

Modern Slavery & Human Trafficking Statement

Document number: 3-1.3

Version: 2

Author: Amanda Bailey, Tech Support Mgr

Approved by: Euan Mackay, MD

Date adopted: January 2025

Review date: January 2026



Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that John E Fells and Sons Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within its business or supply chain.

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 within 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 structure

John E Fells & Sons Ltd is a UK based importer and distributor of fine wines and spirits and a manufacturer of alcohol and food-based gifts. We operate throughout the UK, with our Head Office in Hertfordshire. Our current turnover is in excess of £36 million which brings our business within the scope of Section 54 of the Modern Slavery Act.

We act as principal agents for a limited number of wine producers from around the world, 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, physical 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.

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

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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.

Policies in relation to slavery and human trafficking

John E Fells & Sons is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

We have the following internal policies in place to ensure that we are conducting business in an ethical and transparent manner:

- Recruitment policy – including checks on an individual’s eligibility to work
- Whistleblowing policy
- Anti-Bribery
- Ethical People Management
- Anti–Harassment & Bullying
- Grievance policy

Our Suppliers Code of Practice on Ethical Trading sets out our policy on legislation, child labour, conditions of employment, wages, benefits, health & safety and the environment and forms part of our supplier approval process.

Due diligence processes

In order to reduce and mitigate risk, we commit to taking the following action 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.
- Ensure that there is ongoing confirmation of existing suppliers’ agreement to our codes of practice through our agreed schedule of supplier reviews.

Training

Those personnel responsible for procurement and those who visit suppliers’ sites, have been issued with the Modern Slavery Act Guidance document and the Stronger Together Toolkits for Global Supply Chains and UK Businesses. All members of staff are required to complete the mandatory e-learning in Modern Slavery.

Looking ahead and measuring effectiveness

Over the course of the next financial year we will continue to monitor the effectiveness of our current procedures and enhance any procedures that will help us to identify, prevent and

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mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers.

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 2024.

COMPANY APPROVAL

This statement has been presented to the Board of Directors in February 2025.

Signed

**Euan Mackay, Managing Director
JOHN E FELLS & SONS LTD**

Date

25/02/25