



23.5 DEGREES LIMITED T/A STARBUCKS STATEMENT ON UK MODERN SLAVERY ACT OF 2015 (FOR FISCAL YEAR 2021)

The Modern Slavery Act of 2015 came into effect on 29 October 2015 and requires those entities conducting business in the UK, supplying goods and services, and having annual turnover of £36 million or more to disclose information regarding the efforts they have taken to address slavery and human trafficking from their supply chains during the previous financial year.

Our Business and Values

23.5 Degrees Limited is a Starbucks franchised business partner and has more than 86 stores in the UK. We offer a range of products that customers enjoy in our cafes, at home, and on the go - including coffee, handcrafted beverages, merchandise, fresh food, and consumer goods.

We have always believed we can - and should - have a positive impact on the communities we serve. One person, one cup and one neighborhood at a time. It is our vision that together we will elevate our partners, customers, suppliers and neighbours to create positive change. Starbucks focus in four areas where their commitment and scale can make the biggest impact:

- Making coffee the world's first sustainable agricultural product by doing our part to improve the lives of 1 million people in coffee communities around the world.
- Building and operating the world's largest green retail business, minimizing our environmental footprint and inspiring others to do the same.
- Investing in pathways to opportunity through education, training and employment.
- Strengthening communities by welcoming all and creating impact on issues that matter.

Starbucks has a long history of promoting Ethical Sourcing of its products, which are produced in countries all over the world, and have devoted considerable resources over the last several years to mapping their supply chain for greater transparency and developing and implementing appropriate ethical standards applicable to our many suppliers and those involved in the production, processing and manufacturing of all the products we sell.

23.5 Degrees Limited is fully committed to preventing acts of modern slavery and human trafficking from occurring within our business and seeks to impose those same high standards on its suppliers. We will take a zero-tolerance approach to non-ethical practices and we are committed to acting professionally, fairly and with integrity in all our business dealings and supply chain relationships.

Key Executives

Our executive team comprises of the following people

Role	Name
CEO	Mark Hepburn
CFO	Luca Contardo
COO	Barry Mulholland

Supply Chain and Due Diligence

Starbucks continues to work closely with suppliers of manufactured products used or sold in Starbucks stores to ensure that the manufactured goods and ethical sourcing standards and all legal obligations are followed.

Commitment to continuous improvement is the cornerstone of this program, and factory assessments have been a key part of Starbucks' and our strategy since 2006. Starbucks continues to collaborate with others in the coffee industry to address ethical sourcing best practices in our shared supply bases.

Where suppliers work with 23.5 degrees and do not also work with Starbucks, we will review their working practices and require them to commit to ensuring that modern slavery does not exist within their own supply network and/or business.

Our policies

We currently operate the following internal policies to ensure that we are conducting business in an ethical and transparent manner. We continuously review and update all of our policies. These include:

1. This Modern Slavery Statement, which sets out our approach on modern slavery and explains how as a business we can identify any risks and how to mitigate these.
2. The Employee Handbook, which sets out our Entitlement to Work in the UK Policy, and confirmation that all employees will be paid directly into their nominated bank accounts, again to safeguard against human trafficking or individuals being forced to work against their will. It also outlines our Health and Safety Policy, , and our Whistleblowing Policy.
3. Going forwards, we also plan to introduce the following policies:
4. The Anti-Slavery and Human Trafficking Policy, which will be supported by a briefing note and which will outline the obligations for all staff members; and

All employees (referred to as "partners") are required to abide by all of our published policies and procedures in order to ensure that we exhibit and promote ethical business activities.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains, our business partners and our employees will be required to take regular training on our standards regarding slavery and human trafficking. All employees will also be provided with copies of the Anti-slavery and Human Trafficking Policy and the Modern Slavery Briefing Note upon the commencement of their employment so that they are aware of what to look out for, their obligations and the zero-tolerance approach taken by the company.

Due diligence

We understand that the following areas give rise to the highest modern slavery risks:

- The employment of staff, or "workers" that may be provided by an agency (such as cleaners or maintenance staff) who may be forced into compulsory labour; and
- The sourcing of goods and services/the supply and acquisition of manufactured products.

As part of our initiative to identify and mitigate risks in relation to staffing we will be requiring all members of HR and managers that are involved with the onboarding of new employees or agency workers to undertake appropriate training on the topic of Modern Slavery.

Additionally, in relation to identify and mitigate risk in relation to the sourcing of goods and services/the supply and acquisition of manufactured products we will be working with contractors and service suppliers to ensure that the necessary Modern Slavery requirements are in place within contracts and that our suppliers engage in ethical business practices. Going forward, as part of our initiative to identify and mitigate risk we will require all contractors and suppliers to provide us with a copy of their Modern Slavery Statement. If this is not available, we require them to confirm in writing their compliance. We also undertake to protect any whistleblowers in line with our Whistleblowing Policy.

Effectiveness

Going forwards Starbucks and 23.5 Degrees Limited will review, survey and evaluate supply chains with regards to human trafficking and forced labor as we have zero tolerance policy against slavery and human trafficking. If it is determined that a supplier is operating outside of Starbucks policies or 23.5 Degrees Limited policies, then Starbucks, 23.5 Degrees Limited or a party representative and the supplier will develop and implement a corrective action plan including a mutually agreed upon schedule for resolution of all issues. Any failure thereafter to meet a corrective action plan commitment is considered a material breach of our agreement with the supplier and may result in cancellation of any current orders and/or termination of the contractual relationship with the supplier. Gross violations or illegal activities are cause for outright and immediate termination of the contractual and business relationship.

We are committed to continuous improvement and review our programs and policies on an ongoing basis to ensure all actions are consistent with industry norms and to make possible additions or amendments where needed to address the specific topics described in the law.

We are continuously evolving to identify any risk mitigation within our existing business and supplier base. We require employees and our supply chain partners to share our ethical business practices ambitions.

Starbucks responsible business practices can be found at www.starbucks.com/responsibility which discloses at length and in detail our various Ethical Sourcing programs and policies. It is Starbucks and 23.5 Degrees Limited's intention to make its customers, as well as other interested consumers, aware of all that we do to ensure that, among other things, our supply chain is free of forced or trafficked labor.

Further steps

We intend to take the following further steps to combat slavery and human trafficking:

- Implement and train all staff on our Anti-Slavery and Human Trafficking Policy; and
- Engage a procurement specialist who will assist with a review of our procurement processes and work with contractors and service suppliers to ensure that the necessary Modern Slavery requirements are in place within contracts.

This statement is by 23.5 Degrees Limited for itself and is made pursuant to Section 54 of the Modern Slavery Act of 2015 and constitutes our slavery and human trafficking statement for the financial year beginning 1/9/2020 and ending 31/8/2021. This statement is approved by 23.5 Degrees Limited's board of directors.

Signed



Mark Hepburn
CEO 23.5 Degrees Limited

Date: 24 January 2022