Modern Slavery Statement – 2023/2024

This statement has been published in accordance with the Modern Slavery Act 2015 (the "Act") and constitutes the slavery and human trafficking statement for the Snowfox Group and its relevant subsidiaries for the financial year ended 30th November 2023. The statement specifically applies to our UK business, YO! and Taiko Foods. It sets out the steps we take to understand all potential risks to ensure that there is no slavery, servitude, forced or compulsory labour, or human trafficking in our business or supply chains.

Introduction
We recognize our responsibility to identify and address potential or actual human rights infringements linked to the products and services we provide. We require our suppliers to uphold the same standards as we apply to ourselves.

Organization structure and supply chains
YO!, Panku and Taiko Foods are brands within Snowfox Group which is a leading international multi-channel Japanese food business. We reach customers across multiple routes to the market including fresh sushi kiosks, grab-and-go products on supermarket shelves and innovative restaurants, selling over 60 million trays of fresh sushi a year.

We have centralized procurement teams managing the relationship between our direct suppliers that provide both food and non-food products. Most of which have been supplying Snowfox Group long-term and therefore have established strong working relationships based on trust and transparency.

YO! opened its doors in 1997 as a fast-casual dining restaurant chain and was one of the first UK brands to introduce the Kaiten belt. Since then, we have developed our company strategy and introduced new concepts such as YO! To Go kiosks operating in both supermarkets and train stations. Taiko Foods is a UK production company made up of factory and head office workers.

Policies in relation to slavery and human trafficking
A policy and procedure on Modern Slavery and Human Trafficking is in place, which outlines how we will confidentially act, along with the steps that will be taken if we uncover any employees who are a victim of modern slavery and/or human trafficking or external suppliers not adhering to the Act.

We encourage our employees to report in confidence any concerns relating to any part of the organization in line with our whistleblowing policy which allows employees to confidentially telephone an external company called 'Ethics Point'. All matters are then passed on to a trained adviser who guides the employee on the best cause of action.

Our Code of Conduct is clearly outlined to our team members along with the actions and behaviors which are expected of them whilst at work and through the course of their duties and responsibilities. We strive to maintain the highest standards of employee conduct when managing our staff and suppliers and expect all our people to behave in the same way.

The Snowfox Group complies with the Anti-Bribery Act 2010 and does not tolerate any form of bribery by or of its employees, agents or any other person acting on our behalf.

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Due diligence processes
We never knowingly accept food or any non-food products from our suppliers who do not adhere to the Modern Slavery Act 2015. They must demonstrate their compliance to the Act by providing their most recent annual statement.

The procedure is designed to establish an assess areas of potential risk in our business and supply chains, monitor potential risk areas in our business and supply chains, reduce the risk of slavery and human trafficking occurring in our business and supply chains, provide adequate protection for whistleblowers.

If we become aware of any concerns with our suppliers and/or they are classed as 'high risk', a full investigation will take place to determine whether these concerns are justified with appropriate action taking place if needed. Depending on the severity of the concerns, we will work with the provider by agreeing an action plan, terminate the supplier, and/or source the product from an alternative supplier.

In addition, we hold regular meetings with the key suppliers not only to ensure they are the right business to partner with but to highlight the expectations of no slavery or human trafficking within their own company and supply chain.

Risk assessment and management
Two main areas have been highlighted as potentially high risk to the business regarding modern slavery and human trafficking. These areas are ~~r~~ecruitment and procurement.

By identifying the above, our UK businesses, YO!, **Panku** and Taiko Foods have invested in a robust applicant tracking system (People Bank) when hiring new people and external right to work checking system, Trust ID. By introducing both People Bank and Trust ID we have lowered our risk for recruitment as all of our teams complete an online application through People Bank and are applying at their own will, hold a face to face interviews where further checks are held and a thorough external right to work check is followed.

With regards to our suppliers, we understand that some of our food products, mainly fish, would be identified as high risk within their supply chain. By introducing our tight procedures, new contracts, completing supply audits and continuing our ongoing close relationships with suppliers, we will safe~~ly~~ measure the risk moving forward.

Both our people and suppliers have access to our modern slavery policy along with the whistleblowing policy and procedure they must follow if needed.

Training on modern slavery and trafficking
The education of our employees about the risks of modern slavery and human trafficking within our businesses and supply chains is important. This is done through our UK internal communication platform YO! 360 and e-learning programs accessed via our training platform, Attensi. Our People are encouraged to identify and report any potential breaches of the organisations anti-slavery and human trafficking policy.

Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains. Examples of training provided across our organisation include:

- All UK Managers have completed e-learning training on the topic.
- All new joiners onboarded to our UK businesses will have to complete a training module on Modern Slavery during their induction.
- Information absorbed during the training has been communicated to all our employees via our communication platform YO! 360, to ensure they are aware of the signs to spot and how to communicate correctly if they deem it necessary.
- Our UK businesses are a registered supporter of Stronger Together and actively use the resources available to improve our understanding of the topic across the organization.

Key performance indicators to measure effectiveness of steps being taken
We have taken many steps during 2023 to prevent modern slavery and human trafficking within the business, these consist of:

- The Group has established a formal, Environmental Social and Governance Committee whose purpose is to support the Group's on-going commitment to environmental, health and safety, corporate social responsibility, corporate governance, sustainability, and other public policy matters relevant to the Group. Each brand is appropriately represented within the Environmental Social and Governance Committee.
- A right to work audit is done every month to notify employees if their documents are due to expire to ensure we provide our people with enough time to renew.
- Our Applicant tracking system (People Bank) allows better control over recruitment.
- Our UK Learning and Development team have created awareness training that highlighted key signs to spot on our e-learning platform 'Attensi'. All Managers who operate a region or manage a team completed the awareness training.
- The People Team completed a day of training on Modern Slavery awareness, provided by Stronger Together.
- The People Team delivered Modern Slavery Awareness sessions during Regional Business meetings.

Further steps YO! will take to prevent Modern Slavery and Human Trafficking in 2024
Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the following further steps to tackle slavery and human trafficking:

- Maintain the robust right to work checks through 'Trust ID' for all new and existing employees.
- Improve our knowledge and understanding across the organisation by delivering group training each quarter to all employees holding a management position.
- Ensure all our Restaurant and Retail managers have watched and understood the training on our e-learning platform 'Attensi'.
- Become an active member of Stronger Together to eliminate any future risk.
- Ensure all members of the People Team and Procurement Team attend training during our new financial year.
- Creating a new clause within the supplier contract to outline expectations, and ensure consistency between all suppliers and UK business of the Snowfox Group



Richard Hodgson
Chief Executive Officer
Snowfox Group

February 2024