
Accolade Wines Anti-Slavery and Human Trafficking Statement 2018-19

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

This Statement

This Statement is made by Accolade Wines in accordance with the Modern Slavery Act 2015.

This Statement covers the UK activities of Accolade Wines including Accolade Wines Limited which is the UK trading company for Accolade Wines.

Accolade Wines' Global Business

Accolade Wines is one of the world's number one wine companies by volume in the world, selling around 30 million cases a year. Drawing on a proud heritage, treading our first grapes 165 years ago 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 with its five key regions being Australia/New Zealand; UK/Ireland; EMEA; Asia and Americas.

Accolade Wines is a privately owned group of companies with its head office located in Australia and employs over 1,300 employees globally. Further information regarding Accolade Wines' global footprint can be accessed at <http://www.accoladewines.com/>

Accolade Wines' principal business activities consist of the following:

It is a globally, vertically integrated wine business with core activities including: grape growing and sourcing; winemaking and production; and sales and marketing.

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, USA, South Africa, 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:**
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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; illegal act; or ethical violation. The procedure has been developed primarily to allow employees to report such acts concerning Accolade Wines, however, reports will also be accepted from employees' family members, suppliers, customers, retailers or the general public. Reports can be made anonymously through a global third party reporting website or by anonymous phone call to the relevant local number.

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 implemented the following programmes in the year July 2018 to June 2019:

- **Due Diligence Screening on all Suppliers and Customers and Third Party Contracts**

Continuing on from previous years, Accolade Wines conducts due diligence screening, through a third party provider red flag tool, 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 addition, this year due diligence screening was conducted on all existing suppliers and customers from a country with a Corruptions Perceptions Index score below 70. Following this the balance of all 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 are required to complete a Supplier Bulk Wine Questionnaire on an annual basis, this year was no exception. 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.

Accolade Wines has recently appointed a third party to create a Supplier Questionnaire and risk rating assessment for all new suppliers (regardless of the good being provided). All current suppliers will be required to complete this survey also. The results of these surveys and results will be used to better map Accolade Wines' supply chain (including second and third tier suppliers), and in particular identify those with a high risk for modern slavery, these suppliers will form part of an audit programme. Any suppliers who flag actual modern slavery convictions, will not be able to do business with Accolade Wines.

- **Training**

All Executive Leadership and Senior Leadership were trained in the risks of modern slavery. The Executive Leadership and the Board were consulted in the development of the 2019-20 programme.

- **Upcoming Programme**

Whilst our Anti-Slavery programme has always had a global focus, with the introduction of the Modern Slavery legislation in Australia, the UK and Australian programmes will be streamlined for 2019-20. The following activities are planned:

- supply chain mapping to identify high risk modern slavery suppliers (as outlined above)
- modern slavery policy and supplier code of conduct rolled out to all suppliers, with compliance becoming a mandatory contract requirement
- procurement policies and procedures updated to empower procurement teams to identify modern slavery risks
- further awareness programmes for employees on identifying modern slavery
- review of labour hire providers and any high risk employment areas
- development of an audit programme for 2020-21.

- **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' anti-slavery and human trafficking statement for the financial year ending 30 June 2019.



Ari Mervis
Executive Chairman
13 December 2019
