



**BESTWAY WHOLESALE LIMITED, BESTWAY NORTHERN LIMITED, BESTWAY RETAIL LIMITED, COSTCUTTER SUPERMARKETS GROUP LIMITED, BATLEYS PROPERTIES LIMITED, ADAMS FOODSERVICE TRADING LTD AND MAP TRADING LIMITED**

**MODERN SLAVERY STATEMENT - FINANCIAL YEAR ENDING 30 JUNE 2025**

**Introduction**

This statement is for Bestway Wholesale Limited, Bestway Northern Limited, Bestway Retail Limited, Costcutter Supermarkets Group Limited, Batleys Properties Limited and Adams Foodservice Trading Ltd 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, Batleys Properties Limited, Adams Foodservice Trading Ltd and MAP Trading Limited (together the "Bestway Wholesale Entities") represent the following statement for the financial year ending on 30 June 2025.

**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 largest independent food wholesaler in the UK, with over 70 depots across England, Scotland and Wales. Over 100,000 customers in the independent retail and foodservice industries regularly shop with Bestway Wholesale

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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 and operates alongside key suppliers in supplying crisps, snacks, biscuits and confectionary. Bestway Vans Direct provides a service to ensure product availability and operates on the ethos "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 one of the UK's largest franchised offlicence 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 939 colleagues, approximately 1,400 independent retailers and 28 stores nationwide as part of our company owned estate.

Bestway Wholesale has circa 6,000 employees across these businesses. Offering the best choice and convenience for customers, our company mission is to be the best way for a customer to grow their food, drinks or pet business.

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Acquired by the Bestway Group in October 2024, Adams Foodservice Trading Ltd is a UK-based wholesaler and supplier, operating across 9 depots with a team of 250 employees. It serves a wide spectrum of businesses, from independent takeaways and franchises to retailers, restaurants, and caterers.

### **Our suppliers**

The Bestway Wholesale Entities which source products globally and produce their own-label goods are committed to ethical conduct and expect the same from their suppliers. Any failure to meet our standards will be assessed on a case-by-case basis and may result in Bestway Wholesale Entities ceasing to trade with any such supplier.

### **Cost of living crisis**

We recognise that the continued cost-of-living crisis throughout this financial year has increased financial pressures on our retailers, customers, suppliers, and colleagues. In light of this, we remain committed to robust due diligence regarding modern slavery and the proactive identification of vulnerable people.

### **Within our business**

The Bestway Wholesale Entities maintain a suite of people-related policies and processes to ensure compliance with UK Employment Law, including an Employee Code of Conduct, a Recruitment Policy, an Equality & Diversity Policy, an Anti-Bribery and Corruption Policy. All colleagues across our Head Office, depots, and company-operated stores can access these policies on the Bestway Wholesale Intranet or through other published formats.

As part of our commitment to responsible business, Bestway implemented mandatory Equality, Diversity and Inclusion (EDI) training for all colleagues in October 2024. This training reinforces our EDI Policy by fostering a respectful and inclusive work environment, which in turn helps prevent discrimination and exploitation, including modern slavery.

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Our existing Anti-Slavery and Human Trafficking Policy continues to be fit for purpose in our current business context. In conjunction with this policy, we intend to introduce a dedicated online training module to further support our commitment to preventing modern slavery during the next financial year. This training will raise employee awareness, deepen their understanding of exploitation risks and indicators, and reinforce our top-to-bottom zero-tolerance approach across our business and supply chain.

The Bestway Wholesale Entities positively encourage colleagues 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 the publication of our Modern Slavery Statement for the financial year ended 30 June 2024, the Bestway Wholesale Entities have undertaken the following actions:

#### **1. Training and Awareness**

Substantial work has gone into the creation of an online training module on modern slavery which is scheduled to be introduced in the first quarter of the financial year ending 30 June 2026. This module helps to raise awareness among colleagues about the risks and indicators of modern slavery, reinforces our top-to-bottom zero-tolerance approach to modern slavery, and supports our broader efforts to uphold ethical standards across our business operations and supply chains.

#### **2. Relevant Policies Risk Analysis**

As part of our ongoing audit to identify and mitigate key risks to our business operations and supply chains within our central distribution network, we reviewed 739 suppliers out of which 424 were eligible for modern slavery reporting under UK law, and we successfully collected and reviewed their Modern Slavery Statements and/or

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relevant policy documentation. The remaining 315 suppliers were not eligible for modern slavery reporting under UK law due to factors such as being non-UK based, having a turnover below £36 million, or no longer trading.

### 3. **Supplier Onboarding, Engagement and Compliance**

Most of our new suppliers to Bestway Wholesale Entities have been provided with our Modern Slavery Policy during onboarding, with the expectation that they do not fall below our standards as to modern slavery. Suppliers to Adams Foodservices Trading Ltd, the newly acquired business of the Bestway Group, are gradually onboarded to these modern slavery standards as well.

For the financial year ending 30 June 2025, our supply base audit included collecting Modern Slavery Statements and questionnaires from our UK suppliers and we aim to widen the audit perimeter to include non-UK based suppliers with a turnover exceeding £36 million at some point in the near future. The purpose of this audit is to identify risks to our business operations within our non-UK based supply chain.

### 4. **Modern Slavery Committee**

A reconstituted committee of Modern Slavery Champions has been established to incorporate new resource and expertise in tackling modern slavery risks within the business operations and supply chains of the Bestway Wholesale Entities. This committee is specifically tasked with identifying and reporting on modern slavery risks within our business operations and supply chains and recommending appropriate next steps to mitigate and respond to such risks.

### 5. **Batleys Property Limited**

The action planned for completion during the financial year ending 30 June 2025 by Batleys Properties Limited (as set out in the Modern Slavery Statement for the financial

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year ending 30 June 2024), whereby it would integrate modern slavery processes for its key supplier, has been put on hold due to strategic changes involving Batleys Properties Limited.

#### 6. **Adams Foodservices Trading Ltd**

During the financial year ending 2025, the newly acquired business of the Bestway Group, Adams Foodservice Trading Ltd, has initiated work to strengthen its approach to supplier governance and modern slavery prevention in line with the Bestway Group.

#### 7. **Next steps**

The Boards of Directors for each of the Bestway Wholesale Entities hold ultimate responsibility for the implementation of all policies and procedures, for the performance of audits including those concerning ethical trading and modern slavery. To strengthen our commitment and operational oversight in these areas, the respective Boards of Directors of the Bestway Wholesale Entities propose the following next steps be undertaken during the financial year ending 30 June 2026:

1. **Integration of Adams Foodservices Trading Ltd:** The Bestway Group will pursue the integration initiated last year of the newly acquired business into the Bestway framework for ethical trading and sustainability standards including modern slavery.
2. **Centralised Supplier Database:** the Bestway Group intends to develop and maintain a new database to onboard new suppliers and track their modern slavery compliance. This includes monitoring supplier responses to our onboarding questionnaire, ensuring submission of their Modern Slavery Statement and/or relevant policy documentation.

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3. **Non-UK Supplier Review Strategy:** the Bestway Group plans to develop a structured approach for evaluating modern slavery compliance for our non-UK supplier base. Prior to its implementation, our ongoing due diligence will include communicating the minimum modern slavery standards that all non-UK based suppliers are expected to meet.
4. **Suppliers with annual turnover of less than £36 million:** A new framework to be developed in the near future to assess modern slavery compliance for suppliers with an annual turnover of less than £36 million. This will involve setting clear expectations, issuing improvement notices and implementing a proportionate compliance strategy.
5. **Supplier Communication:** We are committed to sharing our most up to date Modern Slavery Statement and Policy with all suppliers. The distribution will be completed using appropriate communication methods.

### Approval

The Boards of Directors for each of the Bestway Wholesale Entities have approved this statement. The statement will be reviewed and revised annually.

**Dawood Pervez**

### Managing Director

*For and on behalf of Bestway Wholesale Limited, Bestway Northern Limited, Bestway Retail Limited, Costcutter Supermarkets Group Limited, Batleys Properties Limited, Adams Foodservice Trading Ltd and MAP Trading Limited*

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