



Slavery and Human Trafficking Statement 2023

INTRODUCTION FROM THE MANAGING DIRECTOR

Delaware North is a provider of catering and hospitality services in several sectors within the UK marketplace. It is a part of Delaware North Companies Incorporated headquartered in Buffalo, New York. The UK Company has in the region of 300 salaried and guaranteed-hours employees as well as a significant database of some 6,000 individuals who work shifts on a periodic, and occasional basis. The UK head office is in Uxbridge, Middlesex.

The Company recognises that modern slavery is a crime that can take many forms such as slavery, servitude, forced and compulsory labour and human trafficking. The directors and senior management team of Delaware North in the UK are fully committed to the implementation of the requirements of the Modern Slavery Act 2015.

The company is grounded in a foundation of family ownership for over 100 years, and we strive to maintain those same core family values of integrity, honesty and equality for all. We are committed to increasing transparency within our supply chain and working with suppliers who share this same commitment to our end goals.

The UK turnover for the year ending December 2022 was £88 million which returned us to the levels of turnover last seen in 2019 prior to the pandemic, which significantly adversely affected Delaware North, as it did most companies in the hospitality sector. This revenue was derived from 5 UK subsidiaries operating within sectors including sport and leisure, travel and tourism.

The UK Risk and Compliance Committee has oversight of actions taken in relation to our commitment to ensuring our supply chain is free from modern slavery and human trafficking. The committee comprises members of the senior UK leadership/directors and representatives from Risk, HR, Procurement, Finance, IT and Safety.

OUR SUPPLY CHAINS

We are committed to working with our suppliers to build greater transparency within our supply chain. We make a commitment to act ethically and expect the same of our suppliers. Our supplier contracts require suppliers to comply with all relevant legislation, applicable laws and our company policies. All our tier one primary suppliers are based within the UK though many of them will be supplying goods which have been sourced and/or manufactured in other locations throughout the world and as such we are aware of the additional exposure that this may create and of the need for them to improve the transparency within their own supply chains.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Ethical Buying Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

SUPPLY CHAIN RISK

We have identified that the risk of slavery and human trafficking in our business comes from three principal areas:

1. Our directly engaged workforce.
2. The supply of temporary agency labour
3. The supply of goods and services

DUE DILIGENCE PROCESSES FOR OUR WORKFORCE

All our full-time workforce is required to read and sign our employee code of conduct which outlines all our core policies and draws attention to our independent and externally monitored confidential reporting hotline. Additionally, our Human Relations department maintains a suite of policies and procedures to protect our employees and workforce.

The nature of our business requires that we have a large variable hours' workforce:

- a) Directly engaged workers are seen by a member of our team following worker assessment days before commencing work where their right to work documentation is verified and other checks such as the bank account where they are paid is in their own name.
- b) Staffing agencies providing workers are all engaged under a Service Level Agreement which they have signed up to and are audited against during the term of their contract.

We have an independently externally monitored confidential hotline which we encourage employees or any member of our wider team to use to anonymously report any area of concern. The hotline is advertised in company collateral as well as on posters displayed throughout our workplaces.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking and expect the same of our suppliers.

As part of our initiative to identify and mitigate risk we have taken several steps in recent years to deliver on our commitments: During 2022 we continued this commitment despite the incredibly tough trading environment we are faced with as we and our supply chains emerge from the pandemic.

RISK ASSESSMENT

An internal assessment of supply chain risk has been carried out based on such areas as availability of appropriate ethical, corporate social responsibility and employment policies, demographics of the workforce, geographical concerns, supplier audits and responses to supplier questionnaires.

In 2021 we became a member of Sedex Global Network, their vision is to drive organisations globally to improve the lives of the people they impact. Our membership allows us access to information and tools to improve visibility within our supply chain to help us proactively identify and manage supply chain risks. Further engagement has taken place with suppliers since we commenced our membership, and we are now actively linking to them which allows us further insights into their own performance in this area.

AUDIT

All agencies providing labour are audited against the Service Level Agreement that they are signed up to which includes checks on areas such as compliance, right to work, training, and levels of pay.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business our procurement team has received training in the 'red flags' which can be used to help identify areas where modern slavery or human trafficking may exist. Since 2017 Modern Slavery and Human Trafficking Training has been a mandatory requirement for all existing and new full-time hires across our UK business.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

No calls have been received through the confidential hotline which related to Modern Slavery. Agency audits completed to date have not identified any cause for concern. All new hires complete mandatory Modern Slavery Awareness Training.

FURTHER STEPS

- We continue to publish our Transparency Statement on the Modern Slavery Registry website
- Our Learning and Development Department has introduced refresher training to ensure this subject retains appropriate focus within our business and all employees are required to complete this as part of a suite of annual compliance training.
- In 2022 despite the economic situation, we took the step to move the pay for all our variable workforce up to either the London Living Wage for those locations in London and the Real Living Wage for those locations outside London. These rates also apply to the workforce of our Agencies Providers; their increased charge rate to Delaware North is predicated on them paying these rates published by the Living Wage Foundation.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending December 2022.



Doug Tetley
Managing Director
Delaware North – United Kingdom

27th June 2023