
Modern Slavery Act 2015: slavery and human trafficking statement

Accolade Wines is committed to preventing slavery and human trafficking within its business activities and its global supply chain.

Accolade Wines' Global Business

Accolade Wines is the number one wine company in Australia and the United Kingdom by volume and the fifth largest wine company in the world. Drawing on a proud heritage with one of the first wineries established in Australia, Accolade Wines has evolved into a global wine company. Accolade Wines has a comprehensive portfolio of market leading brands which are sold across over 140 countries.

Accolade Wines is a privately owned group of companies with its head office located in Australia and employs over 1,600 employees across 12 countries. Further information regarding Accolade Wines' global footprint can be accessed at <http://www.accolade-wines.com/our-company/about/>

Accolade Wines' principal business activities consist of the following:

Grape growing and sourcing: Accolade Wines sources its grapes through vineyards it owns and leases, and from contracts with third party growers.

Wine production and sourcing: Accolade Wines produces and bottles wine at its own production facilities in Australia, Chile, USA, South Africa, New Zealand and the UK, and also sources bulk wine from third party suppliers around the world.

Marketing and sales: Accolade Wines markets and sells its products via its own dedicated marketing and sales teams and through appointed distributors and agents.

Preventing Modern Slavery and Human Trafficking

- **Employees and Agency Workers:**

Accolade Wines operates under a range of global and local policies, processes and procedures that ensure its workplaces comply with local laws and ethical standards.

Accolade Wines complies with all local labour laws and when it has the need to use agency workers at its sites it ensures reputable agencies are used and those agencies warrant compliance with all local laws.

- **Whistleblowing or Confidential Reporting of Criminal or Illegal Acts Policy:**

In order to ensure full compliance with the law regardless of locality of the relevant employees, and to protect employees' freedom to act within the law, Accolade Wines established a procedure to be followed by

employees throughout its business where they feel the need to report a criminal wrong-doing or illegal act. The procedure has been developed primarily to allow employees to report illegal acts concerning Accolade Wines, however, calls will also be accepted from employees' family members, suppliers, customers, retailers or the general public.

- **Due Diligence Screening on all Suppliers and Customers**

By engagement via an independent third party, Accolade Wines conducts due diligence screening on all potential new suppliers and customers. Accolade Wines only enters into a contract with a new supplier or customer once this due diligence has been completed satisfactorily. Potential new suppliers and customers are searched against 23 key risk areas which include, for example, corruption and bribery, fraud, money laundering and financial irregularities and modern-day slavery. For scoring purposes, Accolade Wines has ranked the 23 key risk areas as high, medium or low. Modern-day slavery is amongst those key risk areas considered to be high risk and the potential new supplier or customer should therefore score highly in this area if any adverse information is identified.

In 2018 Accolade Wines expanded the above programme further by conducting due diligence screening on all of its top ten customers and suppliers (by revenue) for each region globally, against the same 23 key risk areas and ranking described above.

Further Steps

As part of Accolade Wines' initiative to identify and mitigate the risk of slavery and human trafficking in its business activities and supply chain it will continue to implement the following programmes in 2019:

- **Due Diligence Screening on all Suppliers and Customers**

The next phase of the programme is to finalise due diligence screening on all existing suppliers and customers from a country with a Corruptions Perceptions Index score below 70. Once this has been completed the remaining customers and suppliers will have due diligence screening conducted.

- **Supplier Risk Assessment Questionnaires**

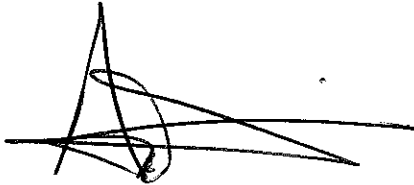
Accolade Wines has developed a quality and risk assessment questionnaire for all its existing bulk wine suppliers. All bulk wine suppliers will be required to complete this questionnaire on an annual basis. The questionnaire covers quality and food safety, environment, compliance with local laws and ethical trading. Completed questionnaires that highlight potential risk areas, for example an absence of SEDEX membership or BSCI accreditation, will be subject to a further in depth audit in order to adequately assess compliance in those areas.

The next phase of this programme will involve Accolade Wines requiring all its suppliers to complete this questionnaire on an annual basis.

- **Review:**

Accolade Wines will review this statement at least annually.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Accolade Wines Group's (including Accolade Wines Holdings Europe Limited and Accolade Wines Limited) slavery and human trafficking statement for the financial year ending 30th June 2018.

A handwritten signature in black ink, appearing to be 'Andy P Smith', written over a horizontal line.

Andy P Smith

Director

20 December 2018
