

Modern Slavery And Human Trafficking Statement

Our Business

Culinera is a specialist caterer, providing freshly prepared, nutritious food for mainly schools and colleges and some workplaces. 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. 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 business.

Introduction

This statement sets out Culinera's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

As part of the hospitality industry, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- Whistleblowing policy - We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can complete our confidential disclosure form.
- Employee code of conduct - Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- Supplier code of conduct - We are committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.
- Recruitment policy - We use only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

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Due diligence

We undertake due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Our due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- creating an annual risk profile for each supplier;
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationships.

Training

We require all managers within our organisation to complete training on modern slavery as a module within our wider human rights and ethical trade training programme. Our modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including removal from our supply chains.

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Awareness-raising programme

As well as training staff, we have raised awareness of modern slavery issues by circulating a series of communications to staff.

The emails explain to staff the basic principles of the Modern Slavery Act 2015, how employers can identify and prevent slavery and human trafficking, employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation and what external help is available, for example through the Modern Slavery Helpline.

Review

Culinera will regularly monitor and review the Policy and will take such corrective action as may be necessary to ensure it is being complied with.