

ANTI SLAVERY STATEMENT

OUR BUSINESS

Thomas Franks is a leading provider of catering and hospitality services to head offices, independent schools and private members' clubs. Our food is freshly prepared and served on client premises by well trained staff. Key to the quality of our food provision is our commitment to local and regional, family owned suppliers who care about their product and service. We work with a large number of partners and suppliers all of whom have a duty to respect human rights.

OUR POSITION

The prevention of slavery and human trafficking across our operations and throughout our supply chain is a responsibility we take extremely seriously; our approach is one of zero tolerance.

This statement outlines the steps we have taken to prevent modern slavery within our organisation and our supply chains and sets out our plans for future improvements. The UK Modern Slavery Act (the 'Act') has prompted us to undertake a thorough review of our policies, examine our supply chains and question the robustness of our current practices

OUR SUPPLY CHAIN

We have a family of suppliers who provide us with diverse and varied fresh produce, locally and regionally sourced to meet the specific needs of our customers and clients. Our location managers are given the freedom to select from approved suppliers from which to create their own choice of menus.

All of our suppliers are UK based and we are committed to procuring goods and services from suppliers who demonstrate ethical principles in the way they conduct their business.

We engage with suppliers on standards of quality, safety, environmental responsibility and human rights and we will continue to enhance our CSR strategy which includes conducting audits of our contracted suppliers to verify supply chain visibility and CSR compliance.

STEPS TAKEN

SUPPLIER CODE OF CONDUCT

Our supplier code of conduct applies to all our top tier suppliers. We require all of our suppliers to confirm that they 'shall not use any form of slave, bonded, forced, involuntary prison labour or engage in human trafficking or exploitation'.

We reserve the right to terminate supplier contracts where a supplier engages in any activity, practice or conduct that would constitute an offence under sections 1, 2 or 4 of the UK Modern Slavery Act if such activity, practice or conduct were carried out in the UK, regardless of where it takes place. However in the first instance we seek to work with our suppliers to identify the issues and remedy the situation.

We are committed to taking swift and robust action in the event that any evidence relating to slavery in our supply chain is identified.

ETHICAL TRADING INITIATIVE BASE CODE

Thomas Franks respects and 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

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- ♦ 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

DUE DILIGENCE ON NEW SUPPLIERS

We require our new suppliers to go through a detailed on-boarding process. Suppliers are expected to update the information provided during the on-boarding process on an annual basis for further review and approval by the supply chain team. This annual review process is to be extended to all existing suppliers to ensure that our due diligence remains up to date and relevant.

As part of our supplier on-boarding process, all new suppliers are expected to acknowledge and commit to comply with:

- 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.

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.

We maintain regular dialogue with our suppliers to ensure that they understand and implement our high standards and they continue to comply with local legislation and regulations. Our on-boarding process also allows us to determine which suppliers are most at risk for responsible sourcing challenges and, for those high risk suppliers, we will prioritise a site audit. Following a site audit, we will notify the supplier of any remedial action required.

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.

OUR PEOPLE

We expect all our employees to be treated with respect. Our aspiration is to provide a working environment in which all employees can realise their potential, free of harassment and discrimination.

Employee awareness and engagement

We have provided training and guidance on the UK Modern Slavery Act 2015 procurement colleagues. This statement is also available on our intranet site.

We see the implementation, measurement and raising of awareness and standards across our business and supplier base as being an ongoing project. We will continue to draw on industry best practice and evolve our supply chain in the best way possible to ensure that we are continually assessing the effectiveness of preventing slavery and human trafficking.

APPROVAL

This statement has been approved by our Board of Directors and will be reviewed and updated, where required, on an annual basis