



Anti-Slavery and Human Trafficking Statement

Modern slavery and human trafficking is an international and growing problem affecting millions of individuals around the world. It transcends age, gender and ethnicities. It includes victims who have been brought from overseas and vulnerable people who are forced to illegally work against their will across many different sectors.

Musgrave has a zero tolerance approach to modern slavery of any kind either in our business or in our supply chain. All employees and representatives are expected to report any concerns they have and management is expected to act upon them.

Musgrave structure and business

Musgrave is Ireland's leading food retail and wholesale company. Our brands, including SuperValu, Centra and Daybreak, are market leaders and Musgrave MarketPlace is Ireland's leading wholesale supplier to retail, foodservice and SME's with significant grocery wholesale operations in the Alicante region of Spain. We are also committed to our corporate values of Long Term Relationships; Achievement; Honesty; Working Hard and Not Being Greedy. These values encourage equality, fairness, accountability and compliance throughout the Group.

The Group employs over 45,000 people directly and through its retail partners across the island of Ireland and Spain. Further details on the structure of Musgrave are available on our website: <https://www.musgravegroup.com/about-us/>. In May 2004, we underscored this commitment by becoming the first Irish company to sign up to the principles of the United Nations Global Compact (www.unglobalcompact.org) and our sustainability website sets out our continuing commitment to sustainability across all of our businesses and supply chain: <https://musgravesustainability.com>. We have also had an ethical trading policy for many years: <https://musgravesustainability.com/publications/musgrave-ethical-trading-policy>

Musgrave Anti-Slavery and Human Trafficking Policy

Musgrave policy is to conduct all of our business in an honest and ethical manner, and in compliance with the law.

In this policy we confirm:

1. We will not tolerate any form of modern slavery or human trafficking;
2. We are committed to dealing professionally, honestly and ethically in all our business relationships whether in Ireland, the UK, Spain or elsewhere. This is reflected in the Musgrave Values and our Ethical Trading Policy and Environmental Policies.
3. We have a zero tolerance approach to violations of anti-slavery and human trafficking laws and take seriously any allegations of such activity in our business or in our supply chain.



4. We are committed to reviewing and updating our practices and procedures so that we take all reasonable measures to ensure there are no instances of Modern Slavery or human trafficking in our business and/or our supply chain.
5. If any instances of Modern Slavery or Human Trafficking or breaches of Modern Slavery laws are found within our supply chain we will look to support organisations in their efforts to comply with the applicable legislation. Musgrave will review the continuation of business with any individuals and organisations it deals with who have been found to be involved in slavery, human trafficking, forced or child labour and will engage with them to cease this activity and where appropriate will cease doing business with such individuals and organisations.

Reporting knowledge or suspicion of slavery or human trafficking

All employees of Musgrave have an obligation to report knowledge or suspicion of slavery or human trafficking. Any genuine suspicion or knowledge of slavery or human trafficking is to be immediately reported to the individual's line manager and to Group Legal Counsel, who will decide what further action, if any, is deemed necessary. If the issue being reported relates to knowledge or suspicion of money laundering or terrorist financing then a report will be submitted to the Musgrave Group Financial Controller for investigation. In addition the Musgrave Protected Disclosure Policy and Fraud Policy provide the means for reporting suspicion or knowledge of any wrongdoing or breaches of law including slavery or human trafficking. Employees who raise concerns of slavery or human trafficking in good faith may do so without fear of discrimination or reprisal.

These provisions do not replace any legal reporting or disclosure requirements. Where statutory reporting requirements and procedures exist these must be complied with fully.

Suppliers

We recognise that Musgrave has a risk of being exposed to slavery and human trafficking through its supply chain when dealing with suppliers of products and services, particularly those who have operations and suppliers in territories outside the EU.

We work with our suppliers to resolve issues and problems. If a problem is identified, the type of corrective action implemented will depend on a number of factors. These include the severity of the issue and the willingness of the supplier or production facility to work jointly towards a solution. If required, we will introduce a corrective action plan that sets out a clear timescale for remediation. Suppliers are required to implement corrective measures through collaboration with the production facility management. This process is monitored by our Group Commercial team and relevant Trading departments, in close cooperation with our suppliers. If a severe risk is not resolved, we will stop working with the production facility in question. The relationship will only resume once we are satisfied that the issues have been fully resolved.

We recognise we have a greater responsibility in relation to manufacturers and suppliers of our own brand products where we have greater control over the supply chain than when we are buying branded goods from suppliers. All of our own-brand suppliers are also required to comply with our Ethical Trading Policy and our Sustainability Policy.



Employment procedures

Musgrave has procedures in place pertaining to our employment practices. Robust recruitment processes in line with Republic of Ireland, Northern Ireland (UK) or Spanish employment law (as applicable), including “right to work” document checks, and contracts of employment for all employees.

One of the areas of risk in our own logistics operations is in our utilisation of agency-provided temporary workers. The seasonal nature of some of our operations makes the use of agency labour necessary, so we work closely with our providers to ensure they have rigorous and effective processes in place.

Related policies and documents

In addition to the Ethical Trading Policy mentioned above Musgrave has additional related policies and documents. The Musgrave Protected Disclosure Policy and the Musgrave Fraud Policy facilitates and encourages employees to raise concerns or disclose information which relates to wrongdoing, illegal practices or unethical conduct which may come to their attention through work (including any concerns that may relate to modern slavery and human trafficking).

Musgrave has a number of further policies and documents which reflect our objective to act ethically and in line with our legal and regulatory obligations with regard to our employees, clients and our business relationships including the Musgrave Code of Conduct; Musgrave Staff Handbooks; and the Musgrave Gift and Hospitality Policy.

These policies and documents are subject to continuing review.

Training

We want to help our employees, retail partners and suppliers to understand more about these issues and how to report any suspicions they may have related to them and are developing training on these issues to be delivered to all relevant employees.

Looking forward

Going forward Musgrave will continue to develop the measures mentioned above in respect of our supply chain. More generally our approach to modern slavery and human trafficking risk will continue to evolve and we will continue to mitigate these risks through the provisions mentioned above during 2018 and beyond.

Musgrave shall take responsibility for this statement and its objectives which will be reviewed and updated as appropriate.

UK compliance

This statement and policy are to be read as applying to all subsidiaries of Musgrave operating in Northern Ireland and is being published to comply with the (UK) Modern Slavery Act 2015. However, the terms of the policy apply to all Musgrave businesses regardless of where they operate. The (UK) Modern Slavery Act 2015 categorises offences of slavery, servitude and forced or compulsory labour

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and human trafficking. Although human trafficking often involves an international cross-border element it is also possible to be a victim of modern slavery within one's own country. There are several broad categories of exploitation linked to human trafficking, including sexual exploitation, forced labour, domestic servitude, organ harvesting, child related crimes, forced marriage and illegal adoption.