

MODERN DAY SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

This statement sets out Pricecheck's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking within the organisation and throughout its supply chains. This statement relates to actions and activities during the financial year 1 May 2018 to 30 April 2019, and proposed activity for the upcoming year. This statement has been approved by the Board of Directors.

As part of the wholesale industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The organisation is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Pricecheck is satisfied that there is no evidence of any modern day slavery or human trafficking within its own organisation and remains committed to not knowingly support or deal with any business involved in slavery or human trafficking.

Pricecheck operates from one site in Sheffield, South Yorkshire. Here, all administrative, trading and distribution process are undertaken by our team of 155 employees with a secondary, flexible warehousing solution also available when needed.

Whilst we are based in South Yorkshire, we buy and sell FMCG goods across the world. As part of the Company's due diligence processes, the supplier approval procedure incorporates an assessment of the controls undertaken by a prospective supplier against slavery and human trafficking. Imported goods from sources outside of the UK and the EU are potentially more at risk of slavery and human trafficking issues, and therefore, the level of management control required for these sources will be continually monitored.

In addition to this, we make market trips to visit as many customers and suppliers as possible to view their operations in practice. If any concerns are raised regarding witnessed practices within the supply chain operations, or if concerns have been confidentially shared, trading partnerships would cease.

We also make use of the [Modern Slavery Registry](#) when assessing larger prospective new suppliers (over £36m) as part of our due diligence checks.

Pricecheck operates a number of policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Our whistleblowing policy encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make



disclosures, without fear of retaliation. Employees, customers or others who have concerns can call the whistleblowing advice line for public concern at work: 0207 4046609.

Our employee code of conduct and ethical policy makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad in visiting its supply chain.

Pricecheck uses only specified, reputable employment agencies to source temporary labour and always verifies the practices of any new agency it is using before accepting workers from that agency. All agency workers are based at our Sheffield site where we control working hours, and they work for us exclusively whilst contracted to us.

We appreciate that the continued commitment to ethical trading is an ongoing process and will therefore plan to develop KPIs to measure the effectiveness of our due diligence procedures in preventing risks appearing in our operations and supply chains.

We will also undertake a review of our existing supplier arrangements and evaluations and where appropriate, seek to agree amendments to trading arrangements to ensure compliance throughout the supply chain.

Additionally, we are committed to increasing awareness for all employees and empowering them with knowledge in how to identify signs of slavery and human trafficking, what initial steps should be taken if it is suspected and offering protection after a disclosure. Posters will be displayed throughout the organisation raising awareness of what to look out for and where external help is available.

The Board of Directors and leadership team will undertake responsibility for implementing this Policy Statement and its objectives, which will be reviewed and published annually.

Signed:



Mark Lythe
Joint Managing Director

11th October 2019

