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KELLYDELI COMPANY LIMITED
SLAVERY AND HUMAN TRAFFICKING STATEMENT

January 2022 – December 2022

1 INTRODUCTION FROM THE CHIEF EXECUTIVE OFFICER

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another, in order to exploit them for personal or commercial gain.

Our commitments:

To act ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

To ensure transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same standards.

To improve our practices to combat slavery and human trafficking. KellyDeli Company Limited, as the holding group of the 'KellyDeli Company Ltd' (defined below), is taking steps to ensure compliance with legislation relating to Anti-Slavery and Human trafficking, as well as doing its utmost to go above and beyond these requirements. KellyDeli has taken, and continue to take, these positive actions to combat these unfortunate trends.

2 OUR STRUCTURE AND SUPPLY CHAINS

We are a global food retail and restaurant group. We are the parent group of the KellyDeli subsidiaries in the following countries: France, Belgium, Spain, Italy, United Kingdom, Germany, Netherlands, Sweden, Denmark, Finland, Portugal and Mexico ("KellyDeli Company Ltd"). As of December 2022, the Group had 493 employees across the world.

2.1 OUR BUSINESS

KellyDeli is an innovative food group committed to bringing the best of Asia to the world, through Asian-inspired brands and over 1000 kiosks across Europe, the United Kingdom and Mexico. KellyDeli is a franchisor supporting a network of independent kiosk owners preparing and offering for sale Asian inspired food in supermarkets, hypermarkets and similar. KellyDeli also has a presence in UAE via a franchisor agreement.

2.2 OUR SUPPLY CHAINS

Our supply chains include over 50 suppliers throughout Europe who supply products to each of our kiosks. These suppliers range from large scale cross-country suppliers to local small-scale suppliers.

3 OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

Our Human Rights Policy and supplier questionnaire reflects our commitment to acting ethically and with integrity all our business relationships and to implementing and promoting effective systems and controls.

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Other policies include equality, whistleblowing, harassment & bullying, and code of business conduct.

In 2021 KellyDeli included as part of their suppliers' contracts several ethical obligations. All contracts are reviewed to ensure consistent ethical obligations are met.

4 DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we have a free whistleblowing line, available to all employees. The aim is to:

- **Identify** and assess potential risk areas in our supply chains.
- **Mitigate** the risk of slavery and human trafficking occurring in our supply chains.
- **Monitor** potential risk areas in our supply chains; and
- **Protect** whistle blowers.

In 2021, KellyDeli joined a global collaboration platform to improve supply chain transparency. The aim of this new tools is to allow the group to proactively identify social and environmental risks and engage their suppliers on this journey.

Where an issue is spotted at suppliers of partners level, a corrective action plan is requested. If the action plan does not sufficiently address the issue, the contract will be at risk of termination.

5 RISK ASSESSMENT

KellyDeli is committed to respecting and protecting human rights of all those who are in contact with its operations, including employees, partners and supply chain workers. KellyDeli supports transparency, to find and resolve problems; to regularly review business practices; and to collaborate to protect the rights of workers, particularly those who are most vulnerable and exposed to abuses such as modern slavery.

A detailed risk assessment is key to help focus on the areas where we face the greatest risk. The introduction of policies and training for our people helps identify any signs of modern slavery and empowers them to act accordingly.

In 2022 two Managers from KellDeli were trained to use Radar - a risk Management tool - allowing us to better scope and assess potential risks across our operations and supply chain. We conducted a risk assessment of our supply chain by product and country of operations and were able to flag higher risk suppliers (prawn farming / fisheries) and from a location perspective, two countries (Mexico and UAE) of operations being flagged as medium risks.

6 MEASURING EFFECTIVENES

In 2020, we strengthened and developed the effectiveness of our risk management processes. KellyDeli appointed a General Counsel reporting directly to the CEO and a head of employees relations to strengthen further its commitment. Several new policies were implemented in 2020 spanning equality, whistleblowing, harassment & bullying, and code of business conduct. They are regularly reviewed.

KellyDeli have an ethical task force, dedicated to plan, assess, and continuously promote best practices related to human rights, ethics, and equality. The role of the task force is to actively manage any potential risk linked with human rights breaches and to ensure continuous improvement in this arena.

A free and completely independent whistleblowing tool is available to all employees. The whistleblowing hotline and online reporting allows employees to speak up and report their concerns to the highest levels of management (a freephone telephone and the SafeCall website), available to all KellyDeli employees, 24 hours a day and 365 days per year.

In 2022, we also set up an internal confidential email address allowing our partners and their employees to report or raise concerns. In 2022 no complaint was raised.

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In 2021, KellyDeli joined a global platform allowing to better assess social and environmental risks by countries of operations and industries. The system enables KellyDeli to access their suppliers social and environmental audits and assess their progress against a set of internationally recognised standards.

7 TRAINING

In 2021, we moved all employee and partners' training programs to an online platform, including human rights, responsible recruitment, diversity and inclusion as well as modern slavery. KellyDeli's values are fully integrated in the policies and partners' practices through their onboarding programme and online training suite. The group updates and creates new modules regularly to make sure partners are armed with a strong knowledge base in all areas relating to fundamental values we believe in.

In 2022, 87% of all employees completed the anti-modern slavery training and 89% completed the diversity and inclusion e-learning module.

We are committed to respecting and protecting human rights of all who come into contact with our operations, including employees, partners and supply chain workers. We accept our responsibility to support transparency, to find and resolve problems; to regularly review our business practices; and to collaborate with others to protect the rights of workers, particularly those who are most vulnerable to abuses such as modern slavery.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes KellyDeli Company's slavery and human trafficking statement for the financial year ending December 2022. This statement has been presented to the board on 25 July 2023.

Silvano Delnegro

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Silvano Delnegro
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CHIEF EXECUTIVE OFFICER
KellyDeli Company Limited

Progress summary

2019: Human rights policy and suppliers' due diligence questionnaire

2020: General Counsel appointed. New policies introduced.
Introduction of a free confidential helpline
Introduction of internal audits to assess labour standards, business ethics and right to work (UK)

2021: Human rights policy review and introduction of the nine Ethical Trading Initiative (ETI) base code principle.
Formal ethical obligations are included in suppliers' contracts.
Joined a global collaboration platform to improve supply chain transparency.

2022: Supply chain and risk screening using RADAR / UAE & Mexico Medium risk. Prawns' farms most at risk.