



Modern Slavery Statement

This statement is made pursuant to Section 54(1), Part 6 of the Modern Slavery Act 2015, and outlines the steps taken by Sticks'n'Sushi UK Ltd. ("the Company", "we", "us" or "our") to prevent modern slavery in the financial year ending 31.12.2025.

ORGANISATIONAL STRUCTURE

Sticks 'N' Sushi UK Ltd. ("SNS") is a UK registered organisation with operations in England and Scotland. The Company is a subsidiary of the Sticks'n'Sushi Group wholly owned by Tokyo Topco Ltd which also operates the brand of Sticks'n'Sushi in Denmark and Germany.

The Company is wholly owned and has neither subsidiaries nor franchisees, therefore this statement is only applicable to SNS. All locations in the UK operating under the brand name Sticks'n'Sushi are thus covered by this statement.

SUPPLY CHAINS

Our supply chains are global in reach, reflecting the nature of our menu and the quality standards we maintain. Our principal categories of procurement include food and beverage products, notably seafood (including fish, shellfish and sushi-grade products), fresh produce, meat and dairy. Non-food and beverage categories include packaging, restaurant equipment, cleaning products and uniforms.

Key sourcing regions include the United Kingdom, continental Europe, and Asia-Pacific with some goods also sourced from North and South America. We recognise that certain of these regions carry elevated risk of labour exploitation and modern slavery conditions, and we take this into account in our risk assessment and supplier engagement.

We rely on larger entities to import goods into the UK and transport these to our operating sites. For core purchases, we maintain several long-term supplier relationships, which allows us to develop familiarity with the operations and practices of those business relationships over time.

New suppliers are subject to a basic onboarding review, which includes acknowledgement of our Code of Conduct for Business Relationships. We prioritise direct engagement with key suppliers and seek to build transparency progressively across our supply chain tiers.

DUE DILIGENCE PROCEDURES

Sticks'n'Sushi is in the process of making our human rights due diligence procedures fully operational. We acknowledge that at present our procedures are not yet fully systematised, and we are committed to improving this position over the coming reporting periods.

Where specific concerns arise whether identified internally, raised through our grievance mechanism, or prompted by external information, we undertake a targeted review of the relevant supplier or operational area. We are working to ensure that the outcomes of such reviews are recorded and retained, so that findings can inform future assessments and demonstrate progress over time.

Should someone from our business relationships or in our own operation experience any impact on their human rights, we have made a grievance mechanism available, with public information on our website, allowing an impacted party to contact us directly and make us aware of the issue.

As part of our commitment to the minimum standards of the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises (OECD), we are communicating the



expectations we have to business relationships and their compliance with the minimum standards, of which all human rights are a part. This expectation is made through our Policy Commitment and our Code of Conduct for Business Relationships. These expressively state our expectations for business relationships to respect all human rights.

OWN OPERATIONS

Besides committing to comply with all human rights through the implementation of the minimum standards (see [our policy commitment](#)), we work to ensure no or a minimal impact on human rights in our own operations, and thus create situations constituting modern slavery, through the following actions.

- Ensure a salary that as a minimum follows the national minimum wage and pay out the full wage the employee is entitled to, after mandatory government deductions
- No use of child labour in our locations
- Safe and healthy working environments for all our operating locations
- Policies on relevant topics, including health & safety, respect at work and holidays & time off.
- Paid time off
- Grievance mechanism for all employees
- Verifying eligibility to work
- No fees charged to candidates
- Written contract setting out terms of employment
- Itemised payslips so employees can verify their deductions
- Check on working hours to comply with working time regulations
- Promoting internally to reduce vulnerability to exploitation

RISK ASSESSMENT AND MANAGEMENT

Based on our current assessment, we consider the following areas to present the greatest risk of modern slavery exposure:

- **Seafood procurement:** is a globally recognised area of elevated risk, particularly in Southeast Asia, due to the prevalence of labour exploitation in fishing and aquaculture. We will engage with our key seafood suppliers to understand their own labour practices and due diligence measures.
- **Hospitality sector labour:** the industry, including our own operations can be associated with risks related to migrant workers, zero-hours arrangements and recruitment practices. We mitigate this risk through our employment policies and pay practices.
- **Indirect procurement:** Goods such as uniforms and packaging, which may be sourced from higher-risk manufacturing regions, due to potential prevalence of child labour, are identified as an area for increased scrutiny in future periods.

We intend to formalise this risk mapping process and conduct more structured supplier-level assessments in the coming reporting period, prioritising those categories identified as highest risk.

KEY PERFORMANCE INDICATORS AND MEASURING EFFECTIVENESS

We acknowledge that our ability to measure the effectiveness of our actions is at an early stage of development. In the current reporting period, we have tracked the following indicators as a baseline:

- Number of grievances received via our grievance mechanism relating to human rights or labour concerns: 0



- Number of suppliers who have acknowledged our Code of Conduct for Business Relationships: **1**
- Compliance with National Minimum Wage and National Living Wage requirements across all locations: **Confirmed**

In future reporting periods, we intend to expand our KPI framework to include metrics relating to supplier assessments completed, training participation rates, and the outcomes of any due diligence reviews conducted.

TRAINING AND CAPACITY BUILDING

We recognise that awareness and training are important components of an effective response to modern slavery risk. In the current reporting period, relevant management staff have been made aware of our Policy Commitment and Code of Conduct for Business Relationships and their obligations thereunder.

We acknowledge that formal modern slavery awareness training has not yet been rolled out across the business. In the next reporting period, we intend to introduce structured training for our procurement and supply chain teams covering how to identify indicators of modern slavery; how to respond to and report concerns; and the due diligence expectations we apply to our supply chain.

FUTURE WORK

Our priorities for the next reporting period include:

- Operationalising our human rights due diligence procedures, with a focus on higher-risk supply chain categories
- Introducing human rights training for managers and relevant staff
- Expanding our KPI framework to enable more meaningful measurement of progress
- Conducting a more formal risk mapping exercise across our supply chain tiers
- Reviewing our grievance mechanism to ensure it is accessible, well-communicated and effective

PREPARATION AND APPROVAL

This statement was prepared pursuant to our obligations under the Modern Slavery Act 2015. The statement has been prepared to the best of our knowledge based on the procedures and actions that has taken place in the company during the reporting period.

Approval from the Board of Directors has been obtained and the statement has been made available on the website of the Company.

London, June 2026

Kushal Banerjee
Director, Sticks'N'Sushi UK Limited