

Modern Slavery Policy

Purpose

Our Modern Slavery policy reflects our commitment to acting ethically and with integrity in all our business relationships. To implement and enforce effective systems to contribute to the prevention of slavery and human trafficking both within our business and externally to set an expectation of high standards in working with contractors, suppliers and other business partners.

The purpose of this policy is to raise awareness within IWSR of the issue of modern slavery and how employees can play their part in preventing this form of exploitation whilst protecting our business reputation.

Scope

IWSR and all its subsidiaries are part of the WGSN Group. This policy applies to all IWSR companies, including directors, employees and contractors ("**IWSR Staff**"), and we require compliance from our suppliers and clients globally.

IWSR Drinks Market Analysis Limited Subsidiaries: IWSR US Inc, JSP Insights, Wine Intelligence Limited, IWSR Pte Ltd and Wine Intelligence Limited (Australia).

The definition and meanings of Modern Slavery and Human Trafficking are internationally recognised.

Activities

The UK Modern Slavery Act 2015 covers four defined activities:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed by the use of coercion
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

The Modern Slavery Act 2015 recognises the important part organisations can and should play in tackling slavery. We pay close attention to:

- our supply chain and clients;

- any outsourced activities, particularly to jurisdictions that may not have adequate safeguards; and
- cleaning and catering suppliers.

Responsibilities

All IWSR staff have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity.

IWSR will:

- publish and maintain a policy and procedures aimed at preventing exploitation and human trafficking, and protecting our workforce and reputation;
- be clear about our recruitment policies and procedures;
- take reasonable steps to check our supply chains (for example, requiring suppliers to provide us with a suitable Statement or Code of Conduct);
- lead by example by making appropriate checks on all IWSR Staff, recruitment agencies, suppliers and other third parties we work with;
- ensure we have in place an open and transparent grievance process for all IWSR Staff;
- seek to raise awareness so that our colleagues know what we are doing to promote their welfare; and
- make a clear statement that we take our responsibilities to our IWSR Staff and third parties seriously.

Staff can participate in the prevention of slavery and exploitation by adhering to the following guidelines:

- keep your eyes and ears open—if you suspect anyone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services then please report it immediately to a Director or HR;
- follow our reporting procedure (see the “Reporting Slavery” section below) if a colleague tells you something you think might indicate they are or someone else is being exploited or ill- treated;

- follow our reporting procedure if you become aware that there could be concerns within our supply chains or with clients; and
- use the reporting procedure to tell us if you think there is more we can do to prevent people from being exploited.

Managers and Directors undertake to listen carefully to any concerns and to take appropriate actions.

Positive Working Environment

IWSR is committed to providing all IWSR Staff with a safe, healthy and supportive environment at work. Alongside contractual terms we have a range of policies to create a supportive workplace culture. As examples of these IWSR offers:

- Flexible working, regular appraisals and career development opportunities.
- Social events/activities to encourage positive relationships within the workplace.
- Trained mental health first aiders, first aiders and fire wardens.

The Risks

The principal areas of risk we face, related to slavery and human trafficking, include:

- supply chains;
- clients; and
- general recruitment.

We manage these risk areas through our procedures set out in this policy and elsewhere.

Examples of good practice:

- Examine internal business procedures to avoid making demands of suppliers or subcontractors that might lead them to violate human rights, including children's rights. These types of demands include insufficient or late payments, and late orders or high- pressure deadlines resulting from poor demand forecasting.
- Ensure that zero tolerance for modern slavery and respect for human rights, including children's rights, are built into contracts and represented in dialogue, self-assessment, audits, training and capacity- building

opportunities for suppliers, subcontractors, customers, and other business partners.

- Wherever possible, foster long-term relationships with trusted suppliers, contractors and subcontractors.

General recruitment

- We always ensure all IWSR Staff have a written contract of employment / appointment.
- We always ensure IWSR Staff are legally able to work in the UK the jurisdictions where they are required to work from.
- We provide information to all new IWSR Staff on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.
- Salary payments will only be made to accounts in the individual IWSR Staff member's name.

If, through our recruitment process, we suspect someone is being exploited, the HR department or recruiting manager will follow our reporting procedures (See Reporting Slavery below).

Supply chains

We will monitor our supply chains for breaches of the Modern Slavery Act 2015. We tell the companies that we do business with that we are not prepared to accept any form of exploitation.

We are working to update all our standard supplier contracts include an anti-slavery clause. This clause clarifies to suppliers that we will not engage with them if they are suspected of or found to be engaging in slavery or human trafficking.

Identifying Slavery

We are aware that there is no typical victim and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a slavery or trafficking victim. IWSR Staff are made aware of this list through the induction process on joining.

- The person is not in possession of their own passport, identification or travel documents.

- The person is acting as though they are being instructed or coached by someone else.
- They allow others to speak for them when spoken to directly.
- They are dropped off and collected from work.
- The person is withdrawn or they appear frightened.
- The person does not seem to be able to contact friends or family freely.

This list is not exhaustive.

Reporting Slavery

Remember that talking to someone about your concerns may stop someone else from being exploited or abused. Please always raise any concerns immediately with a Director or HR who can help to decide on a course of action.

UK

UK Modern Slavery Helpline on 0800 0121 700

www.modernslaveryhelpline.org

If you think that someone is in immediate danger, dial 999.

USA

National Human Trafficking Resource Center (NHTRC) at 1 -888-373-7888 or text 233733. This is a free 24/7 service.

Singapore

Police hotline 6435 0000 or email : SPF_Report_Trafficking@spf.gov.sg

Ministry of Manpower 6438 5122 or email mom_fmmd@mom.gov.sg

Australia

To report modern slavery in Australia call the Australian Federal Police on [131 237](tel:131237) or report through their website www.afp.gov.au

Policy Owner

This policy is owned and maintained by our Head of HR.

Policy was last reviewed on 23 January 2026

For and on behalf of the Board.



Carla Buzasi
WGSN Group CEO