BESTWAY GROUP LIMITED

MODERN SLAVERY STATEMENT

Introduction

This statement is for the relevant group companies* of Bestway Group Limited pursuant to section 54(6) of the Modern Slavery Act 2015 (the "Act") and represents the statement for the financial year ending on 30th June 2019.

Our commitment

Bestway Group Limited is the ultimate parent company in the Bestway Group. Bestway Group Limited and other relevant group companies* fully endorse the aims of the Act and take a zero tolerance approach to slavery and human trafficking across such companies, in their supply chains and across their business. Bestway Group Limited and other relevant group companies* are committed to preventing slavery and human trafficking within the business and in their transactions with other businesses.

Our structure

The Bestway Group operates in the wholesale, retail and pharmacy sectors in the UK, with operations in banking and cement led in Pakistan.

An Unprecedented Year

This year our teams have worked exceptionally hard across all our businesses to effectively face into the impact of the Coronavirus Covid-19 Pandemic. Through the lockdowns and various restrictions maintaining each business division's supply chain to our customers who serve local communities has been a vital lifeline for many. Despite unprecedented times and our colleagues working in exceptionally difficult circumstances we have remained focused on our commitments in this statement.

Our suppliers

Bestway Group Limited and other relevant group companies*are committed to acting ethically and expect all of their suppliers to make the same commitment. Bestway Group Limited and other relevant group companies* will address any failures by their suppliers to meet such standards on a case by case basis and ultimately may lead to their ceasing to trade with any such supplier.

Within our business

*The other relevant group companies that fall within the scope of section 54(2) of the Modern Slavery Act 2015 and that are part of this specific statement are: Bestway (Holdings) Limited, Bestway Northern Holdings Limited, Oakleaf Limited, Bestway Securities Limited and Bestway UK Holdco Limited

1. The Bestway Group of companies in the UK have a number of HR policies and procedures that demonstrate compliance with UK Employment Law including: Employee Code of Conduct, Recruitment Policy, Equality & Diversity Policy, Anti-Bribery Policy and Corporate Social Responsibility. During 2020 all policies have been uploaded onto our Intranet and we have actively communicated that they are available to all colleagues in our Public Folders, this includes a newly published Colleague Handbook which references all of our policies.
2. Bestway Group Limited and other relevant group companies* have mandated that each of the Bestway divisions implement their own policies and procedures to promote ethical business practices and policies applicable in the relevant jurisdictions that will protect workers from being abused and exploited in the businesses and in their global supply chains.

Reporting

Bestway Group Limited and other relevant group companies* positively encourage employees to report any unlawful activity and/or any activity which may be in breach of policies and procedures through the Whistleblowing Policy. This includes any circumstances which may give rise to an enhanced risk of slavery or human trafficking.

Actions Achieved

Since publication of the Modern Slavery Statement for the financial year ending 30 June 2019 Bestway Group Limited and other relevant group companies* have undertaken the following:

1. Added training on Modern Slavery to our induction process for all colleagues across Bestway Group Limited and other relevant group companies* to ensure that the previously delivered training is maintained going forward. All colleagues have to ensure they have familiarized themselves with the Anti-Slavery and Human Trafficking Policy within 5 working days of commencement of their employment. Induction records are required to be signed as part of this process. To support this, we have Q&A available on our public folders.
2. We have endorsed the inclusion of all Bestway Group companies (excluding Bestway Retail Limited and the entities trading under the 'Well') to the Bestway Group policy on Anti -Slavery and Human Trafficking.
3. We have sought and obtained letters of policy compliance from all external Employment Agencies on our preferred supplier list for recruitment used by Bestway Group Limited and the other relevant group companies* to recruit permanent and temporary staff.

Next steps

The Board of Directors of Bestway Group Limited and the other relevant group companies* have ultimate responsibility for the implementation of the policies and procedures, including those related to ethical trading and modern slavery.

The Board of Directors have reviewed the processes and effectiveness of the various Group companies that fall within the scope of the Modern Slavery Act 2015 over their last financial year in an effort to ensure that slavery and human trafficking is not taking place in its business or supply chains.

1. Bestway Group Limited and the other relevant group companies* will aim to

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monitor and measure their compliance with the Modern Slavery Act by the annual review of processes put in place by each division of the Bestway Group as applicable in the relevant jurisdictions to tackle modern slavery and human trafficking across the business.

2. To endorse the inclusion of all Bestway Group companies (excluding Bestway Retail Limited and the entities trading under the 'Well') to the Bestway Group policy on Anti-Slavery and Human Trafficking.
3. To continue training on Modern Slavery to Bestway Group Limited and the other relevant group companies* employees.
4. To seek and obtain letters of policy compliance from all external Employment Agencies currently used by Bestway Group Limited and the other relevant group companies* to recruit permanent and temporary staff.

Approval

This statement has been considered and approved by the Board of Directors of:

Bestway Group Limited

Bestway (Holdings) Limited

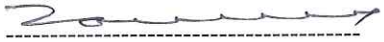
Bestway Northern Holdings Limited

Oakleaf Limited

Bestway Securities Limited

Bestway UK Holdco Limited

on behalf of the company, who will review and update it annually.



Director
For and on behalf of Bestway Group Limited, Bestway (Holdings) Limited, Bestway Northern Holdings Limited, Oakleaf Limited, Bestway Securities Limited and Bestway UK Holdco Limited

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