



Modern Slavery Act 2015

SLAVERY AND HUMAN TRAFFICING STATEMENT

ORGANISATION STRUCTURE

Euro Garages Limited (EG) is one of the UK's largest privately-owned forecourt operators.

We have an expanding portfolio of c.340 sites located throughout mainland UK and have strategic brand partnerships with BP, ESSO, Shell, SPAR, Starbucks, Subway, Greggs and Burger King. We currently operate more than 60 Starbucks and over 140 Subway stores across our estate, with plans in place for many more.

Our annual turnover for the year ending July 2015 was £815.6m.

OUR BUSINESS

The senior management team is currently made up of Co-CEOs Zuber Issa & Mohsin Issa, Commercial Director Ilyas Munshi, Chief Financial Officer Michael Hughes & Group General Counsel Imraan Patel.

OUR SUPPLY CHAINS

Our procurement activities take place in England; and our contractors and suppliers are predominantly UK based.

We expect our brand partners, organisations from whom we procure products and services, and other companies we engage with to ensure their goods, materials and labour related supply chains:

- Fully comply with the Modern Slavery Act 2015; and are
- Transparent, accountable and auditable; and are
- Free from ethical ambiguities.

Individuals with evidence of non-compliance with the Modern Slavery Act in connection with EG supply chains are encouraged to follow the reporting procedure outlined within our Whistleblowing Policy.

OUR POLICY ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

DUE DILIGENCE FOR SLAVERY AND HUMAN TRAFFICKING

We have in place arrangements to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Monitor potential risk areas in our supply chains; and
- Protect whistle blowers.

SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values and ethics we have in place a supply chain compliance programme monitored by a transversal team consisting of representatives and involvement from the following departments:

- Legal.
- Finance.
- Operations and Procurement.
- Human Resources.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to those of our staff involved in buying decisions. We also require our business partners to provide training to their staff and suppliers and providers.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

Steps taken by EG since August 2015 - Year 1

(A) Management responsibility and general awareness

We have:

- Agreed management responsibility for this policy and statement and received unanimous endorsement from our Executive Management Team and our Board.
- Raised general organisational awareness to key members of staff explaining progress in preparing this statement.

(B) Risk assessment

We have:

- Undertaken an assessment using our professional legal, risk and procurement teams to determine our risk exposure.
- Included the Modern Slavery Act 2015 within our statutory and regulatory Compliance Risk Register to ensure the risk continues to be flagged, assessed and appropriately addressed.

(C) Risk mitigation

We have obtained legal advice and we will seek to impose in new contracts that we enter into provisions for termination in the event of a modern slavery or human trafficking compliance breach by any supplier. This may be structured to cover termination for breach of any law.

Further steps

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

(A) Management responsibility and general awareness

We will:

- Report progress to our Executive Management Team and our Board.
- Raise awareness of this published statement by notifying organisations in our partnerships and other companies with which we regularly engage.
- Prepare the statement on an annual basis.

(B) Risk assessment

We will:

- Commence a review exercise of this policy against our activities to establish whether the approach we have taken follows emerging best practice by:
 - (A) Assessing and interpreting any recent or emerging case law and best practice; and
 - (B) Benchmarking our activities against statements and action plans undertaken by similar public and private organisations.
 - (C) Re-evaluating the risk of non-compliance as part of our cyclical Compliance Risk Register assessment.

(C) Risk mitigation

We will:

- Act promptly where a compliance breach has been identified or flagged.
- Continue to feedback lessons learnt into EG's compliance risk management process.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year beginning 1 August 2015 and ending on 31 December 2016.

A handwritten signature in black ink, appearing to read 'Zuber Issa'.

Zuber Issa
CEO

A handwritten signature in black ink, appearing to read 'Mohsin Issa'.

Mohsin Issa
CEO

Euro Garages Limited

Date: 28 September 2016