



# **ANTI-SLAVERY & HUMAN TRAFFICKING STATEMENT FOR FINANCIAL YEAR ENDING 25TH DECEMBER 2024**

## **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. Whilst we have a zero-tolerance approach to all forms of slavery both within our own operations and across our supply chain, we recognise the need to foster transparency within our supplier relationships to allow for greater collaboration and supportive action to be taken in the event of any issues being identified. We want everyone, whether they work within our business, or across our Supply Chain, to have greater awareness of the risks of modern slavery and to have faith that, if identified, we will deal with them responsibly.

Human Rights are extremely important to us and continued turbulence across the world only serves to raise the risk of Modern Slavery and the exploitation of people. Labour shortages, cost of living pressures and the continued mass migration of people as a result of conflict or climate change continue 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. 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 have an extensive Supply Chain of over 1,000 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. Almost all our suppliers are based in the UK although we acknowledge that across the wide range of products and services they

provide, a number of these will be sourced from both Europe and further afield for seasonality, availability and provenance reasons. 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 a 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 our 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 BM 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 responsibility for developing and overseeing our ethical approach in this area as a high priority.

### 2. POLICIES AND CONTRACTUAL CONTROLS

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 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 clauses guide us in how we protect and respect human rights across our operations:

- a) employment is freely chosen;
- b) freedom of association and the right to collective bargaining are respected;
- c) working conditions are safe and hygienic;
- d) child labour shall not be used;
- e) living wages are paid;
- f) working hours are not excessive;

- g) no discrimination is practiced;
- h) right to an effective remedy;
- i) regular employment is provided; and
- j) no harsh or inhumane treatment is allowed.

We expect suppliers to comply with our Modern Slavery policy, Supplier Code of Conduct and Whistleblowing policy as well as 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.

#### 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 Modern slavery policy which sets out our standards in relation to ethical trading;
- b) if eligible, confirm compliance with UK Modern Slavery Act and share their modern slavery statement;
- 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.

The above requirements are reviewed and verified by our Supply Chain team prior to any supplier being set up to trade with our business. In addition to managing our requirements through the onboarding process, we also capture additional information through our supplier management portal where all eligible strategic supplier partners 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. We 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 and 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 2024 we focused our activities on the following areas:

What we said we would do	How have we done	What have we done
<p><b>Following the creation of our Modern Slavery policy in 2023 we continue to monitor and encourage our strategic supply partners to have a Human Rights policy as well. Target being &gt;80%.</b></p>	<p>Progress made</p>	<p>We have continued to monitor the sharing of policies from our Tier 1 and 2 suppliers as these are captured as part of the annual resubmission of SAQ data. As at end-2024, 67% of our suppliers had approved policies in place with a further 27% pending approval from our Supply Chain and Procurement team.</p>
<p><b>Achieving 100% SEDEX or equivalent registration for strategic supply partners with completed SAQ's by end-2025</b></p>	<p>Ongoing</p>	<p>Our SEDEX registration process encountered some challenges in 2024 with the redesign of the SEDEX SAQ forcing us to restart the onboarding of all suppliers. From a position of 40% in 2023 we ended with 29% in 2024 with work continuing to re-register and onboard suppliers.</p>
<p><b>Commit to having all Tier 1 and 2 suppliers signed up to our Supplier Code of Conduct by the end-2024.</b></p>	<p>Completed</p>	<p>The Supplier code of conduct has been signed by all Tier 1 and 2 suppliers, accounting for approximately 60% of our Purchased goods and services.</p>
<p><b>Roll out our e-learning tools for employees to grow their awareness of human rights and modern slavery risk. The aim is to have every colleague trained by end-2024</b></p>	<p>Progress made</p>	<p>In addition to those departments and functions with a higher risk of Modern Slavery, we have trained a further 1,304 people in the 6 months following the training portal being made available. Whilst the objective of having everyone trained remains, we will adjust our target to being more location focused as this gives us a greater opportunity to mitigate risk</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>Progress made</p>	<p>We continue to evaluate the ProcureTech marketplace for innovative digitally-led solutions and having built Power BI dashboards in 2024 to enable our teams to monitor progress across a number of our objectives we have also made good progress with our existing Supplier information management (SIM) partner to adopt an additional risk management module which will further strengthen our due diligence and risk mitigation across a greater number of suppliers</p>
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**Fig 1: 2024 targets**

**UNSEEN UPDATE**

Unseen is a UK charity that provides safehouses and support in the community for survivors of trafficking and modern slavery. They operate the UK Modern Slavery & Exploitation Helpline and work with individuals, communities, business, governments, other charities and statutory agencies to stamp out slavery for good. We have been an Unseen Business Hub member since 2023, enabling us to access a range of unique and bespoke services to aid us with tackling the risk of human exploitation, creating a culture of continuous improvement.

Following primary GAP analysis\* undertaken by Unseen UK, we set ourselves the following additional objectives to those outlined above to not only ensure that we are meeting our legal and moral obligations but also working towards best practice and continuous improvement across our Supply Chain. The objectives, and progress made, are detailed below;

<b>Prevent</b>	<b>How have we done</b>	<b>What have we done</b>
<p><b>Launch BM Modern Slavery Training</b></p>	<p>Completed</p>	<p>In addition to the e-learning provided to colleagues, the BM Board received training Q1 2024</p>
<p><b>Launch BM Whistleblowing policy</b></p>	<p>Completed</p>	<p>Policy launched and available for all employees to access. We have also shared links to the Unseen whistleblowing helpline.</p>
<p><b>Update Recruitment policies</b></p>	<p>Ongoing</p>	<p>Our policies are reviewed annually to reflect any changes or additional legislative requirements</p>
<b>Identify</b>	<b>How have we done</b>	<b>What have we done</b>
<p><b>Develop Supply chain Risk assessment model and Ethical risk audit procedure</b></p>	<p>Progress made</p>	<p>We engaged Unseen to conduct an ethical risk assessment covering a high proportion of our suppliers. The findings of which are now being used to inform our audit plans.</p>
<p><b>Introduce Ethical audits (own and 3rd party)</b></p>	<p>Ongoing</p>	<p>Whilst work commenced 2024 to define and introduce ethical audits we expect these to start in 2026</p>

Identify	How have we done	What have we done
Implement Remediation procedure	Delayed	All the mitigation actions identified through the gap analysis were originally earmarked for completion in Q4 2024. However we were unable to complete the work in time, rolling most of these into 2025. In the meantime we will work with Unseen to deal with any alleged incidents of Modern Slavery reported.
Implement Root Cause Analysis framework	Delayed	
Conduct investigations of supply chain allegations where relevant	Delayed	

**Fig 2: Gap analysis: further objectives**

**\*Aligned with the elements suggested in S54 Modern Slavery Act, as well as 2022 BSI 25700**

**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 Strategic supplier partners, we understand that some of our greatest ethical and human rights risks lie elsewhere in our 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 responsible for both locations and beyond as well as those who work in higher risk functions.

## 5. LOOKING AHEAD

We hope to make further progress in 2025 to further reduce the risk of Modern Slavery by working towards delivering those outstanding objectives outlined in both Fig. 1 “2024 Targets” as well as those arising from the Gap analysis conducted (Fig. 2 Gap analysis: further objectives) above.

Whilst we had no modern slavery concerns confirmed within our business in 2024 or to date, we are committed as a business to operate responsibly and with integrity. While we believe that the risk of modern slavery within our own operations is low, due to the strength of our systems and processes, we acknowledge that the risk across our wider supply chain, particularly our indirect supply chain, is higher. By taking some of the steps outlined in this statement forward we hope to increase the levels of collaboration with our supply chain partners to both raise awareness and mitigate any future risks. The scale of modern slavery, with an estimated 50 million people affected according to the Global Slavery Index, highlights the urgency for collective action and we remain dedicated to the implementation, measurement and raising of awareness and standards on modern slavery across our business and supplier base.

## APPROVAL

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes BM’s anti-slavery and human trafficking statement for the fiscal year ending 25th December 2024. It was approved by BM’s Board of Directors on 30th June 2025.



Angus Brydon  
Managing Director, BM  
30th June 2025

This statement has been endorsed by:



Andy Milner  
WSH Procurement &  
Supply Chain Director