



BESTWAY WHOLESALE LIMITED, BESTWAY NORTHERN LIMITED and MAP TRADING LIMITED

MODERN SLAVERY STATEMENT

Introduction

This statement is for Bestway Wholesale Limited and Bestway Northern 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 and MAP Trading Limited (together the ‘Bestway Wholesale Entities’) represents the following statement for the financial year ending on 30th June 2019.

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 business. 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 125,000 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 company’s independent retail proposition expands across Company Owned and Franchised stores through Bestway Retail’s Bargain Booze, Select Convenience and Wine Rack brands, the Symbol Group brand, best-one, retail club, Xtra Local, and with a range for unaffiliated retailers. Last year we invested in Bestway Vans Direct; 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.

Our 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.

Bestway also owns the UK's number 1 pet product business, Bestpets, which supplies the specialist pet trade and pet retailers nationwide and operates a Pet Retail Club, 'Bestpets Local'.

Our range includes both leading brands and own-label products across all divisions, offering customers the highest quality for value prices, with an excellent selection of weekly promotions.

Bestway has over 6,000 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.

Within our business

1. The Bestway Wholesale Entities have a number of HR policies and procedures 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 of the policies and procedures are readily available to employees in the Employee Handbook and the aim is to publish all of the policies and procedures on the Bestway Wholesale Entities' Intranet.
2. The Bestway Wholesale Entities have created a multi-functional team to ensure compliance with the Act.
3. The Bestway Wholesale Entities have introduced an Anti-Slavery and Human Trafficking Policy.

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 30th June 2018, Bestway Wholesale Limited and Bestway Northern Limited have undertaken the following:

1. Completion of management tier training on Modern Slavery across the Bestway Wholesale Entities to all Regional Operations Managers, Depot Managers, Operations Managers, Depot Team Leaders and all head office management.

2. The review of the Bestway Wholesale Limited contract with its national haulage and logistics partner and completion of a letter of compliance to Modern Slavery by such supplier on 26th April 2019.
3. Registration with the Home Office Modern Slavery Database to receive additional guidance and utilise the available resources.
4. Received notification that Bestway (Holdings) Limited has been recognised by the Modern Slavery Registry as an example of how to publish a compliant statement in their formal communications to encourage businesses to comply.

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.

1. To endorse the inclusion of all Bestway Group companies (excluding Bestway Retail Limited and the entities trading under the 'Well') to the Bestway Group policy on Anti-Slavery and Human Trafficking.
2. To continue training on Modern Slavery to Bestway Wholesale Entity employees to include all depot staff, depot supervisors and FLT drivers.
3. To seek and obtain letters of policy compliance from all external Employment Agencies currently used by the Bestway Wholesale Entities to recruit permanent and temporary staff.

Approval

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



Director

For and on behalf of Bestway Wholesale Limited, Bestway Northern Limited and MAP Trading Limited