

# STEWART WINES

## Modern Slavery and Human Trafficking Statement

Stewart Wines Ltd (SWL) presents this Statement on a voluntary basis. The Statement refers to SWL financial year 1 April 2022- 31 March 2023.

### Policy on Slavery and Human Trafficking

1. SWL has no tolerance of modern slavery in any of its forms, which include slavery, servitude, forced and compulsory labour, debt bondage and human trafficking.
2. SWL regards any form of modern slavery as repugnant and a violation of fundamental human rights.
3. SWL will act to ensure that modern slavery is not taking place within its own operations, by utilising fair recruitment and employment practices, and by cultivating a workplace environment of mutual respect between all employees.
4. SWL will avoid procurement practices which might put Suppliers under undue commercial pressure, and will also be proactive in working with its Suppliers to support them in finding and excluding any risk of exploitative behaviour along SWL supply chains.

### Organisational Structure

SWL is a privately owned limited company registered in England and Wales. The company imports wholesales and distributes wine and other beverages within UK, the Isle of Man and the Channel Islands. SWL employs 10 members of staff and turnover is between £2m-£10m.

### Supply Chains

**Stock:** SWL purchases and imports direct from Producers and Suppliers in Spain, France, Italy and elsewhere in the EU. This sometimes includes tier-2 Suppliers. SWL also purchases from UK Producers and UK Importers stock from countries including England, Argentina, Uruguay, Chile, Australia, New Zealand, USA and South Africa. This most often includes tier-2 and tier-3 Suppliers.

**Services:** SWL purchases a range of legal, financial, IT, motor and office support services including recruitment from companies and individuals within the UK primarily in Bristol. These are usually tier-1 Suppliers.

**Haulage:** SWL purchases delivery services from two UK Companies, for both intra-UK deliveries and also for stock imported by SWL from EU Suppliers. Sub-contractors (tier-2) may be used for deliveries.

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## Steps taken by SWL to prevent Modern Slavery

1. SWL has adopted the Ethical Trading Initiative (ETI) Base Code. The Code comprises nine labour standards which SWL fully endorses. The Code has been published to SWL workforce as the standard of employment practice to which SWL will operate in its own operations, and it will be considered in all future procurement decisions.
2. SWL has researched the risk levels for slavery and exploitative labour practices in each country from which stock originates from a variety of resources including the Global Slavery Index and the US Department of Labour. This resulted in identification of one high risk area for child labour in grape harvesting. SWL discussed the risk with the two relevant tier-1 Suppliers. In each case the Supplier demonstrated that the agricultural estates producing the wines held Fair for Life certification.
3. SWL has completed the Home Office Modern Slavery Assessment Tool. This has enabled staff concerned to access resources and develop a fuller understanding of the nature of the problem of modern slavery, and also of the constructive actions that can be taken by a trading company of any size to assist in the global effort to eliminate cruel and exploitative labour practices from commercial supply chains. This awareness and understanding is now embedded and SWL is well equipped to continue positive actions against slavery.

## Further Steps against Slavery for the next financial year.

1. SWL will continue to expand its discussions with tier-1 Suppliers to encourage and support good practice.
2. All SWL staff will have Modern Slavery Awareness Training.
3. SWL will develop a procurement policy which includes specific reference to the ETI base code.
4. SWL will focus on risk management of modern slavery in the Haulage supply chains.

This Modern Slavery and Human Trafficking Statement has been approved at a meeting of SWL Board of Directors on 10 May 2023.

signed

Judith Stewart  
Director

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