

# ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

FOR FINANCIAL YEAR ENDING 27<sup>TH</sup> DECEMBER 2023

## 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 are clear about our responsibility to prevent slavery and human trafficking. Whilst we have a zero-tolerance approach to all forms of slavery both within our own operations and across our supply chain, we recognise the need to foster transparency within our supplier relationships to allow for greater collaboration and supportive action to be taken in the event of any issues being identified. We want everyone, whether they work within our business, or across our Supply Chain, to have greater awareness of the risks of modern slavery and to have faith that, once identified, we will deal with them responsibly.

Human Rights are extremely important to us and continued turbulence across the world only serves to raise the risk of Modern Slavery and the exploitation of people. Labour shortages, cost of living pressures and the continued mass migration of people as a result of conflict or climate change continue to present challenges for our clients, customers and colleagues as well as those domestic and international communities working across the supply chains serving our business. This statement outlines the steps we have taken to date, and continue to take, as a business to prevent slavery and human trafficking in our own operations and supply chains.

## Our Supply Chain

We have an extensive Supply Chain with access to over 1,000 suppliers and are immensely proud of the role they play in enabling each of our operating locations to deliver outstanding levels of service and hospitality to meet our client and customer needs. Almost all our suppliers are based in the UK although we acknowledge that across the wide range of products and services they provide, a number of these will be sourced from both Europe and further afield for seasonality, availability and provenance reasons. Our supply chain is complex and varied and 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 but our Procurement & Supply Chain function is also responsible for the goods and services we need to run our business (GNFR – Goods and services not for resale) such as HR and professional services, technology, logistics and cleaning. Our supply chain remains 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

### 1. Governance

At Holroyd Howe, we recognise that strong governance is essential for identifying and driving out modern slavery in our business and across our supply chain, and that executive-level ownership and engagement on the issue of modern slavery is critical. Development and oversight of our Modern Slavery strategy sits with our Environmental, Social and Governance ("ESG") Committee which meets on a quarterly basis reporting to the main WSH Board. The ESG Committee is chaired by a WSH board member and committee members lead a number of distinct action groups that focus on a wide range of areas including ethical and sustainable supply chain ("Progressive Partnerships") as well as colleague welfare and wellbeing ("Inclusion by Design" and "Growing talent"). Action groups include representation from all WSH businesses either through direct participation or consultation on targets and KPIs. Modern slavery continues to be a permanent agenda item for the ESG Committee as it continues to take its responsibility on developing and overseeing our ethical approach in this area as a high priority.

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## 2. Policies and Contractual Controls

Holroyd Howe remains committed to ensuring that its dealings with its own employees, and with its suppliers, are conducted ethically and responsibly. Holroyd Howe adheres to internationally recognised human rights principles and our policies are underpinned by our adherence to important internationally recognised standards including the UN Universal Declaration of Human Rights, core International Labour Organisation (ILO) standards, the Ethical Trading Initiative (ETI) Base Code and national and international laws. The following clauses guide us in how we protect and respect human rights across our operations:

- a. employment is freely chosen;
- b. freedom of association and the right to collective bargaining are respected;
- c. working conditions are safe and hygienic;
- d. child labour shall not be used;
- e. living wages are paid;
- f. working hours are not excessive;
- g. no discrimination is practiced;
- h. right to an effective remedy;
- i. regular employment is provided; and
- j. no harsh or inhumane treatment is allowed.

We expect suppliers to comply with our Modern Slavery and Human Rights policy, Supplier Code of Conduct and Whistleblowing policy as well as all applicable national laws in the countries in which they operate and all relevant ILO Conventions.

## 3. Our Suppliers

Our procurement function is responsible for sourcing the goods and services that we need to run our business. Our supply chain is extensive and, even though our focus naturally lies in the food, beverage and people categories given the nature of our business, our standards and policies extend to all suppliers used across our operations and we have well established processes and policies in place to ensure that workers making and delivering the products and services we use or sell are treated responsibly.

Throughout 2023 we continued to adapt our ways of working to ensure that they remained fit for purpose in the face of ongoing labour market challenges, inflation and supply chain disruption. The nature of these additional pressures continues to impact on our supply chain and is recognised as increasing the risk of Modern Slavery; financial hardship increasing the vulnerability to exploitation for many working within it. How we identify, assess and manage risk in our supply chains is therefore increasingly important due to the changing nature and visibility of this risk. As we adapt, we make sure that our standards are continuously met through a rigorous

supplier on-boarding and audit process, along with regular supplier dialogue.

### Supplier on-boarding:

Any supplier wishing to work with our business will go through a detailed on-boarding process which requires them to agree and sign up to our general terms and conditions of trade, which include appropriate anti-slavery and human trafficking clauses. They are also required to agree and commit to full compliance with the following:

- a. our Responsible Sourcing and Ethical Trading Policy which sets out our standards in relation to ethical trading;
- b. our Anti-Slavery and Human Trafficking Supplier Sign-Off which relates more specifically to the Modern Slavery Act;
- c. the implementation of a due diligence process within their business to ensure there is no slavery and human trafficking in their supply chain (including in relation to personnel obtained via recruitment agencies); and
- d. that any contracts with subcontractors and suppliers also include human trafficking provisions that meet our requirements.

The above requirements are reviewed and verified by our Supply Chain team prior to any supplier being set up to trade with our business. In addition to managing our requirements through the onboarding process, we also capture additional information through our supplier management portal where all eligible Tier 1 and Tier 2 suppliers are required to complete a Self-Audit Questionnaire (SAQ) which formally records and captures the supplier's key details, policies and third-party accreditation and certification. It is a requirement of our portal that these be refreshed and updated on an annual basis by the supplier for our Supply Chain Technical team to approve continued supply and adherence to our requirements and policies. We are committed to strengthening further our processes and controls around gathering key supplier information for us to increase visibility, identify risks and improve ethical practices across our supply chain.

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## Supplier Auditing:

Our on-boarding process also enables us to determine which suppliers are most at risk of responsible sourcing challenges and, for those high-risk suppliers, we prioritise a site audit. The site audit allows us to understand more about what the supplier is really doing to protect their people and following this, we notify the supplier of any remedial action we believe is required. We monitor the update of SAQ's closely to ensure no deterioration in a supplier's status in complying with our Responsible and Ethical standards and requirements and continue to make strong progress with our SEDEX (Supplier Ethical Data Exchange) engagement work and self- assessment questionnaires.

Our approach to modern slavery continues to evolve as we strive to keep pace with the challenges of the changing external environment. In 2023 we focused our activities around the following areas:

| What we said we would do   | How have we done | What have we done  |
|--|------------------|--|
| Continue to collaborate with our top strategic suppliers across Tiers 1 and 2 to ensure that a minimum of 80% have a Human Rights policy in place by end-2023  | Progress made    | We have continued to monitor the sharing of policies from our Tier 1 and 2 suppliers as these are captured as part of the annual resubmission of SAQ data. We also created a new Human Rights and anti-modern slavery policy in 2023 which is shared with all suppliers. All policies are reviewed annually.   |
| Achieving 100% SEDEX or equivalent registration for all suppliers with completed SAQ's by end-2025   | Ongoing          | Our SEDEX registration process continues to make progress and, at the end of 2023, we had 41% of our Tier 1 and 43% Tier 2 suppliers registered.   |
| Redeveloping and launching our Supplier Code of Conduct and updating our Ethical Trading and Sustainability policy by end -2023  | Progress made    | Whilst the Code of Conduct was created before the end of 2023, we did not issue it due to some further, additional, requirements we wanted to include to reflect 2024 goals and targets. At the time of updating 2023's statement, the Code of conduct has been finalised and issued; progress on supplier acknowledgement to be shared in 2024's statement.           |
| Reviewing our supplier onboarding process and platforms, along with our standard terms and conditions, to ensure that supplier expectations and standards are clear, understood and reflect the changing needs of our clients and customers in the areas of ethical trading and human rights | Completed        | We successfully switched our Supplier onboarding platform in Q2 2023, updated our Terms and Conditions and continue to onboard all new suppliers through this.   |
| Growing awareness of human rights through additional e-learning tools and platforms across all our businesses with the aim of having every colleague undertake annual online training by end-2023  | Behind schedule  | Whilst we have developed an effective e-learning platform we have not been able to provide access for every colleague to complete within the target date. We see this being implemented in 2024.   |
| Continue to investigate the marketplace for digital options to enable us to undertake full traceability mapping on key products and suppliers enabling us to assess the modern slavery risk for such products and suppliers.   | Progress made    | Our improved supplier onboarding solution provides the capability of assessing risk at a Category and Supplier level and we are hopeful that we will be able to trial this across our Tier 1 and 2 suppliers in 2024. We continue to evaluate opportunities to improve traceability at product level and continue to assess the ProcureTech marketplace for solutions. |
| Implement the findings and recommendations made from the review of our Modern Slavery prevention strategy by Unseen, our Charitable Partner by Q3 2023   | Ongoing          | The findings from our work with Unseen address a few key areas and progress has been made in how we adapt these to a 'Prevent, identify and mitigate' strategy. Recommendations being made to the ESG Board in Q4 2023.  |

Fig 1: 2023 Targets

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## Our Supplier Expectations:

We maintain a regular dialogue with our suppliers and, with many of them, have a history of strong, long-standing relationships. We believe that this enables them to invest in the longer term and improve working standards for their employees. We see it as our responsibility to work closely with our supplier partners to ensure that they understand and implement our high standards and 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. Whilst we have a greater ability to influence our Tier 1 suppliers, we understand that some of our greatest ethical and human rights risks lie in our Tier 2 and 3 supply chain. Although these do not come under our direct management, we see it as a collective responsibility to work with our suppliers to understand existing and emerging risks and take appropriate action.

## 4. Training and Awareness

We recognise that to achieve the successful implementation of any anti-slavery and anti-human trafficking culture 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 intention is to continue to focus on identifying any potential risks or failures, thereby driving ever greater compliance with our high standards.

We remain committed to rolling out our Ethical Trade and Modern Slavery training module to our colleagues beyond

those who are directly linked to managing and assessing modern slavery and human trafficking risks in our business who received training in 2023. We have continued to work with our Learning and Development team to provide all our teams with access to our training module and, whilst missing the 2023 target to have this available to all teams, expect this to be rolled out in 2024.

## 5. Looking Ahead

With the continued development of Holroyd Howe's ESG Strategy and continued oversight of this by the ESG Committee, we hope to make further progress in 2024 to further reduce the risk of Modern Slavery by working towards delivering those outstanding objectives outlined (Fig. 1 2023 Targets) above. In addition to this we look forward to implementing the findings and recommendations made from the review of our Modern Slavery prevention strategy undertaken by Unseen, our Charitable partner.

### Unseen

Unseen is a UK charity that provides safehouses and support in the community for survivors of trafficking and modern slavery. They operate the UK Modern Slavery & Exploitation Helpline and work with individuals, communities, business, governments, other charities and statutory agencies to stamp out slavery for good. In 2023 we became an Unseen Business Hub member, enabling us to access a range of unique and bespoke services to aid us with tackling the risk of human exploitation, creating a culture of continuous improvement.

## Gap Analysis

The primary gap analysis undertaken by Unseen UK in 2023 reviewed our approach to mitigating the risks of modern slavery across our business and Supply Chain. The gap analysis is intended to ensure that we are not only meeting our legal and moral obligations, but also working towards best practice and continuous improvement. The gap analysis is aligned with the elements suggested in S54 Modern Slavery Act, as well as the recent 2022 BSI 25700, focusing on the following elements:

- organisational structure;
- core policies;
- due diligence processes in relation to tackling slavery and human trafficking in the organisation and supply chains;
- risk identification, mitigation, and management of anti-slavery issues; and
- training



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From the gap analysis we are aiming to deliver the following in 2024:

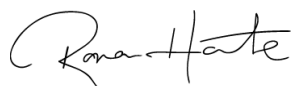
| Phase                 | Prevent  | Identify  | Mitigate  |
|-----------------------|--|---|---|
| <b>Quarter 1 2024</b> | Launch Modern Slavery Training<br>Launch Whistleblowing policy<br>Update Recruitment policies<br>Launch Supplier Code of conduct to Tier 1 and 2 suppliers |   |   |
| <b>Quarter 3 2024</b> | Develop Procurement Modern Slavery procedure   | Develop Supply chain Risk assessment model and Ethical risk audit procedure<br>Undertake a risk assessment pilot across part of the Supply Chain  |   |
| <b>Quarter 4 2024</b> | Review Modern Slavery policy   | Evolve supplier on-boarding process<br>Increase coverage of suppliers on Sedex<br>Conduct full supply chain risk assessment incl existing supplier data<br>Introduce Ethical audits (own and 3 <sup>rd</sup> party) | Implement Remediation procedure<br>Implement Root Cause Analysis framework<br>Conduct investigations of supply chain allegations where relevant |

Fig 2. 2024 Goals

Whilst we had no modern slavery concerns raised within our business in 2023 or to date, we are committed as a business to operate responsibly and with integrity. While we believe that the risk of modern slavery within our own operations is low, due to the strength of our systems and processes, we acknowledge that the risk across our wider supply chain, particularly our indirect supply chain, is higher. By taking some of the steps outlined in this statement forward we hope to increase the levels of collaboration with our supply chain partners to both raise awareness and mitigate any future risks. The scale of modern slavery, with an estimated 50 million people affected according to the Global Slavery Index, highlights the urgency for collective action and we remain dedicated to the implementation, measurement and raising of awareness and standards on modern slavery across our business and supplier base.

## APPROVAL

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Holroyd Howe slavery and human trafficking statement for the fiscal year ending 27th December 2023. It was approved by Holroyd Howe Board of Directors on 30th June 2024.



**Ronan Harte**  
Chair  
Holroyd Howe  
30th June 2024

This statement has also been endorsed by:



**Andy Milner**  
Procurement and Supply Chain Director  
30th June 2024