

Slavery and Human Trafficking Statement 2026

INTRODUCTION FROM THE MANAGING DIRECTOR

Delaware North is a provider of catering and hospitality services in the UK marketplace and forms part of Delaware North Companies Incorporated, headquartered in Buffalo, New York. The UK business employs approximately 200 salaried and guaranteed-hours employees, alongside a significant variable workforce of approximately 6,000 individuals who work shifts on a periodic or occasional basis. Our UK head office is located in Uxbridge, Middlesex.

Delaware North recognises that modern slavery is a crime and a violation of fundamental human rights. It can take many forms, including slavery, servitude, forced and compulsory labour, and human trafficking. The Directors and Senior Leadership Team of Delaware North in the UK are fully committed to preventing acts of modern slavery and human trafficking from occurring within our business or supply chains and to meeting the requirements of the Modern Slavery Act 2015.

As a family-owned business for over 100 years, Delaware North is grounded in core values of integrity, honesty, and respect for all. These values underpin our approach to ethical business practices. We are committed to increasing transparency across our operations and supply chain and working only with suppliers who share our commitment to responsible and ethical conduct.

The UK turnover for the year ending December 2025 exceeded £125 million, generated across four revenue-producing subsidiaries operating primarily within the sport, leisure, and exhibition sectors.

Oversight of our approach to preventing modern slavery and human trafficking is provided by the UK Risk and Compliance Committee. This committee comprises the Managing Director, members of the UK senior leadership and director group, and representatives from Risk, Human Resources, Procurement, Finance, IT, and Safety.

OUR SUPPLY CHAINS

We are committed to working collaboratively with suppliers to enhance transparency and accountability throughout our supply chain. We operate ethically and expect the same standards from our suppliers.

All supplier contracts require compliance with relevant legislation, applicable laws, and Delaware North policies. Our tier-one suppliers are predominantly UK-based; however, we recognise that many goods and services supplied to our business may originate outside the UK. We remain conscious of the additional risks this may introduce and continue to encourage suppliers to improve visibility and due diligence within their own supply chains.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

Delaware North is committed to ensuring there is no modern slavery or human trafficking within our business or supply chains. Our Ethical Buying Policy reflects this commitment and sets out our expectations for ethical conduct, integrity, and compliance across all business relationships.

We maintain appropriate systems, controls, and safeguards aimed at mitigating risk and ensuring that slavery and human trafficking do not occur within our operations or supplier network.

SUPPLY CHAIN RISK

We have identified the principal areas where risk may arise within our business as:

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 directly employed colleagues are required to read and sign the Employee Code of Conduct, which outlines our core policies and highlights access to our independently managed and externally monitored confidential reporting hotline.

Our Human Resources function maintains a comprehensive framework of policies and procedures designed to protect employees and promote fair, transparent employment practices.

Given the nature of our business, we engage 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.

**We now outsourced the verification of Right To Work to a government approved third-party provider*

- b) **Agency workers** are supplied under formal Service Level Agreements (SLAs). Agencies are audited during the lifetime of their contracts to ensure compliance with agreed standards, including employment practices and worker protections.

We operate an independently managed, confidential whistleblowing hotline, accessible to employees and members of our wider workforce. The hotline enables anonymous reporting of concerns, including suspected modern slavery or human trafficking, and is promoted through workplace posters and company communications.

SUPPLIER ADHERENCE TO OUR VALUES

We operate a zero-tolerance approach to slavery and human trafficking and expect the same standards from 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:

RISK ASSESSMENT

We undertake internal assessments of supply chain risk, considering factors such as:

- The presence of ethical, corporate responsibility, and employment policies
- Workforce demographics
- Geographical risk factors
- Supplier audits and responses to supplier questionnaires

Delaware North has been a member of the Sedex Global Network since 2021. Sedex supports organisations to improve working conditions and ethical practices across

global supply chains. Our membership provides access to tools and data that improve visibility of risks and supports proactive risk management.

Engagement with suppliers via Sedex has increased, including expanded supplier linkages, allowing greater transparency into suppliers' own policies and performance.

AUDIT

All labour-providing agencies are audited against their Service Level Agreements. These audits include checks on right-to-work compliance, training, pay practices, and overall adherence to agreed standards.

TRAINING

To promote a comprehensive understanding of the risks associated with modern slavery and human trafficking within our supply chains and business operations, our procurement team has completed training focused on identifying 'red flags' that may indicate such activities. Since 2017, Modern Slavery and Human Trafficking Training has been a mandatory requirement for all existing and incoming full-time employees across our UK operations. In 2023, we updated the content of our Modern Slavery training module to ensure its continued relevance and effectiveness.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

No reports relating to modern slavery were received via the confidential hotline

- Agency audits did not identify any areas of concern
- All new hires completed mandatory Modern Slavery Awareness training

FURTHER STEPS

Over the coming year, we will continue to:

- Publish our Modern Slavery Transparency Statement on the UK Modern Slavery Registry
- Deliver mandatory annual refresher training as part of our broader compliance programme, which now also includes updated training on the prevention of sexual harassment. Our sexual harassment training will be revised in line with the Employment Rights Act legislation incoming in the last quarter of 2026.
- Complete ongoing self-assessment and supplier engagement through the Sedex platform
- Further rationalise our agency labour supply to ensure stronger governance and oversight
- Maintain our commitment to paying at least the London Living Wage or Real Living Wage, as applicable, for all directly employed and agency workers, with agency charge rates aligned to Living Wage Foundation requirements

STATEMENT APPROVAL

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Delaware North UK's slavery and human trafficking statement for the financial year ending 31 December 2025.



Doug Tetley
Managing Director
Delaware North – United Kingdom

11 May 2026