Due Diligence Policy

Super7 Wholesale commits to carrying out due diligence checks on our supply chain.

Due diligence is the appropriate care we take when entering into business relations or contracts with other companies, and how we respond to the risks we identify. Due diligence must establish that our supply chain and each trade we undertake are credible.

Due diligence is important for our business to minimise exposure to commercial risk, reduce the risk of being a part of fraudulent transaction chains and reduce the risk of being exposed to significant financial losses.

As part of the Alcohol Wholesaler Registration Scheme, Super7 Wholesale (AWRS URN: XEAW00000103648) is required to conduct due diligence checks on all parties involved in the supply chain for alcoholic drinks.

Our Commitment

- We assess and document the risks of fraud within the supply chains within which we operate.
- We undertake routine checks to identify business relationships and transactions that may be fraudulent or intended to avoid payment of duty.
- We have appropriate procedures in place to take timely and relevant actions if a risk is identified.
- We have clear due diligence procedures and we ensure that all members of the team understand their obligations and responsibilities to due diligence within their own day-to-day activities.
- We keep records of our checks and decision making.

Our Process

We have assessed the key Risk Indicators to our business. All partners are evaluated against these indicators. Each sale and purchase is also reviewed against these indicators.

In assessing our exposure to these risks we consider objectively whether the supply chain and trading activity is credible. This includes knowing who we trade with.

Our Due Diligence Checks are intended to establish the credibility of the supply chain and each trade. These address the Risk Indicators and are intended to mitigate the risks. Checks are carried out at the beginning of a trading relationship, on a regular basis thereafter and for each purchase and sale.

The checks follow the HMRC's FITTED principle:

- **F**inancial health of the companies we trade with
- **I**dentity of the companies we trade with
- **T**erms of any contracts, payment and credit agreements
- **T**ransport details of the movement of the goods involved
- **E**xistence/provenance of goods
- the **D**eal - the nature of the transaction itself, including:

- how the cost of the goods is calculated
- why is it being offered
- is it too good to be true
- how the deal compares to the market

We choose which products we sell, who we buy them from and who we sell them to – and we are committed to reducing risk across along the supply chain. Where we identify a risk and our checks do not satisfy our concerns, we will take immediate measures to change our supply chain. This will include choosing not to begin a trading relationship or trade and ceasing an existing trading relationship or trade. Where we have suspicions of duty fraud we will inform HMRC immediately.

We follow a documented process for assessing risks, conducting due diligence and maintaining records of our checks and decision making.

Operational responsibility for due diligence is shared by three business functions (Sales, Logistics and Finance) which work together to conduct the checks and to ensure that all necessary transactional documentation is provided to evidence due diligence requirements.

The Managing Director has oversight of the Due Diligence process and takes overall responsibility for it within the business.