



# MODERN SLAVERY STATEMENT



# MODERN SLAVERY ACT

## Transparency Statement 2021

**At EG Group, we do not tolerate any form of modern slavery and are committed to taking steps to ensure slavery and human trafficking does not take place within our own operations or supply chain.**

### About this Statement

This statement has been prepared in accordance with the statutory requirement (set out in the UK Modern Slavery Act, section 54) for large UK businesses to publish an annual transparency statement on steps taken to prevent modern slavery in their business and supply chain.

This statement is available to download from the EG Group website at [www.eg.group](http://www.eg.group) and is also available on the UK Modern Slavery Registry. It covers the activities of EG Group across the UK and international markets for our financial year 2021 (1 January to 31 December 2021). This statement covers all EG Group's UK legal entities required to publish a transparency statement under the UK Modern Slavery Act (see page 8 for a list of UK entities covered). Acquisitions made during the year have been included, including LEON (acquired in May 2021) and Cooplands (acquired in October 2021).

See UK Home Office Guidance for further details of the statutory disclosure requirements under the Modern Slavery Act.

**At EG Group, we are committed to delivering world-class convenience retail whilst improving the lives of others and delivering a positive impact on society.**

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

We recognise that all businesses must be alert to risks of modern slavery and labour exploitation in the workplace and we are committed to taking a proactive approach to identify and mitigate risks. Over the past year, we have been working to strengthen our approach to due diligence on modern slavery in line with our commitment to deliver a positive impact on society.

# COMPANY OVERVIEW

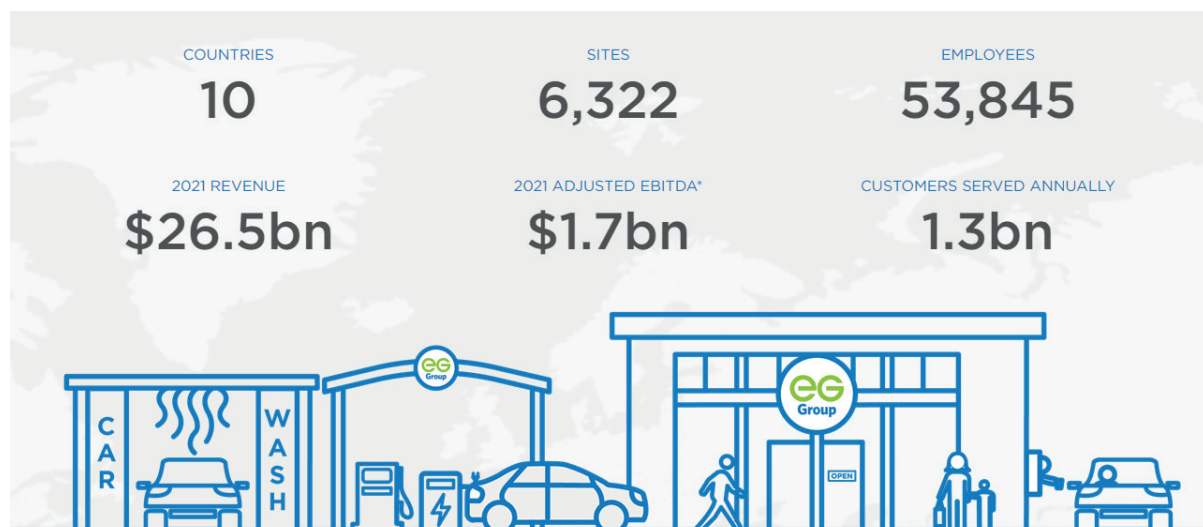
EG Group is one of the world's leading independent convenience retailers with an extensive network of sites across the United Kingdom & Ireland, Continental Europe, Australia and the United States of America.

Founded in 2001 by the Issa family with the acquisition of a single site in the UK, today the company is at the forefront of delivering an innovative approach to forecourt convenience retail.

At EG Group, we pride ourselves on being recognised for our investment model, trading performance and more importantly, providing a best-in-class customer experience in Grocery & Merchandise, Foodservice and Fuel.

Our transformational convenience retail business model has been built on excellent relationships with an extensive portfolio of leading retail brands, and through strategic network acquisitions supported by a programme of new-to-industry developments.

Every day, our committed workforce tirelessly deliver our products and services to millions of customers alongside supporting the local communities in which we operate.



# OUR SUPPLY CHAIN

Our procurement activities predominantly take place from our Group Head Office and Shared Services Centre in Blackburn (UK), with support from regional offices in France, Italy, Germany, the Netherlands, the USA and Australia.

**Goods for Resale:** We work with leading retail brand partners to deliver products and services to our customers across Grocery & Merchandise, Foodservice and Fuel (see table below). We aim to work with trusted brand partners that are well recognised globally or in their local markets and that have well-established Environmental, Social & Governance (ESG) policies and programmes, including due diligence on human rights and modern slavery.

**Goods & Services Not for Resale:** We also procure equipment and services from a range of suppliers and contractors to support our business, including for example, uniform suppliers, logistics companies, waste contractors, cleaning and landscaping contractors, construction and refurbishment companies, IT equipment and services.

Our proprietary food brands in the UK – LEON and Cooplands – work with a range of suppliers including ingredient suppliers, food wholesalers, food manufacturing and service companies, packaging and logistics suppliers. LEON has around 50 suppliers (of which 39 manufacture for LEON in the UK) and Cooplands has around 100 suppliers (mostly small to medium enterprises in the UK). Food ingredients are sourced from all over the world. In line with LEON's commitment to responsible sourcing, it only uses higher welfare British meat, British free-range eggs and the menu celebrates local and seasonal produce.

# OUR BRAND PARTNERS: UK&I

We aim to work with trusted brand partners that are well recognised globally or in their local markets and that have well established Environmental, Social & Governance (ESG) policies and programmes, including due diligence on human rights and modern slavery. Some examples of our brand partners are included in the graphic below.



# OUR POLICIES ON MODERN SLAVERY & HUMAN RIGHTS

In 2022 we plan to formalise and publish key policies. This will include a Code of Conduct, with a section on Environment, Social and Governance (ESG) including human rights and modern slavery. This will apply to all persons working for EG or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, contractors, external consultants, third-party representatives and business partners.

We will also publish a separate ESG policy in 2022, setting out our approach on material ESG issues. This will set out our commitment to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or in any of our supply chains.

## RISK ASSESSMENT

We monitor and review risks associated with our business, including ESG risks. In 2021, our ESG & sustainability team started to assess potential areas of risk relating to human rights & modern slavery, based on external benchmarking and internal interviews with managers across key functions in the business. A number of areas were identified as higher risk for potential human rights & modern slavery issues. In 2022, we worked with external consultants to carry out a materiality assessment of our material ESG issues and risks, and were able to validate the modern slavery risks identified through our internal review, below:

- **Food production sites for proprietary food brands, including the use of recruitment agencies**
- **Sourcing of food ingredients for proprietary food brands**
- **Uniform suppliers**
- **Construction, maintenance and site refurbishment contractors**
- **Use of recruitment agencies to provide temporary staff at our sites. Note that the majority of our recruitment is carried out in-house but we do occasionally use recruitment agencies in some parts of our business**
- **Our extended, global supply chain**

Note that we have automated car washes on our forecourts at some locations, and also jet washes that are operated by our customers. We recognise that there are higher risks of modern slavery in the car wash sector, but these apply to attended hand car washes.

## DUE DILIGENCE

We carry out the following activities to mitigate the risk of modern slavery in our business. We have also developed an action plan for 2022 (see section below on future plans).

- **Regularly review and assess modern slavery risks (see previous section on risk assessment).**
- **Provide training & awareness to our employees on modern slavery (see section below on training).**
- **We engage with our partners to share good practice and assess risks. Our key partnerships are with established and recognised brand partners, with a history of managing their own risks around responsible sourcing, human rights and modern slavery.**
- **Started to work with suppliers to address some areas of risk. For example, LEON has a number of responsible sourcing initiatives to promote good working conditions and environmental protection in its supply chain. The menu now features coffee that is both fair trade and organic (with proceeds donated to the World Land Trust for reforestation projects) and celebrates local and seasonal products.**
- **HR processes ensure that employees have a Right to Work in the UK and that salaries are paid directly to workers.**
- **Whistleblowing policy and independent reporting hotline to enable stakeholders to raise concerns without fear of recrimination.**

## EMPLOYEE TRAINING

In order to address modern slavery risks effectively, we recognise that employees need to be aware of the issues and how to report any concerns.

We have an online training module on modern slavery and human rights. All new employees are required to complete this training module as part of their induction training. In 2021, over 17,000 colleagues in the UK completed the training module.

We are planning to develop and roll out more detailed training for managers in risk areas e.g. site managers and procurement managers. We will also promote awareness of modern slavery through internal communications channels e.g. site notice boards.

## OUR FUTURE PLANS

We have developed an action plan to strengthen our due diligence on modern slavery over the next two years (2022-2023). Our plans include:

- **Clauses on compliance with law in all our contracts**
- **An ESG questionnaire (including a section on modern slavery and human rights) as part of the due diligence process for selecting new brand partners and key suppliers**
- **Pilot third-party ethical / social audits at a sample of food production sites for our proprietary brands**
- **Further training and awareness for employees on modern slavery (see previous section on Employee training)**
- **Renewed focus on our approach to whistleblowing, with an independent reporting hotline**
- **A standard protocol for dealing with incidents of modern slavery**
- **Collaborating with brand partners and suppliers to address specific areas of potential risk (see previous section on Risk Assessment).**

## EFFECTIVENESS OF MEASURES

There were no cases of modern slavery identified or reported to us in 2021.

However, we recognise that we need to continue to improve our due diligence to ensure we effectively identify and address risks. Our modern slavery action plan will be regularly reviewed and updated, and progress will be reported at least annually to the Board.

# ENTITIES COVERED BY THIS STATEMENT

This statement covers the activities of EG Group for the financial year 2021 (1 January to 31 December 2021). It covers all entities in the Group as at 31 December 2021.<sup>(1)</sup>

We have listed below our UK holding companies and subsidiaries that are included in this statement which fall in scope of the UK legal requirement to publish an annual transparency statement.<sup>(2)</sup>

## Entity Name

**Euro Garages Limited**

**Scotco Restaurants Limited**

**Scotco NI Limited**

**LEON Restaurants Limited**

**Coopland & Son (Scarborough)  
Limited**

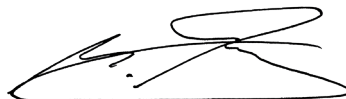
# TRANSPARENCY STATEMENT APPROVAL

This statement has been approved by the Board of EG Group on 10 May 2022.

Signed by:



**Zuber Issa**  
**Co-CEO**  
**Director, EG Group Limited**  
**Date: 10 May 2022**



**Mohsin Issa**  
**Co-CEO**  
**Director, EG Group Limited**  
**Date: 10 May 2022**

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<sup>1</sup> Relevant acquisitions made by EG Group during 2021 for the purposes of this statement include LEON (May 2021) and Cooplands (October 2021).

<sup>2</sup> All UK legal entities with a turnover of £36 million or above are required by law (section 54 of the Modern Slavery Act) to publish a modern slavery transparency statement.