

Slavery and Human Trafficking Statement

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 (the Act) and sets out the steps that Direct Wines Holdings Ltd (“Direct Wines”) has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within its business or supply chain. Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Direct Wines is committed to acting ethically and with integrity and transparency in all business dealings.

Our Business

This Slavery and Human Trafficking Statement applies to Direct Wines, a family owned international wine merchant operating in the UK, USA and Australia and its subsidiary Averys of Bristol. The UK Group employs around 630 people.

Direct Wines’ business comprises the areas set out below.

- Wine and sourcing: We source wines from a mix of owned and third-party vineyards.
- Wine production: Direct Wines owns or leases wine production and packaging facilities in the UK, France and Australia.
- Marketing and distribution: We market and distribute wines to customers and businesses. The principal brands are Laithwaites, Sunday Times Wine Club and Averys of Bristol. As part of Direct Wines’ commitment to ensuring that there is no modern slavery or human trafficking in its supply chains, it has the following internal policies to ensure that it is conducting business in an ethical and transparent manner:
- Recruitment Direct Wines conducts robust checks on any new employee including eligibility to work in the UK to safeguard against human trafficking or individuals being forced to work against their will.
- Training To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, we provide appropriate training to our staff.
- Employee Engagement All employees have an obligation to familiarise themselves with our Slavery and Human Trafficking Statement which is included in the Employee handbook forming part of their contract of employment.
- Whistle blowing Policy The business has a whistle blowing policy so that all employees can raise any concerns that they might have without fear of reprisals.

Due Diligence for Slavery and Human Trafficking

As part of Direct Wines’ due diligence processes we identify and mitigate risk;

- Identify and assess potential risk areas in our supply chains.
- Where practical, mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.
- Ensure a high level of understanding of the risks of modern slavery and human trafficking in our business by providing training to all relevant staff.
- Direct Wines does not and will not knowingly support or deal with any business involved in slavery and human trafficking. The Company completes due diligence on its suppliers, where practicable, to satisfy itself that it is trading with a reputable organisation. The Company expects all those in its supply chain to be opposed to slavery and human trafficking. As a minimum, the Company expects each entity in its

supply chain to adopt 'one-up' due diligence on the next link in the chain for those organisations governed by the Act. It is not practical for the Company to have a direct relationship with all links in the supply chain.

This statement has been approved by the Board of Directors on 23 May 2018 and it is available on the Direct Wines website. This Statement will be reviewed on an annual basis and will be updated if required

David Thatcher
Chief Executive Officer

23 May 2018