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Slavery and Human Trafficking Statement

October 2026

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.

Our primary exposure to modern slavery risk lies in the viticultural and seasonal labour used to produce grapes and grapes-sourced product inputs, particularly in regions where harvesting relies on migrant and temporary workers — conditions which increase vulnerability to exploitation. We also recognise elevated risk in parts of the supply chain outside direct winemaking: use of third-party harvest contractors, bottling and packing operations, suppliers of packaging materials (for example glass and labour-intensive component suppliers), and agency or subcontracted labour used in logistics, warehousing and distribution. Geographic sourcing from regions with high unemployment and limited worker protections can further heighten risk. Finally, auxiliary services procured through third parties (e.g., seasonal labour agencies, temporary warehouse staff, and some outsourced production services) present additional points of vulnerability that we monitor as part of our risk assessments.

At this stage, we are continuing to develop formal performance indicators to measure the effectiveness of our actions in preventing modern slavery and human trafficking. However, we currently monitor progress through key activity-based measures. As of this reporting period, approximately 45.6% of our active wine suppliers have signed and agreed to comply with our Supplier Code of Conduct and Modern Slavery requirements, and we aim to increase this to full coverage over the next financial year. Internally, while formal, accredited training has not yet been implemented, relevant staff involved in procurement, supply chain engagement and recruitment have received practical guidance and awareness information to help them identify potential warning signs of exploitation.

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 intention is to build on the foundations mentioned previously by establishing specific targets in the coming year, including supplier onboarding completion rates, staff training participation levels and the frequency of supplier risk reviews.

The board is accountable for any oversight.

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 2026 by Virgin Wines UK plc and subsidiaries. This statement was approved by the Board of Directors on 1st October 2026.

Signed on behalf of the Board by Jay Wright, Chief Executive Officer
1st October 2026