

VENUS

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

INTRODUCTION

This statement sets out **Venus Wine & Spirit Merchants PLC**'s actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 October 2019 to 30 September 2019.

As part of the Drinks Distribution Industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

The statement covers the activities of Venus Wine & Spirit Merchants PLC and is made in reference to Section 54, Part 6 of the modern Slavery Act 2015.

Venus Wine & Spirit Merchants PLC's is a drinks distribution company with a portfolio of 2 depots and 1 retail outlet in the UK and over 150 employees, serving independent, on trade accounts. We understand the role we have to play in eliminating challenging practices as well as respecting human rights across our own operation. All colleagues who work for Venus Wine & Spirit Merchants PLC's benefit from a working environment in which their rights and freedoms are wholly respected. All sales operations take place in the UK.

The majority of our purchases are from UK based businesses with less than 5% from EU countries.



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



"We are committed to working with established, large brand owners where we can view their Modern Slavery Statement as their commitment to the responsible practices within our supply chain."

For smaller suppliers we have instigated a process to ensure they have implemented and are enforcing effective systems and controls to have confidence that slavery and human trafficking is not taking place in our supply chain.

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HIGH-RISK ACTIVITIES

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

- > We ensure that all suppliers have the correct registration and certification of VAT, as well as correct identification, before trading.
- > We have also registered on the Alcohol Wholesaler Registration Scheme (AWRS) following new legislation to raise awareness and identifying the risks of illicit trading with our current and new suppliers, as well as being transparent to our customers. Suppliers that do not register on AWRS will not trade with Venus Wine & Spirit Merchants PLC's.
- > We carry out Right to Work checks on all new employees ensuring that valid passports/ Identity cards are held and validated by HR.

RESPONSABILITY

Responsibility for the organisation's anti-slavery initiatives is as follows:

- Policies:** Put in place by HR (as defined in the Employee Handbook) and Supply chain;
- Investigations/Due Diligence:** HR and Supply chain are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking;
- Training:** While not completed as of yet, Venus Wine & Spirit Merchants PLC's will require all staff to complete training on modern slavery.

Specifically:

- > How to identify the signs of slavery and human trafficking
- > What initial steps should be taken if slavery or human trafficking is suspected
- > What external help is available

This training will be carried out throughout the new Financial Year and cascaded to all employees. This will in turn, raise awareness of modern slavery and human trafficking to ensure all colleagues are sensitive of any areas that could pose a concern or risk.

RESPONSABILITY POLICIES

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Whistleblowing policy. The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can contact us confidentially.

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Employee code of conduct. The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

Supplier code of conduct. The organisation is committed to ensuring that its 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. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

Recruitment/Agency workers policy. The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

DUE DILIGENCE

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- > mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- > reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- > invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

PERFORMANCE INDICATORS

The organisation has reviewed its key performance indicators (KPIs). As a result, the organisation is:

- > All new staff to have completed training on modern slavery by within their probationary period.

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AWARENESS-RAISING PROGRAMME

As well as training staff, the organisation has raised awareness of modern slavery issues by putting up posters across the organisation's premises and circulating a series of emails to staff.

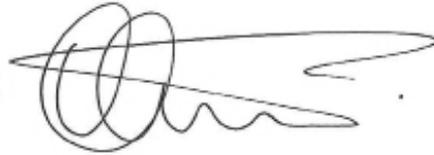
The posters and emails explain to staff:

- > the basic principles of the Modern Slavery Act 2015;
- > how employers can identify and prevent slavery and human trafficking;
- > what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- > what external help is available, for example through the Modern Slavery Helpline.

DIRECTOR APPROVAL

This statement was approved by the organisation's Chairman/M.D., who will review and update it annually.

PANTELIS CHRISTOFOROU SIGNATURE :



DATE

1/10/2019

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