

BOOKER GROUP LIMITED ("Booker")

MODERN SLAVERY STATEMENT 2019/20

This statement is made pursuant to the UK Modern Slavery Act 2015 (the "Act") and relates to the financial year ending 1st March 2020. It sets out the steps taken by Booker to prevent modern slavery and human trafficking in our own operations and supply chains.

Introduction

Modern slavery is a crime resulting in abhorrent abuse of human rights. It is constituted in the Act by the offences of 'slavery, servitude and forced and compulsory labour and human trafficking'. Booker are committed to ensuring that modern slavery is not taking place in our own operations and 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. In the year ahead we will continue to develop our approach to managing risk of modern day slavery within our business and supply chains and ensure that our strategy responds to changing risks.

Our Business and Structure

Booker is the UK's leading food wholesaler. Booker directly employs approximately 13'000 employees. The Booker Group was acquired by Tesco PLC in 2018. The Booker Group comprises:-

Booker Wholesale/Makro –Our cash and carry businesses serve:-

- **Catering customers** (serving 430,000) and **Small Businesses** (serving 538,000). 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 Chef Direct infrastructures;
- **Independent retailers** (serving 112,000). Our largest retail customers tend to be our Premier, Londis, Budgens and Family Shopper symbol group members. We also serve our retail club members, unaffiliated independents and retail national accounts;
- **Premier** – Premier is a Booker symbol group, which consists of 3,336 independent retailers operating Premier local convenience shops stocking branded and own branded products;
- **Family Shopper** – Family Shopper is our local discount format and we currently serve 83 independent retailers who trade under this format;
- **Budgens & Londis** – We currently serve 328 Budgens retailers. We also serve 2,139 Londis retailers.

Booker Direct – Booker Direct serves national retail chains from our distribution centres, with customers including Marks & Spencer, most of the cinema chains in the UK and the prison service in England and Wales. Our Chef Direct business also serves national catering accounts from our distribution centre in Didcot.

Ritter Courivaud – Ritter Courivaud is a speciality foods supplier in 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 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. 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.
- **Whistleblowing Policy** –We take any breach of our policies or allegations of labour abuse extremely seriously. We provide an independent helpline for the confidential disclosure of any incidents, or suspected incidents, of breaches of the Code of Conduct, 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, Health & Safety as appropriate for complaints of an internal nature. The terms of our whistleblowing policy and 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. 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, Health & Safety as appropriate for complaints of an internal nature.

Identifying Risk and Preventing Modern Slavery in Our Supply Chain

As part of our efforts to ensure all those in our supply chain comply with our values, we internally review our supply chain to evaluate the risk of modern slavery and we conduct, where required, appropriate levels of due diligence on our suppliers. We are looking to strengthen commitment to reduce the risks of slavery within the supply chain where possible, by continuing to verify that any engagement with suppliers contains suitable assurances of zero tolerance of slavery and human trafficking.

We also seek to:

- Mitigate the risk of slavery and human trafficking occurring in our supply chain, including ensuring that our own procedures are robust enough to avoid making demands of suppliers, which may lead them to violate human rights. Ensuring that we make timely payment and request realistic expectations of our suppliers are examples of how we mitigate this risk;
- Encourage and protect whistle blowers by providing a free anonymous and confidential 24 hour help line.

We address failures by a supplier to meet our standards on a case by case basis. Organisations that fail to meet our standards may jeopardise their ability to continue to do business with us and, ultimately, we may cease trading with any such supplier.

Supplier Assurance Programme

In order to enhance our due diligence process and ensure that we can meet both legislative requirements and those which reflect our own values, Booker is seeking to introduce an enhanced supplier assurance programme for its suppliers. All suppliers will be encouraged to enrol on an online service to curate important supplier assurance documentation. As part of this, certain evidence will be required to demonstrate the compliance measures suppliers have in place within their supply chain, including details around anti-slavery policies and the suppliers own due diligence activities.

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.

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 applicable staff and have mechanisms to increase the visibility of issues.

Reporting Incidents

We encourage our colleagues to report any activity they believe to be unlawful and/or in breach of the Company's policies and standards. Colleagues can also make use of the independent whistleblower helpline. We are looking to increase awareness of Modern Slavery amongst all our employees, so that they are more aware of the indicators of modern slavery and how to report suspected cases.

Plans for 2020/21

- Conduct a review of potential modern slavery risk in own operations
- Provide further modern slavery e-learning training for all UK commercial colleagues.
- The implementation of the supplier assurance programme.

This statement has been approved by the Board of Directors.

Charles Wilson
Chief Executive
Booker Group Limited
Date: 17 August 2020

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