



## **ANTI-SLAVERY & HUMAN TRAFFICKING STATEMENT 2021**

### **OUR BUSINESS**

Bartlett Mitchell ('BM') is an award-winning, independently-minded, boutique contract caterer. Our business caters for a diverse range of operations with discerning clients and customers. We work with many partners, stakeholders and suppliers and are committed to ensuring that everyone in our supply chain is working to combat slavery and human trafficking. Whilst we operate exclusively in the UK and Ireland, we recognise to guard against slavery and human trafficking closer to home in the UK (particularly with the supply of labour), it is also vital to train, educate and raise awareness amongst our team.

BM joined the WSH group of companies in November 2020 and, as part of the integration into the wider group, our procurement function and annual statement is now supported by WSH Group activity. WSH published their annual Anti-Slavery & Human Trafficking Statement at the end of June 2021, closely followed by the BM statement, which includes the 2021-2022 plan. BM will continue to follow this pattern each year hence.

### **OUR POSITION**

At BM, we are clear about our responsibility to prevent slavery and human trafficking. 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 we have taken to date, and are continuing to take, 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 and their role in enabling 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 business can grow, develop and continue to provide fantastic food and service.

## **STEPS TAKEN BY BM TO DATE:**

### **1. Governance**

2020 was a year that saw our business, along with the lives of our colleagues and suppliers within the catering and hospitality sector, turned upside down by the impact of the Covid-19 Pandemic. This continues to present a unique set of business challenges that we are striving to overcome and whilst this has inevitably delayed the achievement of some of the targets set to improve our processes and controls further in areas of modern slavery or human trafficking, we remain determined to protect and respect the rights of the people who work within our supply chain.

Whilst we were unable to meet in person, our Integrity and Ethics Committee (which has recently become our Environmental Social Governance 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, continues to be fully embedded in our business and continued to meet virtually throughout 2020. Reporting to the main Board, Modern Slavery remains a permanent agenda item for the Committee as it continues to take responsibility for developing and overseeing our ethical approach as a high priority.

### **2. Ethical trading initiative base code**

BM remains committed to ensuring that its dealings with its own employees, and with its suppliers, are conducted ethically and responsibly. BM adheres to internationally recognised human rights principles and the Ethical Trading Initiative Base Code.

This Code contains the following nine clauses which are founded on the conventions of the International Labour Organisation (ILO) 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

We expect suppliers to comply with 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 and beverage categories given the nature of our business, our standards and policies extend to all suppliers used across our operations.

2020 was a year when we had to adapt and change our ways of working to address new risks and challenges resulting from the Covid-19 Pandemic. Not only has Covid-19 impacted how we identify, assess and manage risk in our supply chains, it has also changed the nature and visibility of some of those risks. This has been compounded by geopolitical factors with the changing status for many workers as a result of the UK leaving the EU, as well as new, unanticipated, demand for products directly associated with the Pandemic. Whilst we continue to adapt, we endeavour to make sure that our standards are continuously met through a rigorous supplier on-boarding and audit process, along with regular supplier dialogue.

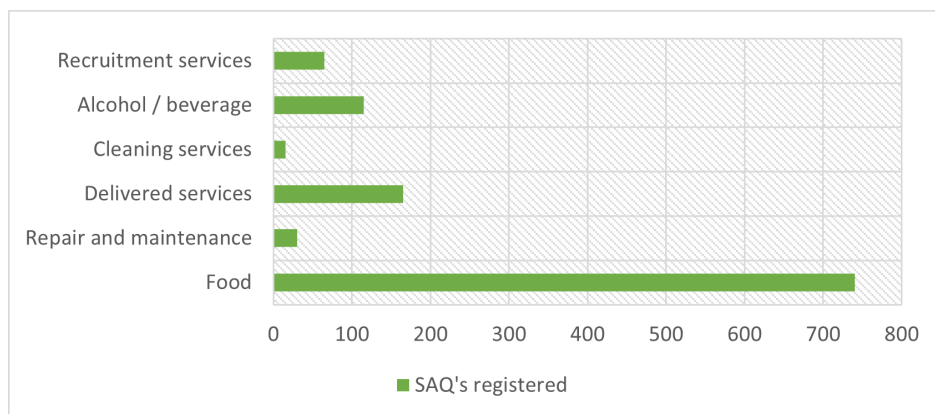
#### Supplier on-boarding:

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

- our Responsible Sourcing and Ethical Trading Policy which sets out our standards in relation to ethical trading; and
- 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 (SAQ) which formally records and captures the supplier's key details and capabilities.

A breakdown of the 1,087 suppliers registered on our portal who submit Self Audit questionnaires annually (2020) is provided below;



**Fig1: SAQ registered 2020.**

Whilst all existing and new suppliers agree and sign up to our general terms and conditions of trade, which include appropriate anti-slavery and human trafficking clauses, the extra level of due diligence managed through our portal enables us to regularly monitor and manage adherence to our policies.

Whilst the number of suppliers registered on our Portal increased vs. 2019, not all were able to commit to agreeing to our Responsible Sourcing and Ethical Trading Policy as well as our Anti- Slavery and Human Trafficking Supplier Sign-Off. We saw this very much as being a direct result of key resources being absent as well as lockdown restrictions being forced on many suppliers as a result of the Covid-19 Pandemic. We look forward to working with our supplier base throughout the remainder of 2021 to update SAQ's for those Categories where we have agreements outstanding.

**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. Unfortunately, throughout 2020 on site audits were severely restricted due to the Covid-19 Pandemic but we continued to have an open dialogue with all key suppliers and managed and monitored 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. We also embarked on our SEDEX (Supplier Ethical Data Exchange) audits and whilst we made progress in the first quarter of 2020 (Top 100 Suppliers approached outside of those already registered) we temporarily put the programme on hold due to the Covid-19 Pandemic. We plan to resurrect this in Q4 2021 once restrictions are lifted and resources are more freely available.

The below table summarises those actions that we committed to in our last statement along with an update on progress and 2021 plans:

What we said we would do	How have we done	What have we done	2021 Plans
Audits will be undertaken on the high-risk suppliers; we will also be utilising the Supplier Ethical Data Exchange platform (SEDEX) for supporting evidence following our registration in 2019	Progress made	We have amended and added to our existing audit schedule of questions although tailored assessments have not yet commenced due to Covid-19 restrictions	We hope to recommence audits and incorporate SEDEX criteria into the standard supplier SAQ in order to improve our visibility of those suppliers registered with SEDEX as well as identify those who are yet to register
Extend the SAQ to all suppliers who are likely to use sub-contracted services and labour	On track	We continue to evaluate this by category	We will extend the SAQ to all suppliers in this category

Continue to identify our goods and services which have the highest spend as well as those suppliers who are business critical	Achieved	This continues to be reviewed on a regular basis	Develop this further by creating tailored reports for the benefit of clients and customers
Broaden our risk assessment for those suppliers who may be sourcing from areas with a high risk of modern slavery inc. higher risks of worker exploitation, representation and small-holder livelihoods	Behind schedule	We have many tiers in our Supply Chain and see the information gleaned from SEDEX as being critical to this exercise. The timely rollout of this to our suppliers has been impacted by Covid-19	We hope to expedite progress in this area as we rollout SEDEX to more of our suppliers and gain greater visibility in these high-risk Supply Chains
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	We have continued to review options throughout 2020 and are making formative plans to develop product mapping with our incumbent SAQ partner	We will trial the mapping tool with our partner to assess whether this is scalable; at the same time we will continue to review market developments and innovation in this area
Following our SEDEX registration in 2019, increase the number of suppliers linked to our business through this platform focussing on all nominated and high-risk suppliers	Progress made	We have engaged with key suppliers to register with SEDEX although progress has been severely hampered by the availability of resources due to Covid-19	We will be revising those suppliers targeted to register with SEDEX and will embark on a further round of engagement in 2021

**Fig 2: 2020 targets, status and 2021 plans.**

#### **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.

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 & 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.

In 2020 we 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. Whilst early progress was made in 2020 prior to the onset of the Covid-19 Pandemic, the subsequent disruption to many of our teams and colleagues has meant that meaningful progress in this area has been temporarily arrested. Our focus in 2021 will be to re-engage with many of our colleagues returning to the business as well as increasing awareness across our locations using a variety of mixed media.

2020 was a year that highlighted the many inequalities and imbalances that exist in our society and around the world and whilst responding effectively to the direct needs within our business for wellbeing and colleague welfare, we recognise that the responsible and ethical sourcing of products and services is of increasing importance as we recover from the social and economic consequences of the Covid-19 Pandemic.

We remain dedicated to the implementation, measurement and raising of awareness and standards on modern slavery across our business and supplier base and will continue to build on the activities and progress we have made to date.

## APPROVAL

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes BM's slavery and human trafficking statement for the financial year ending 30th December 2020. It was approved by BM's Board of Directors on 28th June 2021.



Ian Thomas  
CEO



Wendy Bartlett  
Founder

This statement has been endorsed by:



Andy Milner, WSH Procurement & Supply Chain Director