



## **Modern Slavery and Human Trafficking Act 2015 Statement**

### *Introduction*

In accordance with the Modern Slavery Act 2015, this statement sets out the steps that Freixenet Copestick Ltd is taking to understand and address potential Modern Slavery risks related to its business and put in place steps that are aimed at ensuring there is no Slavery or Human Trafficking in its own business or supply chains.

The company is 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.

### *Business Structure*

Formed in 2019 following the merger of Freixenet UK and Copestick Murray Ltd. Freixenet Copestick is a wholly owned subsidiary of Henkell – Freixenet a member of the Oetker Group.

The company's core business is the import and sale of still and sparkling wines. Our products are supplied by Group and non-Group companies based in the major wine producing regions of the world.

### *Due Diligence and Supply Chain*

Subsidiaries of the Henkell – Freixenet Group are subjected to an annual Oetker compliance audit which includes ethical standards. Managing directors of each subsidiary have overall responsibility for compliance and are actively involved in the compliance audit.

Prior to supply third party suppliers are risk assessed and audited to ensure suitability of supply to the Henkell Freixenet Group. The company audit includes staff welfare and ethical standards of the supplier.

We establish a relationship of trust and integrity with all our suppliers, which are built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, and compliance with health, safety and environmental standards.

[We haven't been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the relevant authorities.

### Training

Key staff with direct responsibility for compliance has undertaken external training to better understand the risks of modern slavery and how to identify them. Staff training is reviewed annually and training will be provided where relevant.

### Policies

Modern slavery is a crime and violation of fundamental human rights. It takes various forms, such as slavery servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to both modern slavery and human trafficking. All employees must be eligible to work in the relevant country, and employment must be freely chosen with no original identification documents retained by employers. There must be no one employed who is under the national minimum working age. All employees must be provided with good working conditions, fair treatment and reasonable rates of pay (which are in no way less than the legal minimum.)

The company recognises that the agricultural sector may be one of the risk areas for Modern Slavery. We operate a number of internal policies to ensure we are conducting business in an ethical and transparent manner. These policies include;

- Employee Code of Conduct: which describes the standards of conduct and ethical behaviour the company expects its employees to adhere to.
- Supplier Code of Conduct: This applies to suppliers of the Company requiring strict compliance with the law and compliance with the Core ILO labour standards.
- Whistleblowing: the Company have introduced the Oetker whistleblowing policy. This enables staff, contractors, suppliers and visitors who become aware of wrongdoing, illegality or unethical conduct within the Company and its supply chains to report their concerns at the earliest opportunity so that they can be investigated and addressed. The confidentiality and anonymity of individuals who report suspected wrongdoing under this policy will be maintained as far as reasonably practicable, and staff will not face reprisals for disclosing concerns even if they turn out to be mistaken.