

Origin Wine

Modern Slavery Statement 2020

Introduction

This statement has been published in terms of the Modern Slavery Act of 2015. It outlines the measures taken by all relevant companies within the Origin Wine Group during the financial year ended 31 March 2020 to prevent slavery and human trafficking within its business and supply chain.

Structure, business and supply chain

Origin Wine currently operates from seven trading sites in seven different countries (including the United Kingdom), of which two are production sites. Origin Wine exports products around the globe (including the United Kingdom) and employs approximately 300 employees worldwide. As the majority of its wines and components are sourced from South Africa, its oversight and influence can be focussed on a discrete geographic region, albeit due diligence procedures are applied globally.

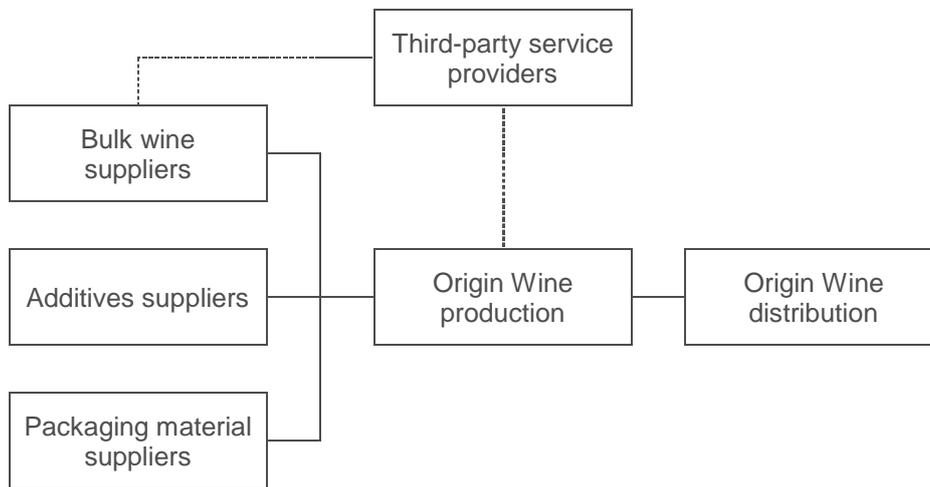


Figure 1: Origin Wine supply chain

Slavery and human trafficking policies

Origin Wine conducts business in accordance with its Human Resources Manual, which is applied across the Group and addresses matters such as workplace ethics, codes of conduct, working hours and leave entitlement. Its policies are also aligned with UN Regulations, International Labour Organisation (ILO) standards and the Ethical Trading Initiative (ETI) base code. Seeing that products are sourced globally, the Group remains wary of the risk of slavery and human trafficking manifesting throughout its supply chain. To mitigate this risk, components are only sourced from satisfactorily vetted suppliers. In addition, it is Group policy that all South African bulk wine suppliers are required either to be accredited by the Wine Industry Ethical Trade Association (WIETA) or any similar approved third party ethical compliance body, or are in the process of becoming accredited. Similarly, foreign bulk wine suppliers are expected to adhere to applicable ILO standards and ETI codes. All European and Australasian bulk wine suppliers are required to undergo a formal ETI audit and become ETI-accredited by the end of the 2020 calendar year. In addition, all packaging material suppliers are required to qualify in terms of either SA8000 or the ETI base code by the end of the 2020 calendar year.

Due diligence

As part of Origin Wine's supplier vetting process, supplier premises are inspected by the Group's compliance staff. These inspections include consideration to social- and labour law-related matters.

Material approved resource suppliers will be subjected to regular audits conducted by independent third parties. These include, for suppliers of wine products, Supplier Ethical Data Exchange (Sedex) and Business Social Compliance Initiative (BSCI) audits, and for suppliers of packaging materials and third-party service providers, SA8000 and ETI base code audits. Sedex and BSCI audits are both heavily focussed on agriculture, thereby scrutinising the supply chain from the source. In addition, suppliers forming part of the Fairtrade movement undergo regular Fairtrade audits. The Fairtrade surveillance starts at the primary producer, aiming to ensure better trading conditions and the promotion of sustainable farming in developing countries. Participation in this regard is entirely voluntary.

All suppliers not subjected to the abovementioned audits are expected to complete and submit annual questionnaires. The inclusion of specific questions relating to social- and labour law-related matters and the Modern Slavery Act of 2015 are expected to be finalised by July 2020.

Identifying, assessing and managing risk

The Group ensures that it employs a representative qualified in performing SA8000 audits and aligning company policies and standards in terms of these standards. Origin Wine sets out to identify and address the extent of any slavery and human trafficking in our supply chain by:

- Engaging third party auditors to conduct audits including consideration to social- and labour law-related matters;
- Interviewing both employees and producers on farms supplying the Group with material volumes of bulk wine, based on an annual approved plan;
- Verification of ethical practices during above mentioned site visits and scrutinising of the results;
- Collaborating with suppliers to align their policies with the Group where slavery and/or human trafficking issues have been identified as a higher risk in the sector;
- Supporting the United Kingdom-based Stronger Together initiative in understanding challenges and registered cases, undergoing training and actively participating in addressing shortcomings in association with United Kingdom-based clientele;
- Review and interpretation of news flashes and notifications received from Stronger Together as and when applicable to the Group; and
- Utilising an independent whistleblowing service as of the beginning of the 2019 financial year, of which reports are monitored and dealt with under oversight by the Group's Social & Ethics Committee.

In recognising that, within Origin Wine's supply chain, wineries are at higher risk to slavery and human trafficking practices, all wineries (including those that are not necessarily material suppliers) will continuously be a focus point. Additional efforts will include requesting all bulk wine suppliers to ensure that the same standards demanded by the Group, also be applied to sub-suppliers.

Key performance indicators

In order to assess the effectiveness of Origin Wine's measures, it will be reviewing the following key performance indicators:

- Staff training and awareness levels;
- Number of incidents reported, whether by means of our own inspections and questionnaires, third party audits or tip-offs;
- Reporting on and monitoring of incidents reported via the whistleblowing service; and
- Review and analysis of third party surveillance audit reports.

Training available to staff

A key part of efforts to combat slavery and human trafficking is the promotion of cultural change through training. During the current financial year:

- Origin Wine and its supply chain staff will receive annual BSCI, Sedex and, as applicable, Fairtrade, refresher training; and
- Origin Wine appointed representatives will attend scheduled BSCI and Sedex conferences and training courses to update company policies and align practices to ETI codes. Attendance to these conferences and training will allow the opportunity to share best practices with others in the industry on precompetitive issues.

In addition, Origin Wine will include a section on the Modern Slavery Act in the training manual supplied to all new employees during the forthcoming financial year.

This statement has been approved by the Board and constitutes the Origin Wine Group's commitment to avoid and combat slavery and human trafficking for the financial year ended 31 March 2020.