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## ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

**Owner: Company Secretary**

Reviewed: August 2018

Majestic Wine PLC maintains a diverse supply chain across a number of geographic areas, as well as directly employing over 1500 people worldwide. As a Group we are committed to the principles of the Modern Slavery Act 2015 and the Californian Transparency in Supply Chain Act of 2010 (TISCA) and to doing everything we can to prevent slavery and human trafficking in our businesses and across our supply chains.

We recognise that modern slavery can take many forms, including servitude, forced or compulsory labour and human trafficking.

### Our Anti-Slavery Statement:

“As part of our Company mission ‘To Do the Right Thing for our People, Customers and Suppliers’ we oppose modern slavery in all its forms and will try to prevent it by any means that we can. We expect anyone who has any suspicions of modern slavery in our business or our supply chain to raise their concerns without delay. We promise that we will keep any information provided completely confidential.”

### 1. Structure and Supply Chains

#### *Our Structure*

Majestic Wine PLC is a leading wine retailer with four divisions: Majestic Wine Retail, Majestic Commercial, Naked Wines and Lay & Wheeler. The Company is based in the UK and has operations in the UK, France, USA and Australia. Group turnover for the year ended 02 April 2018 was just below £476m. For more information on our Group please visit: <http://majesticwineplc.co.uk/about-us/our-group-at-a-glance/>

#### *Our Supply Chains*

Our Group purchases goods and services from a wide range of providers located across differing geographic areas. By value the largest part of our supply chain is wine which comes from a mix of developed and developing economies around the world. As well as wine, we purchase goods and services to support our operations around the world ranging from staff uniforms and printed marketing materials to consultancy and facilities management services.

Within our retail business our staff are predominantly permanent employees. The nature of our business is such that employees are required to work “out of office” hours and over weekends. Working hours are agreed between managers and staff at shop level. We do not utilise zero hours’



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contracts. We are of the view that our policy in no way contravenes the principles which support the individuals' right to offer their services in exchange for a fair wage.

We recognise our supply chain as our biggest risk area for exposure to modern slavery. We operate in a sector where our suppliers may make use of seasonal workers employed on a variety of types of contracts. This is a high risk area in terms of the legislation. In the developing economies, or where there are large numbers of unskilled and/or unemployed workers, there may also be an enhanced risk for abuse.

## 2. Risk Mapping Process

As a result, we are committed to developing a detailed risk mapping process, together with the required mitigation and intervention strategies, to adequately address our obligations. To this end we have already developed an action plan, with realistic time lines for implementation.

This process will include a determination as to which parts of our business and suppliers are considered to represent the highest risk of modern slavery taking into consideration the locations they are based in, the types of labour they utilise and the services provided to our Group.

## 3. Policies and Commitments

We expect high standards and transparency from inside our own businesses as well as from all our contractors, suppliers and other business partners. We expect our suppliers to hold their own suppliers to the same high standards.

### *Our commitments*

- To prohibit use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children;
- All team members must familiarise themselves with our procedures to help in the identification and prevention of modern slavery;
- We will review our supply base to identify high risk areas which raise concern against our "Doing the Right Thing" standards.

We have identified a number of policies which will underpin and support our commitments and have developed and implemented a Code of Conduct and Whistle Blowing Policy. The consideration of additional supporting policies will form part of our risk process as part of the required mitigation actions.

## 4. Training Processes



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We understand that we need to raise awareness of modern slavery within our own business as well as amongst our supply chain, including a process which is available to report transgressions.

We will endeavour to work with suppliers identified as “at risk” following our assessment process so as to train them and provide capacity building within the relevant structures to address the problem. As part of this strategy, we will also attempt to work with groups at risk within the labour grouping to ensure they are made aware of their rights.

## 5. Actions to address modern slavery or human trafficking

### *Risk Management*

Our current action plans include a risk assessment process together with mitigation and prevention outcomes.

### *Whistle Blowing*

We promise to unconditionally protect any legitimate whistle blowers within or outside our organisation. Concerns about suspected modern slavery associated with the Company or our suppliers may be reported via the process set out below.

Anyone may submit a complaint or tip off via our hotline - [speakup@majestic.co.uk](mailto:speakup@majestic.co.uk)

All reports of suspicious activity are kept in the strictest confidence. The source of reports will be kept confidential, save to the extent that our maintaining that secrecy or the anonymity of the source is not permitted by law, or is not consistent with our maintaining our adequate procedures. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Please cross refer to our Whistle Blowing Policy.

Employees should in the first instance approach their Divisional Director/MD or contact the confidential email contact on [speakup@majestic.co.uk](mailto:speakup@majestic.co.uk) as per our Whistle Blowing Policy. The Director will then escalate this further and the course of action will depend on the nature of the complaint.

The Company encourages members of the public or people not employed by us to write, in confidence, to our hot line, our Company Secretary or Group Controls Manager at our headquarters at Majestic House to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain.

Employees should take action in the following circumstances:

- where they suspect a person acting on behalf of Majestic Wine PLC or one of our businesses is seeking to exploit another in a way which could amount to modern slavery;



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- where they suspect that a person acting on behalf of one of our suppliers is seeking to exploit another in a way which could amount to modern slavery;
- where they have received an approach from a person acting on behalf of Majestic Wines PLC or one of our businesses who has invited you to participate in acts which could result in offences under the Modern Slavery Act 2015 being committed;
- where they have information which leads to the rational conclusion that a person acting on behalf of Majestic Wine PLC or one of our businesses or suppliers is preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015.

## 6. Engagement with Stakeholders

Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. We expect all our people to have read and be aware of this statement.

We will include in the directors' report accompanying our Annual Report a reference to the Company's Slavery and Human Trafficking Statement, which will be presented on our PLC website post the year end. This statement will also be available on our PLC website at [www.majesticwineplc.co.uk](http://www.majesticwineplc.co.uk).

Recommend for adoption by the Board

Date of Adoption: August 2018

Next Review: July 2019

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 3 April 2019.



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Greg Hodder (Chairman)  
The Majestic Wine PLC Board  
Date 08 August 2018

