

HOLROYD HOWE ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR FINANCIAL YEAR ENDING 28TH DECEMBER 2018

Our Business

Holroyd Howe Limited ('Holroyd Howe') is a specialist caterer, providing freshly prepared, nutritious food exclusively to independent schools and colleges. We work with a large number of partners, stakeholders and suppliers and recognise that every entity in our supply chain has a duty to respect human rights.

Our position

At Holroyd Howe, 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 HOLROYD HOWE TO DATE

Throughout 2018, we have continued our commitment to ensure that our business and our supply chain have taken appropriate and effective steps towards preventing modern slavery and human trafficking.

1. Governance

Our Integrity and Ethics 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, is fully embedded in our business. The Committee has continued to meet on a regular basis with modern slavery (and discussions around it) being a permanent agenda item.

2. Ethical Trading Initiative Base Code

Holroyd Howe remains committed to ensuring that its dealings with its own employees, and with its suppliers, are conducted ethically and responsibly. Holroyd Howe adheres to internationally recognised human rights principles and, in particular, the Ethical Trading Initiative Base Code. This Code contains the following nine clauses which are founded on the conventions of the International Labour Organisation 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

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. We ensure that these standards are met through a supplier on-boarding process, supplier auditing and maintaining a regular dialogue with our suppliers (as described in more detail below).

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:

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

Throughout 2018, we updated our standard supplier terms and conditions to include appropriate anti-slavery and human trafficking obligations and these were also rolled out across our supply chain. In addition, we extended our on-boarding process to existing suppliers to ensure that our due diligence on them remains up-to-date, relevant and appropriate.

Our ultimate target is to get to a position where we can ensure that 100% of our suppliers have agreed to our Responsible Sourcing and Ethical Trading Policy and our Anti-Slavery and Human Trafficking Supplier Sign-Off.

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. Following a site audit, we notify the supplier of any remedial action we believe is required.

Throughout 2018, the continued development of our auditing systems, increase in number of audits conducted, and creation of bespoke audits for different types of goods and services supplied to our business, has meant that we have a more robust method for identifying and mitigating ethical challenges in our supply chain. We have also carried out an initial high-level desktop risk assessment of modern slavery across our supplier base.

In 2019, we plan to take the following steps:

- (a) carry out tailored assessments for those suppliers identified as having a higher proportion of low-paid, unskilled labour, particularly where this is likely to be transient or agency labour;
- (b) review those suppliers who are likely to use sub-contracted services and labour;

- (c) identify our goods and services which have the highest spend as well as those suppliers who are business-critical;
- (d) consider which suppliers are supplying from, and/or goods or services are ultimately sourced from, countries with a high risk of modern slavery; and
- (e) undertake full traceability mapping on key products and suppliers (identified from the above steps), assessing the modern slavery risk for such products and suppliers.

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.

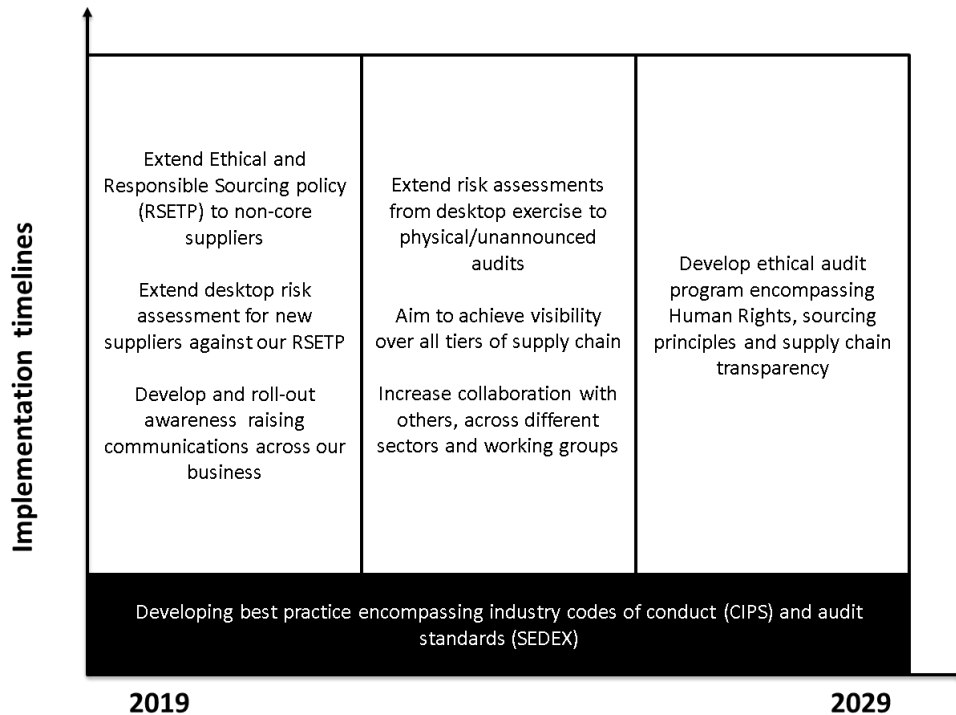
4. Training and awareness

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.

To date, we moved towards this by training on our purchasing and supply chain teams and our Integrity and Ethics Committee. In 2018, we created an ethical trade and modern slavery module (both online and paper-based). This training is intended to help the business to understand our expectations of ethical trade, to recognise the signs of modern slavery and unethical working practices and to know how to report any concerns. We plan to roll-out this module to other functions beyond those responsible for procurement throughout 2019.

STEPS TO BE TAKEN IN THE FUTURE

Holroyd Howe Modern Slavery Act Implementation Plan



We continue to build on the activities and progress we have made to date, recognising that the implementation, measurement and raising of awareness and standards on modern slavery across our business and supplier base is an ongoing project.

APPROVAL

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Holroyd Howe's slavery and human trafficking statement for the financial year ending 28th December 2018. It was approved by Holroyd Howe's Board of Directors on 20th March 2019.

Alastair Storey
Chairman
Holroyd Howe Limited
20th March 2019

Ronan Harte
Managing Director
Holroyd Howe Limited
20th March 2019

This statement has also been endorsed by:

Andy Milner
Procurement and Supply Chain Director
20th March 2019