

The Wine Society's Human Rights Policy

Overview

The Wine Society is committed to conducting its business and sourcing its products in a manner that respects, upholds and advances people's human rights, whether directly and indirectly.

As a buyer of global products and services in more than 25 countries and employing more than 250 people in the UK, we have the opportunity to positively impact people and societies. This policy outlines the approach we take to make this happen.

Our commitment

In line with the United Nations Guiding Principles on Business and Human Rights, we base our Human Rights Policy commitment on the [International Bill of Human Rights](#) and the principles concerning fundamental rights set out in the [International Labour Organization's Declaration on Fundamental Principles and Rights at Work](#). It applies to all Wine Society operations and those of our sub-contractors and suppliers.

As a business, we seek to:

- provide a workplace where everyone enjoys a safe and healthy environment that embraces diversity and champions equality
- respect the rights set out in the [Ethical Trading Initiative Base Code](#)
- implement a human rights due diligence approach that enables us to identify, prevent and mitigate potential adverse human rights impacts that we may cause, contribute or be directly linked to through our business activities
- inform and guide our business relationships through our due diligence processes and embed our commitment to respect human rights in all business areas and processes
- conduct business in a way that allows our supply chain to operate in line with our Supplier Code of Conduct, which includes ensuring prices paid reflect true costs of production
- communicate our Human Rights Policy within our own operations and our supply chain
- work with industry and stakeholders where possible to support human rights
- track our impact and our suppliers' impact on people and communities.

Governance and Reporting

The Wine Society's Committee is ultimately accountable for ensuring human rights are upheld across the business and for effective due diligence procedures within the supply chain. The Executive Team, which reports to The Committee, is responsible for the ongoing development of an appropriate human rights approach, as well as supporting its implementation through all business teams. This workstream is led by The Director of Sustainability and Social Impact, who sits as part of the Executive Team.

Our [Modern Slavery statement](#) (in accordance with the Transparency in Supply Chains provision of the UK Modern Slavery Act 2015) is published on our website and updated annually to highlight the steps we are taking to prevent modern slavery and human trafficking within our business and our supply chains.

Partners

We work with a wide and diverse range of suppliers around the world, including wineries and growers, food producers and service providers. While we recognise that each entity has its own duty to respect human rights, we expect them to adhere to our Supplier Code of Conduct which sets out our requirements of suppliers and partners and we commit to working with them to achieve our common goals. Key elements of the Code of Conduct include:

- **observing all the applicable laws of the operating country.** Should national laws or regulations mandate our suppliers to cause or contribute to adverse human rights impacts, we will seek to develop innovative approaches with them to meet the responsibility to respect human rights without breaching such laws and regulation
- **complying with all the human rights and environmental principles** outlined in the Code
- ensuring **responsibility for human rights at a senior level** within the business
- **undertaking human rights due diligence** within their own operations and supply chain, including appropriate grievance mechanisms being in place
- **supporting suppliers in their own supply chain** to meet expectations with regards to human rights
- **encouraging open communication** throughout the supply chain and with The Wine Society regarding any human rights issues.

Identifying priority areas to tackle

There are several ways in which The Wine Society identifies priority areas to focus on, which include:

- a **human rights risk assessment** of our supply chain
- **supplier visits and phone calls** by Wine Society employees
- **stakeholder engagement**, which includes gathering industry intelligence and having discussions with our employees, sub-contractors and suppliers.

We pay particular attention to individuals or groups who may be at greater risk of negative human rights impacts due to their vulnerability or marginalisation.

We know that human rights due diligence is an ongoing process that requires particular attention at certain stages in our business activities, such as when we form new partnerships or our operating conditions change. Therefore, we will continually review our approach to how we work, who we work with and how we identify and address potential or actual human rights risks and violations.

More information about priority areas identified can be found in our [Modern Slavery Statement](#).

Grievance and remedy

We respect and value honest and open communication. As an employee or someone working in our supply chain, if you have a serious concern or have been affected by any wrongdoing, we actively encourage you to speak to The Wine Society. This can either be done directly to HR@thewinesociety.com or anonymously through our third-party whistleblowing line [SafeCall](#).

No reprisal or retaliatory action will be taken against anyone for raising legitimate concerns. We are committed to investigating and responding to such concerns in a prompt and responsible manner.

If we have caused or contributed to negative human rights impacts, we will actively engage in remediation. If we are linked to negative human rights impacts in our supply chains, we will use all available leverage to ensure remediation takes place. We expect our suppliers to adopt the same approach to grievance and remedy.

This policy has been reviewed by and approved by our Chief Executive Officer.