



## SLAVERY AND HUMAN TRAFFICKING STATEMENT

### INTRODUCTION FROM THE MANAGING PARTNERS

Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. All members of Jascots Wine Merchants Limited are expected to report concerns and management are expected to act upon them.

### ORGANISATIONS STRUCTURE

Jascots Wine Merchants Limited specialises in servicing restaurants, hotels and caterers. We are focused in London and across the UK. We supply an extensive range of exceptional wines from around the world. Together with great wine, Jascots provides unrivalled customer service covering in-house staff training, food and wine matching, on demand delivery, sales advice and wine list creation services. The Company is in the process of establishing one subsidiary Company – WineEd Limited, a wine training company dedicated to hospitality with a mission to help employees grow profits, enhance guest experiences and progress their careers.

### OUR SUPPLY CHAINS

We import wine directly from: France, Spain, Italy, Argentina, Austria, Croatia, Portugal, Romania, Greece, South Africa and USA. We buy wine from Germany, Chile, New Zealand, Australia and Macedonia through UK agents. The remainder of goods and services are procured from the UK.

### ANTI-SLAVERY POLICY STATEMENT

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

### DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

We conduct due diligence to identify and mitigate risk of slavery and human trafficking forming part of our supply chain -

- As part of this Policy and also our routine Business (HMRC) Due Diligence as well as our Quality Control policies we are required to:
  - Apply appropriate reasonable care when entering into business relations/contracts with other companies, understand trading risks and chose whether the counter party is an appropriate entity to trade with. Checks include:
    - Identity of the business Jascots intends trading with
    - Financial health of the company Jascots intends trading with
    - Provenance of goods
  - Visit 4 of the top 20 overseas suppliers per year (by value of spend) and audit standards they adopt and whether they have their own quality control, due diligence

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and HACCP procedures are in place and fit for purpose. This includes asking about as well as observing for evidence of slavery and human trafficking.

- Suppliers are instructed to complete a 'Jascots Supplier Information Form' on which they have to state whether they are aware and compliant with The Modern Slavery Act 2015?
- Where possible we build long standing relationships with suppliers and make clear our expectations of business behaviour;
- For product procured via UK agents we expect these entities to have suitable anti-slavery and human trafficking policies and processes.
- Other appropriate Jascots policies are:
  - Whistleblowing (contained with the Employee handbook)
  - Anti-Bribery Commitment (contained with the Employee handbook)
  - Responsible Sourcing Policy Jan 2016

#### SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

All Heads of Departments are responsible for compliance in their respective departments and for their supplier relationships.

#### TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject.

#### OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year

J S CHARNOCK  
Managing Partner

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