

Super7 Wholesale - Due Diligence Policy

AWRS URN: XEAW00000103648

As part of the Alcohol Wholesaler Registration Scheme (AWRS) Super7 Wholesale are required to conduct due diligence checks on both customers and suppliers involved in the supply chain for alcoholic drinks.

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

Making due diligence an obligation for all businesses involved in alcohol will help drive fraudsters from the market place, increase consumer confidence in the sector, boost legitimate businesses by restoring a level playing field and help maintain confidence and reputation.

We carry out extensive due diligence checks following the guidelines from HMRC and the 'FITTED' checks as a structure to establish potential risk within supply chains. We ensure we "know our customer and supplier".

Any customers or suppliers identified as high risk will undergo further questioning before we decide if we will begin to trade. Due diligence will be evaluated every 6 months for high risk customers/suppliers, annually for all others, with regular reviews to highlight any changes in activity so the appropriate actions can be taken.

Any customers or suppliers who don't pass our internal checks will be notified that we are unable to open an account and unable to trade. Any business with suspicious behaviour will be reported to HMRC in a timely manner.

All customers and suppliers must provide the required list of documents and completed questions for Super7 Wholesale to undertake risk assessment before any account is opened. Super7 Wholesale will only trade with a customer or supplier that has passed the assessment checks.

Information submitted will be reviewed on a case-by-case basis and the company director will conduct final sign off.

All initial checks and further reviews will be documented in the customer or supplier file both electronically and in paperwork formats. Reminders for checks should be logged into Sage accounting software and Outlook calendar reminders.

Day-to-day checks will be carried out to identify any potential transactions that may lead to fraud or involve goods on which duty may have been evaded. These checks are made on both supplier purchase ordering and customer sales orders.

Purchase ordering

For any new purchases, we will first check that the supplier's due diligence file is up to date by checking Sage and reviewing the due date.

All orders are raised through official purchase orders for approved suppliers via Sage. The orders are emailed across to the supplier directly with the full details of the product and price. Once the goods are received into the warehouse the goods are booked in onto Sage which will highlight any error in quantity. If any delivery hasn't been received within the required window we will raise a query with the supplier or haulier.

Customer ordering

For any new sales, we will first check that the customer's due diligence file is up to date by checking Sage and reviewing the due date.

Customer orders are received in writing by email. Orders are then raised and sent for approval to the purchasing manager who provides ultimate sign off and each transaction will be assessed alongside the due diligence provided on a case-by-case basis.

Documentation required in order to consider opening an account:

- A) Super7 Wholesale new account form and due diligence questionnaire
- B) Company introduction
- C) Company registration certificate
- D) VAT certificate
- E) Credit report
- F) Company owner / director's photo ID
- G) Copy of business utility bill (within 3 months)
- H) Company headed paper, signed by director
- I) AWRS URN
- J) Copy of WOWGR certificate (if applicable)

Once the relevant information has been gathered, we will review the information provided and carry out risk assessment.

Version Control

	NAME	TITLE	DATE
Author	Becky Bates	Purchasing Manager	February 2018
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Authoriser	Peter Caplan	Company Director	February 2018