

Financial Year Ended 30th April 2026

Introduction

Corney and Barrow fully supports the United Kingdom's commitment to combating human trafficking and modern slavery. This statement describes the steps taken during the financial year ended 30 April 2026 to help prevent modern slavery and human trafficking in our business and supply chains.

We offer our customers carefully selected, fairly priced wines from all over the world, wines that not only deliver quality and value for money but also offer a sense of place and respect for the environment. Our aim is to build close working partnerships with our suppliers and their teams, through which we develop a sound knowledge of their operations and business practices. This puts us in a strong position to identify malpractice.

Our ethical approach is supported by the following policies, standards and controls relevant to preventing or addressing modern slavery:

- Our 5 Corporate Values: Relationships, Spirit, Excellence, Independence and Integrity
- Modern Slavery and Human Trafficking Policy
- Supplier Charter
- ESG Policy
- Anti-Bribery & Anti-Corruption Policy
- Recruitment Policy including Right to Work in the UK
- Notice Period Termination of Employment Policy
- Dignity at Work Policy and Equal Opportunities Policy
- Whistleblowing Policy (Disclosure in the Public Interest Policy)

Company policies are reviewed periodically and whenever material changes occur in legislation, guidance, business activities or identified risks. The Modern Slavery and Human Trafficking Policy is reviewed by the Finance Director, supported by the Head of Compliance, with material amendments submitted to the Board for approval.

Our structure

During the financial year ended 30 April 2026, Corney and Barrow Group Limited, a private limited company, acted as the holding company of the Group. Its operations comprised one UK trading subsidiary, Corney and Barrow Limited, which operated through a branch in Singapore and two wholly owned subsidiaries in Hong Kong and China. The Group's principal activity is the sale of wine and spirits.

Assessing and Managing Risk

The Board of Corney and Barrow Group Limited has overall oversight of modern slavery risk across the Group. Modern slavery and human trafficking have been considered by the Boards of Corney and Barrow Limited and Corney and Barrow Hong Kong Limited and will remain subject to Board oversight. The Finance Director has primary day-to-day responsibility for implementing the Modern Slavery and Human Trafficking Policy, supported by the Head of Compliance. The ESG Committee, which includes managers from Buying, Supply Chain and Compliance, supports the delivery and review of relevant activities. The Group uses Sedex inherent-risk data, in conjunction with producer-supplied site information and observations from producer visits to assess supply-chain risk.

Identification of high-risk activities

Corney and Barrow has identified the potential for a higher risk of modern slavery affecting workers in the following areas:

- Agriculture, including the use of seasonal workers e.g. during grape harvests.
- Construction, refurbishment, maintenance, events and other temporary projects involving subcontracted, agency or migrant labour, particularly where labour providers are newly appointed, labour sourcing is unclear or workers are accommodated by the employer or agency.
- Hospitality and facilities services, including cleaning, catering, warehousing, and other outsourced labour, where workers may be isolated, accommodated by an employer or agency, or unable to leave freely.
- The employment of agency workers by logistics and transport service providers and sub-contractors.
- Electronics, IT and IT services, where complex global supply chains may increase exposure to modern slavery risk.

Action taken during the year ended 30 April 2026

- Corney and Barrow maintains close working relationships with producers and suppliers and applies risk-based onboarding and monitoring controls to support legal compliance and responsible business practices. These controls include the Supplier Charter, supplier information and verification checks, sustainability questionnaires, Sedex assessment where required and producer visits where appropriate.
- **Modern slavery awareness training**
During the reporting period, the Company introduced an online compliance training platform and assigned an introductory modern slavery course to all staff. The course was also incorporated into the compliance induction for new starters.
During the next reporting period, the Company will assign a practical follow-up module covering indicators of modern slavery, the role of employees in preventing and identifying it, and the procedures for reporting concerns without placing workers or evidence at risk.
- **Supply chain engagement - Supplier Charter**
Building on supplier data gathered through Sedex, the Buying team developed and launched a Supplier Charter tailored to the risks and practical requirements of our industry.
The Charter sets out clear expectations for suppliers, including commitments to:
 - prohibit forced, bonded and involuntary labour;
 - provide fair wages;
 - maintain appropriate working hours.

Action to be taken over the coming year

- Deliver the scheduled practical modern slavery training to employees, covering indicators of exploitation, responsibilities for prevention and identification, and the process for reporting concerns safely.
- Continue the rollout of the Supplier Charter and obtain suppliers' written acknowledgement of, and commitment to, its requirements, supported by completion of the Sustainability Questionnaire.
- Continue Board-level oversight of modern slavery and human trafficking, including review of identified risks, due diligence outcomes, training completion, reported concerns and progress against the actions set out in this statement.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year ended 30 April 2026. It has been approved by the Board of Directors and signed on its behalf by a director.



Adam Brett-Smith – Managing Director, 1st October 2026.