

Berry Bros. & Rudd

Modern Slavery Statement 2021

As a family-owned business, we've always felt a responsibility and affinity towards everyone involved in our purpose of helping customers drink better now and in the future. A key part of that is protecting, respecting and championing the human rights of everyone connected to our operations and supply chain.

Simply put, modern slavery, servitude, human trafficking and forced labour has no place in any business. Every business therefore has a duty to look to identify, combat and ultimately eradicate any human rights abuses from with its activities. Here at Berry Bros. & Rudd, we therefore fully accept and embrace our responsibility to take concrete action to try to ensure that there is no place for modern slavery, human trafficking and other such abuses to happen within our business and those of our partner suppliers.

In this statement, we set out the steps that Berry Bros. & Rudd takes to try to ensure modern slavery and human trafficking is not happening within our business or supply chain. This Statement is made pursuant to section 54(6) of the Modern Slavery Act 2015 and was approved on behalf of BB&R's Board of Directors on 23 September 2021.



Emma Fox
Chief Executive Officer

Governance

The Chief Executive and Executive Committee are responsible for ensuring that BB&R meets its human rights responsibilities. Our strategy has the full sign-off and commitment of the Executive and PLC Board, and we report regularly to the Board on our progress.

Human rights and modern slavery are key elements of our regular corporate risk review process, which is overseen by the General Counsel and Director of Sustainability. This risk review is performed across the business with the full participation of BB&R's leadership team and management. We report on the risks identified to both our Board and Owners, as well as in our Annual Report.

To support our business in meeting its human rights responsibilities, the following functions carry out day-to-day activities to ensure we do the right thing:

- Fine Wine & Spirits (supplier liaison and compliance within our product supply chain and whistleblowing within product supply chain)
- Logistics & Supply Chain (supplier liaison and compliance within our outsourced logistics partners)
- Technology (supplier liaison and compliance within our outsourced technology partners)
- People (checks on employees, including eligibility to work in the UK, to safeguard against human trafficking or them being forced to work against their will)
- Legal (contractual terms and conditions), and
- Company Secretarial (overall risk management & mitigation, whistleblowing)

ABOUT BERRY BROS & RUDD

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.

BB&R is based in the UK, with its iconic home at No 3 St James’s Street, London, plus a second office and fulfilment centres in Basingstoke, UK. We also have satellite sales offices in Japan, Hong Kong and Singapore, and a small wine trading business in Bordeaux, France.

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.

The company also has exclusive fine wine and dining venues, and a wine school. The Group has more than 350 employees worldwide. We are also honoured to hold two Royal Warrants for H.M. The Queen and H.R.H. The Prince of Wales.

TACKLING MODERN SLAVERY IN BERRY BROS & RUDD

To effectively tackle modern slavery and achieve sustainable change across our supply chain and business operations, we must be proactive in first identifying, and then addressing the root causes and impacts of modern slavery.

Identifying Modern Slavery risks within BB&R

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 key risk areas for our specific business and supply chain:

- 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

That review also outlined certain specific red flags that could suggest that modern slavery may be taking place within those risk areas, and that we therefore need to look out for:

- Deposits for work and deceptive recruitment practices
- Restriction of movement at work
- Poor working conditions
- Harsh and inhumane treatment
- Withholding worker documentation
- Cash-in-hand, withheld or delayed payments
- Forced or excessive overtime
- No access to grievance mechanisms
- Accommodation tied to employment
- Unsatisfactory accommodation conditions
- Restricted movement when in accommodation

Addressing Modern Slavery risks within BB&R

The task of then going and looking out for those risk areas and red flags is the responsibility of the relevant operational area within BB&R:

- our wine buying teams have responsibility for looking into how the seasonal harvest workers within our wine production and supply chain are treated
- 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

In liaising with their third party partners, we expect each of these teams to first make regular enquiries of their partners around the 'red flag' indicators we have identified, and any actions those partners are taking to combat modern slavery, and respect human rights, within their business and supply chain.

The exclusive nature of the fine wine & spirits that we sell is an inherent advantage to us, as we deal with a small number of providers, each of whom care deeply about their product & how it is made, and share our values, and the vast majority of whom we have strong, long-standing cooperative relationships with. As a result, we have regular, deep, open conversations with those producers, making it easier to raise and assess complicated sensitive issues such as modern slavery without the need for formal audit and due diligence questionnaires.

Although we recognise that we cannot become complacent when it comes to modern slavery, the above liaison and discussions with our partners since the last report has not uncovered any red flags or actual instances of modern slavery across our supply chain. However, if we were to identify any actual or potential problems, we would look to use those long-standing relationships to work with the partner in question to resolve those problems, and address their impact, as quickly and effectively as possible.

Once we have worked with our partners to resolve any issues that may arise, we would then seek to take stock and review our business practices, to understand how we may need to change how we work going forward to help reduce the risk of these issues arising again anywhere else in our supply chain.

To help them perform those roles, we look to empower our employees through education on modern slavery, and the provision of the backing, tools and resources they need to make those enquiries.

Closing Statement

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.