
WITNESS STATEMENT OF JOHN MAHON

I, **JOHN MAHON** of Motor Fuel Group of Gladstone Place, 36-38 Upper Marlborough Road, St Albans, Hertfordshire, AL1 3UU, England ("MFG") say as follows:

1. I am employed by MFG as the Head of Range & Space, and I am also responsible for alcohol licensing across MFG's sites. I have held this position for the past two and a half years. My remit within this role includes defining the product range & category space for food and drink products within our stores and I have responsibility over new licence applications.
2. MFG is a UK based forecourt operator with 872 sites located across the UK, providing customers with fuel supply, valeting services, EV Charging at some sites and the retail of convenient food, non-food and drink.
3. In 2018 MFG merged with Malthurst Retail, bringing close to 500 sites into the MFG network. The majority of our sites operate under a commission operator business model, based on a Contract Manager operating a site on a self-employed basis. The Contract Manager is responsible for employing the staff and running the business in line with MFG's operating standards.
4. MFG works together with different symbol groups such as Budgens and Londis who supply the shop goods. We work with a number of major fuel suppliers including BP, Esso, Murco, Shell & Texaco. So, a store that is branded Shell or Londis is still an MFG store, but the fascia/fuel brand could change from time to time.
5. The management structure of MFG is as set out as follows:

The Managing Director sits under the Chief Operating Officer and heads-up all non-fuel retail sales & operations at MFG. Beneath the Managing Director, there are two Operational Directors who are responsible for each of the North and South region. There are 4 Regional Managers and under each of those there are Area Managers who each look after between 18-20 sites – 53 nationally looking after MFG sites.
6. MFG operates a structured and rigorous site inspection process across all sites.
7. Each site is visited a minimum of every two weeks by the Area Manager. The Area Manager is responsible for carrying out a Service, Availability and Standards check ("SAS check"). On an SAS check, the Area Manager carries out the following checks:
 - (a) a physical inspection of the whole of the site forecourt, checking for litter, the presentation of bunkers and checking all pumps are clean and operational and free from hazards;
 - (b) a physical inspection of each bay in the store, walking through each bay with the Store Manager to check that the products and product display are compliant with the planogram set for that particular site; and
 - (c) a check of the due diligence log at each site, including the alcohol sale refusals register and incident report log.

8. A planogram is a set list of what products can and cannot be sold in each site. As far as possible, MFG wants all sites to look the same and the SAS checks are the point at which compliance with the planograms are checked. MFG does not allow the sale of strong ciders or beers and has limited promotional offers. MFG is independent of our brand partners such as Londis or Budgens, so do not have to offer the same promotions as they do. We have control over the promotions offered.
9. The Area Manager also carries out an additional monthly audit on each site to check the health and safety records and alcohol licensing records.
10. In certain sites, there are licence conditions including Alcohol by Volume (“ABV”) restrictions in place. The Area Manager checks the site’s licence conditions and ensures compliance.
11. MFG ensures that before any member of staff can work on the tills in store, online training on alcohol licensing is provided, as well as training with the individual Contract Manager. Refresher training takes place every quarter, across all staff at all sites. Training records are checked by the Area Manager at the monthly audit.
12. The Contract Manager and Designated Premises Supervisor at each site carry out monthly checks to ensure all staff are meeting the conditions of the premises licence.
13. On a weekly basis, the Contract Manager carries out random observation checks. This includes logging onto the till, finding an alcohol transaction and checking this against the CCTV footage, to check that all ID challenges are being carried out correctly.
14. MFG engages a 3rd party contractor, Serve Legal, to carry out test purchases to ensure that our Challenge 25 Policy is being adhered to for all age restricted products including alcohol. MFG is also about to launch a web portal which will show at company, regional and area level the performance of each site, including the number and outcome of Serve Legal checks. The results will show up as red, amber or green allowing Area Managers and Contract Managers to focus on and respond quickly to any site that may fall short of MFG standards.
15. Compliance across all sites is treated seriously, and our management team as a whole take responsibility by ensuring that regular site visits are carried out at each level.
16. Our Managing Director carries out site visits three days a week, and on each day will visit six sites. To ensure the audit process is thorough and consistent, our Operational Directors will also attend site visits with our Regional Managers and the Regional Managers will attend some visits with the Area Managers. There is a layer of checking at each level.
17. MFG is a responsible retailer. Complaints can be made directly to our head office Customer Services Department or to the site in question. We understand our responsibility as a business in the community to do the right thing and take time to act in the best interests of those around us. We respond to issues quickly. We have and will not hesitate to suspend alcohol sales immediately, either voluntarily or if requested to do so by the Police or other authority. To the best of my knowledge no MFG licence has been the subject of a licence review.

Signed

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John Mahon