

HOLROYD HOWE ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT 2017

Our Business

Holroyd Howe Limited ('Holroyd Howe') is a specialist caterer, providing freshly prepared, nutritious food exclusively to independent schools and colleges. We work with a large number of partners, stakeholders and suppliers and recognise that every entity in our supply chain has a duty to respect human rights.

Our Position

At Holroyd Howe, we take our responsibility as a business to prevent slavery and human trafficking extremely seriously. We have a zero tolerance approach to all forms of slavery both within our own operations and across our supply chain. This statement outlines the steps which we have taken to date, together with our continuing efforts to ensure that slavery and human trafficking cannot take place in any part of our supply chain and/or business.

Our Supply Chain

We are immensely proud of our supply chain and family of suppliers who allow each of our operating locations to source products and services to meet individual client and customer needs. We deliberately operate a decentralised supply chain model, providing our teams with the choice and ability to select from approved suppliers as opposed to creating and forcing centrally determined supply chain solutions. Our supply chain is predicated on fresh and regional supplier networks. It is incredibly diverse and provides the platform from which our businesses can grow, develop and continue to provide fantastic food and service.

STEPS TAKEN BY HOLROYD HOWE TO DATE

Throughout 2017, we have continued to work hard to ensure that our business and our supply chain have taken appropriate steps towards preventing modern slavery and human trafficking.

1. Governance

Our Integrity and Ethics Committee, which is responsible for overseeing the processes we are putting in place to prevent modern slavery or human trafficking from taking place in our business and/or supply chain, has continued to meet on a regular basis with modern slavery being a permanent agenda item.

2. Ethical Trading Initiative Base Code

Holroyd Howe has remained committed to adhering to internationally recognised human rights principles and in particular the Ethical Trading Initiative Base Code. This Code contains the following nine clauses which are founded on the conventions of the International Labour Organisation and are an internationally recognised code of labour practice:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practiced
- Regular employment is provided
- No harsh or inhumane treatment is allowed

Holroyd Howe is committed to ensuring that all its dealings with its own employees and with suppliers are conducted in line with such ethical and responsible trading requirements.

3. Our suppliers

We have reviewed the policies and processes in place with our suppliers and determined that these are clear and appropriate. The key processes are described below.

Supplier on-boarding:

All new suppliers go through a detailed on-boarding process. Suppliers are then expected to update the information provided during the on-boarding process on an annual basis for further review and approval by the supply chain team. As part of that on-boarding process, suppliers must acknowledge and commit to comply with:

- a) our Responsible Sourcing and Ethical Trading Policy which sets out our standards in relation to ethical trading; and
- b) our Anti-Slavery and Human Trafficking Supplier Sign-Off which relates more specifically to the Modern Slavery Act.

These commitments have to be made as part of the Self Audit Questionnaire which formally records and captures the supplier's key details and capabilities.

Throughout 2017, this on-boarding process (previously only available to new suppliers) was extended to some existing suppliers to ensure that our due diligence on them will continue to remain up to date and relevant.

Our ultimate target is to get to a position where we can ensure that 100% of our suppliers have agreed to our Responsible Sourcing and Ethical Trading Policy and our Anti-Slavery and Human Trafficking Supplier Sign-Off.

Supplier auditing:

Our on-boarding process also allows us to determine which suppliers are most at risk of responsible sourcing challenges and, for those high-risk suppliers, we will prioritise a site audit. The site audit allows us to understand more about what the supplier is really doing to protect their people. Following a site audit, we will notify the supplier of any remedial action we reasonably believe is required.

Further developments in our systems and an increased frequency of audits over 2017, particularly for suppliers considered as being high risk, has resulted in a more robust programme for the identification and mitigation of ethical challenges in our supply chain.

In 2018, we will also commence a comprehensive desktop risk assessment exercise to understand which suppliers, or categories of suppliers, have a potential modern slavery risk attached to their activities.

Our supplier expectations:

We maintain regular dialogue with all of our suppliers to ensure that they understand and implement our high standards and that they continue to comply with local legislation and regulations.

We will only continue to trade with those suppliers who fully comply with our Responsible Sourcing and Ethical Trading Policy and our Anti-Slavery and Human Trafficking Supplier Sign-Off or those who are taking verifiable steps towards compliance.

We see it as our responsibility to work with our suppliers to achieve 100% compliance, and if non-compliance or refusal to adhere is presented, we will work to find suitable, compliant, alternatives.

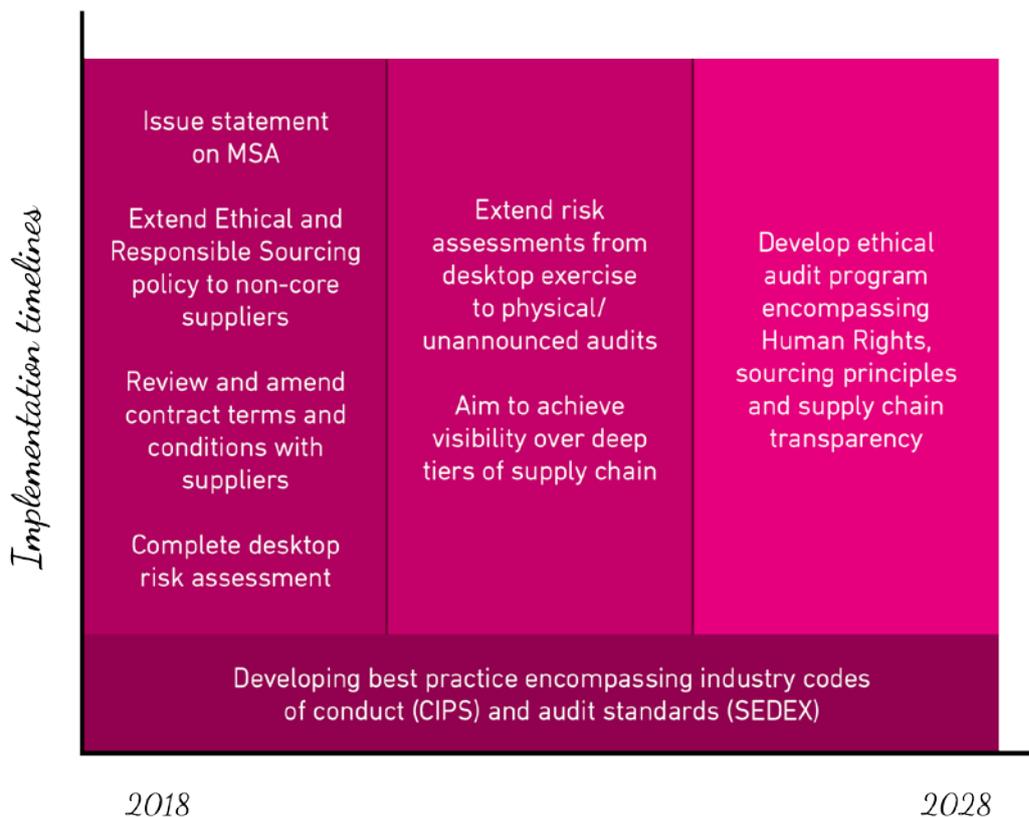
4. Training

We recognise that to achieve the successful implementation of any anti-slavery and anti-human trafficking policy it is vital to train and raise awareness with those employees who have the potential to come in to contact with suppliers on a regular basis. Our focus will be to continue to help the business to identify any potential risks or failures thereby driving ever greater compliance with our high standards.

To date, we have focused our training on our purchasing and supply chain teams. In 2018, through the launch of our new employee engagement platform, we plan to create and roll out training and awareness raising modules focusing on ethical trade and modern slavery. These modules will initially be targeted at key HR and operational functions so that they are well equipped to identify where modern slavery could be present and to know what steps to take when they recognise potential issues.

STEPS TO BE TAKEN IN THE FUTURE

Modern Slavery Act Implementation Plan



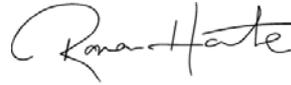
We see the implementation, measurement and raising of awareness and standards across our business and supplier base as being an ongoing project and, since last year's initial statement, we have made progress both with our suppliers and our business. Over the coming years, we will continue to evolve our supply chain by drawing on industry best practice and we will continue to put our people at the forefront of what we do.

APPROVAL

This statement has been approved by Holroyd Howe's Board of Directors. Holroyd Howe intends to review and update this statement as necessary on an annual basis.



Alastair Storey
Chairman
Holroyd Howe Limited



Ronan Harte
Chief Executive
Holroyd Howe Limited

This statement has also been endorsed by:



Andy Milner
Procurement and Supply Chain Director