



SPAR (UK) Limited
Modern Slavery Statement March 2022- February 2023

Introduction

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 we 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 issues.

About our business

SPAR (UK) has over 2,600 stores, comprising of independent retailers and company owned stores operated by 5 regional distribution wholesalers, with national activity managed by a central office function. This statement is supported by these 5 partners who source locally and by central office, who develop the SPAR branded food, drink, and non-food products.

Our Supply chains

Our supply chains include the sourcing of materials principally related to the provision of food and drink, however, do include household goods, chemicals, and cosmetics.

Modern Slavery and due diligence processes for slavery and human trafficking within our supply chains

SPAR (UK) is a member of Sedex, and it is a condition that all SPAR brand and brand exclusive suppliers are also members of Sedex, allowing us access to their ethical data.

The SEDEX platform allows members to map their supply chain, assessing industry sector and geographical risk. This assessment covers the entirety of our business, and in doing this assessment we can understand the biggest risks and we can steer our actions to have a positive impact.

All new SPAR suppliers are requested to join Sedex as part of their supply contract, and we review our contractual documentation with our suppliers on an ongoing basis to ensure compliance with our policies in tackling Modern Slavery within the overall supply chain. This gives us more diligence and better visibility and helps us to educate and train our suppliers on Modern Slavery issues and compliance.

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.

Our policies and contractual controls

Not only do we reference the SEDEX requirement within the SPAR national brand Technical Code of Practice, SPAR (UK) also has an Ethical Trading Policy, within which we confirm: that we will not tolerate any form of Modern Slavery; we are committed to acting ethically and with integrity in all our business dealings and relationships; that we take any allegations of Modern Slavery in our business and/ or supply chains seriously; and are committed to reviewing, updating and improving our practices to ensure that Modern Slavery risks are understood and risk mitigation is in place within our business and/or supply chains.

Modern Slavery Training

All staff within SPAR Central Office are required to do an e-learning module on Modern Slavery to enable them to identify and report their concerns to the relevant people as well as being notified within the SPAR handbook upon commencing work at SPAR Central Office. Sedex also provides us with a training module for key staff members, so they understand what responsible sourcing is, and how to use it in the context of SPAR's operations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the SPAR (UK) Modern Slavery statement for the financial year 2022/2023.

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