



BY APPOINTMENT TO
HER MAJESTY THE QUEEN
AND BY AUTHORITY OF
THE PARLIAMENT OF GREAT
BRITAIN AND NORTHERN
IRELAND



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CORNEY &
BARROW

INDEPENDENT WINE MERCHANTS-1780

CODE OF CONDUCT FOR SUPPLIERS TO THE CORNEY & BARROW GROUP





CODE OF CONDUCT FOR SUPPLIERS TO THE CORNEY & BARROW GROUP

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Corney & Barrow Group (“C&B”) expects all its suppliers to comply with relevant legislation and to maintain high ethical standards and integrity in the conduct of their business. This Code sets out the key expectations of our business partners driven by our own corporate values of relationships, spirit, excellence, independence and integrity.

This Code contains general requirements applicable to all suppliers of C&B. Particular supplier agreements and contracts may contain specific provisions addressing some of the same issues. In the event of any inconsistency between this Code and a specific supplier agreement, the provision in the supplier agreement will prevail.



ETHICAL STANDARDS AND BUSINESS INTEGRITY



1. Data Protection & Data Security

C&B is a Data Controller and a supplier is a Data Processor unless otherwise agreed by C&B.

Data Protection is also known as Information Privacy and its purpose is to ensure the fair and proper use of people's personal information and its security. Suppliers are required to ensure they use the best possible organisational and technical measures available to protect all electronically held and physical data from a data breach. Suppliers will not transfer any C&B personal data to a

sub-processor unless prior approval is given by C&B. Suppliers will notify C&B of a potential or actual personal data breach within forty-eight hours of first becoming aware of the data breach. Where a regular volume of personal data is being shared with a supplier, a data sharing agreement will be necessary to ensure the protection of the data. Special consideration will be given to any personal data being shared or hosted with suppliers whose processing takes place outside the EU/ EEA.



2. Anti-Bribery & Anti-Corruption - Gifts, Meals and Entertainment

All suppliers must warrant that they have adequate procedures in place to prevent the offering or receiving of a bribe or the bribery of a public official in relation to any transaction as a supplier to C&B. The supplier must not transfer anything of value, directly or indirectly to any employee or government official in order to secure an improper advantage or create a feeling of obligation. C&B does not permit any of its employees, associates or director's to accept gifts or incentives in return for conducting business that are anything more

than a modest non-cash gift. For example; one-off gifts under the value of GBP £50.00 such as small gift hampers, chocolates, infrequent business meals would be acceptable. C&B employees are required to seek approval for all gifts greater than GBP £50.00 made and received, before they are given or accepted.

C&B expect suppliers to comply with competition and anti-trust laws which apply to their businesses as well as to C&B's.



3. Fraud, Tax Evasion & Anti Money Laundering - Due Diligence Policy

Suppliers to C&B must comply with the UK Criminal Finances Act and Anti Money Laundering Regulations as well as local laws dealing with Fraud and the Proceeds of Crime. As a minimum, C&B expect suppliers to have reasonable and proportionate procedures in place to prevent the criminal facilitation of tax evasion or money laundering by their employees or those they transact with in connection with C&B's business.

New supplier accounts are subject to due diligence. This includes verification of information supplied and risk assessment with specific reference to country risk, sectorial risk and transactional risk-before being

accepted as a supplier. Transactions and exchanges between a supplier and C&B must be strictly between that supplier and C&B i.e. no third party involvement unless C&B agrees upfront and it is approved by a director of C&B. Never under any circumstances should the supplier or a C&B employee alter, edit or re-draft an order or financial document creating a copy that purports to be the original.

Both the supplier and C&B must keep accurate records of all matters related to the supplier's business with C&B. This includes proper recording of agreements, orders, invoices and payments.



HUMAN RIGHTS, EMPLOYMENT CONDITIONS AND THE ENVIRONMENT



1. Our World – Our Employees

Our employees together with those of our suppliers and service providers have the right to respectful treatment. We will not tolerate discrimination, harassment or victimisation in the workplace or in connection with any service C&B receives. We expect our suppliers to provide the same commitment, including to their own employees. Suppliers must comply with all applicable human rights and employment laws in the jurisdiction in which they operate. This includes complying with the provisions of the Modern Slavery Act 2015, where suppliers are required to have measures to monitor and ensure that their own supply chain is free of this heinous crime.

Every employee and worker has the absolute right to go to work each day without the risk of potential health concerns or risk of injury in order to carry out their work. C&B expects suppliers to have properly addressed the following key areas: Compliance to local health and safety laws with a clear health safety policy; a safe working environment for all workers which includes (but is not limited to) adequate portable drinking water; access to sanitation and hygiene facilities and personal protective equipment; regular and routine risk assessment which reflects on existing issues as well as identifying emerging issues so appropriate action can be taken to mitigate risk.



2. Our World – Our Environment

C&B recognises the urgent action required by all of us to reduce adverse environmental impact. We aim to prevent environmental damage and minimise our use of energy and resources and the same must be true of our suppliers. Suppliers must comply with local environmental laws applicable

to both the work place and the products produced and the methods of manufacture. Suppliers must not use materials that are considered harmful to the environment but should encourage the use of processes and materials that support sustainability.



DEMONSTRATING COMPLIANCE AND REPORTING WRONG DOING



1. Our World – Are we all doing our part?

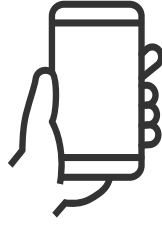
C&B is entitled to request information from suppliers to confirm their compliance with and adherence to these standards. C&B may require a supplier to provide evidence of compliance through the completion of questionnaires and submission of evidence.



2. Our World – Speaking Out

C&B has a “Disclosures in the Public Interest” policy that encourages staff to make disclosures (“Whistleblowing”) about fraud, misconduct, safety, bribery, money laundering, modern slavery or any other wrongdoing (suspected or otherwise) without fear of reprisal. C&B expect suppliers to have a similar policy in place that allow their employees to speak out if they find malpractice in an organisation and if necessary the employee can claim compensation for any victimisation following such disclosures.





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