Thomas Franks Anti-Slavery Statement 2025

Introduction

This statement sets out Thomas Franks'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 its supply chains.

As part of Hospitality Industry, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

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 Thomas Franks:

We provide contract catering services in the hospitality sector and employ approximately 2,800 employees across approximately 200 locations across the UK and Europe in both business and industry sites and the education sector. Our Head Office is based in Hook Norton, Oxfordshire. Our values are of honesty, respect, consideration for others, professional pride and personal responsibility and form the basis of our policies, procedures and working practices. They also reflect the values we seek when selecting our suppliers

Our supply chain includes the key product categories of ambient, frozen and chilled food, fresh produce, dairy, fresh meat, equipment and disposables.

Countries of operation and supply

We currently operate in the following countries:

- UK
- Malta
- Portugal
- Lithuania
- Switzerland
- Czech Republic

- Belgium
- Hungary
- Spain
- Ireland

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- A review of each country taking into account the following: Labour laws – are they adequate
- Poverty levels and economic need
- Type of work being undertaken

High-risk activities

The following activities are considered to be at high risk of slavery or human trafficking:

- Roles involving unskilled workers

Responsibility

Responsibility for our anti-slavery initiatives is as follows:

- Policies: HR Department Recruitment Policy
- HR Department Modern Slavery Statement
- Procurement Department – Supplier Code of Conduct

- **Risk assessments:** The procurement team evaluate risk of each new supplier prior to commencing business with them.
- **Investigations/due diligence:** HR will be notified of any instances of or concerns about modern slavery and a full investigation will be undertaken.
- **Training:** All employees complete online training regarding modern slavery through our online I-HASCO portal. An information booklet is also provided for reference.

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.
- **Employee code of conduct** as detailed in our Employee Handbook. Our code makes 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/Procurement code of conduct** We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to confirm 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. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment policy** We use only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due diligence

Thomas Franks undertake due diligence when considering taking on new suppliers, and regularly review its existing suppliers. Our tender documents ask the following questions:

Please confirm that you operate in line with the UN Global Compact by confirming that you uphold the freedom of employees to join workers associations, the right to collective bargaining, the elimination of all forms of enforced, compulsory and child labour and the elimination of discrimination.

Please confirm your compliance with the Modern Slavery Act 2015 and what you have done to address compliance with the Act, including a copy of any policy created with specific relation to this.

If you are successful, please confirm you will comply with the Supplier Code of Conduct.

Failure to comply with the above will result in the supplier being excluded from the process.

Performance indicators

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

- requiring all staff/supply chain managers/HR professionals to have completed training on modern slavery by 1st September 2025;
- ensuring 100% of new suppliers confirm compliance with Thomas Franks Supplier Code of Conduct

Training

We require all staff within our organisation to complete training on modern slavery.

Our modern slavery training covers:

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- 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 our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

Awareness-raising programme

As well as training staff, we have raised awareness of modern slavery issues by highlighting this through reference booklets and online communications.

The above explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

Board/Member approval

This statement was last approved on 31 March 2025 by our Board of Directors, who review and update it annually.

Director's/Designated member's/Partner's signature:

V Freeman

Director's/Designated member's/Partner's name:

M Mort

Date:

March 2025