

Introduction

This statement sets out Dine Contract Catering Limited'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 / or its supply chains. This statement relates to actions and activities during the financial year 1st April 2020 to 31st March 2021.

We recognise that we are publishing this statement later than expected due to the ongoing COVID-19 pandemic.

As part of Contract Catering industry, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking and we continue to take our responsibility very seriously during the coronavirus pandemic.

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.

Organisational structure and supply chains

This statement covers the activities of Dine Contract Catering Limited

The Company currently operates to provide a food service within the Business & Industry and Education sector.

Countries of operation and supply

The organisation currently operates solely within the United Kingdom.

High-risk activities

It is our belief that that none of our current activities are considered to be at high risk of slavery or human trafficking.

All organisations contracted to supply Dine Contract Catering are required to confirm their compliance with The Slavery Act 2015.

Responsibility

Responsibility for our anti-slavery initiatives is as follows:

- **Policies:** The Board of Directors are responsible for the drafting and reviewing of the company's policy on an annual basis.

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- **Risk assessments:** The compliance of all suppliers is regularly reviewed by the Purchasing Manager, who will also undertake any investigations and due diligence required ensuring compliance or where there are known or suspected instances of slavery and human trafficking
- **Investigations/due diligence:** The Purchasing Manager and/or Human Resources Operations Manager are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- **Training:** All senior managers receive formal communication to better understand, respond and report any identified slavery and human trafficking risks.

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 escalate these through the appropriate channels as detailed within the policy.
- **Staff Handbook:** Our Staff Handbook makes it 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 our suppliers adhere to the highest standards of ethical practice. 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.

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- **Recruitment/Agency workers policy:** We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency we use before accepting workers.

Due diligence

We undertake due diligence when considering taking on new suppliers, and regularly reviews our 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;
- Engaging in supplier / client audits or assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- 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 relationship.

Performance indicators

We have reviewed our key performance indicators (KPIs). As a result, we are:

- Developing a system for supply chain verification whereby we evaluate potential suppliers before they enter the supply chain; and
- Reviewing our existing supply chains whereby we evaluate all existing suppliers.

Training

Our modern slavery awareness 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;

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- How to escalate potential slavery or human trafficking issues to the relevant parties within the 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 the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

This statement was approved on 1st December 2020 by our board of directors who review and update it annually.



Steve Kyffin
Operations Director

Date: 1st December 2020

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