

Name of document	WSH Modern Slavery Policy	Frequency of review	Annually
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WSH INTRODUCTION

WSH is a premium hospitality and catering business with many brands and operating businesses across the UK and Europe. As a collective of businesses and individuals who take great pride and pleasure in what we do and how we do it, we set ourselves high standards.

Our focus will always be on great service, fresh food, ethical and sustainable purchasing and being socially responsible in all we do. We review our social and environmental position and standards continuously to ensure they meet our and our stakeholders' expectations.

DEFINITION

Modern slavery is the term used within the UK and is defined within the Modern Slavery Act 2015 under which it is classed as a criminal offence. The term is used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking.

SCOPE

This policy applies to WSH and all its brands, operating businesses and suppliers.

THE ISSUE

It is estimated that as many as 50 million people are now trapped in modern slavery worldwide, with more than 110,000 victims of modern slavery in the European hospitality sector each year.

Modern slavery, in any or all of its shapes, is a risk that must be recognised, mitigated and managed within all businesses and supply chains, including ours.

The food service sector includes many diverse and complex supply chains extending across the globe. The risks of Modern Slavery are therefore high and if not properly managed, pose a threat to our and our suppliers' teams, business reputation and growth.

WSH POSITION AND POLICY

Our position

At WSH, 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 operations and across our supply chain.

We remain committed to ensuring that our dealings with our employees, and with our suppliers, are conducted ethically and responsibly, in full compliance with internationally recognised human rights principles, underpinned by our adherence to 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, including:

- 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 are a signatory of the UN Global Compact which demonstrates our commitment as a responsible business and helps us stay informed and continuously educate ourselves.

We have a Modern Slavery strategy that we review at least every third year, and we publish actions and progress annually in our Modern Slavery statement.

Policy

Our Modern Slavery approach follows the below principles to which we are committed:

- Assess modern slavery risks using Sedex and Supplier SAQs
- Remediate confirmed cases in a timely and appropriate manner and collaborate with relevant law enforcement authorities where required
- Improve awareness and build skills within our operations to help spot signs when engaging with our employees and suppliers.
- Ensure fair terms and improve working conditions across our own operations and expect our suppliers to do the same.

The WSH Whistleblowing policy outlines the process for reporting malpractice within the workplace. Concerns can also be raised via the Modern Slavery and Exploitation Helpline on 08000 121 700. This helpline is a wholly independent, non-governmental line, which is free to call and has access to interpreters in over 200 languages.

We will collaborate with relevant parties to investigate genuine concerns brought to our attention, seeking to understand the real cause. Where a human rights violation is identified, we will work with the parties involved to seek access to remedy, compensation and justice for the victim.

Responsibilities and Accountabilities

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or in partnership with us, and for this purpose, we set the following expectations:

Employees

- We expect all our employees to read, understand and comply with our Modern Slavery policy, which is shared as part of the onboarding process.
- To raise awareness, we provide mandatory training based on a risk-to-role approach to key functions including annual refresher for Procurement and for location managers and above.
- To assure compliance, we track and monitor training records yearly.

Suppliers

As part of our onboarding, suppliers are requested to agree and sign up to our general terms and conditions of trade, including anti-slavery measures. They need to commit to full ongoing compliance with:

- Our Supplier Code of Conduct and this Modern Slavery Policy.
- Sign our Anti-Slavery and Human Trafficking Supplier Sign-Off relating more specifically to the UK Modern Slavery Act.
- Have a Modern Slavery policy and a due diligence process within their business to assess there is no slavery and human trafficking in their supply chain (including concerning personnel obtained via recruitment agencies); and
- Any contracts with subcontractors and suppliers to comply with human trafficking legislation
- Complete a Self-Audit Questionnaire (SAQ) which formally records the supplier's key details, policies and 3rd party accreditations.
- Be a member of SEDEX, the world's largest database for sustainable supply chain assessment, with a fully completed questionnaire.
- We are working towards having all our strategic and valued partners fully compliant by the end of 2024.

We encourage transparency and believe in working together to remediate any confirmed cases, but we hold the right to terminate the relationship as a last resort.

Policy impact and efficiency

We monitor the impact of our policy through the number of concerns raised through both formal and informal channels such as audits, visual checks, whistleblowing etc.

Ownership

Overall responsibility sits with the WSH Procurement & Supply Chain Director, a member of the WSH Board and the WSH ESG Board. Execution is delegated to, and shared between the Technical & Supply QA function, the Procurement function, the Sustainability function and the People teams.

RELATED DOCUMENTS

Name of policy	WSH Supplier Code of Conduct
Name of policy	WSH ESG Policy
Name of policy	WSH Whistleblowing policy
Name of policy	Individual operating businesses Recruitment policy