



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

**MODERN SLAVERY STATEMENT – FINANCIAL YEAR ENDING JUNE 30<sup>th</sup> 2022**

**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<sup>th</sup> June 2022.

**Our commitment**

The Bestway Wholesale Entities are part of the Bestway Group of companies with the ultimate parent company being Bestway Group 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 businesses. 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**

Bestway Wholesale is the largest independent food wholesaler in the UK, with over 60 Bestway and Batleys depots across England, Scotland and Wales. Over 130,000 customers in the independent retail and foodservice industries regularly shop with Bestway Wholesale either within the depots, via the dedicated customer contact centre, or on the company 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 20,000 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 School’s 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 per product business which supplies the specialist pet trade and pet retailers nationwide and operates a Pet Retail Club, ‘Bestpets Local’.

Bestway Retail is part a business that is part of the wider Bestway Wholesale operation. Bestway Retail operates the UK's largest franchised off-licence and convenience chain. With over 1,150 colleagues and over 125 stores nationwide, Bestway Retail trades under the Bargain Booze, Select Convenience, Central Convenience and Wine Rack brands.

Costcutter Supermarket Group, which was acquired by Bestway in February 2021, has over 500 colleagues and 25 stores nationwide and over the last year full integration into our existing Wholesale and Retail businesses has progressed.

Bestway has over 5,700 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. Despite having continuing issues with supply chains as a result of the pandemic, affecting supply into our suppliers, we remain committed to the particulars in this statement.

### **Cost of living crisis**

We are even more mindful of the need for due diligence in regard to Modern Slavery and the identification of vulnerable people as a result of the emerging cost of living crisis which will increase pressure on retailers, customers, suppliers and colleagues.

### **Within our business**

1. The Bestway Wholesale Entities have a number of People policies and processes 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 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 we have reviewed all our policies and brought together our People Policies of various businesses within the Bestway Wholesale Entities into one standard policy set. We have continued to actively communicate that policies are available to all colleagues via managers or in our Public Folders, shared drives or Colleague handbook.
2. We have taken the opportunity to review again the members of our Modern Slavery Steering Group that work together across all business units in the Bestway Wholesale Entities to ensure compliance with the Act and identify colleagues who are likely to have the best impact in this area.
3. 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 2021, the Bestway Wholesale Entities have undertaken the following:

1. We have further reviewed members for the Modern Slavery Steering Group to ensure we have the right number of people involved with Modern Slavery Champions across the organisation. They have worked together to deliver our Modern Slavery Commitment throughout our wider business and supply chain.
2. We have continued to use and embed our Modern Slavery Toolkit, so all practice, policy and learning is available to managers and colleagues to utilise in their teams.
3. We have completed a full review of suppliers in retail to ensure they are aware that they must comply with Modern Slavery legislation in their supply chains. We have created a database with the outputs of these checks, which includes copies of supplier modern slavery statements, as appropriate. This review is now an annually updated process.
4. The full briefing of all depots on Modern Slavery and all supporting materials continues to be available this includes ensuring Modern Slavery posters and other supporting collateral is available in all depots.
5. All colleagues in our Head Office complete a standard induction which includes the modern slavery training module which is signed off.

## **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. Ongoing analysis of our supply chain highlighting key risk areas, outputs of which will be discussed on a regular basis with the Modern Slavery Steering Group with a view to identifying ways to eradicate the identified risk with suppliers.
2. Continue with the Modern Slavery Steering Group with the identified Modern Slavery Champions in the business, including updating the Board of Directors on progress made against our commitments throughout the year.
3. Further update the modern slavery toolkit by creating an online learning module with the current content and upload it onto our new Learning Management system so it will be available as e-learning for colleagues. This will be completed by all colleagues annually going forward.

4. Actively deliver new training with our store colleagues including regional teams and Business Development Managers on how to identify vulnerable people who may be the subjected to modern slavery. This will include guidance and support on how to raise this within the business so that appropriate action can be taken.
5. Pilot our training with a small group of our independent retailers sharing a simple toolkit that highlights and supports them in identifying potential modern slavery.
6. Continue with the audit process for our retail suppliers ensuring that all suppliers adhere to our Modern Slavery policy, amongst others, through this process.
7. Follow the same supplier review process as we have with retail suppliers with our wholesale supply chain with the outputs kept in our database.
8. Ensure that the standard posters and educational materials are available at all business premises.

### **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.



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Dawood Pervez  
Director

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