

## **ANTI-SLAVERY STATEMENT 2022**

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Liv-ex 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. Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Liv-ex is committed to acting ethically and with integrity and transparency in all business dealings.

## **OUR BUSINESS**

Liv-ex Ltd operates the global marketplace for fine wine. It makes fine wine trading more transparent, efficient and safe for the benefit of its members and the market as a whole. Its principal activities during the year continue to be the provision of an electronic exchange for trading fine wines, and the provision of data and logistics services in support of this.

## **OUR POLICIES AND PROCESSES ON SLAVERY AND HUMAN TRAFFICKING**

Liv-ex Ltd is committed to treating people with dignity and respect in the workplace and the community as well as to the respect and protection of human rights. Liv-ex has a zero tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in the Liv-ex business or in any of its supply chains.

Liv-ex is also committed to ensuring there is transparency in our own business and in our approach to identifying modern slavery through our supply chains, consistent with our disclosure requirements under the Modern Slavery Act 2015. We expect the same high standards from all of our suppliers and business partners, and we expect that our suppliers will hold their own suppliers to the same high standards.

As part of Liv-ex's commitment to ensuring that there is no modern slavery or human trafficking in its supply chains, Liv-ex has the following internal policies to ensure that it is conducting business in an ethical and transparent manner:

- Recruitment – Liv-ex Ltd conducts robust checks on any new employee including eligibility to work in the UK to safeguard against human trafficking or individuals being forced to work against their will.
- Training - To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, we provide appropriate training to our staff.
- Employee Engagement - All employees have an obligation to familiarise themselves with our Slavery and Human Trafficking Statement which is

included in the Employee Handbook forming part of their contract of employment.

- Whistleblowing Policy – Liv-ex has a whistleblowing policy so that all employees can raise any concerns that they might have without fear of reprisals.

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains
- Monitor potential risk areas in our supply chains
- Manage any risks highlighted with appropriate terms and conditions that all suppliers must adhere to
- Protect whistleblowers

## **SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

Liv-ex Ltd does not and will not knowingly support or deal with any business involved in slavery and human trafficking.

Liv-ex procures a wide range of goods and services via a diverse and varied supply chain, including:

- Wine, fortified wine and spirits
- Transport
- Insurance
- Warehousing
- IT system development and maintenance
- Property maintenance services
- Facilities management services
- Communications and IT equipment services
- Temporary / agency staff
- Recruitment agencies
- Various professional services
- Office equipment and supplies
- Utilities

Our procurement activities take place in England. Our contractors and suppliers are based worldwide, with the majority based in the UK and EU.

Liv-ex completes due diligence on its suppliers, where practicable, to satisfy itself that it is trading with a reputable organisation. In assessing risk within our supply chain we consider the following risk factors:

- supplier location;

- nature of goods / services provided;
- the strength of our relationship with the supplier;
- the supplier's level of corporate governance.

Liv-ex Ltd expects all those in its supply chain to be opposed to slavery and human trafficking. We take a collaborative approach to our relationships with our supply chain and encourage transparency. If issues are reported we will provide guidance and support to help identify an appropriate resolution. In the instance of repeated or serious incidents we will terminate our relationship with the person or business accordingly.

As a minimum, Liv-ex Ltd expects each entity in its supply chain to adopt 'one-up' due diligence on the next link in the chain for those organisations governed by the Act. It is not practical for Liv-ex Ltd to have a direct relationship with all links in the supply chain.

## **APPROVAL OF THIS STATEMENT**

This statement has been approved by the Board of Directors on 30<sup>th</sup> September 2022

Name: James Miles

Position: Managing Director

### ***Terms and Conditions – Clause 48.6 Modern Slavery Act***

*Liv-ex Ltd does not and will not knowingly support or deal with any business involved in slavery and human trafficking. By signing our trading terms you confirm to us that you agree with our values and ethics, and that where your organisation is governed by the Modern Slavery Act 2015 you have put in place appropriate policies and due diligence procedures to ensure that that there is no modern slavery or human trafficking in your supply chains or in any part of your business.*