

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. This statement relates to actions and activities for the financial year ending 31st December 2018.

It sets out the steps that Sewell take and continue to take, to ensure that modern slavery and/or human trafficking does not take place within our business or supply chain.

Modern slavery encompasses slavery; servitude; human trafficking and forced labour. Sewell has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically, with integrity and transparently in all our business dealings and to put effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our Business:

Sewell Retail Ltd as part of Sewell Group of companies has been a business with clear social commitment since founded in 1876. Sewell Ventures sits above all our trading group companies to provide: Governance steer, Assurance, Stewardship and act as an advisory Board.

Sewell Retail Ltd trade as Sewell on the go. We operate petrol stations with convenience stores, valeting and 'food to go' services in and around East Yorkshire - 24 hours, 365 days a year. We have around 245 staff; 13 store locations; 4 million customers' pa and £60m turnover.

We have a strong culture and set of values, setting expectations of our people to do the right thing, not just for the environment but for our people, supply chain, communities and business.

Supply Chains:

Our immediate supply chains are relatively simple but in turn are immensely complicated with the extensive range of manufacturer products we sell. We consult with our main supply partners who provide 99% of our products we resell.

Our Policies:

We operate a number of internal policies and procedures which aim to ensure we are conducting business in an ethical, legally compliant and transparent manner.

1. Anti-fraud, Bribery & Corruption policy.
2. Code of conduct on Company business policy
3. Equal Opportunities & Dignity at Work policy.

Training:

Whilst training has not been completed to date on the Modern Slavery Act, it is the intention of the business to train key policy makers and people in influential roles linked to our people, business and supply chain over the course of the next 12 months.

Due Diligence & Risk Assessment

At a Group governance level (Sewell Ventures) we undertake a Risk Register each year. This includes a review of our commercial activities in relation to identifying if there are any potential risks where modern slavery could occur.

Sewell carries out a 'right to work' screening and proof of address for all prospective staff.

An important part of any due diligence is the ability for workers and others to raise concerns about labour rights, non-compliance and other issues. We are recognised externally for the level of engagement we have within our business (Sunday Time Top 100 Co. to Work for). A large element of this is effective workplace communication and confidential feedback.

Areas of Risk

We are supplied by very reputable business of the likes of Londis (owned by Tesco); BP Fuels (UK); Subway; Washtec and Country Choice (to highlight some key areas). There are many local suppliers and a few specialist providers in addition. We have currently have one sub-lease hand carwash, operated by a previous employee. We have a good understanding of his business and the business has satisfied our specific scrutiny checks.

Notes on 2018:

Sewell also (in Summer 2018) took part in a national and local campaign to highlight Modern Day Slavery with Humberside Police & Humberside Slavery Partnership.

Next Steps:

In 2019 we plan to:

- Continue awareness and training within our business
- Ask of more from our supply chain of their actions specifically relating to Modern Slavery.

This statement refreshed and was approved by the Board of Sewell Retail Ltd on 26th November 2018.

Signed

Patrick Sewell

Date

1st January 2019.

Patrick Sewell, Managing Director, Sewell Retail Ltd