



Modern Slavery Statement

for Financial Year 2018/19

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that McCull's has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. We are committed to acting ethically and with integrity and transparency in all business dealings.

Our business

McCull's Retail Group is a leading neighbourhood retailer in the independent managed sector, operating 1,556 convenience stores and newsagents. We operate 1,253 McCull's branded UK convenience stores as well as 303 newsagents branded Martin's, except in Scotland where we operate under our heritage brand, RS McCull. In the past few years we have substantially grown our estate, principally through acquisition. We serve communities right across the UK and most of our stores are close to residential areas, in neighbourhoods and villages where customers really value all that our stores offer.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- *Anti-slavery policy.* This policy sets out the organisation's stance on modern slavery which encompasses slavery, servitude, forced and compulsory labour and human trafficking. The policy explains how employees can identify any instances of this and where they can go for help
- *Recruitment policy.* We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will
- *Speaking up in confidence policy.* We operate a policy for colleagues who wish to speak up in confidence so that all colleagues know that they can anonymously raise concerns about practices within our business or supply chain, without fear of repercussions.

Our suppliers

McCull's operates with a small number of preferred suppliers. We undertake due diligence on our preferred suppliers, to ensure that particular organisation to ensure that they have not been convicted of offences relating to modern slavery. Our

policy on anti-slavery is reflected in any new contract with a supplier and they are required to confirm that no part of their business operations contradicts this policy.

When considering contracting with a new supplier, we expect:

- They have taken steps to assess, prevent and if necessary eradicate modern slavery within their business
- They hold their own suppliers to account over modern slavery
- Them to pay their employees at least the National Minimum Wage/National Living Wage (as appropriate).

We undertake due diligence on our preferred suppliers to ensure that they have not been convicted of offences relating to modern slavery.

Approval for this statement

This statement was approved by the Board of Directors on 14 February 2019.

A handwritten signature in black ink, appearing to read 'Robbie Bell', with a horizontal line underneath.

Robbie Bell

Chief Financial Officer

This statement applies to all companies in the McColl's Group including the following wholly owned subsidiaries: Martin McColl Limited; Martin Retail Group Limited; Dillons Stores Limited; and Smile Stores Limited. These subsidiaries therefore do not publish individual modern slavery statements.