

Elior UK statement on modern slavery

Compliance with Modern Slavery Act 2015 Statement (Financial Year [2016-17])

Elior UK

 **13,000**
people

 **+1,250**
sites

Elior Group

 **13**
countries

 **106,000**
staff

3.8 million
customers daily



About Elior

Elior UK is an award-winning contract caterer. We primarily provide food services to a number of sectors including business and industry, education, defence, leisure and care. We have a large and diverse workforce with 13,000 staff at over 1,250 sites and are ranked in the Sunday Times Top 25 Best Big Companies to work for 2015.

We're a subsidiary of Elior Group, which operates in 13 countries, employing 106,000 staff, and takes care of 3.8 million customers every day. The Group has a management team in each country and overall operations are led by Philippe Salle, the Group Chief Executive Officer. Catherine Roe, the Chief Executive of Elior UK and her board of directors, oversee operations within the United Kingdom.

Elior Group has been a signatory of the United Nations Global Compact since 2004. As a signatory, Elior Group and all its subsidiaries pledge to uphold the ten principles. Indeed, the new CSR strategy – The Positive Foodprint Plan – is based on providing a key response to UN Sustainable Development Goals. Principle 4 of the compact is the “elimination of all forms of forced and compulsory labour” and we're dedicated to ensuring we comply with this principle.

To enable us to regulate and ensure compliance with this principle we've introduced various policies that outline how our employees are to act with regard to ethical trading. The following policies can be found on our website www.elior.co.uk/sites/default/files/pictures/policy_documents.pdf

- Our Corporate Responsibility policy outlines our ultimate goal, to promote sustainable growth with responsible, innovative and ethical business practice.
- Our Purchasing policy states that our colleagues are committed to purchasing in an ethical and transparent manner and operate a rigorous approach to selecting suppliers.
- Reinforcing this is our Standards of Business Conduct policy, which outlines that colleagues who are in contact with suppliers and contractors (including external consultants) are to abide by Elior UK's Supplier Code of Conduct at all times.

Since our first report, we have continued to build on the steps we've taken as a business to ensure we are equipped to help eliminate all forms of forced and compulsory labour, for example:

- We have issued further training and guidance to all site managers, regional managers and directors to help them identify signs of modern slavery and explain what to do if modern slavery is suspected.
- Launched Celebrate Equality Workbooks with a section dedicated to preventing modern slavery to all existing colleagues and new starters.
- And introduced a new 'checking app' called Trust ID to assist in the combating of illegal working.

You can find out more about these steps and how they've been integrated into our existing processes, checks and procedures below.

Raising awareness of modern slavery in our business

We have distributed Modern Slavery Guidance notes to all our site managers and delivered presentations to regional directors and operations managers. These presentations covered training on:

- What modern slavery is
- Types of modern slavery
- How it affects Elior
- What Elior is doing to raise awareness
- Who can be affected by modern slavery
- How to spot signs of modern slavery
- And what to do if modern slavery is suspected

In addition, we've issued all existing colleagues and new starters with Celebrate Equality Workbooks – these include a section on preventing modern slavery and signs to look out for. Once one of our colleagues has completed their workbook, their manager logs this centrally, allowing us to accurately monitor progress across the business.

Rights to work in our business

We're committed to ensuring that right to work checks are carried out consistently and diligently in line with current UK legislation. Copies of documents from List A or B, the official documentation that must be checked as an employer in order to prevent illegal working, are retained on colleague files. Regular audits are carried out to ensure all sites are compliant with our internal procedures. Right to work checks are supplemented by additional security checks within areas of the organisation that are subject to satisfactory DBS disclosure prior to employment. Full guidance relating to the importance of all pre-employment checks is provided to line managers along with various training guides and online tools designed to ensure that illegal working is prevented. In addition, the Company standard is to reference check the last five years of employment of all new colleagues (2 references).

We have also recently rolled out a 'checking app' called Trust ID to assist in combatting illegal working. This cloud-based document checking solution automatically identifies whether or not a Right to Work check is authentic by analysing key information, such as the Machine Readable Zone (MRZ) code, i.e. the code lines you see at the base of passports, visas and ID cards.

Following the completion of satisfactory background checks, all our colleagues are given contracts at the start of employment. These are given to the colleague for review, and are then signed by both the colleague and Elior UK, clearly stating the terms and conditions of engagement, and the voluntary nature of employment. Colleagues have the freedom to leave our employment at any time (subject to contractual notice) and any overtime in excess of standard contracted hours is also voluntary.

Over the past 20 years, working arrangements have been changing rapidly and new working patterns have emerged – it's now less common for our colleagues to work full time for their whole career. In our industry part-time, agency and casual workers are more typical than the traditional full time employee.

Casual workers agreements enable us to maintain a pool of individuals who may or may not be available at short notice to help out at busy times of the year or when there is a major event / function (such as a banquet, conference, race meeting, etc.) for which they require the services of extra colleagues. Although in these instances we control when, how, and where the work is to be done, there is no mutuality of obligation – Elior UK is not obliged to provide any specific individual worker with the work and each individual is free, without penalty, to accept or reject any offer made to him or her. Such an individual may be, for example: someone who may work on match days occasionally through the football season, who may work at specific functions, conferences or banquets throughout the year.

To assist with the elimination of modern slavery and to ensure it does not occur within our business; this year we launched our Manager's Guidance Notes. The document outlines specifically how the hospitality sector is affected by modern slavery, what areas are more at risk, and recent figures. It re-affirms the processes that managers need to take when hiring new starters and lists legal documents required. It also includes a section on common signs on how to spot potential victims, including; legal documents, behaviour, pay, medical care, transport, appearance, fear of authorities and debt slavery; and explains

the what the manager should do and who they need to contact if they believe someone is affected by modern slavery.

Furthermore, we created a HR Toolkit session on our internal extranet providing additional information and guidance. This is an interactive session that managers are able to work through with their staff and discuss modern slavery as a topic and how they can work together to help in its elimination.

Additionally, presentations and operational briefings at team meetings have occurred targeting all senior management.

Supply chain transparency

The Elior UK Purchasing Department's principal commitment is to ensure our suppliers deliver products and services to our business via a safe and auditable supply chain, ensuring compliance to legislative, food, safety and welfare regulations. We work alongside the Elior UK Safety and Wellbeing Team to maintain the highest standards for our clients and customers.

Elior UK is committed to purchasing in an ethical and transparent manner and operates a rigorous tender approach to selecting suppliers. We require suppliers to meet our Corporate Responsibility requirements related to:

- transparency of ingredients such as allergens
- sustainability, for example sustainable palm oil
- prevention of undesirable ingredients such as trans fats and GM ingredients
- a responsible approach to the environment
- regulation and welfare, such as the Modern Slavery Act

As a signatory of the UN Global Compact Elior is committed to upholding the Ten Principles surrounding Human Rights, Labour, Environment and Anti-corruption. This means we always operate in ways that meet fundamental responsibilities in these areas. We also encourage responsible business practices throughout our supply chain by only engaging with suppliers who approach and manage their business in an ethical, social and responsible manner in line with national legislation. To ensure that our objectives are met we stipulate a Supplier Code of Conduct, which suppliers must sign up to.

We will not knowingly engage with any suppliers that operate poor labour practices that breach our code of conduct and we reserve the right to audit suppliers where we consider necessary.

With the introduction of the Modern Slavery Act, we have contacted all nominated suppliers to ensure their ongoing commitment to the new legislation and will remove any suppliers unable to demonstrate compliance. We have highlighted this in our supplier code of conduct and tender pre-requisites.

It is our intention to review this statement on an annual basis in line with the requirements of the Modern Slavery Act and update on progress made to ensure full compliance with the act.



Catherine Roe ■ Chief Executive, Elior UK
[October 2017]