



## MODERN SLAVERY STATEMENT 2020

July 2020

The United Kingdom Modern Slavery Act 2015 requires businesses to disclose their efforts to guarantee no trafficking or modern slavery occurs either internally within the company or in affiliated supply chains. The following constitutes the statutory statement by Sticks 'n' Sushi in accordance with section 54 of said act.

### *Structure and Supply Chains*

Sticks 'n' Sushi is a Danish-owned restaurant group founded in 1994. The group currently consists of twenty-two restaurants: twelve in Denmark, nine in the United Kingdom and one in Germany. In addition, there is a central kitchen and office capacity in Denmark. As of 2020, the overall portfolio included 1300 staff. We expect the scope of the restaurant group to increase in the proximate years, with the possibility of expansion to new countries.

Our supply chains consist of a number of direct sellers and some wholesalers, many based in Denmark, some in the UK and some in alternative parts of the world. We have high standards for the suppliers we work with.

### *Prevention of Modern Slavery and Human Trafficking*

We have a strict code of conduct relating to employees' rights and also covering the actions of our suppliers. The code complies with the legal frameworks of all the countries we operate in, in addition to being based on a number of general international standards. Notably, The Universal Declaration of Human Rights [1948], the International Covenant of Civil and Political Rights [1966] and the eight fundamental ILO Conventions. This code covers numerous areas relating to slavery and human trafficking including, forced labour, child labour and young workers and various wider conditions related to employment and work.

We have a People team, with a specific responsible based in the UK, who ensure compliance with our code of conduct and generally that our standards for Sticks 'n' Sushi employees remain high. This team also ensure that recruitment is conducted in a manner that is compliant with the 2015 Modern Slavery Act.

We have high standards for the suppliers we work with, a key criterion in suppliers' selection is their Corporate Social Responsibility activities. We would never knowingly accept goods from suppliers who do not adhere to the 2015 Modern Slavery Act. We expect suppliers to live up to our strict code of conduct and have previously ended relationships with suppliers who fell below our zero tolerance standards. We also attempt, where possible, to visit all new suppliers. However, we do not have a comprehensive overview and due diligence procedures are not always highly consistent across our supply chains; over the next year we will work to gain a clear overview. Mapping out all supply chains and contacting suppliers to collect further information where required.

### *Training*

Senior members of our people team are trained in employees' rights and mechanisms to prevent modern slavery and human trafficking. New restaurant managers are also provided with relevant information during their onboarding training. Other members of our people team also partake in workshops with our membership restaurant association (REGA) regarding anti-corruption measures, workers' rights, and human rights.

### *Further Steps to be taken in 2020-2021*

Following our consideration of our actions related to the prevention of modern slavery and human trafficking in 2019, we have specified certain tasks to prevent said actions both internally and in our supply chains in the upcoming year. See below initiatives.



## STICKS N | SUSHI

- Expand our Whistle-blower policy to the UK: In our Danish restaurants we have a whistle-blower policy, known as our 'Fish Tank System'. Each worksite has an independent elected member of staff who employees can confidentially voice concerns to. Based on the issues risen actions will be taken. In 2020 we intend to extend this policy to our UK restaurants.
- Comprehensive overview of key suppliers: We will map out all our suppliers and ensure effective due diligence of all suppliers has been conducted. Where information is lacking, we will contact suppliers for clarifications.
- Any new suppliers will undertake the same aforementioned due diligence analysis.
- We will ensure the same onboarding training of restaurant managers is conducted in all new restaurants, in all new countries.

Signed

Director

Date 14.09.20