

## **MODERN SLAVERY STATEMENT**

This Statement relates to our financial year 1<sup>st</sup> April 2020 to 31<sup>st</sup> March 2021. It describes the actions of Hertfordshire Catering Limited (HCL) to eliminate slavery and human trafficking from our business and supply chains.

### **Overview**

HCL is a catering company dedicated to delivering excellence in education catering to schools throughout Hertfordshire and surrounding areas. Our supply chain includes the sourcing of items relating to the provision of food, drink and equipment. Our values of Trust and Integrity, Accountability, Innovation, Continuous Improvement, Social Responsibility, Teamwork, Equality and Diversity underpin our culture and behaviour as an organisation. These values communicated throughout the Company, call for the highest ethical standards in all interactions with all stakeholders.

### **Steps Taken to Tackle Modern Slavery and Human Trafficking Risk in 20/21**

We continue to view modern slavery as a crime that can take many forms such as: slavery, servitude, forced and compulsory labour and human trafficking. HCL's staff are the key to our continued success and we will not tolerate any behaviour which undermines their rights or freedom of association within our own business and supply chains. During our financial year 20/21, we could only monitor the below embedded initiatives to mitigate risks of slavery and human trafficking across our business and supply chains due to the ongoing global pandemic.

### **Our Approach**

Internally HCL has a large number of policies and procedures within its own organisation that ensure poor work practices don't exist. Copies of these policies and procedures, including both grievance and whistleblowing policies (to help police our internal practices), are available to all employees via several platforms for ease of use and reference.

HCL's supplier spend is concentrated, with the top 6 suppliers representing 85% of spend, and the remaining 15% concentrated with a relatively long tail of small suppliers. HCL by the nature of its supply chains, requires manufactured products which increases the risk profile for us as subcontracting and offshoring further down the supply chain is maximised. This therefore means more opportunity for hidden risks, or for risk levels to be changed without our knowledge.

HCL has reviewed the practices of its major supplier that accounts for 60% of HCL's total spend and we are confident that they represent minimal discernible risk in this area. In the next 12-18 months we will be reviewing 5 more which covers an additional 25% of HCL's spend. Furthermore, over the next 12 months we are doing a more detailed review per supplier, to identify and resolve risks.

HCL's procurement team undergo annual e-learning and testing on ethics which includes a significant section about modern slavery, recognizing the risks and actions to take to eliminate it. This helps to ensure staff know and understand the issues and responsibilities they and HCL have

in this matter. Our staff are listed on the CIPS Ethical Register of those who have completed the ethics E-learning and test since 2016.

## Our Suppliers

HCL has three high-level commodity categories which covers the majority of our supply chain - food, non-food, IT and equipment. The identified risks are in these 3 categories.

- **Food** – Our major food supplier which represents 60% of HCL’s spend is committed to working with its suppliers to build greater transparency within its supply chains. This includes meeting the standards set out in the supplier’s ethical trading policy in addition to the principles of the Ethical Trading Initiative and relevant International Labour Organisation standards and Conventions. Their supply chains are expected to meet as a minimum, the supplier trading policy and are subject to due diligence checks.
- **Non-Food** – Our suppliers in this category are smaller organisations with turnover below £36m. Since the legislation does not apply, we encourage our suppliers to be open and transparent about their recruitment practices, policies and procedures in relation to modern slavery and to take steps that are consistent and proportionate with their sector, size and operational capacity.
- **IT and Equipment** – given the close control of supply chains by the major equipment brands and lack of transparency, coupled with HCL’s very small spend, we have a very limited leverage but we will try to influence where we can.

## Our Performance Indicators

We use the following key performance indicators to measure how effective the above steps have been, to ensure that slavery and human trafficking is not taking place in our business or supply chain:

- **Reporting and whistleblowing** - we actively promote and encourage employees to report any activity they believe to be unlawful and/or in breach of HCL’s policies, code of conduct and/or standards. A free, anonymous and confidential 24-hour telephone line is available to all employees, details of which are in our Employee Handbook.
- **Supplier Engagement** - ongoing monitoring, collaboration and engagement with key suppliers to help identify key areas of risk within the supply chain in the next 12-18 months.
- **Ongoing Training** – HCL will continue to apply a self-regulated approach by raising awareness of individual staff members to modern slavery and inhumane issues across the organisation.

## Responsibility

The Board of Directors has strategic oversight and accountability for ensuring this statement is up to date, and accurately reflects HCL’s actions and initiatives to tackle and comply with our legal and ethical obligations, and that all those under our control comply with it.

The Quality and Assurance Officer has primary and day –to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with these actions.

## **Communication and Awareness**

Training on this statement, and on the risk and effect of modern slavery forms part of our induction process and employee training to ensure workforce knowledge and skills are in line with HCL's due diligence processes.

Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## **Disciplinary Action**

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Employees whose conduct breaches this Policy and our Code of Conduct in any way may be subject to disciplinary action in accordance with HCL's Discipline and Performance Management Policy which could result in dismissal.

This policy will be reviewed as appropriate to sustain its effectiveness, and such changes will be brought to the notice of employees. It may be supplemented in appropriate cases by further statements.

This statement has been considered and approved by HCL's Board of Directors.



Ian Hamilton, CEO  
8<sup>th</sup> December 2020