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**Slavery and Human
Trafficking Statement**

October 2024



Slavery and Human Trafficking Statement

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Virgin Wine Online Limited (Virgin Wines) has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Virgin Wines has a zero tolerance approach to any form of modern slavery and we are committed to acting ethically and with integrity and transparency in all business dealings and to put in place effective systems and controls to safeguard against any form of modern slavery taking place within the business or supply chain.

Our Business

We are an Online Wine Merchant operating exclusively within the UK. We employ over 180 staff all located at our three premises in the UK. Seasonal office and warehouse staff are employed directly by us or from a small number of established reputable recruitment agencies.

We source wine internationally either directly from the vineyard or via third party agents representing winemakers.

Other business services and consumables are procured almost exclusively from UK based companies.

Our Policies

The following internal policies exist to ensure we are conducting business in an ethical and transparent manner:

- **Recruitment Policy**
We conduct robust checks on any new employee including their eligibility to work in the UK to safeguard against human trafficking or individuals being forced to work against their will. Suppliers of temporary labour will be vetted to ensure they are applying the same checks and controls before being approved.
- **Training Policy**
To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, we provide appropriate training to our staff. This is focused on but not limited to staff involved in recruitment, wine buying and the procurement team.
- **Staff Engagement**
All staff have an obligation to familiarise themselves with our Slavery and



- Human Trafficking statement. This forms part of the induction process for all new staff and is included in the Employee handbook which forms part of their contract of employment.
- **Whistleblowing Policy**
We operate a whistleblowing policy so that all employees know they can raise concerns about any practices within the business or the supply chain, without any fear of reprisals.

Supplier Due Diligence for Slavery and Human Trafficking

As part of our due diligence processes to identify and mitigate risk we:

- Identify and assess potential risk areas in our supply chains
- Where practical, mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains
- Ensure a high level of understanding of the risks of modern slavery and human trafficking in our business by providing training to all relevant staff

Virgin Wines does not and will not knowingly support or deal with any business involved in slavery and human trafficking. The Company completes due diligence on its suppliers, where practicable, to satisfy itself that it is trading with a reputable organisation.

We expect all of our partners in our supply chain to be opposed to slavery and human trafficking. As a minimum, we expect each entity in its supply chain to adopt 'one-up' due diligence on the next link in the chain for those organisations as it is not practical for us to have a direct relationship with all links in the supply chain.

Reporting

There have been no reports from staff, the public, suppliers or law enforcement agencies to indicate that modern slavery practices have been identified in the business or supply chain.

Our aim for this year is to distribute our new supplier code of conduct and make all existing suppliers aware of the standard we expect from them.

Modern Slavery Statement

This statement is published in accordance with section 54(1) of the Modern Slavery Act 2015 and outlines our approach and work undertaken in relation to the financial year ended 28 June 2024 by Virgin Wines UK plc and subsidiaries. This statement was approved by the Board of Directors on 15 October 2024.



Signed on behalf of the Board by Jay Wright, Chief Executive Officer
15 October 2024