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## Modern Slavery and Human Trafficking Statement

### Financial Year Ending: 31 December 2025

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 and human trafficking in its business operations and supply chains.

We are committed to acting ethically and with integrity in all our business relationships, and to implementing and enforcing systems and controls to ensure modern slavery is not taking place anywhere in our supply chains.

### Organisational Structure and Supply Chains

Sticks n Sushi UK Ltd and has business operations in the United Kingdom, as well as:

- Denmark
- Germany

Our supply chains predominantly include **UK-based suppliers**, with whom we maintain long-term partnerships. All suppliers must confirm compliance with our **anti-slavery and human rights standards** before engagement.

For more information about our business, please visit: <https://www.sticksnsushi.com/gb/en/>

### Policies in Relation to Slavery and Human Trafficking

To ensure ethical operations and transparency, we maintain the following policies

- **Recruitment and selection policy** - All staff are recruited within the UK and must pass Trust ID before being employed,.
- **Supplier code of conduct** - We operate this policy to ensure our suppliers operate in full compliance with the laws, rules and regulations of the countries in which they operate, and to seek similar commitments across their own supply chain.
- **Staff code of conduct** - We are committed to the fair treatment of all staff. Our staff code of conduct reflects our core values and expected behaviours. The code of conduct makes it clear that we have a zero-tolerance approach to modern slavery.
- **Procurement policy** - We want to make sure that potential suppliers are committed to ensuring that slavery and human trafficking is not taking place within their own supply chains. Our procurement policy and supporting procedures set out controls and checks undertaken to help verify this

### Due Diligence Processes

We conduct due diligence procedures to identify, prevent, and mitigate modern slavery risks:

- Internal Supplier Audits
- Risk-based supplier assessments



- Ongoing monitoring of supplier compliance

These procedures aim to:

- Identify and mitigate risks of modern slavery and human trafficking.
- Improve transparency across our supply chain.
- Ensure non-compliant suppliers are either remediated or removed.

### Risk Assessment and Management

Although we operate in a sector and geographies considered **low-risk**, we remain vigilant. Our risk management actions include:

- Risk evaluation of **all new suppliers** during onboarding.
- Enhanced checks for suppliers operating in higher-risk jurisdictions or industries (e.g. food production, logistics).
- A clear **remediation protocol** for addressing any identified non-compliance.

### Performance Monitoring (KPIs)

To measure the effectiveness of our actions, we track the following **Key Performance Indicators (KPIs)**:

- **Annual modern slavery questionnaires** issued to 100% of suppliers.
- **Staff training completion rates** (initial and refresher modules).
- Number of supplier issues raised, escalated, and resolved.
- Timely audits and reviews of higher-risk suppliers.

### Training and Awareness

All staff are required to complete **mandatory training** on modern slavery, including:

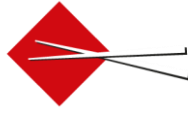
- Identifying signs of modern slavery and trafficking.
- Reporting mechanisms and internal escalation steps.
- External reporting options and helplines.
- Expectations for managing non-compliant suppliers.

Refresher courses are provided every 12–24 months to ensure ongoing awareness.

### Commitment to Continuous Improvement

We are committed to **continuous improvement** in our approach to preventing modern slavery. During the next financial year, we aim to:

- Strengthen our **human rights due diligence** in supplier contracts.
- Collaborate with industry partners to align on ethical sourcing practices.
- Align with government and regulatory recommendations from the 2024 House of Lords review, including potential integration with future due diligence legislation.



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This statement was approved by the Board of Directors of Sticks n Sushi UK Ltd on **02/02/2025** and will be reviewed annually.

Dan Munt  
Operations Director