



Modern Slavery Act 2015

Modern slavery and human trafficking statement

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to improving our practices to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for current financial year. It is reviewed for each financial year.

Organisational structure

We are a provider of chilled RTE sandwiches, paninis, rolls, wraps & other chilled food to go items to the food service industry for events and Hospitality.

Definitions

The Soho Sandwich Company considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

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.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free we have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. **Anti-slavery policy:** This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.

2. **Recruitment policy:** We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. **Whistleblowing policy:** We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. **Code of business conduct:** This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
5. **Ethical Responsibilities:** The Soho Sandwich Company acknowledges its obligations towards its employees, stakeholders and the communities in which we work and operate. The Soho Sandwich Company wishes to carry out work and to do business in an ethical fashion.
6. **Adverse Publicity and Damage to the Company's Reputation:** adverse publicity from the discovery of poor labour standards within the Company's business operations presents reputational and structural risks to the Company not only in terms of revenue, but also in respect of staff recruitment and retention. Poor labour standards can also lead to a loss of trust and confidence with suppliers and also within the wider community.
7. **Reduced Quality of Service:** The Soho Sandwich Company recognises that there is commonly a link between poor labour standards and poor quality of services. To this end, it is in the interest of The Soho Sandwich Company to ensure that the Company reaches and exceeds minimum labour standards requirements at all times.
8. **Child Labour:** The Soho Sandwich Company does not and will not engage in or support the use of child labour. The Company respects and supports children's rights consistent with the United Nations Convention on the Rights of the Child (CRC) and the Children's Rights and Business Principles (CRBP).
9. **Forced or Compulsory Labour:** The Soho Sandwich Company shall not engage in or support the use of forced or compulsory labour, or bonded or involuntary prison labour. Employees are free to leave after providing reasonable notice in line with their individual contracts of employment.
10. **Health and Safety:** The Soho Sandwich Company shall provide a safe and healthy workplace environment and shall take effective steps to prevent potential accidents and injuries to employee's health by minimising, so far as is reasonably practicable, and in co-operation with its employees, workers and other members of staff, the causes of hazards inherent in the workplace. All employees will receive safety and job specific health and safety instructions during the course of their employment with the Company. Employees shall have access to clean sanitary facilities and drinking water.
11. **Freedom of Association:** Freedom of association is respected and The Soho Sandwich Company will comply with UK and the Republic of Ireland labour relations legislation (as appropriate) in this regard.

12. **Discrimination:** The Soho Sandwich Company shall not engage in or support any discriminatory practices in recruitment, remuneration, access to training, promotion, termination or retirement based on gender (including gender reassignment), marital status, family status, religious belief, disability, age, racial grounds (race, colour, nationality or ethnic origin, including membership of the traveller community), sexual orientation or other conditions that could give rise to discrimination. The Soho Sandwich Company has an Equal Opportunities Policy in place.
13. **Disciplinary Practices:** The Soho Sandwich Company shall treat all employees and members of staff with dignity and respect. The Company shall not engage in or tolerate the use of corporal punishment, mental or physical coercion, harassment, intimidation or verbal abuse of personnel. Any disciplinary meeting will be conducted according to organisational rules.
14. **Working Hours:** The Soho Sandwich Company shall comply with applicable laws and industry standards on working hours and holiday entitlements. The Company's normal working hours do not exceed 48 hours per week, and overtime hours do not exceed 12 hours per week, with the relevant periods of rest similarly observed. The Company ensures that all employees have the legal right to work/be employed in the UK.
15. **Remuneration:** The Soho Sandwich Company shall comply with national laws and regulations with regard to wages and benefits. All work related activities are carried out on the basis of a recognised employment relationship established according to national law and practice. All members of staff are remunerated in a way which is in excess of the national minimum wage in the UK or the Republic of Ireland as is appropriate. The Soho Sandwich Company is committed to the Living Wage for all our staff.

The Company also commits to:

- Compliance with relevant legal and other requirements to which the Company subscribes.
- Ensuring that all our key contractors, sub-contractors and suppliers are aware of this policy.
- Making available sufficient resources for the implementation of this policy.

Our workplace policies and procedures demonstrate 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.

Supplier adherence to our values

The Soho Sandwich Company has a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that the particular organisation has never been convicted of offenses relating to modern slavery. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

Key performance indicators

The Soho Sandwich Company has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the company or its supply chains. We review our policies and procedure every year and staff feedback to ensure no one in our business is effected.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. We also require our business partners to provide training to their staff and suppliers and providers.

Slavery compliance

The Soho Sandwich Company has a slavery compliance person, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to The Soho Sandwich Company obligations in this regard.