MODERN SLAVERY STATEMENT 2021/22

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This statement has been published in accordance with the Modern Slavery Act 2015 (the "Act") and constitutes the slavery and human trafficking statement for the Snowfox Group and its relevant subsidiaries for the financial year ended 30 November 2021, apart from Taiko whose Modern Slavery Statement can be accessed at: https://www.taikofoods.co.uk/modern-slavery/. It sets out the steps we take to understand all potential risks to ensure that there is no slavery, servitude, forced or compulsory labour, or human trafficking in our business or supply chains.

INTRODUCTION

We recognise our responsibility to identify and address potential or actual human rights infringements linked to the products and services we provide. We require our suppliers to uphold the same standards as we apply to ourselves.

ORGANISATION STRUCTURE AND SUPPLY CHAINS

Snowfox Group is a leading international multi-channel Japanese food business. We reach customers across multiple routes to market including fresh sushi kiosks, grab-and-go products on supermarket shelves and innovative restaurants, selling over 60 million trays of fresh sushi a year. We bring together four outstanding brands within the Snowfox Group - Snowfox, Bento, YO! and Taiko - that serve a large and growing international customer base.

We have centralised procurement teams managing the relationship between our direct suppliers that provide both food and non-food products. Most of which have been supplying Snowfox Group long-term and therefore have established strong working relationships based on trust and transparency.

POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

The Snowfox Group has both a policy and procedure on modern slavery and human trafficking in place which outlines how we will confidentially act, along with the steps that will be taken if we uncover any staff members who are a victim of modern slavery and/or human trafficking or external suppliers not adhering to the Act.

We encourage our employees to report in confidence any concerns relating to any part of the organisation in line with our established whistleblowing policy which allows employees to telephone, in confidence, an external company called 'Protect'. All matters are then passed onto a trained adviser who guide the employee on the best course of action.

Our Code of Conduct is clearly outlined to our teams along with the actions and behaviours which are expected of them whilst at work and through the course of their duties and responsibilities. We strive to maintain the highest standards of employee conduct when managing our staff and suppliers and expect all our people to behave in the same way.

The Snowfox Group complies with the UK Anti-Bribery Act 2010 and does not tolerate any form of bribery by or of its employees, agents or any other person acting on our behalf.

DUE DILIGENCE PROCESSES

During 2020 the procurement team introduced a clause within the supplier contract that outlines the due diligence expected by Snowfox Group. We never knowingly accept food or non-food products from suppliers who do not adhere to the UK Modern Slavery Act 2015. They must demonstrate their compliance to the Act by providing their most recent annual statement whilst undertaking regular audits of the range of suppliers being used.

The procedure is designed to establish and assess areas of potential risk in our business and supply chains, monitor potential risk areas, reduce the risk of slavery and human trafficking occurring, and provide adequate protection for whistle-blowers.

If we become aware of any concerns with our suppliers and/or they are classed as 'high risk', a full investigation will take place to determine whether these concerns are justified with appropriate action taking place if needed. Depending on the severity of the concerns, Snowfox Group will work with the provider by agreeing an action plan, terminate the supplier, and/or source the product from an alternative supplier.

In addition, we hold regular meetings with key suppliers to ensure they are the right business to partner with and to highlight the expectations of no slavery or human trafficking within their own company and supply chain.

RISK ASSESSMENT AND MANAGEMENT

Two main areas have been highlighted as potentially high risk to the business regarding modern slavery and human trafficking. These areas are recruitment and the products the Snowfox Group handles.

By identifying the above, we have invested in a robust applicant tracking system (ATS) when hiring new people and use an external right-to-work checking system, Trust ID. All our people complete an online application through ATS, apply at their own will, and we hold face-to-face interviews where further checks are made, and where a thorough external right-to-work check is followed. This has lowered our risk of non-compliance within recruitment to the UK Modern Slavery Act 2015.

With regards to our suppliers, we understand that some of our food products, mainly fish, would be identified as high risk within their supply chain. By introducing our robust procedures with new contracts, completing supply audits, and continuing our ongoing close relationships with suppliers, Snowfox Group will safely measure and pro-actively respond to potential risk moving forward.

Both our people and suppliers have access to our modern slavery policy along with the whistleblowing policy and procedures that they must follow if needed. These policies are reviewed annually and updated where appropriate.

TRAINING ON MODERN SLAVERY AND TRAFFICKING

The education of our employees about the risks of modern slavery and human trafficking within our business and supply chains is important. This is done through our internal communication platform YO! 360 and e-learning programmes FLOW. Our employees are encouraged to identify and report any potential breaches of the organisation's anti-slavery and human trafficking policy.

Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains. Examples of training provided across our organisation include:

- Representatives from each department within our Head Office have attended a Modern Slavery training session run by one of our Partners.
- All regional managers have completed e-learning training on the topic.
- Information absorbed during the training has been communicated out to all our employees via our communication platform YO! 360, to ensure they are aware of the signs to spot and how to communicate correctly if they deem it necessary.
- We are a registered supporter of Stronger Together and actively use the resources available to improve our understanding in the topic across the organisation.
- A representative of our People Team attends training every year to ensure we are adhering to the Morden Slavery Act 2015.

KEY PERFORMANCE INDICATORS TO MEASURE EFFECTIVENESS OF STEPS BEING TAKEN

Activities during 2020/2021 to prevent modern slavery and human trafficking within the business consist of:

- The Group has established a formal, board-level, Environmental Social and Governance Committee whose purpose is to support the Group's on-going commitment to environmental, health and safety, corporate social responsibility, corporate governance, sustainability, and other public policy matters relevant to the Group. Each brand is appropriately represented within the Environmental Social and Governance Committee.
- The whistleblowing policy and procedure is reviewed annually.
- A company-wide right-to-work audit check took place using an external company called 'Trust ID'. In addition, a right-to-work audit is done every quarter to notify employees when their documents are due to expire.
- Our Applicant tracking system (ATS) allows better control over recruitment.
- A section within the supplier contract was added to outline the Group's expectations and ensure consistency between all suppliers.

FURTHER STEPS SNOWFOX GROUP WILL TAKE TO PREVENT MODERN SLAVERY AND HUMAN TRAFFICKING IN 2021/22

Following our review of actions taken to date to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the following further steps to tackle slavery and human trafficking:

- Establish an internal audit team to maintain our high standards in sustainability.

- Continue to monitor the UK Government's proposed changes, following an independent review, to the UK Modern Slavery Act 2015.
- Maintain the robust right-to-work checks through 'Trust ID' for all new and existing employees.
- Ensure all our operations teams have watched and understood the training on our e-learning platform 'Flow'.
- Become an active Business Partner with Stronger Together to reduce any future risk.

Richard Hodgson
Chief Executive Officer
Snowfox Group

DATE: 21 September 2021