



ANTI-SLAVERY & HUMAN TRAFFICKING STATEMENT 2022/23

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.

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. As we continue to move on from the Covid-19 pandemic, the impact of the Ukraine conflict and its effects upon both humanity and economies worldwide has only added to rising social inequality. The cost-of-living crisis in the UK continues 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. Combined, these continue to increase the risks of human trafficking and forced labour and 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 many 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. Development and oversight of our modern slavery strategy sits with the WSH 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.

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; and
- 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, 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 2022 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 our supply chain and are recognised as increasing the risk of Modern Slavery with financial hardships increasing 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.

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.

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. Whilst the availability and accessibility of on-site audits has improved markedly in 2022, following the restrictions in place during the pandemic, we have continued to 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. We also 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 2022 we focussed our activities around the following areas:

What we said we would do	How have we done	What have we done
<p>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</p>	<p>Ongoing</p>	<p>We have defined our Supplier hierarchy and are capturing information on the suppliers that meet our Tier 1 and 2 criteria. The target of 80% recognises that within Tier 2 some suppliers may not have the resource, capability or opportunity to have created a policy to date.</p>
<p>Achieving 100% SEDEX or equivalent registration for all suppliers with completed SAQ's by end-2025</p>	<p>Ongoing</p>	<p>Our SEDEX registration process continues to make strong progress</p>
<p>Redeveloping and launching our Supplier Code of Conduct and updating our Ethical Trading and Sustainability policy by end -2022</p>	<p>Behind schedule</p>	<p>The creation of our Supplier Code of Conduct is now set to be-end 2023 in line with the wider ESG strategy, targets and KPIs. Work is underway to complete this.</p>
<p>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</p>	<p>Progress made</p>	<p>Throughout 2022 we continued to review options available to us in the marketplace for improved Supplier onboarding platforms and commenced work Q4 2022 to move from our existing solution to an alternative, improved platform due to be completed Q3 2023. This will provide improved data and reporting capabilities for us to manage standards across our Supply Chain.</p>

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	Ongoing	We have worked with our Learning and Development team to develop an e-learning module that colleagues can access and complete training.
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, available 2023, (see above) will provide greater opportunity to assess risk at a Category and Supplier level. We continue to evaluate opportunities to improve traceability at product level.
Exploring the option to partner with a charity or supplier supporting the survivors of Modern Slavery.	Progress made	Work undertaken 2022 to identify a charity partner and will commence work with them in 2023 to evaluate our current Modern Slavery prevention strategy. We will look to develop this relationship further beyond 2023.
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.	Complete, ongoing	Engagement made and audits are ongoing. Bi-annual, annual and half-yearly audit cycles in place depending on level of risk.

Fig 1: 2022 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.

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. Whilst the training module is available to all we recognise that this needs to be mandated and, working with our Learning and Development team, aim to have an improved solution by end-2023.

5. LOOKING AHEAD

With the continued development of BM's ESG Strategy and continued oversight of this by the WSH ESG Committee, we hope to make further progress in 2023 to further reduce the risk of Modern Slavery by working towards delivering those outstanding objectives outlined (Fig. 1 2022 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 our Charitable partner, expected completion Q3 2023.

2022 continued to highlight 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 continue to recognise that the responsible and ethical sourcing of products and services is of paramount importance. We are in no doubt that modern slavery is a growing issue and global and domestic crises only increase the risk of human trafficking and forced, bonded and child labour.

We remain dedicated to the implementation, measurement and raising of awareness and standards on modern slavery across our business and supplier base



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Managing Director



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This statement has been endorsed by:



Andy Milner, WSH Procurement & Supply Chain Director