



The Wine Society – Modern Slavery Statement

Background

The Wine Society (TWS) is required to comply with the Modern Slavery Act 2015 by publishing an updated annual statement in July 2023. This statement highlights the steps we are taking to prevent modern slavery and human trafficking within our business and our supply chains.

Process undertaken to update statement

Our statement has been updated this year with support from an external sustainability consultancy, Herring Consultancy Ltd, who have:

- Consulted internally with legal, HR, sourcing and sustainability teams to ensure all relevant policies and procedures are covered in the statement
- Updated the statement to ensure details of our organisation are correct
- Included the steps we are taking to improve our responsible sourcing and human rights approach and bolster our activities to tackle forced and child labour.

Key differences between the 2022 and 2023 statements

The key differences between the 2022 and 2023 statements are:

- Updated organisational and governance details
- Updated actions and due diligence processes
- Updated and expanded policies and procedures.

Modern Slavery Act Statement

TWS is committed to complying with the Modern Slavery Act 2015. This statement highlights the steps we are taking to prevent modern slavery and human trafficking within our business and our supply chains. This statement and the related processes are reviewed annually.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Our commitment

TWS takes a zero-tolerance approach to any activity that violates human rights. We are committed to acting ethically and with integrity in all our business dealings and relationships. We understand that it is our responsibility to take all reasonable steps available to us to prevent and mitigate the risk of such violations in our business and our supply chains. We are committed to treating our staff and supply chains fairly. We regularly review and improve our practices to ensure that they are the most effective in protecting human rights.

Our business

TWS is one of the world's oldest member-owned communities of wine lovers. Since 1874 we've been doing business differently, putting our members before profit to ensure fairer bottle prices for both the people that enjoy them, and for those who make them. We are committed to trading ethically and responsibly.

TWS has a head office and combined warehousing facilities in Stevenage in the UK where own-label and branded wine is packaged and distributed. We have 57 permanent staff in our warehouses and use agency workers during peak times who are recruited through 5 labour agencies. We have over 43 permanent staff working in our Contact Centre and can recruit up to 40 seasonal workers during the peak Christmas period through third party suppliers. We also employ 27 permanent drivers and use 3rd party logistics providers who hire temporary drivers that work for TWS. Our permanent warehouse workers are represented by the USDAW union.

TWS, entirely owned by its members, is overseen by a board of up to 13 members known as 'the Committee'. The Executive Team, which reports to the Committee, is responsible for TWS's strategic approach to identifying and tackling forced and child labour and for ensuring that appropriate measures are in place within TWS's operations, business and supply chains. Our Senior Leadership Team take operational decisions and lead the implementation of our agreed goals and strategy. Our over 250 staff members are supported by the Head of HR and the HR team.

The role of Director of Sustainability & Social Impact – created in 2022 - leads our approach to human rights including tackling forced and child labour. Our Director has been overseeing a review of existing policies and procedures and the implementation of a formal Responsible Sourcing and human rights approach throughout 2022/23 with support from an external sustainability consultancy.

Our supply chain

We trade with a wide range of producers, suppliers and carriers nationally and internationally. We source our wine globally from more than 800 direct suppliers in more than 25 countries across Europe, South Africa, North and South America, Australia and New Zealand. Agriculture is a high-risk sector and evidence from NGOs and research bodies such as [Oxfam](#)

indicates that there will be risks on European farms particularly where migrant and casual workers are used. A significant body of research also indicates labour exploitation and forced labour risks for migrant and casual workers in vineyards in South Africa. More work is underway in 2023 to understand the specific risks of forced and child labour in our supply chains (see below).

Policies, procedures and contractual controls

TWS has the following policies and procedures in place to manage the risks of forced labour and child labour in our own operations and supply chains:

1. **Employee Handbook** – our employee handbook is provided to all new employees. It contains our:
 - a. Discipline and Grievance procedures
 - b. Whistleblowing Policy
 - c. Equal Opportunities Policy
 - d. Health and Safety Policy
2. **Wage commitments** – we monitor compliance against payment of national minimum wage and national living wages to our own directly employed operational staff on an ongoing basis by our Payroll Manager.
3. **Recruitment process** - we conduct robust checks on all new members of staff, including their eligibility to work in the UK to detect human trafficking or individuals being forced to work against their will.
4. **Labour provider vetting** – we have formal terms of business with the temporary agencies we use. We have identified and are investing in the Association of Labour Provider’s ComplyER tool, which will be rolled out with our agencies in 2023.
5. **Anti-Corruption and Bribery Policy** – our policy was updated in 2022 and applies to all members of TWS’s staff and our members who make up our Committee.
6. **Contracts** – where possible, we include Anti Modern Slavery clauses within our supplier agreements. We recognise that there is more work to be done in this area and will be developing a responsible sourcing policy for Goods and Services Not for Resale suppliers in 2023.
7. **Legal compliance review** – we continuously review changes to regulation and our business’s legal compliance, including the Agency Workers Regulations and modern slavery legislation.

In addition to developing our strategy for responsible sourcing, we have created a number of policies and procedures for both our own operations and supply chain. These are being rolled out and embedded in our ways of working throughout 2023 and beyond:

Supplier Social and Environmental Code of Conduct – developed in collaboration with relevant TWS teams and suppliers, the Code is based on international laws and norms (including International Labour Organisation conventions and Ethical Trading Initiative Base Code) and outlines the requirements we have of our suppliers regarding social and environmental conduct. These have been rolled out globally across all Own Label and Non-Own Label suppliers in 2023 with confirmation of acceptance expected from all suppliers.

Human Rights Policy – this policy has been developed to set out TWS’ commitment and approach to human rights across our own operations and our supply chains. It is publicly available on our website from June 2023.

Bottle Books – in 2022, we invested in an online data collection system called Bottle Books, which enables us to gather and store data from our suppliers. Within the system we can collect information on suppliers’ sustainability certifications, policies and approach to social and environmental conduct. In 2023, we are using this system more extensively to be able to ascertain performance against social criteria.

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To continue our efforts to identify, mitigate and manage risks of forced and child labour, in 2023/4, we will be:

- Consolidating and updating policies and procedures, providing guidelines and supporting information, and communicating to all employees, ensuring accessibility and frequent updates through our Intranet (The Hub)
- Communicating our updated policies to relevant stakeholders
- Developing supplier visit guidance/ protocols
- Developing guidance on ethical procurement practices.
- Developing a human rights and environmental supplier risk assessment, to help us work more closely with the higher risk areas in our business and supply chains
- Developing a Goods and Services Not For Resale Supplier Code of Conduct
- Rolling out in person and online modern slavery training to all employees
- Working with an external third party to develop grievance and remedy procedures

Assessing risks of forced labour and child labour

We are in the process of formalising our risk assessment of human rights, including forced labour and child labour, for our own operations and our supply chains. This risk assessment will use publicly available, reputable information about country and product risks of forced and child labour.

We anticipate that our greatest risks will be in our global supply chains at farm level and linked to indirect supply chains in particular packaging, services and the outsourcing of labour provision.

Our ongoing modern slavery risks will be informed by our risk assessment, third-party audits, grievance or whistleblowing channels or external sources. We will prioritise the risks which are most salient to our business.

Due diligence and steps to manage modern slavery risks

We have built trusted relationships with our suppliers over many years and we work closely with them to ensure they are reputable and conduct business to the same high standard as TWS.

Before we start working with suppliers, we carry out due diligence checks to satisfy ourselves that we are trading with reputable, financially viable organisations. We also ask wine producers to complete a self-audit which includes a declaration relating to modern slavery.

We expect all partners in our supply chain to be opposed to slavery and human trafficking. Our wine producers are visited frequently by buyers and staff and our quality audit covers a check that suppliers have signed our Code of Conduct.

During 2023 and 2024 we will be strengthening how we work with suppliers to ensure continuous improvements in their approaches to identifying and tackling forced and child labour. Potential steps will include regular communication, supportive purchasing practices, third-party certification, strengthening suppliers' engagement in, and understanding of, modern slavery and increasing the number of suppliers who have effective grievance mechanisms in place.

Staff training

All new starters attend an induction with the HR Department which specifically highlights our commitment to the prevention of modern slavery and our overarching Human Rights Policy. Employees are expected to familiarise themselves with the Modern Slavery Statement annually following the publication of our annual statement. This Statement is accessible both on our website and within our Employee Handbook, which will be added to the new Intranet (The Hub) this year.

In 2023, we are delivering training and engagement activities with relevant TWS members of staff to ensure they are up to date with emerging modern slavery risks and with changes to TWS's policies and procedures for preventing and mitigating modern slavery. Teams including the Executive, Human Resources, Operations, and Buying will attend in-person training sessions, with the rest of the business participating in specific e-learning.

Grievances and remedial action

All employees are actively encouraged to be vigilant when it comes to identifying the risk of modern slavery. Any concerns are referred to the Executive Team, even if they are unsure about whether a particular act, or any treatment of workers or their working conditions, might constitute slavery. All concerns are investigated with the support of the HR and Legal teams. Following a full investigation, appropriate action is taken as required.

Our staff have access to a comprehensive grievance policy and whistle blowing policy should there be a need to refer to them.

This year we are rolling out an independent whistleblowing line for workers in our supply chain. This whistleblowing line will be available to anyone associated with The Wine Society's activities throughout our supply chain.

To date, 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. However, we remain alert to the threat in a rapidly changing world and continue to scrutinise any suspicious activities in our business.

We will also be reviewing and further defining our policies and procedures with regards the remediation of cases of forced and child labour.

Key Performance Indicators

This year we are implementing indicators which will enable us to measure the performance of our modern slavery approach. These indicators will include:

- % of staff in leadership positions and/ or working directly with suppliers who have been trained to understand the signs of modern slavery, the root causes and the steps they can take to reduce the risks of forced labour and child labour
- % of suppliers who have signed our Code of Conduct
- % of direct and indirect suppliers included in our topline risk assessment
- Total number of grievances raised in own operations and our supply chain
- % of total grievances raised relating to forced labour and child labour
- % of total grievances raised that have been effectively remediated.

This statement was approved by the Committee on 28th June 2023



Alan Black – Committee Chair