

This is our 5th Modern Slavery Statement. It is made pursuant to section 54 of the Modern Slavery Act 2015 in respect of the financial year 01 Jan 2022 to 31 Dec 2022.

It sets out the steps that Sewell take and continue to take, to ensure that modern slavery and/or human trafficking does not take place within our business or supply chain.

Modern slavery encompasses slavery; servitude; human trafficking and forced labour. Sewell has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically, with integrity and transparently in all our business dealings and to put effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our Business:

Sewell Retail Ltd as part of Sewell Group of companies has been a business with clear social commitment since founded in 1876. Sewell Ventures sits above all our trading group companies to provide: Governance steer, Assurance, Stewardship and act as an advisory Board.

Sewell Retail Ltd trade as Sewell on the go. We operate petrol stations with convenience stores, valeting and 'food to go' services in and around East Yorkshire - 24 hours, 365 days a year. We have around 240 staff; 13 store locations; 3.7 million customers' pa and £50m turnover.

We have a strong culture and set of values, setting expectations of our people to do the right thing, not just for the environment but for our people, supply chain, communities and business.

Supply Chains:

Our immediate supply chains are relatively simple but in turn are immensely complicated with the extensive range of manufacturer products we sell. We consult with our main supply partners who provide 99% of our products we resell.

Our Policies:

This statement should not be read in isolation as we operate a number of internal policies and procedures which aim to ensure we are conducting business in an ethical, legally compliant and transparent manner. Our employees are expected to report their concerns and our management to act upon them.

1. Anti-fraud, Bribery & Corruption policy.
2. Code of conduct on Company business policy
3. Equal Opportunities & Dignity at Work policy.

Training:

The Board and senior team have undertaken training in 2020 and this remains relevant. However, it is our intention to continue to and keep up to date. We maintain a good business relationship with the local Humber Modern Slavery Partnership.

Due Diligence & Risk Assessment

We have further built on the Group governance (Sewell Ventures) of undertaking a rolling Risk Register and now have this in place for Sewell Retail Ltd. This includes a review of our commercial activities in relation to identifying if there are any potential risks where modern slavery could occur. This is similarly done specifically for Sewell on the go in our appraisal of risk(s).

Sewell carries out a 'right to work' screening and proof of address for all prospective staff.

An important part of any due diligence is the ability for workers and others to raise concerns about labour rights, non-compliance and other issues. We are recognised externally for the level of engagement we have within our business (Sunday Times Top 100 Co. to work for and Queens Award for Enterprise). A large element of this is effective workplace communication and confidential feedback.

Areas of Risk

We are supplied by very reputable business of the likes of Londis (owned by Tesco); BP Fuels (UK); Subway; DeeBee, AirServ and Country Choice (to highlight some key areas). There are many local suppliers and a few specialist providers in addition. We currently have two sub-lease hand carwash, operated by a previous employee. We have a good understanding of his business and the business has satisfied our specific scrutiny checks. We have recently been liaising with our company solicitors (Andrew Jackson) upon any further checks we should consider with any of our commercial tenants.

Next Steps:

In 2022 we plan to:

- Keep abreast of awareness and training within our business
- Ask of more from our supply chain of their actions specifically relating to Modern Slavery.

This statement was refreshed on the 1st January 2022 and forwarded for approval by the Sewell Retail Board at the first meeting of 2022.

Signed *Patrick Sewell*

Date 16.02.2022

Patrick Sewell, Managing Director, Sewell Retail Ltd