

SPAR (UK) Limited

Slavery & Human Trafficking Statement

### Introduction

Slavery and human trafficking (Modern Slavery) is a global and growing issue given the rapid rise of global migration. SPAR (UK) has a zero tolerance approach to Modern Slavery of any kind within our business and/or supply chain and all of us at SPAR (UK) have a responsibility to be alert to the risks of Modern Slavery no matter how small. Our employees are expected to report their concerns and our management are expected to act upon them. We are committed to constantly reviewing, updating and improving our practices to ensure that we are tackling slavery and human trafficking.

### About our business

SPAR in the UK has over 2,600 stores comprising independent retailers and stores operated by 5 regional wholesalers. The stores are serviced by such 5 regional wholesalers with national activity managed by SPAR UK at the central office. SPAR UK is owned by such 5 regional wholesalers. SPAR sells own brand food, proprietary brands non food and drink products.

### Our Supply chains

Our supply chains include the sourcing of materials principally related to the provision of food and drink.

### Our policies and contractual controls

In our Modern Slavery and Human Trafficking Policy we confirm: that SPAR will not tolerate any form of Modern Slavery; that SPAR are committed to acting ethically and with integrity in all our business dealings and relationships; that SPAR take seriously any allegations of Modern Slavery in our business and/or supply chains; and SPAR are committed to constantly reviewing, updating and improving our practices to ensure that Modern Slavery is not taking place in our business and/or supply chains. We also operate a Whistleblowing Policy for our employees which encourages staff to report any wrongdoing which extends to human rights violations like Modern Slavery.

### Due Diligence processes for slavery and human trafficking

SPAR UK is a member of SEDEX and it will be a condition in our Technical Code of Practice for all of our suppliers to be members of SEDEX, in order for us to view their ethical data. This will enhance our ethical standards within our supply chain.

Any suppliers who are not members of SEDEX are required to successfully complete a Supplier Assessment questionnaire until they become registered members of SEDEX. With regard to the supply chain, our point of contact is preferably with a UK based company and we require these entities to have a suitable anti-slavery and human trafficking policies and processes. We expect each entity in the supply chain to at least adopt one up due diligence on the next link in the chain. It is not practical for us to have a direct relationship with all links in the supply chain.

### Modern Slavery within our supply chains

Our initial focus will relate to Modern Slavery within our SPAR Brand products from suppliers who are both national and also supply our regional RDC's, and then move to wider business operations to ensure that our suppliers reflect the same responsibly sourced values as our own. This is done by having a robust and technical sourcing system. In addition, we are

reviewing and updating our contractual documentation with our suppliers to contractually require compliance with our policies and tackling Modern Slavery within the overall supply chain. This will give us more due diligence, better visibility and helps educate and train our suppliers in this regard.

SEDEX will be able to map our supply chains assessing industry sector and geographical risk, this assessment will cover the entirety of our business, which will include HR, IT and also our product supply chains. By having this assessment conducted we will understand where the biggest risks lie and where we can steer our actions to have a positive impact.

#### Modern Slavery Training

We are using an expert third party consultancy Sedex to train key staff in Modern Slavery and human rights and then use that consultancy to support the business in mapping risk assessment and developing mitigation responses. In addition, as part of the contractual documentation review and update mentioned above, this requires our suppliers to provide training to their staff, suppliers and other relevant businesses.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the SPAR(UK) Ltd slavery and human trafficking statement for the financial year 2015/16.

All Directors and relevant members of staff have been briefed on this policy and its implications.

Debbie Robinson

Managing Director

SPAR(UK) Limited