

Origin Wine

Modern Slavery Statement 2017

Introduction

This statement has been published in terms of the Modern Slavery Act of 2015. It outlines the measures taken by all relevant group companies within Origin Wine during the financial year ended 31 March 2017 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 also production sites. It exports its products around the globe (once again including the United Kingdom) and employs approximately 300 employees worldwide. As the majority of our wines and components are sourced from South Africa, our oversight and influence can be focussed on a discrete geographic region, albeit due diligence procedures are applied globally.

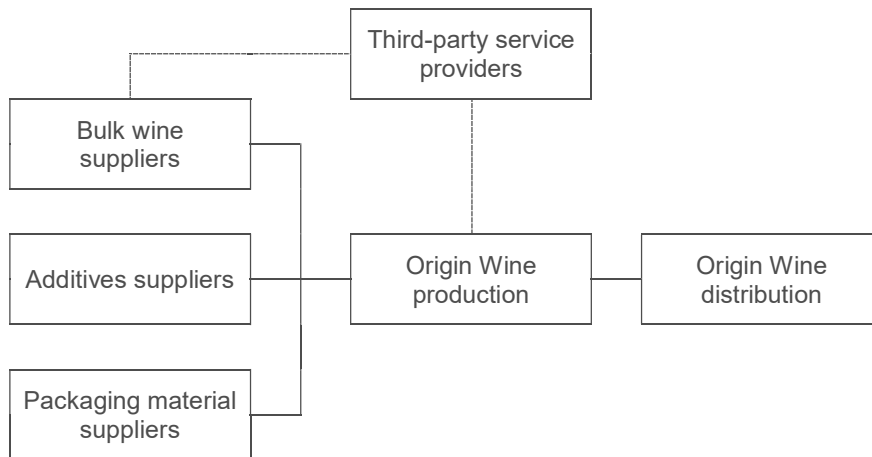


Figure 1: Origin Wine supply chain

Slavery and human trafficking policies

Origin Wine conducts business in accordance with its Human Resources Manual, which is applied across the entire group and addresses matters such as workplace ethics, codes of conduct, working hours and leave entitlement. Its policies are also aligned with ILO standards and the ETI base code.

However, as we source products globally, we remain wary of the risk of slavery and human trafficking manifesting throughout our supply chain. To mitigate this risk, components are only sourced from satisfactorily vetted suppliers. In addition, it is our policy that all South African bulk wine suppliers are required either to be accredited by WIETA, or 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 2018 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 2018 calendar year.

Due diligence

As part of our supplier vetting process, supplier premises are inspected by members of our own compliance staff. These inspections include consideration to social- and labour law-related matters.

Material suppliers are also subjected to regular audits conducted by independent third parties. These include, for suppliers of fresh, perishable products, Sedex and 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 all the way to the source. In addition, suppliers forming part of the Fairtrade movement undergo regular Fairtrade audits. The Fairtrade cycle also starts all the way back at the 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 annual questionnaires for us. In the coming financial year, we plan to include specific questions relating to social- and labour law-related matters and the Modern Slavery Act of 2015.

Identifying, assessing and managing risk

The Group ensures at all times that it employs a representative qualified in performing SA8000 audits and aligning company policies and standards in terms of these standards. We set 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 us with material volumes of bulk wine, on a monthly to bi-monthly basis;
- Verification of ethical practices during above mentioned site visits and scrutinising of the results; and
- Collaborating with suppliers to align their policies with ours where slavery and/or human trafficking issues have been identified in the past.

In recognising that, within our supply chain, wineries are bound to be most susceptible to slavery and human trafficking practices, all wineries (including those that are not necessarily material suppliers) will

be our focus point for the coming financial year. As part of this drive, we will be requesting all bulk wine suppliers to ensure that the same standards demanded by us also be applied to sub-suppliers.

Key performance indicators

In order to assess the effectiveness of our measures, we 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.

Training available to staff

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

- Origin Wine and bulk wine and component supplier staff received annual BSCI, Sedex and, as applicable, Fairtrade, refresher training; and
- Origin Wine representatives attended all scheduled BSCI and Sedex conferences and training courses to update company policies and align practices to ETI codes. Attendance to these conferences and training also allows the opportunity to ask questions and share best practice with others in the industry on precompetitive issues.

In addition, we will be including a section on the Modern Slavery Act in the training manual supplied to all new employees.

This statement has been approved by the Board and constitutes the Origin Wine group's commitments to avoiding and combatting slavery and human trafficking for the financial year ended 31 March 2017.