

**BESTWAY WHOLESALE LIMITED, BESTWAY NORTHERN LIMITED, BESTWAY RETAIL LIMITED, COSTCUTTER SUPERMARKETS GROUP LIMITED AND MAP TRADING LIMITED**

**MODERN SLAVERY STATEMENT – FINANCIAL YEAR ENDING 30 JUNE 2024**

**Introduction**

This statement is for Bestway Wholesale Limited, Bestway Northern Limited, Bestway Retail Limited and Costcutter Supermarkets Group Limited pursuant to section 54(6) of the Modern Slavery Act 2015 (the "Act"). Whilst not meeting the total turnover requirements of section 54(2) of the Act, MAP Trading Limited is included in this statement on a voluntary basis. Bestway Wholesale Limited, Bestway Northern Limited, Bestway Retail Limited, Costcutter Supermarkets Group Limited and MAP Trading Limited (together the "Bestway Wholesale Entities") represent the following statement for the financial year ending on 30 June 2024.

**Our commitment**

The Bestway Wholesale Entities are part of the Bestway Group of companies with the ultimate parent company being Bestway Group UK 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 their own businesses and in their transactions with other businesses.

**Our structure**

Bestway Wholesale is the second largest independent food wholesaler in the UK, with over 60 depots across England, Scotland and Wales. Over 100,000 customers in the independent retail and foodservice industries regularly shop with Bestway Wholesale either within the depots or on E-Commerce websites and ordering Apps.

The Bestway Wholesale Entities' independent retail proposition expands across the Symbol Group brand best-one, the retail club Xtra Local, and with a range for unaffiliated retailers. Bestway Vans Direct also operates under the Bestway Wholesale Entities as a delivered van sales service which visits 22,000 customers every two weeks to stock up their snacks and sweets spaces in store, helping them to sell more, make more and save more.

The Bestway Wholesale Entities' catering proposition provides for restaurants, cafes, pubs and takeaway outlets through our range in depots, for contract Schools and University businesses through BB Foodservice delivered catering proposition and for licensed establishments through Drinks Express or with our licensed range in depot.

The Bestway Wholesale Entities' pet product proposition, Bestpets, is the UK's number 1 independent specialist pet wholesaler, which supplies the specialist pet trade and pet retailers nationwide and operates a Pet Retail Club, 'Bestpets Local'.

The Bestway Wholesale Entities' retail division 'Bestway Retail' operates the UK's largest franchised off-licence and convenience chain. With approximately 1,000 colleagues, 1,600 independent retailers, 270 franchisees and 152 stores nationwide, Bestway Retail trades under the best-one, Bargain Booze, Select

Convenience, Central Convenience, Wine Rack brands and Co-op Franchise. Costcutter Supermarkets Group has 415 colleagues, approximately 1,400 independent retailers and 28 stores nationwide as part of our company owned estate.

Bestway Wholesale has over 5,000 employees across these businesses. Offering the best choice and convenience for customers, we are on a mission to be the best way for a customer to grow their food, drinks or pet business.

### **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.

### **Cost of living crisis**

Throughout this financial year the cost-of-living crisis has continued to impact customers and colleagues. We continue to be mindful of the need for due diligence in regard to Modern Slavery and the identification of vulnerable people as a result of the cost-of-living crisis which has increased pressure on retailers, customers, suppliers and colleagues.

### **Within our business**

The Bestway Wholesale Entities have a number of people-related policies and processes that demonstrate compliance with UK Employment Law including Employee Code of Conduct, Recruitment Policy, Equality & Diversity Policy, Anti-Bribery and Corruption Policy and Corporate Social Responsibility Policy. All policies are available within our Bestway Wholesale Intranet or are published to teams in various formats both online and in hard copy for all colleagues in our core Head Office teams, our cash and carry depot teams or our store colleagues in our company operated estate. This year again we have reviewed all our policies to ensure they continue to be fit for purpose and are available to all colleagues via our internal communication portals.

Our existing Anti-Slavery and Human Trafficking Policy continues to be fit for purpose in our current business context.

### **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.

### **Actions Achieved**

Since publication of the Modern Slavery Statement for the financial year ending 30 June 2023, the Bestway Wholesale Entities have undertaken the following:

1. We continue to update and make available our Modern Slavery Toolkit, so all practice, policy and learning is available to managers and colleagues to utilise in their teams.



2. Our induction training for all colleagues continues to use an updated Modern Slavery training module as a key part of our compliance training.
3. Senior HR leaders are registered as Stronger Together Champions for our business, with Stronger Together being an organisation that tackles Modern Slavery in supply chains enabling us to utilise their resources in our business. We have used these resources to update our training and posters available for colleagues.
4. We have continued with the audit process for our goods for retail suppliers, procuring that all suppliers adhere to our policies through this process and have now communicated with 667 suppliers. As part of this audit of our goods for retail supplier base, we have:
  - audited approximately 40 direct to store retail suppliers, who have completed our Modern Slavery questionnaire and provided us with their Modern Slavery Statements; and
  - secured Modern Slavery Statements from 48 key suppliers who are managed through our central distribution network.
5. Invested in resource to facilitate our ongoing analysis of our supply chain highlighting key risk areas, outputs of which will be discussed on a regular basis with a view to identifying ways to eradicate the identified risk with suppliers.
6. Ensured that the Modern Slavery posters and educational materials are available at all business premises.

#### **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. We propose the following as next steps.

1. All training materials for Modern Slavery to continue being made available on an updated internal Learning Management system.
2. Continue with the auditing and analysis of our supply chain highlighting key risk areas and opportunities to address the issues and continuous improvement (particularly with respect to central distribution suppliers). Our plan will be to audit in the region of our top 100 suppliers in the financial year ending 30 June 2025, representing more than 50% of the Bestway Wholesale Entities' turnover. We will also continue the audit process with the 667 suppliers managed through our central distribution network.
3. Continue obtaining Modern Slavery statements from remaining suppliers and request they complete our questionnaire over the coming financial year ending 30 June 2025 as part of our audit.
4. Provide new suppliers of Bestway Wholesale Limited, Bestway Northern Limited, Bestway Retail Limited and Costcutter Supermarkets Group Limited with our Modern Slavery policy and request a Modern Slavery statement from those suppliers during our due diligence and set up process.
5. A committee of Modern Slavery Champions to be reconstituted in order to allow for new resource to assist with identifying and reporting on modern slavery risks within the supply chain of the Bestway Wholesale Entities so that appropriate next steps may be undertaken by the same.
6. Integrate modern slavery audit processes for Batleys Properties Limited with regards to its key supplier for the financial year ended 30 June 2025.

**Approval**

This statement has been considered and approved by the Board of Directors of Bestway Wholesale Limited, Bestway Northern Limited, Bestway Retail Limited, Costcutter Supermarkets Group Limited and MAP Trading Limited on behalf of the Bestway Wholesale Entities, who will review and update it annually.

**Dawood Pervez**

Director

For and on behalf of Bestway Wholesale Limited, Bestway Northern Limited, Bestway Retail Limited, Costcutter Supermarkets Group Limited and MAP Trading Limited