MODERN SLAVERY STATEMENT

SGN LTD MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR 2023

INTRODUCTION

In order to comply with Section 54 of the Modern Slavery Act 2015, this statement sets out SGN Ltd and its subsidiary companies' approach and actions in understanding the implications and risks of potential modern slavery and/or human trafficking within its business and supply chains.

This statement relates to actions taken for the financial year ending 26 March 2023.

SGN Ltd and its subsidiary companies recognise the importance of and its responsibility for, having a robust and proactive approach towards the prevention of modern slavery and human trafficking in all areas of the business, including supply chains.

THE BUSINESS

The principle business of SGN Ltd and its subsidiary companies is the ownership and operation of up to 100 Petrol Filling Stations and 2 Convenience Stores. The Convenience Stores are direct managed and SGN Ltd employs all colleagues. Contracted Commission Operators, on behalf of SGN Ltd and its subsidiary companies, run the Petrol Filling Stations. The employees in the Petrol Filling Station are recruited and directly employed by the Commission Operator.

Our main business activities are:

- Sale of fuel
- Retail of food, drink and other sales
- Car wash and valet services
- Fast food
- Fast food franchise operations

COUNTRIES OF OPERATION

SGN Ltd and its subsidiary companies operate in England, Wales and Scotland.

SGN Ltd has assessed these countries as not high risk in relation to modern slavery or human trafficking and regularly reassesses these countries to ensure a potential risk does not become apparent.

POLICIES

SGN Ltd has the following policies in situ, ensuring we conduct our business in a highly ethical and legally compliant manner. These policies are regularly reviewed to ensure they remain up to date and appropriate.

- Personal Harassment Policy
- Equal Opportunities Policy
- Whistle Blowing Policy
- Health & Safety Policy
- Anti-Bribery Policy

RISK ASSESSMENT

The Board of SGN Ltd is responsible for reviewing the risk of our commercial activities and identifying any potential risks of modern slavery and human trafficking occurring. SGN Ltd believes that its business and supply chain are at very low risk of either modern slavery or human trafficking.

A potential risk is identified however, whereby the Commission Operators, contracted to SGN Ltd and its subsidiary companies, employ their own workforce and who currently employ a high percentage of non UK Nationals. Whilst this is beyond the control of SGN Ltd and lies purely with the Commission Operator, the Agreement signed by both the Commission Operator and SGN Ltd prior to them beginning contracting with us, confirm that they are aware of and will not contravene the Modern Slavery Act 2015 in any way. (Clause 4.9). The Commission Operator also warrants that they will undertake pre-vetting Right to Work checks to ensure that all workers meet legislative requirements for working in the UK, retaining copies of evidence provided by each employee (clause 4.6)

DUE DILIGENCE

SGN Ltd undertakes pre-vetting Right to Work checks with all prospective employees and copies of evidence provided are retained to ensure that there are no instances of modern slavery and human trafficking. Should this be suspected however, by any of the recruiting Managers, it would be immediately investigated and appropriate action taken.

Pre-contract Right to Work screening is also undertaken with all of our Commission Operators prior to any contract between us, including Right to Work in the UK documents, proof of address and credit checks. These are updated on an annual basis and any changes in status are investigated and appropriate action taken.

TRAINING

SGN Ltd ensures that all of its employees are made fully aware of the Modern Slavery Act, its risks to the company, their own personal responsibility and how to report any concerns. A robust training document is provided.

PERFORMANCE INDICATORS

SGN Ltd considers that the following indicators are a reasonable intimation that modern slavery and human trafficking are not taking place within our business. There are:-

- no reports from law enforcement agencies
- no reports from employees
- no reports from Commission Operators
- no reports from members of the public
- no reports from suppliers

to indicate that modern slavery and human trafficking has been identified in relation to our business, our third party Commission Operators or our suppliers.

BOARD APPROVAL

This statement is approved by the Board of Directors of SGN Ltd