

The Wine Society

Modern Slavery Statement

Covering the period February 2025 to January 2026

Background

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

Also included in this statement is a summary of the actions we are taking more broadly to uphold human rights and ensure safe and fair working conditions in our wine supply chain, particularly in relation to seasonal and casual workers.

Process undertaken to update annual statement

The process has:

- Been led by our Director of Sustainability and Social Impact
- Consulted internally with Legal, HR and Buying 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 wider ethical sourcing approach and bolster our activities to tackle forced and child labour

Key differences from our last statement

The key differences between the 2024/25 and the 2025/26 statements are:

- Updated organisational details
- Updated summary of actions undertaken in 2025
- Updated KPIs

Our commitment

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 to exploit them for personal or commercial gain.

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 improving our effectiveness at protecting human rights.

Our business and governance

TWS is one of the world's oldest member-owned communities of wine lovers. Since 1874 we've been doing business differently, serving our members and with no need to generate profit for paying dividends to shareholders. We 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 ~65 permanent staff in our warehouses and use an average of 15 to 25 agency workers per week. This increases at peak times in the run up to Christmas. These agency workers are generally recruited through 4 labour agencies. We have over 41 permanent staff working in our contact centre and can recruit up to 40 seasonal workers in the contact centre during the peak Christmas period. We also employ 30 permanent delivery drivers. Our permanent warehouse workers are represented by the USDAW union, where they choose to be a member.

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 270 staff members are supported by the Head of HR and the HR team.

The role of Director of Sustainability & Social Impact leads our approach to human rights and ethical sourcing, including tackling forced and child labour. The Wine Society's revised five-year ethical sourcing strategy began roll out at the beginning of 2025. Our Director of Sustainability & Social Impact regularly reports progress on this strategy to the Executive Team, as well as annually to the Committee and in our Annual Sustainability Report. Risks to workers in our supply chain are regularly reviewed as part of the organisation's Risk Register.

Our supply chain and salient risks

We trade with a wide range of producers, suppliers and carriers nationally and internationally. We source our wine globally from more than 800 winemakers in over 34 countries across Europe, South Africa, North and South America, Asia, Australia and New Zealand.

Agriculture is a high-risk sector, in terms of incidents, and prevalence, of human rights abuses and poor labour conditions. Risks are prevalent close to home in the UK and across Europe, as well as further afield. More specifically in the wine industry, there is a growing body of reports that points to human rights abuses and poor labour conditions in wine supply chains. This is also particularly the case for more vulnerable workers (e.g. seasonal, migrant and casual workers).

Whilst our Ethical Sourcing programme seeks to continuously assess the potential and actual human rights and labour risks in our supply chains, existing research and global data sources have identified that the following risks are likely, based on the sector we operate in and the regions we source wines from:

- **Forced labour:** Where there are high numbers of migrants in a workforce employed on a seasonal basis, there is a greater chance of informal recruitment practices which might lead to forced labour practices
- **Discrimination, violence and harassment:** This can be particularly seen against women and migrant workers
- **Decent wages and working hours:** Where people are required to work long hours for less than a decent living wage
- **Health and safety breaches and poor working conditions:** As noted above, there have been reports of concerns around worker heat stress, as well as reports of inadequate personal protective equipment
- **Lack of freedom of association or access to remedy:** Where workers are unaware of unions or feel they could not safely join one or make a complaint.
- **Charging excessive fees to workers in relation to recruitment and employment:** illicit or inflated costs charged to workers to secure a job which can result in debt bondage.

Research also suggests that these risks can be higher where third parties are used to provide labour, particularly seasonal and temporary workers at peak times in vineyards and wineries throughout the year.

Policies, procedures and 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. **Company Intranet** - our company intranet, The Hub, hosts all information our employees need, including our:
 - Human Rights Policy (also available on our website)
 - Discipline and Grievance procedures
 - Whistleblowing Policy
 - Equal Opportunities Policy
 - Health and Safety Policy
2. **Wage commitments** - we monitor and ensure 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 & HR Team.

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 only work with labour agencies that are REC/ALP/APSCO accredited or provide relevant evidence to demonstrate they meet the same level of certification.
5. **Anti-Corruption and Bribery Policy** - our policy was reviewed in 2023 and remains up to date. It applies to all members of TWS's staff and the members who make up our committee.
6. **Anti-Fraud Prevention Policy** – our policy was updated in 2025 and remains up to date. It also includes a compulsory Fraud Prevention course for hiring managers.
7. **Contracts** - where possible, we include Anti Modern Slavery clauses within our supplier agreements.
8. **Tender process for large business contracts** - for larger contracts the tender process includes questions on a potential supplier's ESG credentials, which are taken into consideration as part of the tender criteria.
9. **Legal compliance review** - we continuously review changes to regulation and our business's legal compliance, including the Agency Workers Regulations and modern slavery legislation.
10. **Safecall worker hotline** - in 2023 a confidential multilingual hotline was made available to all TWS staff, enabling them to report any wrongdoings. The hotline is widely publicised around the business. No reports were made through this line in 2025. The aim is to roll out SafeCall through the TWS supply chain in due course, as part of our Ethical Sourcing programme.
11. **Human Rights Policy** - this policy sets out TWS' commitment and approach to human rights across our own operations and our supply chains which has been [publicly available on our website](#) since June 2023
12. **Supplier Social and Environmental Code of Conduct** -the Code is based on international laws and norms (including International Labour Organisation conventions and Ethical Trading Initiative Base Code) and outlines the requirements for suppliers regarding social and environmental conduct. The code was rolled out across all suppliers in 2023, which to-date has been signed by over 70% of our active suppliers. It is also [publicly available on our website](#).
13. **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 on the HR section of the Intranet (The Hub). All staff and members of our Committee are required to complete annual Modern Slavery training, via our e-learning training partner.

Additional activities conducted in 2025

Delivering Year 1 of our 5-year Ethical Sourcing Strategy

In 2024, we completed our Ethical Sourcing Strategy, which sets out our longer-term approach to working collaboratively with suppliers to identify, manage and mitigate the risks of human rights abuses, as well as ensure safe and fair working conditions, in our wine supply chain. The strategy has particular emphasis on people hired on a seasonal and temporary basis (e.g. picking, pruning, de-budding), as this group of workers tend to face the greatest likelihood of risk.

As we have a large, diverse and global supply base, our approach initially focuses on setting strong foundations and clear expectations for colleagues, suppliers and agents, moving towards mandatory human rights due diligence requirements from year 2 onwards (starting with Own Label and Core suppliers). All of this will be underpinned by awareness-raising, guidance and support from The Wine Society to ensure we continue to build and nurture our strong supplier relationships.

In line with our objectives, we made progress in 2025 against the 6 key workstreams we wanted to focus on in Year 1:

Workstream	Purpose	Progress in 2025
Setting out our ethical requirements and deadlines	Comprehensive and aligned ambitions across the supply base	<ul style="list-style-type: none"> - Over January and February 2025, we held a series of webinars for suppliers to present our 5-step ethical requirements (based on the UN Guiding Principle on Business and Human Rights). Over 260 suppliers attended live, and recordings were subsequently sent to all suppliers. - Our 160 Own Label and Core suppliers were given a deadline of July 2026 to meet our 5-step requirements - Supplier requirements and deadlines are publicly available on TWS website
Creating and rolling out a programme of support for suppliers	Working in partnership to support delivery of change	<ul style="list-style-type: none"> - Created first of its kind ‘How To’ materials, in 5 languages, which gives step-by-step guidance for wine producers on how to fulfil our ethical requirements (publicly available on our website) - Delivered 21 supplier training sessions on how to meet our ethical requirements, in 5 languages, with over 100 Own Label and Core suppliers attending 2 training sessions each - Training session recordings made available to suppliers
Agreeing roles and responsibilities with agents and distributors employed by	Working with agents to support a more ethical supply base	<ul style="list-style-type: none"> - Held 2 x working sessions with key wine agents and distributors to share TWS ethical requirements and agree their role in supporting due diligence

some winemakers to sell their wines		
Conducting Human Rights Due Diligence (HRDD)	Gathering, assessing and responding to evidence from our Own Label and Core suppliers that they have met our requirements	<ul style="list-style-type: none"> - Created our approach to conducting HRDD - Ran a trial with 10 suppliers, to test that our approach to HRDD works in practice - Put in place the right process and resources to conduct HRDD in a highly collaborative way with our suppliers, where we review their evidence and provide constructive feedback
Training for Wine Society buyers	Ensuring TWS colleagues are aware of the issues and can support our suppliers	Throughout 2025 we conducted 3 training and upskilling sessions for TWS buyers so they are up to date on the risks to workers in our supply chain, our ethical requirements and what suppliers need to do to fulfil them.
Industry engagement	Creating systemic change and avoiding duplication for suppliers	<p>In May 2025, we brought together a group of wine producers, labour agencies, human rights experts, certification schemes and industry bodies for a media event to highlight the challenges affecting people in the wine sector. This resulted in a series of constructive media articles supporting the event and calling for greater industry collaboration.</p> <p>Throughout 2025 we continued our strong engagement with the Sustainable Wine Roundtable (SWR) to galvanise action. This included representing the SWR's Retailer Group at several meetings with regional wine bodies.</p>

In 2026, we plan to:

- **Ramp up our work on HRDD.** Our goal is that by the end of 2026, 40% of our 160 Own Label and Core suppliers have met Steps 1 to 4 of our ethical requirements.
- **Continue to support and guide our own label and core suppliers:** This involve 1:1 guidance, particularly focused on areas that are more challenging for suppliers to fulfil
- **Continue regular working sessions with wine agents and distributors,** as part of their role in supporting suppliers to fulfil our ethical requirements
- **Conduct 2 more buyer training sessions** - supporting them to integrate conversations on risks to workers into their supplier interactions.

Key Performance Indicators

KPIs enable us to measure the performance of our anti-modern slavery and ethical sourcing approach.

KPI	Progress
<ul style="list-style-type: none"> 100% of staff in leadership positions and/ or working directly with suppliers 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 	Achieved
<ul style="list-style-type: none"> 100% of our Own Label suppliers have signed our Social and Environmental Code of Conduct 70% of all active suppliers have signed our Social and Environmental Code of Conduct 	<p>Mostly achieved. As of the end of 2025:</p> <p>Approximately 90% of our Own Label suppliers have signed our Social and Environmental Code of Conduct, representing ~95% of Own Label sales volume in the second half of 2025</p> <p>Approximately 60% of all active suppliers have signed our Social and Environmental Code of Conduct, representing ~85% of our total sales volume in the second half of 2025</p>
<p>To have gathered full due diligence documentation on our 5-step requirements from 20% of our Own Label and Core suppliers, conducted a risk assessment and agreed any remedial actions required</p>	<p>Not yet achieved.</p> <p>As of the end of 2025 we have received full documentation from ~5% of our Own Label and Core suppliers. On reflection the goal of 20% was too ambitious in Year 1, as the supplier training programme was never planned to be completed until February 2026.</p> <p>Our goal for 2026 is that 40% of Own Label and Core suppliers have submitted full documentation (covering Steps 1 to 4).</p>
<p>New KPI for 2026:</p> <ul style="list-style-type: none"> 70% of our Own Label and Core suppliers have a Human Rights Policy (or commitment) and have conducted a Human Rights Risk Assessment of their business and supply chain (Steps 1 & 2 of our requirements) 	

This statement was approved by the Committee on 25 March 2026

Signed by The Wine Society Chair, Alan Black: 

