



# BESTWAY (HOLDINGS) LIMITED

## BESTWAY (HOLDINGS) LIMITED MODERN SLAVERY STATEMENT

### Introduction

This is the second statement for Bestway (Holdings) Limited and other relevant group companies\* pursuant to section 54(6) of the Modern Slavery Act 2015 (the "Act") and represents the statement for the financial year ending on 30<sup>th</sup> June 2017.

### Our commitment

Bestway (Holdings) Limited is the ultimate parent company in the Bestway Group. Bestway (Holdings) 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 (Holdings) 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 and pharmacy sectors in the UK, with operations in banking and cement led in Pakistan.

### Our suppliers

Bestway (Holdings) Limited and other relevant group companies\* are committed to acting ethically and expect all of their suppliers to make the same commitment. Bestway (Holdings) 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

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. All of the policies and procedures are readily available to employees in the Employee Handbook and on notice-boards across the business and the aim is to publish all of the policies and procedures on Bestway (Holdings) Limited's Intranet.
2. Bestway (Holdings) 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 (Holdings) 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.

### Next steps

The Board of Directors of Bestway (Holdings) 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.

Bestway (Holdings) Limited and the other relevant group companies\* will aim to 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.

### Approval

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

- 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 (Holdings) Limited, Bestway Northern Holdings Limited, Oakleaf Limited, Bestway Securities Limited and Bestway UK Holdco Limited

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 Northern Holdings Limited, Oakleaf Limited, Bestway Securities Limited and Bestway UK Holdco Limited