

FY26 Anti-Slavery and Human Trafficking Statement

Naked Wines PLC

Updated: 29 April 2026

Next review: April 2027

Owner: PLC Board

About the Statement

Naked Wines PLC and its subsidiaries ("Naked Wines Group" or "Group") remain steadfastly committed to the principles set forth in the Modern Slavery Act 2015 (UK), Modern Slavery Act No 153 of 2018 (Australia), and the California Transparency in Supply Chain Act of 2010 (TISCA). This Anti-Slavery and Human Trafficking Statement ("Statement") in respect of the financial year ended 31 March 2026 outlines the steps taken during the financial year and our ongoing strategy for complying with these Acts and preventing modern slavery within our supply chain and business operations.

Modern Slavery

The Naked Wines Group recognizes that modern slavery takes many forms, including forced labor and human trafficking. Forced labor includes any work or services people are forced to do against their will, typically under threat of punishment or debt bondage. Human trafficking involves the use of violence, threats, or coercion to transport or recruit people for exploitation.

The Group opposes modern slavery in all forms. Under our Whistleblowing Policy, we require employees and suppliers to report suspected instances of modern slavery, including via our compliance hotline speakup@nakedwines.com.

Organisation Structures and Supply Chains

The Group operates in the UK, USA, and Australia, employing approximately 300 people worldwide, predominantly as permanent staff.

Our wine supply chain primarily consists of wine sourced from both developed and developing economies. We recognise that our highest potential risk of modern slavery exists within the supply chain, specifically regarding:

- Procurement of packaging materials from developing countries.
- The potential use of seasonal and unskilled workers by winemakers.
- Procurement from regions with high unemployment, which can increase the risk of labor abuse.

To get our wine to our customers, we work with third party logistics providers, where a potential risk of modern slavery exists, specifically regarding the potential use of seasonal and unskilled workers by warehouse or delivery partners.

Commitments and Policies

The Naked Wines Group commits to:

- Prohibiting all forms of modern slavery, including forced labor and trafficking.
- Monitoring our supply chain to identify high-risk areas.
- Ensuring employees and suppliers are familiar with this Statement and connected policies to both prevent and report violations.

These commitments are supported by our Responsible Supplier Policy, Whistleblowing Policy, and Code of Conduct, all available on our corporate website.

Due Diligence Processes

We utilize the following processes to identify and mitigate risks:

1. **Initial Supplier Assessments:** Employees meet potential suppliers to evaluate their alignment with Group ethics, often visiting production facilities in person.
2. **Supplier Contracts:** Suppliers must accept terms obligating them to adhere to our policies and this Statement specifically.
3. **Regular Assessments:** We request confirmation from winemakers that they adhere to this Statement and we audit adherence regularly.
4. **Intervention:** If an audit indicates increased risk, we follow a structured investigation and action plan.

Measuring Effectiveness

We track the following Key Performance Indicators (KPIs):

- Number of whistleblowing cases and grievances reported and resolved.
- Number of supply agreements that contain reference to our policies and this Statement.
- Confirmation that all employees and suppliers have reviewed and accepted this Statement.

In the preceding twelve months, the Group has maintained a record of zero whistleblower complaints and zero high risk audit flags regarding modern slavery.

Training and Approval

All Group employees and suppliers are required to review and agree to this Statement. Employees must reaffirm this commitment annually.

This Statement was approved by the Board of Directors and constitutes our Anti-Slavery and Human Trafficking Statement for the financial year ended 31 March 2026.



Jack Pailing, Chairman of the Board

Date: 29 April 2026

Audit trail

Details

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Activity



SENT

anneleen.straetemans@nakedwines.com **sent** a signature request to:
• Jack Pailing (jack.pailing@nakedwines.com)

2026/04/29
16:17:25 UTC



SIGNED

Signed by Jack Pailing (jack.pailing@nakedwines.com)

2026/04/29
16:17:57 UTC



COMPLETED

This document has been signed by all signers and is **complete**

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