



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



BY APPOINTMENT TO
HIS MAJESTY 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 2023

Introduction

Corney and Barrow fully supports the United Kingdom stance on combating human trafficking and modern slavery and is pleased to update the action that we have taken during our financial year ended 30th April 2023 to help tackle these abhorrent crimes.

Our business is 240 years old and we are 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, Singapore and China. 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, where 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 maintained the following policies which may serve to combat the causes or effects of Modern Slavery:

- 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 or sooner if there are significant changes in legislation which govern particular policies.

Our structure

During the last financial year to 30 April 2023, 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 two wholly owned subsidiaries in Hong Kong & China (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 Board. 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 2023

- Corney and Barrow has always 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.
- During the year, the company took a decisive step in order to identify and understand labour practices and standards in a cross section of wine producers in different territories. During this first phase, producers along with our principal warehouse, were invited to join Sedex¹ and complete a self-assessment questionnaire ("SAQ") that included questions concerning their employment practices and site health and safety.
- Despite local country legislation and available resourcing at the producer site, a pleasing number of in scope suppliers responded to a satisfactory level.
- An update and staff issue of the company's Modern Slavery and Human Trafficking Policy was undertaken, which included high-level guidance to buyers on how to categorise suppliers in relation to their potential exposure to Modern Slavery. Considerations include a supplier's susceptibility to high risk factors (outside of their direct control) in their country of origin, as well as expected purchase volumes.

Action to be taken over the coming year.

- To further expedite the due diligence process, the company is expanding resources within the buying team who will be taking the lead with producer data analysis, ESG processes and development.
- In line with increased resource, the company will be undertaking a detailed review of SAQ data already collected, in order to understand sectorial and geographical factors that could increase the risk of modern slavery. This will be considered in tandem with the company's business relationship with the producer, known and established business practices of the producer, regular meetings, and site visits.
- We shall 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:



Adam Brett-Smith - Director. 20th September 2023.

¹ a data insights and exchange platform that allows supply chains to share ESG reports.