



Anti-Slavery and Human Trafficking Statement

Updated: June 2024
Next review: July 2025
Owner: PLC Board

About the Statement

Naked Wines PLC and its subsidiaries ("Naked Wines Group" or "Group") are committed to the principles set forth in the Modern Slavery Act 2015 (UK), Modern Slavery Act No 153 of 2018 (Australia) and California Transparency in Supply Chain Act of 2010 (TISCA). This Anti-Slavery and Human Trafficking Statement ("Statement") outlines our strategy for complying with these Acts and preventing modern slavery in our supply chain and business operations.

Modern Slavery

The Naked Wines Group recognises that modern slavery takes many forms, including forced labour and human trafficking. Forced labour includes any work or services people are forced to do against their will, usually under threat of punishment or to pay off a debt. Human trafficking is the use of violence, threats or coercion to transport, recruit or harbour people in order to exploit them for purposes such as forced labour.

The Naked Wines Group opposes modern slavery in all its forms. ***We ask that all Group employees and suppliers report any suspected instances of modern slavery in our supply chain or business operations via the procedure set forth in our Whistleblowing Policy or by emailing speakup@nakedwines.com.***

Organisation Structures and Supply Chains

The Naked Wines Group conducts business in the UK, USA and Australia and employs approximately 350 people worldwide. Our staff are predominantly permanent employees who work office hours.

We purchase goods and services from a wide range of providers across different geographic areas. By value, the largest part of our supply chain is wine, which comes from a mix of developed and developing economies around the world. We also purchase goods and services to support our global operations, including printed marketing materials, logistics services and consultancy management services.

We recognise that our biggest risk of modern slavery lies within our supply chain. Our suppliers use seasonal workers, who are employed in various capacities and under various types of contracts, as well as unskilled workers. Additionally, some of the regions from which we procure grapes experience high levels of unemployment, which can increase the risk of abuse.



Commitments and Policies

The Naked Wines Group commits to:

- Prohibiting the use of modern slavery in all of its forms, including forced labour and human trafficking;
- Monitoring our supply chain to identify areas that present a high risk of modern slavery; and
- Familiarising our employees and suppliers with this Statement and related policies to ensure that violations are reported and prevented.

We have a number of policies that support these commitments, including our:

- Responsible Supplier Policy;
- Whistleblowing Policy; and
- Code of Conduct.

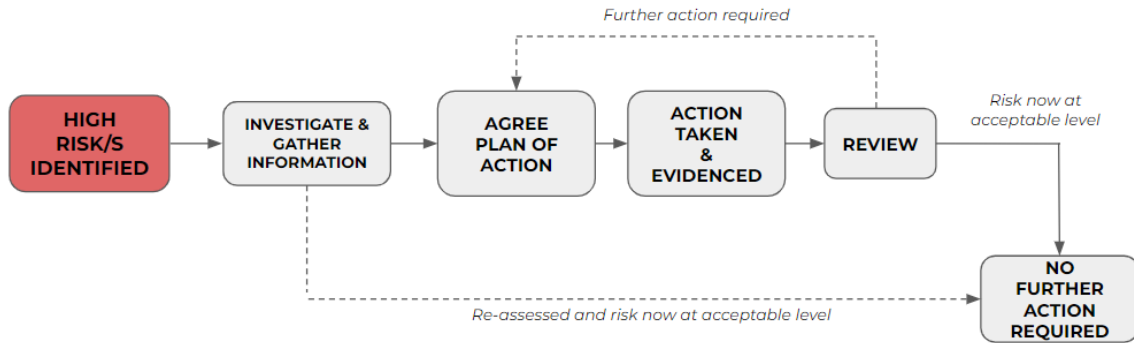
All of our policies are posted on our corporate website, available at:

<https://www.nakedwinesplc.co.uk/sustainability/ethics-and-transparency/default.aspx>

Due Diligence Processes

We rely on the following diligence processes to identify and prevent modern slavery in our supply chain and business operations:

- **Initial Supplier Assessments.** Our employees meet with potential suppliers before we enter into agreements with them to evaluate whether they share the Group's ethics and values. Often, employees have the opportunity to see these suppliers' production facilities and working practices in person, giving them unique insight into the suppliers' labour practices. We also strive to cultivate transparent relationships with our suppliers, encouraging them to bring challenges to our attention.
- **Supplier Contracts.** We require new and existing suppliers to accept standard terms and conditions that obligate them to read, understand and adhere to our policies, including this Statement.
- **Ongoing Supplier Assessments.** During onboarding and periodically thereafter, we send a risk assessment survey to certain of our suppliers, including all wine suppliers and large non-wine suppliers. The survey requests information, including: (i) whether they verify employees' eligibility to work; (ii) employees' typical working hours; (iii) employee pay and benefits; (iv) their provision of protective clothing or equipment to employees if needed; (v) whether they have policies that support this Statement; (vi) whether they have any independent accreditations of ethical and responsible operations; and (vii) details regarding local employment conditions. We review suppliers' responses to this survey to assess their risk of engaging in modern slavery.
- **Intervention.** If a supplier's response to the survey indicates an increased risk of modern slavery, we implement the following procedure:



Measuring Effectiveness

We use a variety of methods to assess the effectiveness of our efforts to exclude modern slavery from our supply chain and business operations. Our key performance indicators include: (i) the number of whistleblowing cases and grievances reported and solved globally; (ii) the number of supplier survey responses that indicate an increased risk of modern slavery and human trafficking; and (iii) the number of employees and suppliers who have reviewed and accepted this Statement. In the past twelve months, we’ve had no whistleblower complaints alleging violations of this Statement or supplier surveys indicating a high risk of modern slavery, and all employees and suppliers have accepted this Statement.

Training

We require all Naked Wines Group employees and suppliers to review, understand and agree to this Statement. We further require all Group employees to affirm their commitment to upholding this Statement annually.

This Statement was approved by the Board of Directors and signed by Rowan Gormley, Chairman of the Board, on 19 July 2024 and constitutes our Anti-Slavery and Human Trafficking Statement for the financial year starting 2 April 2024.