



## BESTWAY WHOLESALE LIMITED and BESTWAY NORTHERN LIMITED MODERN SLAVERY STATEMENT

### Introduction

This is the second statement for Bestway Wholesale Limited and Bestway Northern Limited (together the "Bestway Wholesale Entities") pursuant to section 54(6) of the Modern Slavery Act 2015 (the "Act") and represents the statement for the financial year ending on 30<sup>th</sup> June 2017.

### Our commitment

The Bestway Wholesale Entities are part of the Bestway Group of companies with the ultimate parent company being Bestway (Holdings) Limited. The Bestway Wholesale Entities fully endorse the aims of the Act and take a zero tolerance approach to slavery and human trafficking in their supply chains and across their business. The Bestway Wholesale Entities are committed to preventing slavery and human trafficking within its own business and in its transactions with other businesses.

### Our structure

The Bestway Wholesale Entities form the largest independent food wholesale group in the UK with 63 branches across England, Scotland and Wales with over 4,500 employees and a customer base of over 100,000 businesses in the independent retail sector and the foodservice industry. It also comprises a Symbol Group called 'Best-one' which has over 1,300 members and an additional 2,800 member Retailers' club called 'Xtra Local'. In addition to this, the Bestway Wholesale Entities also have their own product range with over 1,500 food and non-food products.

### Our suppliers

The Bestway Wholesale Entities purchase products from around the world as well as producing their own label products. They are committed to acting ethically and expect all of their suppliers to make the same commitment. The companies will address any failures by our suppliers to meet our standards on a case by case basis and ultimately may lead to the Bestway Wholesale Entities ceasing to trade with any such supplier.

### Within our business

1. The Bestway Wholesale Entities have a number of HR policies and procedures that demonstrate compliance with UK Employment Law including: Employee Code of Conduct, Recruitment Policy, Equality & Diversity Policy, Anti-Bribery Policy and Corporate Social Responsibility. All of the policies and procedures are readily available to employees in the Employee Handbook and on notice-boards across the business and the aim is to publish all of the policies and procedures on the Bestway Wholesale Entities' Intranet.
2. The Bestway Wholesale Entities have created a multi-functional team to ensure compliance with the Act.
3. The Bestway Wholesale Entities have introduced an Anti-Slavery and Human Trafficking Policy.

### Reporting

The Bestway Wholesale Entities positively encourage employees to report any unlawful activity and/or any activity which may be in breach of policies and procedures through the Whistleblowing Policy. This includes any circumstances which may give rise to an enhanced risk of slavery or human trafficking.

### Next steps

The Board of Directors of the Bestway Wholesale Entities have ultimate responsibility for the implementation of policies and procedures, including those related to ethical trading and modern slavery.

1. The Bestway Wholesale Entities will aim to improve the awareness and understanding of modern slavery and human trafficking across the business by appointing Anti-Slavery and Human Trafficking business champions the 'AS Champions' from different functions to review compliance with the Act.
2. The Bestway Wholesale Entities will expand the multi-functional team to include the AS Champions to review business processes.

### Approval

This statement has been considered and approved by Bestway Wholesale Limited's and Bestway Northern Limited's Board of Directors on behalf of the Bestway Wholesale Entities, who will review and update it annually.

A handwritten signature in black ink, appearing to be 'D. ...', written over a horizontal line.

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Director

For and on behalf of Bestway Wholesale Limited and Bestway Northern Limited