

MODERN SLAVERY STATEMENT

A) ORGANISATION

This statement applies to Carpenter Catering Limited (referred to in this statement as ‘the Organisation’). The information included in the statement refers to the financial year 2024.

B) ORGANISATIONAL STRUCTURE

Carpenter Catering runs 8 coffee shops, 6 of which are based out of NHS Hospitals across Oxfordshire, UK. Carpenter Catering also services event catering needs and a 7 day a week patient sandwich provision. The organisation is controlled by the Board of Directors. There is one General Manager and a Supervisor on each of the sites.

The labour supplied to the organisation in pursuance of its operation is carried out in Oxfordshire, UK.

C) DEFINITIONS

The organisation considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

D) COMMITMENT

The organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK.

E) SUPPLY CHAINS

In order to fulfil its activities, the organisation’s main supply chains include those related to food production within the UK. This includes within our own workforce and within the wider supply chain. This is both in terms of the tier suppliers we use, such as the bakery and butchers for our products and the their suppliers for raw goods.

F) POTENTIAL EXPOSURE

The organisation considers its main exposure to the risk of slavery and human trafficking to exist within those tier 2 suppliers and this could include:

- Engagement of labour-hire contractors who recruit workers like backpackers and seasonal workers for farms without ethical recruitment and retention practices.

- Poor working conditions, passport retention, and bonded labour in food processing facilities.
- Forced labour risks in the shipping and transport of high-risk food commodities like seafood, produce, and grains.
- Migrant workers on farms being routinely abused, with employers withholding wages or forcing them to work for less than agreed.
- Labor agents confiscating passports of migrant workers and forcing them to work and live in squalid conditions

In general, the organisation considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

G) IMPACT OF COVID-19

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for the organisation, as it did for others across the nation.

The organisation concludes that the COVID-19 pandemic did not adjust the risk of modern slavery to a level above that which existed before the pandemic, which is as set out under 'POTENTIAL EXPOSURE' above. Its use of suppliers dropped significantly because the demand for catering dropped.

During the pandemic, the Group's employees still had access to the grievance procedure to raise any concerns that they may have had.

In line with emergency legislation passed by the Government, Group employees have been paid Statutory Sick Pay during periods of self-isolation where it has not been possible to agree a temporary period of homeworking.

The organisation modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

H) STEPS

The organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the organisation has taken the following steps to ensure that modern slavery is not taking place:

- Utilising our own recruitment practices and not relying on recruitment agencies to supply our own internal workforce.
- Offering ALL employees contracted hours instead of seasonal, or zero hour contracts
- Reviewing our supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery;
- Taking measures to identify and assess the potential risks in its supply chains, such as reviewing suppliers Policies and Statements on Modern slavery and the steps they also take to review their own supply chain
- We undertake impact assessments of our own services upon potential instances of slavery and continually review and update our own internal policies in relation to changing regulation.
- We create action plans to address risk to modern slavery, including internally reviewing our own work practices and vetting all suppliers

- We have a zero tolerance policy towards modern slavery and will report to the relevant bodies any instances where we are concerned, including ensuring we have a whistle blowing policy if any of our own workforce raise concerns

I) KEY PERFORMANCE INDICATORS

The Organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains.

- **Incident Reporting Rate:** This KPI indicates the frequency and severity of reported incidents or suspicions of modern slavery within the organization and its supply chains, reflecting the level of awareness and responsiveness to modern slavery risks.
- **Supply Chain Audits Compliance Rate:** Monitoring the rate at which suppliers comply with modern slavery audits and assessments helps assess transparency and cooperation in addressing modern slavery risks throughout the supply chain.
- **Training Completion Rate:** Tracking the percentage of employees and suppliers who have completed training on modern slavery awareness and prevention indicates the effectiveness of educational initiatives in enhancing awareness and understanding of modern slavery risks.
- **Risk Assessment Coverage:** Assessing the percentage of suppliers and business partners subject to modern slavery risk assessments ensures the comprehensiveness of risk management efforts in identifying and addressing modern slavery risks across the supply chain.
- **Financial Impact Assessment:** Evaluating the financial implications of modern slavery-related incidents, including legal costs, fines, reputational damage, and supply chain disruptions, helps quantify the financial risks associated with modern slavery and underscores the business case for prevention efforts.

J) POLICIES

The Organisation has the following policies which further define its stance on modern slavery, and these are available on request:

- Supplier Code of Conduct
- Due Diligence Procedures
- Whistleblower Protection Policy
- Human Rights Policy
- Recruitment and Employment Policy
- Training and Awareness Program
- Supply Chain Transparency Policy
- Remediation and Grievance Mechanism

K) TRAINING

At Carpenters Catering, we're serious about stopping modern slavery. That's why we make sure everyone, including new employees, knows what it is and how to spot it. Our induction training covers the basics of modern slavery and the laws around it. We also teach about fair sourcing, risk assessment, and respecting different cultures.

We want our team to feel safe and respected, so we explain their rights and how to get help if they need it. All training records are logged and secured within our HR System, Bright HR.

Refresher training on the above topics are also conducted at least yearly and whenever there is a change in legislation, with this being recorded in Bright HR, which will also give a reminder if any employee is due refresher or additional training.

L) SLAVERY COMPLIANCE OFFICER

The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval.....

Signed.....

Date.....