



Modern Slavery Statement

Introduction

Brakes (part of the Sysco Group) is fully committed to ethical working practices, and, as a company, regards inhumane conditions such as slavery, worker exploitation, and human trafficking as completely unacceptable either within our own business or through our supply chains.

Given our global reach, we understand our responsibilities and have a zero-tolerance approach to modern slavery. We recognise that modern slavery, which can take many forms, is a crime, and we strive 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.

Our suppliers are required to adhere to the Sysco Supplier Code of Conduct and to a set of values which require us, among other things, to act with integrity and responsibility, uphold our values and to always do the right thing. Our commitment to anti-slavery and human trafficking is further strengthened with our Modern Slavery Policy which applies to all employees, officers, workers, contractors, suppliers and other business partners.

We are committed to ensuring there is 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. Our Board fully supports the aims of the Modern Slavery Act and is committed to combating the risk of slavery and human trafficking in our business.

Organisation and Business Structure

Brakes is a leading specialist supplier of food products, as well as catering supplies and equipment, to restaurants, health care and educational facilities, hotels and other foodservice and hospitality businesses. As a company, we employ around 7,000 employees, our business is organised into various trading divisions including Brakes, Country Choice, and Brakes Catering Equipment.

We are part of the Sysco Corporation ("Sysco"), the global leader in foodservice.

Our Supply Chains

Whilst many of the products sold by Brakes are sourced from the UK, we also source globally to support the range, quality, provenance, availability, and price requirements of our customers.

[Prevention of slavery and human trafficking in Brakes](#)

Right to Work Checks

All colleagues employed by Brakes who work on a temporary, fixed term or permanent basis are subject to a right to work check in accordance with UK legislation. A person is unable to commence work for Brakes unless they first satisfy us that they are legally able to work within the UK.

Resourcing

Where Brakes employs the services of an employment agency to source candidates for permanent or fixed term positions, we will use agencies of good repute and who are listed on our preferred supplier list. Brakes requires the agencies to undertake appropriate background checks on prospective colleagues, in conjunction with our own checks.

Agency Workers

Where Brakes uses temporary workers supplied through an employment agency, we require the agency to undertake appropriate background checks on the agency worker and we expect all agencies to comply with our Ethical Trading Code of Conduct, which incorporates compliance with the Modern Slavery Act and other critical legislation. We operate a preferred supplier list for these employment agencies to help ensure the agencies used are of good repute and maintain the high standards we expect.

If Brakes identifies that an employment agency is not adhering to our standards, the agency will be removed from the preferred supplier list and will not be engaged in any further recruitment activity on any basis.

Whistleblowing policy

Brakes has a whistleblowing policy in place under Sysco's Global Code of Conduct, which applies to all employees, casual workers, agency staff, contractors, subcontractors, agents, sponsors, suppliers or any other person associated with Brakes. Any colleague who has concerns about any aspect of Brakes or our supply chain is able to disclose their concerns confidentially through the Ethics Line. Any concerns are investigated thoroughly.

[Prevention of slavery and human trafficking in Brakes' supply chains](#)

All suppliers of products that are intended for resale by Brakes are required to adhere to the Sysco Supplier Code of Conduct in addition to the ethical standards detailed in its 'Working with Us' document. It is based on the standards set by the Ethical Trade Initiative (ETI) and reflects the key elements of the International Labour Organisation (ILO) conventions. Brakes Ethical Trading Policy is reviewed annually.

There is an operational requirement for Brakes own brand suppliers to join Sedex, being one of the world's largest collaborative platforms for sharing responsible sourcing data on supply chains. Where a supplier is not a Sedex member, this is an important consideration when assessing their suitability as a supply partner to Brakes. In such circumstances, we will carefully consider the supplier's own corporate social responsibility credentials and related policies.

The Sedex platform assists Brakes and our suppliers with managing and improving performance when it comes to labour rights, health and safety, the environment and business ethics and we continue to work with our existing own brand suppliers to enhance transparency in these important areas. Our target is to ensure that all Brakes' own brand suppliers join Sedex by 2025.

Supplier adherence to our values

To ensure all those in our supply chain comply with our values, we have in place a supply chain compliance programme.

Our risk framework, against which all new suppliers are assessed, and existing suppliers measured for compliance, determines the level of ethical risk at each stage of the supply chain. Effective escalation processes are in place to support decision making, should Brakes become aware of non-compliance. Suppliers are required to undertake an independent ethical audit of their full supply chain if it is deemed necessary by the risk assessment. The outcome of such an audit is used to determine areas of potential risk in Brakes supply chain and the suppliers' commitment to improving these standards. Brakes would address any failure by a supplier to meet Brakes' standards on a case by case basis, however, suppliers who fail to meet Brakes' standard or fail to demonstrate an active commitment in improving ethical standards in their supply chain will jeopardise their ability to continue to work with Brakes.

Supplier's ethical performance will be monitored on an ongoing basis using the Sedex risk assessment tool. As Sedex members, our own brand suppliers will be required to review and update the Sedex Self-Assessment Questionnaire (SAQ) on an annual basis and to maintain ethical audits at the frequency determined by the level of risk and vulnerability within their supply chain.

We will continue to review the effectiveness of these controls in reducing the risk of unethical practices.

Our Merchandising, Technical, HR and Legal teams have the primary responsibility for ensuring supplier and contractor adherence to our values.

Due Diligence Processes

As part of our ongoing strategy to identify and mitigate risk we have systems in place 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.
- Protect whistle blowers.

Training

Brakes' policies and standards are readily available to colleagues through the intranet and notice boards. To ensure a high level of understanding of the legislation and the risks of modern slavery and human trafficking

in our supply chains and our business, we have made training available on our training platform, Thrive, that is specifically on the issue of Modern Slavery. However, Brakes reviewed its training materials in January 2023 and continues to develop further training materials in this area and provide more bespoke training to our colleagues in the Merchandising teams.

Reporting on our Progress

Following the introduction of the Modern Slavery Act 2015, we took the opportunity to review and update our Terms and Conditions of Purchase; Working with Us Document; and Ethical Trading Code of Conduct, and we engaged with our suppliers to ensure they were aware of our joint responsibilities and our requirement for them to adhere to the practices and controls we put in place to ensure the welfare of those employed within their supply chains. Brakes continue to review the methods, frequency and content of any communication with the suppliers in order to improve alignment with our standards and priorities.

Brakes continues to train all managers in conducting right to work checks in respect of new starters and we have improved our processes such that no new employee can be set-up on payroll without having first passed a right to work check. Further guidance is provided to managers in a document known as the 'manager's toolkit' and is accompanied by a short video to support their learning and understanding.

Brakes has formed an action group which comprises colleagues from our Merchandising, Technical, Human Resources and Legal teams to review our Modern Slavery Statement and related policies and to consider what further improvements can be implemented by the business.

Brakes has set a target of ensuring that all Brakes' own brand suppliers join Sedex by 2025 and, to this end, Brakes has made it an operational requirement for all new and existing Brakes' brand suppliers to join Sedex. By requiring our suppliers to join Sedex and to share their data on responsible sourcing within their supply chain allows Brakes to work closely with its suppliers in monitoring areas of potential risk.

During the last 12 months we can confirm that there have been no reports of slavery or human trafficking involving any Brakes' own brand lines and neither has Brakes received any reports of slavery or human trafficking concerning third party vendor branded lines featuring in the Brakes' range.

Further Steps

We recognise that more can always be done to tackle Modern Slavery and, as a business, we remain committed to helping to increase awareness of the issues and a process of ongoing review of our practices and policies to combat the risk of slavery and human trafficking. We intend to take the following steps to continue to further combat these risks, going forwards:

- To build more tailored ethical trading training that will be designed specifically for our supplier facing Merchandising, Technical and Product Development teams, having regard to the Ethical Trading Initiative (ETI) principles. The training will focus on developing an understanding of core ethical issues, awareness and escalation. The training is intended to build upon training that has previously been completed and attended by Brakes' Merchandising, Product Development and Technical colleagues. We will develop mandatory training for new starters in these areas and work with

external training providers to develop and deliver a programme of refresher training as required by the end of the financial year.

- Having undertaken a review of the effectiveness of our supply chain controls in reducing the risk of unethical practices we are continuing to look at ways to make further improvements, enhance transparency in our supply chain, and measure progress. Brakes will consider new ways of measuring and understanding progress by developing, with the intention of publishing, relevant Key Performance Indicators. For example, we will begin to measure the percentage of: (i) suppliers who engage with and maintain Sedex membership; (ii) suppliers who have completed the latest Sedex Self-Assessment Questionnaire; (iii) colleagues in key business areas that have completed the related annual training, etc.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.

A handwritten signature in black ink, appearing to read 'P. Nieduszynski', with a stylized flourish at the end.

Paul Nieduszynski CEO, Sysco GB

Updated December 2023