

# MODERN SLAVERY STATEMENT: STICKS'N'SUSHI

*June 2021*

As a responsible business we recognise our responsibility to protect employees, guests and those within our supply chains, one key area of this is the prevention of modern slavery. The United Kingdom Modern Slavery Act 2015 requires businesses to disclose their efforts to ensure no trafficking or modern slavery occurs either internally to 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.

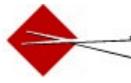
## **ORGANISATIONAL STRUCTURE**

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 and four delivery kitchens in the UK. In total we have around 1100 employees. 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 are based in Denmark, the UK and Germany but, we also work with some suppliers based in Asia and other European companies. Consumables, in the form of food and drink items, are our main sourced product but, we also source non-consumables such as physical items for our restaurants (for example, furniture, crockery, takeaway packaging), energy for our locations, administrative supplies (for example printing material and IT equipment) and logistics services (for example, goods delivery companies, takeaway delivery services and cleaning contractors).

## **PREVENTION OF MODERN SLAVERY & HUMAN TRAFFICKING**

Through a sustainable restaurant association, we are part of in Denmark, the Restaurateur's Guarantee Association (REGA), we conduct bi-annual impact assessments, one of which is based on Human Rights and Workers Rights. These impact assessments are aligned to the UN Global Compacts ten principles and the International Bill of Human Rights which is formed of the International Covenant on Economic, Social and Cultural Rights (ICESCR) and the International Covenant on Civil and Political Rights (ICCPR). These impact assessments are very extensive and identify areas where our business and wider industry is at risk of not adhering to rights. We then develop action plans to prevent these risks. The impact assessment refers specifically to the Right not to be subjected to slavery, servitude or forced labour (Right 14, ICCPR), the right to work, including having a formal contract (Right 3, ICESCR) and the right to enjoy just and favourable working conditions of work, which includes aspects such as the provision of an adequate living wage and the right to safe and healthy working conditions (Right 4, ICESCR). Conducting impact assessments such as these, not only identifies areas where risks can occur but also, raises internal awareness of certain risks. Our Second Human Rights and Workers Rights Impact Assessment was conducted in March 2021. In addition to, and often as a result of, these



impact assessments, which cover all business activities, we conduct actions to prevent modern slavery which are specific to our suppliers and our employees and guests. These actions are outlined below.

### ***Suppliers***

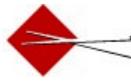
We have high standards for the suppliers we work with. It can be difficult as a relatively small business to have leverage with suppliers so, we have built long-term relationships with many of our key suppliers, facilitating difficult discussions but, also building leverage further. We work with a number of certifications with considerations and clauses for human rights and workers' rights conditions. Many of these certifications conduct annual audits of sites and they also create greater transparency across supply chains reducing, to an extent, possibilities for unregulated and undocumented labour. In early 2021 we began the process of a more formal supplier due diligence process whereby, we have begun sending a formal code of conduct to suppliers and adding additional contractual obligations to supplier contracts. We hoped to have begun this process earlier in 2020 however, delays were incurred due to the COVID-19 pandemic. This process will however be stepped out further across the year. We also have a feedback mechanism on our website where external business relationships can contact us should they want to give any information, such information can be given anonymously.

### ***Employees & Guests***

We are aware that Modern Slavery and Human Trafficking can occur both within our supply chains but, also in-house amongst employees and restaurant guests. All of our employees are based in the UK, Denmark or Germany. Both the UK and Germany have identified minimum wages, which we always pay as a minimum. Denmark does not have a formal minimum wage however, we have identified a minimum level, which is adhered to across the wider industry, which we pay as a minimum. We have a formal People (HR) team who ensure accurate documentation is provided by all employees when they begin working at Sticks'n'Sushi, such as right to work documentation hence, reducing possibilities for undocumented migrants in our employee base. The People team also ensure all employees are provided with an immediate formal contract protecting their rights as employees.

We have an employee feedback mechanism, known as the *Fish Tank* system in our Danish restaurants. This mechanism has a representative in each location that employees can go to should they wish to raise any concerns, they can choose to do this anonymously. The representative cannot hold a management position and is elected by their colleagues. They have a direct line of communication to the People team, including attending regular meetings. One aim of this system is that should issues or suspicions related to modern slavery or human trafficking occur, employees have an anonymous means of reporting this.

In early 2021, a new online Modern Slavery Training module was developed for restaurant general managers, which provides examples of the signs of modern slavery and trafficking but also, procedures for how to act should this occur. This training provides information to managers on how to react if they suspect modern slavery amongst the employees or guests. This training module is due to be released to all general managers in the very near future.



STICKS N SUSHI

## FURTHER ACTIONS 2021-2022

Following the consideration of our actions related to the prevention of modern slavery and human trafficking in 2020-21, we are keen to improve our processes further. Our main focus will be the continuation of our supplier procedure expansion. This process will continue until we have received information from all our suppliers and have sent our Code of Conduct and additional contract clauses to all suppliers. Once this situation has occurred, the maintenance of this system will become a key priority.

Beside this we plan on expanding our *Fish Tank* system to the UK and Germany. We intended to expand this policy in 2021, but due to COVID-19 restrictions this has been delayed. Now that restrictions have been eased, we can proceed with the expansion.

We are always looking for ways to better identify modern slavery and human trafficking and areas this can occur. We will continue to research better ways to do this in the hope of improving our processes further.

Signed

CEO

Date 17-06-2021