Modern Slavery Act 2015 Transparency in Supply Chains Anti-Slavery Statement

INTRODUCTION FROM THE MANAGING DIRECTOR.

Slavery and human trafficking remain a hidden blight on our society not only globally but also at home. We all have a responsibility to be alert to the risks directly within our business and also in the wider supply chain. All members of staff are expected to report concerns and the management team is expected to act upon them.

JOHN E FELLS & SONS LTD understands that our supply chain encompasses not only the overseas countries that we source goods and services from but also the United Kingdom.

We are active members of SEDEX, making Social and Ethical Trading requirements part of our purchasing strategy.

ORGANISATION'S STRUCTURE

JOHN E FELLS & SONS LTD is a UK based shipper and distributor of wines & spirits and manufacturer of alcohol and food based gifts. Turnover is in excess of £36 Million and this brings our business within the scope of Section 54 of the Modern Slavery act.

OUR BUSINESS

We act as Principal agents for a limited number of wine producers, handling all aspects of marketing, sales and distribution within the United Kingdom.

We also design, source and manufacture alcohol and food based gifts both within the United Kingdom and abroad.

All aspects of storage, distribution and manufacturing are outsourced to trusted third parties.

OUR SUPPLY CHAINS

Acting as the UK representatives of our principals we work with them to ensure that all parties are aware of the requirements of the Modern Slavery Act and the requirements of this legislation. We are committed to work with our supply chain to ensure that there is no modern slavery or human trafficking within any part of our business. It is our commitment to act in an ethical manner with integrity throughout all our business relationships.

We acknowledge the depth and breadth of our supply base and are actively engaged with SEDEX providing ourselves and our customer's access to Supplier Self Audit Questionnaires as well as independent audits covering all aspects of social and ethical trading including anti-slavery and human trafficking.

We choose to use the SEDEX Members Ethical Trading Audit (SMETA) to meet the needs both of ourselves and of our customers as well as accepting broadly equivalent audits from AMFORI BSCI and SA8000

The SMETA standard incorporates the following:

- Employment is freely chosen
- Freedom of association
- Health & safety
- Child labour
- Wages & benefits
- Working hours
- Discrimination
- Regular employment
- Sub-contacting
- Harsh and inhuman treatment
- Entitlement to work
- Environmental consideration
- Business ethics
- Community benefits

COUNTRY OF ORIGIN

Fells actively represents Wines from the following countries

France, Australia, Italy, Spain, Portugal, South Africa, Australia, New Zealand, Chile, Argentina, and the United States of America.

Fells also purchases hardware and food products directly and indirectly from China, India, Thailand, Poland, Turkey, Morocco, Nepal, Japan, Kenya, Sri Lanka.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We have a Suppliers Code of Practice on Ethical Trading, which sets out our policy on legislation, child labour, conditions of employment, wages, benefits, health & safety and the environment. The Code of Practice has recently been updated to include our policy on human trafficking.

DUE DILIGENCE

In order to reduce and mitigate risk it is important the following action is undertaken on an ongoing basis

- Identify potential risks through our supply chain
- Monitor risk areas through our supply chain
- Ensure that our principals and suppliers are aware of the risks through the supply chain and of our commitment to mitigate any risk.

TRAINING

Those personnel responsible for procurement have been issued with the Modern Slavery Act Guidance document. And the Stronger Together Toolkits for Global Supply Chains and UK Businesses Fells have recently employed a new HR Business partner who has brought in a series of on-line training modules including a module from iHasco for all staff.

LOOKING AHEAD AND MEASURING EFFECTIVENESS

Over the course of the next financial year we will continue to enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers. This will include sending all suppliers self-audit questionnaires together with copies of our supplier codes of practice. This will be regularly audited as part of our compliance practices. We will also be working closely with our customers to meet their specific CSR requirement within this field

Approval

This statement has been formally approved by the Directors of John E Fells & Sons Limited and signed on their behalf. This is to be updated within 6 months of the company financial year end.

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 financial year 1st January to 31st December 2022

COMPANY APPROVAL

Signed

Managing Director

JOHN E FELLS & SONS LTD.

Date