

## BOOKER GROUP LIMITED (“Booker”)

### MODERN SLAVERY STATEMENT 2024/25

This statement is made pursuant to the UK Modern Slavery Act 2015 (the “Act”) and relates to the financial year ending 23 February 2025. As required under the Act, it sets out the steps taken by Booker to prevent modern slavery and human trafficking in our own operations and supply chains.

#### Introduction

At Booker we are committed to ensuring that modern slavery is not present in our own operations and supply chains. We are dedicated to acting ethically and with integrity in all of our business relationships and to embedding effective systems and controls to eliminate the risk of modern slavery.

#### Our Business and Structure

Booker is the UK’s leading food wholesaler, with approximately 15,000 employees. The Booker Group was acquired by Tesco PLC in 2018 and comprises:-

**Booker Wholesale/Makro** –Our cash and carry businesses have served over the last twelve months:-

- **Catering customers** (serving 347,704) and **Small Businesses** (serving 304,481). Our catering customers include restaurants, fast food outlets, licensed premises and cost centre caterers. These can vary from independent single site locations to larger multiple site locations;
- **Group Customers and National Chains**. All customers can draw upon the Booker, Makro, Booker Retail Partners and Booker Direct infrastructures;
- **Independent retailers** (serving 75,268). Our largest retail customers tend to be our Premier, Londis, Budgens and Family Shopper symbol group members which are all independent retailers operating local convenience shops stocking branded and Booker own brand products; Premier (4972 retailers), Budgens (471 retailers), Londis (2664 retailers) and Family Shopper (330 retailers). We also serve our retail club members (e.g. independent retailers who are members of the Booker promotional club which focuses on securing consumer offers), unaffiliated independents and national retail accounts.

**Booker Direct** – Booker Direct serves national accounts , with customers including UK cinema chains and the prison service in England and Wales. Our Best Food Logistics division provides warehousing and distribution services to several major casual dining and quick service restaurant chains.

Booker acknowledges that it sits within an industry well known to be at risk of modern slavery (e.g. food production, processing, distribution etc.) and as such Booker strives to continually improve in its efforts to mitigate against the risks of modern slavery in its operations and supply chains.

#### Supply Chains

In terms of our product ranges, a large proportion of the Booker supply chain is UK based. However, we also have a considerable global network of suppliers which support our vast and diverse product range offerings. In terms of our own-label ranges, global suppliers are predominately manufacturers and are subject to SEDEX\* audits if identified as high risk (as detailed below under the header ‘Identifying Risk & Preventing Modern Slavery in Our Supply Chain’). \*SEDEX stands for ‘Supplier Ethical Data Exchange’ (a non-profit organisation) which operates a platform for suppliers and retailers to share ethical data and audit records and which developed and owns the SMETA audit (Sedex Members Ethical Trade Audit), designed to assess a business’s supply chain, focusing on environmental sustainability, social responsibility, and ethical practices.

#### Company Policies

At the heart of our approach to human rights are a number of important internationally recognised declarations, standards and codes. These include:

[The UN Universal Declaration of Human Rights](#)

[The International Labour Organisation \(ILO\) Declaration on Fundamental Principles and Rights at Work](#)

[The UN Guiding Principles on Business and Human Rights](#)

[The UN Global Compact](#)

[The Base Code of the Ethical Trading Initiative \(ETI\)](#)

Our modern slavery strategy is supported by several key policies:

- **Code of Business Conduct;** Our Code of Business Conduct details our approach to human rights and ethical trading. It communicates our commitment to ensuring that colleagues, customers and our supply chain are treated with fairness, respect and dignity. The code includes details of our values 'Respect, Dignity and Fair Treatment', which enforces Booker's zero tolerance approach to unacceptable behaviour, including all forms of modern slavery, in any area of our business.
- Our approach to 'Human Rights & Ethical Trading' is also detailed within the Code and reinforces the need to respect human rights and operate ethical trading practices.

The policies communicate that rights must be respected, and breaches remedied. The code recognises that we need to ensure that our own business practices do not become the cause of labour standard issues. Developing long term relationships with suppliers which we know and trust gives them the confidence to invest in improvements so we can achieve more together. To strengthen compliance, colleagues receive refresher training on the policy each year. In further support of this, colleagues are encouraged to choose suppliers based on their values as well as other factors such as price and quality, in order to build strong relationships – we achieve this through technical reviews of the sites and assessments. We seek, for example, to understand a potential supplier's approach to ethical trading issues as part of initial discussions wherever possible and stakeholders can determine not to use a supplier that does not share our values.

- **Whistleblowing Policy** – This policy encourages our colleagues to speak up if they have any concerns about wrongdoing which might be a breach of the law, a breach of our Code of Business Conduct or of our values. It sets out the process for raising a concern and includes access to a confidential whistleblowing helpline (Protector Line) run by an independent third party. Concerns can be raised anonymously if preferred. We take concerns seriously and investigate as appropriate in line with our Group Standards for the Conduct of Internal Investigations. This year, we launched the Protection Line to our suppliers. We shall shortly be making available digital Protector Line posters in a variety of different languages (and in some cases including a Protector Line number that users can call to speak to someone in their native language). Suppliers will be able to download them for use in their premises.
- **Bullying and Harassment Policy** - This policy further reinforces how we expect colleagues, customers, suppliers and third parties who work with Booker to be treated; in an environment that is safe, free from victimisation, harassment and bullying, which includes freedom from all forms of modern slavery. The Protector Line is available for the reporting of any concerns in relation to this policy. Any reported concerns will be fully investigated by managers within HR, Legal, Security or Health & Safety (as appropriate) for complaints of an internal nature. Each of these managers has received our modern slavery training to ensure that they are well equipped to handle any concerns appropriately and sensitively. This is further supplemented by our activities to ensure a culture of diversity and inclusivity within the business.
- **Ethical Trading Policy** - This is available to all own-label suppliers and is based on the [Ethical Trading Initiative Base Code \('ETI base code'\)](#) (a code which incorporates the most relevant conventions of the International Labour Organisation with respect to internationally recognised good labour practices, including a requirement that employment is freely chosen). Under the policy, all own-label suppliers and sites are required to comply with the Base Code, in addition to their own national requirements, to give their workers the best level of protection. The policy also details our audit requirements for own-label suppliers where a risk assessment triggers the need for an independent ethical audit, which is further detailed in this statement below.
- **Modern Slavery Policy** – we take a continuous improvement approach to modern slavery. In addition to the Modern Slavery Statement we publish each year, our Modern Slavery Policy reaffirms the high standards we expect from our own business and our supply chain partners. It helps our colleagues recognise the signs of actual or potential cases of modern slavery and educates them on the correct cause of action to take if they notice anything of concern. This ensures that the risk can be managed or mitigated appropriately in a manner

which doesn't increase the risk of harm to the person(s) involved. Where concerns are raised in our supply chain, we support and work together with the supplier affected to overcome the issues if possible. We would only consider de-listing a supplier in such cases as a last resort where they fail to engage in the process.

## **Identifying Risk and Preventing Modern Slavery in Our Supply Chain**

As part of our continued efforts to ensure modern slavery does not occur in our supply chains, we regularly review the risk of modern slavery for emerging risks. This process seeks to recognise that certain locations (such as India, China, North Korea and Pakistan) and industry types (such as electronics, garments and palm oil) are more prone to poor labour practices including forced or bonded labour, human trafficking, child slavery, excessive working hours, non-payment of the Living Wage. Where own-label suppliers are identified as high-risk we seek further assurances that they are mitigating the risk of modern slavery. One example of how we achieve this is through our ethical audit programme. Sites identified as high-risk (as determined by the [Food Network for Ethical Trade \(FNET\)](#)) are required to have an annual SMETA audit. SMETA audits are based on the ETI base code, include worker interviews and are conducted against best practice international labour standards.

All our suppliers of own-label products have registered with Sedex. This gives us full visibility of their ethical audit performance.

We have worked with all existing own-brand suppliers of tea, coffee, cocoa & bananas, as commodities with particular human rights risks, to become certified to standards such as [Fairtrade](#), [Rain Forest Alliance](#) and [UTZ](#). These standards create a measurable benchmark of compliance against a range of sustainability criteria, including human rights.

In addition to our ethical audit programme, we also seek to:

- Treat suppliers fairly, ensuring that we avoid making demands of suppliers which may lead them to violate human rights. An example includes ensuring that we make timely payment to suppliers and place realistic expectations on them for the delivery of orders; and
- Encourage and protect whistle blowers by providing a free anonymous and confidential 24-hour help line. In 2024/25 we had 139 calls to the Protector line, none of which were identified as potential cases of modern slavery.

Where audits identify issues, or where issues are otherwise identified, we take appropriate action which may include (depending on the nature and severity of any issues):

- working with the supplier to resolve the issues for workers and to ensure that appropriate measures are put in place for workers to avoid a recurrence,
- suspending or terminating trading with existing suppliers, where we believe that sustained improvement cannot be achieved,
- the non-appointment of exited suppliers.

By way of example, a potential incident of modern slavery was brought to our attention by one of our colleagues this year at a third-party site. We worked at speed with the Tesco Human Rights Team and the Tesco Investigations Team to gather further information on the allegations. Contact was made with the alleged victim and considerable support given to them to help them and to encourage them to report their situation to the Modern Slavery Helpline – the Police were also called to investigate. Contact was made with other stakeholders to consider what further protections could be put in place going forward to mitigate against something similar happening again. We have taken learnings from this incident for example we are going to be issuing colleagues with cards containing the Modern Slavery Helpline contact details which we, they or anyone in need can use; we have also amended our Modern Slavery training and are in the process of amending our Modern Slavery Policy to include further guidance on what our colleagues should do if specifically approached by a potential victim.

## **Supplier Assurance Programme**

Following the successful launch in 2022/23 of due diligence measures for new suppliers providing goods for resale ('GFR'), last year we rolled these out to our new suppliers of goods and services not for resale ('GSNFR'). As previously reported, these measures include a modern slavery specific assessment and additional background and reputational checks. Over the course of the second half of last year we began expanding these measures to our existing supplier base, building on the extensive work that we had already done in relation to those of our existing high-risk suppliers.

Due diligence has been completed against approximately 30% of these suppliers and we are continuing to work through the remaining 70%.

We are also looking to introduce a further enhanced human rights due diligence program for our own label products. We are currently in the discovery phase of this new process and implementation will be on a phased basis. We hope to start implementing some aspects of the new program before the end of this financial year.

### **Identifying Risk and Preventing Modern Slavery in our Own Operations**

We take a number of steps to mitigate the risk of modern slavery occurring in our own operations:

#### **Employees - Right to Work Checks**

Right to work checks are completed for all staff working for Booker in accordance with legislation, and Booker will only employ individuals who are legally able to work in the UK. Only agencies on our preferred supplier list are used to select staff whether on a temporary, fixed term or permanent basis. Such agencies are required to carry out appropriate background checks.

#### **Employees – Working Environment Survey**

We are now in the fifth year of running our ‘Every Voice Matters’ survey; an annual survey to provide colleagues with the opportunity to provide feedback on a number of business-related areas such as career development, employment benefits, company culture and their treatment within the business. Based on the feedback, the intention is to continually improve any areas identified as necessary in order to continually strengthen a positive environment for colleagues, including colleagues confidence in ‘speaking up’ around any concerns. We were delighted about the positivity around Booker being a great place to work.

#### **Training**

We continue to increase colleagues understanding of the risks of modern slavery in our supply chains and own operations, we have delivered training to approximately 2,327 staff in roles identified as having responsibility in this area or having potentially greater exposure to the risks of modern slavery (e.g. Managers of Operations & Logistics Teams) or roles of related responsibility (e.g. Managers of Security & Health & Safety roles).

The training details the different forms of slavery, how to spot the signs and what to do where there are suspected cases. The interactive module is aimed at testing colleagues understanding and is reviewed on an annual basis.

We are just about to communicate out a new ‘Stronger Together’ training to our UK based GFR primary suppliers and GSNFR ‘high risk’ suppliers from a Modern Slavery perspective. This includes a compulsory training module “Tackling Modern Slavery in UK Businesses” which a representative from our primary suppliers, together with suppliers in the following categories: Labour Providers, Retail Labour Services, Construction and Fit-out Suppliers and Retail Delivery Partners must attend. The representative is then tasked with disseminating the training to other people managers at their site(s) as appropriate. This training will need to be completed every three years.

#### **Risk Assessment**

We remain committed in our sustained approach to regular assessment of our modern slavery risks. We continue to prioritise key business areas in the UK based on an analysis of evolving risk in the sector, working contract types, the level of skill involved in the work, wages, and our visibility of the service provider. The majority of our staff employed within our cash and carry branches are employed on permanent contracts. The greatest risks of modern slavery exist for workers not in permanent employment, or employed through labour agencies, of whom we have less visibility and often work in roles for shorter periods of time.

We previously identified the following areas in our business as higher risk operations:

- Goods Not for Resale in high-risk countries (as determined by FNET)
- Goods and Services Not for Resale in the UK to include three main areas of focus:
  - Workers in the construction industry who build and fit out our properties, including branches, distribution centres and back-office buildings;

- Labour providers (namely agencies);
- Retail Labour Services (catering, cleaning, security stocktaking and merchandising suppliers); and
- Retail Delivery Partnerships (i.e gig economy courier services) to this list.

#### **Progress Against Last Year's Commitments**

<b>Aim</b>	<b>Outcome</b>
To open up the Protector Line to our suppliers	This has now been implemented and is in use.
To commence full retrospective due diligence on our existing suppliers.	We are now approximately 30% through this process and are continuing to work through the remaining suppliers
Complete the discovery phase of the enhanced human rights due diligence program.	This has been completed and we are starting to introduce the new due diligence processes on a phased basis.
Looking at how we could work more closely with our primary suppliers and those operating in high-risk industries to increase their understanding of modern slavery challenges	We are rolling out the 'Stronger Together' training: "Tackling Modern Slavery in UK Businesses" to these suppliers.

#### **Plans for 2025/26**

- To continue with the Implementation of the additional supplier due diligence to all existing suppliers.
- Training – roll out of the 'Stronger Together' training to the suppliers identified operating in high risk industries from a modern slavery perspective.
- Protector Line – make digital versions of the Protector Line posters available to suppliers in different languages.
- Implement the recently launched further enhanced human rights due diligence program for our own label products in collaboration with the wider Tesco Group.

This statement has been approved by the Board of Directors.

*Veselin Bandev*

Veselin Bandev      Finance Director  
**Booker Group**  
**Date: 27-08-2025**

**Booker Limited**  
**Booker Direct Limited**  
**Makro Self Service Wholesalers Limited**  
**Booker Retail Partners (GB) Limited**