

Berry Bros. & Rudd

Modern Slavery Statement 2023

INTRODUCTION

As we celebrate our 325th year as a family-owned business, our responsibility towards everyone involved in our vision of being the best and most trusted fine wine and spirit merchant continues. A key part of that is protecting, respecting and championing the human rights of everyone connected to our operations and supply chain.

This statement sets out Berry Bros. & Rudd's actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business and supply chains. This statement relates to actions and activities during the financial year 1st April 2022 through to 31st March 2023.

Both the Executive Committee and I are responsible for ensuring Berry Bros. & Rudd meets its human rights' responsibilities. We are absolutely committed to preventing slavery and human trafficking in all our corporate activities, and we ensure that the supply chains are free from slavery and human trafficking.

Emma Fox
Chief Executive Officer

ABOUT BERRY BROS & RUDD

Organisational structure and supply chains

Berry Bros. & Rudd ("BB&R") is Britain's oldest wine and spirit merchant, having traded from the same premises since 1698. BB&R is the parent company of the Berry Bros. & Rudd Group (Group) and members of the Berry and Rudd families continue to own and be involved in the management of the business.

Our principal business activities consist of the following:

- Sourcing Fine Wine and Spirits: we buy fine wines & spirits from third-party suppliers in the UK and around the world.
- Building Spirits Brands: we formulate and create spirits brands, including No 3 London Dry Gin, The Kings Ginger and our own Berry Bros & Rudd's spirits, producing, establishing and then growing those brands for sale to global markets.
- Marketing and selling wine and spirits: we market and sell our products via our own dedicated marketing and sales teams and through appointed distributors and agents.
- Events & Education: The business has exclusive fine wine and dining venues, where we run wine courses and educational tastings.

The Group has more than 390 employees worldwide. We are also honoured to hold two Royal Warrants for the late H.M. The Queen and H.R.H. The Prince of Wales.

Countries of operation and supply

BB&R is based in the UK, with its iconic home at No 3 St James's Street, London, a second office and fulfilment centre in Basingstoke, and a newly opened warehouse in Andover, Hampshire. We also

have satellite sales offices in Japan, Hong Kong and Singapore, and a small wine trading business in Bordeaux, France.

The following is the process by which the company assesses whether or not particular activities are high risk in relation to slavery or human trafficking:

To identify something, you first of all need to know what you're looking out for, and then you need to go and actually look out for it.

To understand what we're looking for, we carried out a fresh risk review in the last year, which identified the following high-risk activities for our specific business and supply chain:

High-risk activities

The following activities are considered to be at high risk of slavery or human trafficking:

- Seasonal harvest workers within our wine production and supply chain.
- Agency labour within the sub-contractors we use for logistics and transport.
- Other contracted labour within our technology providers and services.
- Any labour of our suppliers who produce glass for bottles within our own brands production.

Responsibility

Responsibility for our anti-slavery initiatives is as follows:

- **Policies:** The People Team are responsible for the updated Company handbook of which the countering slavery and human trafficking policy sits.
- **Due diligence:**
 - Our wine and spirit buying teams have responsibility for looking into how the seasonal harvest workers within our wine production and supply chain are treated.
 - Our product and packaging team have responsibility for looking into how the glass manufacturers, and other packaging partners, produce our glass and other own branded goods.
 - Our logistics team have responsibility for looking into the labour practices of our logistics and transport service provider partners.
 - Our IT department have responsibility for making sure all contracted labour within our technology providers and services are treated with respect.
- **Training:** Our People Team are responsible for creating, and ensuring all departments complete relevant modern slavery training, this includes any new joiners to the business.

Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** We encourage all our colleagues and other business partners to report any concerns related to the direct activities, or the supply chains of, our business. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for colleagues to make disclosures, without fear of retaliation. Colleagues, or others who have concerns can raise this with the direct line manager or if they are not comfortable with this then they can raise it with our People Director or a senior member of the People Team.
- **Employee Handbook** Our Handbook makes clear to colleagues the actions and behaviour expected of them when representing Berry Bros. & Rudd. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

- **Supplier Handbook** We are committed to ensuring that suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Serious violations of our supplier handbook will lead to the termination of the business relationship.

Due diligence

We undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. Our due diligence and reviews include:

- evaluating the modern slavery and human trafficking risks of each new supplier,
- representatives from BB&R on site with existing suppliers regularly to review modern slavery and human trafficking risks.
- reviewing on a regular basis all aspects of the supply chain
- taking steps to improve substandard suppliers' practices and requiring them to implement action plans if appropriate.
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan, or who seriously violate our supplier handbook, this can result in the termination of the business relationship.

Training

We require all colleagues working within BB&R to complete training on modern slavery, as a module, within our compulsory learning programme.

We require all new colleagues to complete and pass the assessments on modern slavery to pass their probationary period.

Our modern slavery training covers

- our business's purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline.
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- how to identify the signs of slavery and human trafficking.
- what initial steps should be taken if slavery or human trafficking is suspected.
- how to escalate potential slavery or human trafficking issues to the relevant parties within our business.
- how to seek advice outside of Berry Bros. & Rudd through the UK Modern Slavery Helpline.
- what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

Berry Bros. & Rudd is committed to acting ethically and with integrity and transparency in all business dealings. We are acutely aware of our responsibilities and combating modern slavery and protecting human rights is one of the most important responsibilities we have as a business.

As a result, our modern slavery work cannot stand still. We must remain particularly aware of emerging risks and be alert to the dynamic nature of both modern slavery and the impacts of our own operations. And we are committed to meeting that challenge.

Board approval

This statement was approved on Monday 27th March 2023 by Emma Fox, our Chief Executive, and our Executive Committee who review and update it annually.

Chief Executive signature:



Date: 27th March 2023

For and on behalf of the Executive committee:



Date: 27th March 2023