



BENUGO ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT 2016/17

OUR BUSINESS

Benugo Limited ('Benugo') is a restaurant, coffee and deli bar provider operating within public buildings, client premises and on the high street. Our focus is on showcasing fresh, seasonal and healthy food sourced locally whenever possible. We work with a large number of partners, stakeholders and suppliers and recognise that every entity in our supply chain has a duty to respect human rights. Benugo is one of a number of businesses in the WSH family, each of whom provide goods and services across a diverse range of food and hospitality operations with discerning clients and customers. To find out more information about the rest of the WSH family, please visit www.wshlimited.co.uk.

OUR POSITION

At Benugo, we take our responsibility as a business to prevent slavery and human trafficking extremely seriously. We have a zero tolerance approach to all forms of slavery both within our own operations and across our supply chain. This statement outlines the steps which we have taken to date, together with our continuing efforts to ensure that slavery and human trafficking cannot take place in any part of our supply chain and/or business.

OUR SUPPLY CHAIN

We are immensely proud of our supply chain and family of suppliers who allow each of our operating locations to source products and services to meet individual client and customer needs. We deliberately operate a decentralised supply chain model, providing our teams with the choice and ability to select from approved suppliers as opposed to creating and forcing centrally determined supply chain solutions. Our supply chain is predicated on fresh and regional supplier networks. It is incredibly diverse and provides the platform from which our businesses can grow, develop and continue to provide fantastic food and service.

STEPS TAKEN BY BENUGO TO DATE

1. INTEGRITY AND ETHICS COMMITTEE

WSH has an Integrity and Ethics Committee (the "Committee") made up of senior members and directors of our businesses. This Committee meets on a regular basis and oversees the processes which we have been putting and we will put in place to ensure there is no slavery or human trafficking in our business and/or our supply chain.

2. ETHICAL TRADING INITIATIVE BASE CODE

Benugo respects and adheres to internationally recognised human rights principles and in particular the Ethical Trading Initiative Base Code. This Code contains the following nine clauses which are founded on the conventions of the International Labour Organisation and are an internationally recognised code of labour practice:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected

- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practiced
- Regular employment is provided
- No harsh or inhumane treatment is allowed

Benugo is committed to ensuring that all of its dealings with suppliers are conducted in line with such ethical and responsible trading requirements.

3. DUE DILIGENCE ON AND WORKING WITH OUR SUPPLIERS

We require our new suppliers to go through a detailed on-boarding process. Suppliers are expected to update the information provided during the on-boarding process on an annual basis for further review and approval by the supply chain team. This annual review process is to be extended to all existing suppliers to ensure that our due diligence remains up to date and relevant.

As part of our supplier on-boarding process, all new suppliers are expected to acknowledge and commit to comply with:

- a) our Responsible Sourcing and Ethical Trading Policy which sets out our standards in relation to ethical trading; and
- b) our Anti-Slavery and Human Trafficking Supplier Sign-Off which relates more specifically to the Modern Slavery Act.

These commitments have to be made as part of the Self Audit Questionnaire which formally records and captures the supplier's key details and capabilities.

We maintain regular dialogue with our suppliers to ensure that they understand and implement our high standards and they continue to comply with local legislation and regulations. Our on-boarding process also allows us to determine which suppliers are most at risk for responsible sourcing challenges and, for those high risk suppliers, we will prioritise a site audit. Following a site audit, we will notify the supplier of any remedial action required. We will only continue to trade with those suppliers who fully comply with our Responsible Sourcing and Ethical Trading Policy and our Anti-Slavery and Human Trafficking Supplier Sign-Off or those who are taking verifiable steps towards compliance.

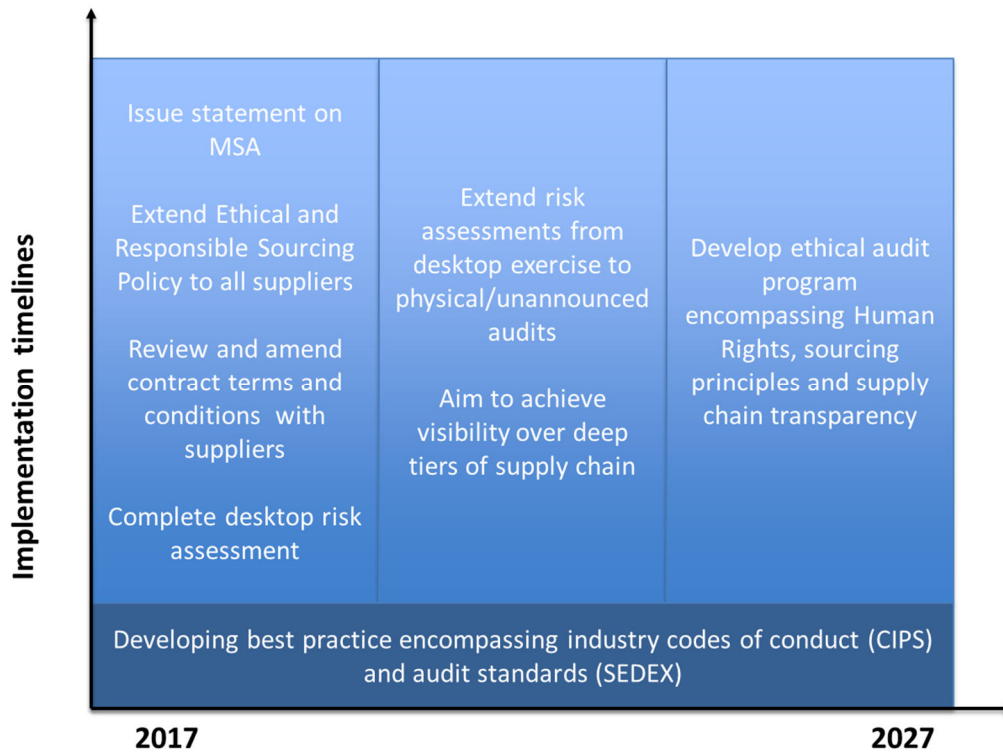
Our target is to ensure that 100% of our suppliers have agreed to our Responsible Sourcing and Ethical Trading Policy and our Anti-Slavery and Human Trafficking Supplier Sign-Off. Whilst we would hope to have completed this work by the end of December 2017, we anticipate a number of challenges within our supply chain partners around communication and understanding of the Modern Slavery Act that may extend this deadline. We see it as our responsibility to work with our suppliers to achieve 100% compliance, and if non-compliance or refusal to adhere is presented, we will work to find suitable, compliant, alternatives.

4. TRAINING

We recognise that to achieve the successful implementation of any anti-slavery and anti-human trafficking policy it is vital to train and raise awareness with those employees who have the potential to come in to contact with suppliers on a regular basis. Our focus will be to continue to help the business to identify any potential risks or failures thereby driving ever greater compliance with our high standards. To date, we have focused our training on our purchasing and supply chain teams. Through 2017, we plan to extend this training to the wider business.

STEPS TO BE TAKEN IN FUTURE

BENUGO MODERN SLAVERY ACT IMPLEMENTATION PLAN



We see the implementation, measurement and raising of awareness and standards across our business and supplier base as being an ongoing project. We will continue to draw on industry best practice and evolve our supply chain in the best way possible to ensure that we are continually assessing the effectiveness of preventing slavery and human trafficking.

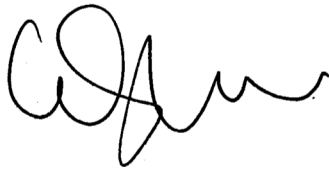
APPROVAL

This statement has been approved by Benugo's Board of Directors. Benugo intends to review and update this statement as necessary on an annual basis.

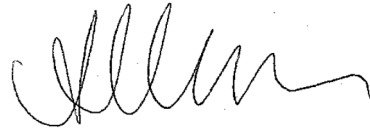
Ben Warner
 Founder

22/12/16

This statement has also been endorsed by:



Andy Milner
WSH Procurement and Supply Chain
Director
22/12/16



Amanda Underwood
WSH Human Resources Director
22/12/16