



# ANTI-SLAVERY & HUMAN TRAFFICKING STATEMENT 2021/2022

## 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.

BM operate exclusively in the UK and recognise to guard against slavery and human trafficking closer to home (particularly with the supply of labour), it is also vital to train, educate and raise awareness amongst our team.

In November 2020 BM joined the WSH group of companies and, as part of the integration into the wider group, our procurement function and annual statement is now supported by WSH Group activity.

## 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. We recognise that modern slavery continues to be a global issue and humanitarian crises. Rising social inequality and widespread labour shortages resulting from the Covid-19 pandemic only serve to increase the risks of human trafficking and forced labour. 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 buy products and services from thousands of 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. 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 BM TO DATE:

### 1. GOVERNANCE

At BM, 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. The development and oversight of ethics and sustainability policies had been the responsibility of our Integrity and Ethics Committee which underwent a refresh in 2021 as we broadened its responsibilities to cover all areas classified within our Environmental, Social and Governance (“ESG”) targets and goals. Now known as the ESG Committee, we continue to have strong membership from our enabling functions such as HR, Health and Safety, Sustainability, Procurement and Supply Chain, Legal as well as Operations. As part of developing the new ESG Committee we also refreshed the terms of reference to clarify the purpose and role of the individual members and Chair. Reporting to the main BM board, 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.

### 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 our policies are underpinned by our adherence to a number of 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 nine clauses guide us in how we protect and respect human rights across our operations:

- 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 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 2021 we continued to adapt our ways of working to ensure that they remained fit for purpose in the face of the ongoing Covid-19 pandemic and the resultant issues created by pressures in the labour market, inflation and supply chain disruption. The nature of these additional pressures continues to impact how we identify, assess and manage risk in our supply chains as well as changing the nature and visibility of some of those risks. 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:**

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.

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 3rd 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 in order for us to increase visibility, identify risks and improve ethical practices across our supply chain.

**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. It has been challenging to carry out site visits and see suppliers face-to-face in 2021 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 have however made good progress with our SEDEX (Supplier Ethical Data Exchange) engagement work and self-assessment questionnaires which had been temporarily put on hold in 2020 as a result of the pandemic.

Our approach to modern slavery continues to evolve as we strive to keep pace with the challenges of the changing external environment. In 2021 we focussed our activities around the following areas:

What we said we would do	How have we done	What have we done
<p><b>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.</b></p>	<p>Achieved</p>	<p>We have amended and added to our existing audit schedule of questions and can now identify, of those suppliers using our portal, who are yet to register with SEDEX.</p>
<p><b>Extend the SAQ to all suppliers who are likely to use sub-contracted services and labour.</b></p>	<p>Achieved</p>	<p>We have extended the SAQ to all suppliers in this category</p>
<p><b>Continue to identify our goods and services which have the highest spend as well as those suppliers who are business-critical and create tailored reports for the benefit of clients and customers.</b></p>	<p>Ongoing</p>	<p>This continues to be reviewed on a regular basis.</p>
<p><b>Broaden our risk assessment for those suppliers who may be sourcing from areas with an elevated risk of modern slavery inc. higher risks of worker exploitation, representation and small-holder livelihoods.</b></p>	<p>Progress made</p>	<p>By focussing on our most critical suppliers in terms of spend and risk with our SEDEX engagement we are now able to evaluate this far more effectively.</p>

<p><b>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.</b></p>	<p>Behind schedule</p>	<p>Fresh options have been considered along with using our incumbent systems providers to trial supplier and product mapping. Early attempts to look beyond Tier 1 have proven difficult although we recognise that external factors and resource challenges in our Supply Chain are likely to be major contributory factors.</p>
<p><b>To increase the number of suppliers linked to our business via the SEDEX platform focussing on all nominated and high-risk suppliers.</b></p>	<p>Progress made</p>	<p>We have engaged with key suppliers to register with SEDEX and expect to have captured data for the top 80% spend by end-2022</p>

**Fig 1: 2021 targets**

## **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. One of the more obvious impacts of Covid-19 in our sector has been the widespread labour shortage in warehousing, processing and driving of heavy goods vehicles and we have focussed on strengthening our due diligence in the area of temporary labour both for suppliers serving our business as well as that of our suppliers.

## **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.

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. Throughout 2021 we continued to engage with our teams using our online platform and see this as a key area of continued development.

## 5. LOOKING AHEAD

With the continued development of BM's ESG Strategy and continued oversight of this by the ESG Committee, we hope to make further progress in 2022 to further reduce the risk of Modern Slavery by working towards, or achieving, the following goals:

- a) collaborating 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;
- b) achieving 100% SEDEX or equivalent registration for all suppliers with fully completed SAQ's by end-2025;
- c) redeveloping and launching our Supplier Code of Conduct and updating our Ethical Trading and Sustainability policy by end -2022;
- d) 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;
- e) 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;
- f) exploring the option to partner with a charity or supplier supporting the survivors of Modern Slavery;
- g) enlisting and instructing the services of an independent third party to complete comprehensive audits of all agencies providing temporary labour provision into our businesses by end-2022; and
- h) acknowledging that modern slavery is a systemic issue requiring greater collaboration and support from external partners and industry bodies, we will register and sign up to work with a verified, independent, body to help us develop our modern slavery prevention strategy.

## 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 29 December 2021. It was approved by BM's Board of Directors on 30 June 2022.



Ian Thomas, CEO



Wendy Bartlett, Founder

This statement has been endorsed by:



Andy Milner, WSH Procurement & Supply Chain Director