

BOOKER GROUP LIMITED (“Booker”)

MODERN SLAVERY STATEMENT 2020/21

This statement is made pursuant to the UK Modern Slavery Act 2015 (the “Act”) and relates to the financial year ending 28th February 2021. It sets out the steps taken by Booker to prevent modern slavery and human trafficking in our own operations and supply chains.

Introduction

The UK Modern Slavery Act 2015 (the ‘Act’) requires businesses to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains. Booker are committed to ensuring that modern slavery is not taking place in our own operations and own label supply chains. We are dedicated to acting ethically and with integrity in all of our business relationships and to implementing and enforcing effective systems and controls to eliminate the risk of modern slavery occurring.

Our Business and Structure

Booker is the UK’s leading food wholesaler. Booker directly employs approximately 14’000 employees. The Booker Group was acquired by Tesco PLC in 2018. The Booker Group comprises:-

Booker Wholesale/Makro – Our cash and carry businesses served over the last twelve months:-

- **Catering customers** (serving 378,920) and **Small Businesses** (serving 427,511). Our catering customers include restaurants, fast food outlets, licensed premises and cost centre caterers. These can be independent single site locations;
- **Group Accounts and National Chains**. All Customers can draw upon the Booker, Makro, Booker Retail Partners and Booker Direct infrastructures;
- **Independent retailers** (serving 83,594). Our largest retail customers tend to be our Premier, Londis, Budgens and Family Shopper symbol group members which consists of independent retailers operating local convenience shops stocking branded and own branded products; Premier (3,869 retailers), Budgens (385 retailers), Londis (2,773 retailers) and Family Shopper (128 retailers). We also serve our retail club members, unaffiliated independents and retail national accounts.

Booker Direct – Booker Direct serves national retail chains from our distribution centres, with customers including large retailers and cinema chains in the UK and the prison service in England and Wales. Our Best Food Logistics division provides warehousing and distribution services to several major casual dining and quick service restaurant chains.

Ritter Courivaud – Ritter Courivaud is a speciality foods supplier to the UK’s leading restaurants and hotels.

Company Policies

Our modern slavery strategy is supported by a number of key policies:

- **Code of Business Conduct;** Our Code of Business Conduct details our approach to human rights and ethical trading. It communicates our commitment to ensuring that colleagues, customers and our supply chain are treated with fairness, respect and dignity. The code includes details of our values 'Respect, Dignity and Fair Treatment', which enforces Booker's zero tolerance approach to unacceptable behaviour, including all forms of modern slavery, in any area of our business.
- Our approach to 'Human Rights & Ethical Trading' is also detailed within the Code, and reinforces the need to respect human rights and operate ethical trading practices.
- The policies communicate that rights must be respected and breaches remedied. The code recognises that we need to ensure that our own business practices do not become the cause of labour standard issues. Developing long term relationships with suppliers which we know and trust gives them the confidence to invest in improvements so we can achieve more together. To strengthen compliance, colleagues receive refresher training on the policy each year. In further support of this, colleagues are encouraged to choose suppliers based on their values as well as other factors such as price and quality, in order to build strong relationships. Our terms of purchase of goods for re-sale or goods and services for our own use require suppliers to adhere to similar principles and standards.
- **Whistleblowing Policy** – We take any breach of our policies or allegations of labour abuse extremely seriously and encourage colleagues to speak up. We provide an independent helpline for the confidential disclosure of any incidents, or suspected incidents, of modern slavery, breaches of the Code of Conduct, and breaches of policies, anything unlawful or suspected cases of the deliberate concealment of information relating to these things. Any concerns reported will be investigated fully by HR, Legal, Security or Health & Safety (as appropriate) for complaints of an internal nature. The terms of our whistleblowing policy are incorporated within our Code of Business Conduct.
- **Dignity at Work Policy** - This policy further reinforces how we expect colleagues, customers, suppliers and third parties who work with Booker to be treated; in an environment that is safe, free from victimisation, harassment and bullying, which includes freedom from all forms of modern slavery. The independent help line, along with other escalation routes is detailed for the reporting of any concerns. Any reported concerns will be fully investigated by HR, Legal, Security or Health & Safety (as appropriate) for complaints of an internal nature. This is further supplemented by our activities to ensure a culture of diversity and inclusivity within the business.
- **Ethical Trading Policy** - This is available to all own-label suppliers and is based on the Ethical Trading Initiative Base Code ('ETI base code') (a code which incorporates the most relevant conventions of the International Labour Organisation with respect to internationally recognised good labour practices (including a requirement that employment is freely chosen). Under the policy, all own-label suppliers and sites are required to comply with the base code, in addition to their own national requirements, to give their workers the best level of protection. The policy also details our audit requirements for own-label suppliers where a risk assessment triggers the need for an independent ethical audit, which is further detailed in this statement below.

Identifying Risk and Preventing Modern Slavery in Our Supply Chain

As part of our efforts to ensure modern slavery does not occur in our own-label supply chains, we continue to review the risk of modern slavery. This process seeks to recognise that certain locations and industry types are more prone to poor labour practices. Where own-label suppliers are identified as high-risk we seek further assurances that modern slavery is not occurring. One example of how we achieve this is through our ethical audit programme. Sites identified as high risk are required to have an annual SMETA audit. SMETA audits are based on the ETI base code and include worker interviews. Where audit results, or any other form of due diligence, identifies issues we take appropriate reasonable action which may include (depending on the nature and severity of any issues)

- working with the supplier to resolve the issues,
- suspending or terminating trading with existing suppliers,
- the non-appointment of new suppliers.

To complement this programme, in the last 12 months we have also introduced KPI reporting on ethical compliance, measuring the number of high-risk own-label suppliers which have undergone risk assessment and audit.

In addition to our ethical audit programme, we also seek to:

- Ensure we avoid making demands of suppliers, which may lead them to violate human rights, for example by making timely payment and placing realistic expectations for the delivery of orders.
- Encourage and protect whistle blowers by providing a free anonymous and confidential 24 hour help line. In 2020-21 we had no calls into this line with potential indicators of modern slavery.

Supplier Assurance Programme

In order to ensure our approach to human rights due diligence continues to evolve, we are seeking to introduce enhanced requirements for new suppliers. All new suppliers will be asked to complete a questionnaire and provide supporting documentation, including detail on their own due diligence to identify and prevent modern slavery. This will, in turn, enable the business to take a wider view of the supplier as a prospective business partner.

Identifying Risk and Preventing Modern Slavery in our Own Operations

We take a number of steps to mitigate the risk of modern slavery occurring in our own-operations:

Employees - Right to Work Checks

Right to work checks are completed for all staff working for Booker in accordance with legislation, and Booker will only employ individuals who are legally able to work in the UK. Only agencies on our preferred supplier list are used to select staff whether on a temporary, fixed term or permanent basis. Such agencies are required to carry out appropriate back-ground checks.

Employees – Working Environment Survey

We intend to strengthen our relationships with our colleagues by introducing the ‘Every Voice Matters’ survey; an annual survey to provide colleagues with the opportunity to provide feedback on a number of business related areas such as career development, employment benefits, company culture and their treatment within the business. Based on the feedback, the intention is to continually improve any areas identified as necessary in order to continually strengthen a positive environment for colleagues.

Training

In addition, to ensure a high level of understanding of the risks of modern slavery in our supply chains and own operations, we provide training to relevant staff and have mechanisms to increase the visibility of issues. We have now rolled out an e-learning module to colleagues, which is aimed at increasing awareness of the different forms of slavery, how to spot the signs and what to do if you have suspicions. The module is interactive and aimed at testing colleagues understanding. The training is reviewed on an annual basis.

Plans for 2021/22

- Conduct a review of potential modern slavery risk in own operations.
- Provide increased modern slavery training for individuals identified within the business as having greater exposure to the risk of modern slavery.
- Conduct ‘Every Voice Matters’ survey to evaluate colleagues views on their working environment, including employment standards and to give due consideration and act on any identified concerns.
- Introduce the additional Supplier due diligence for all new suppliers.
- Introduce Modern Slavery hotline at Distribution Centres.

This statement has been approved by the Board of Directors.

Andrew Yaxley
Chief Executive
Booker Group Limited
Date: 26th August 2021

Booker Limited
Booker Direct Limited
Makro Self Service Wholesalers Limited
Ritter Courivaud Limited
Booker Retail Partners (GB) Limited