

Anti-Slavery and Human Trafficking Policy

Policy Purpose

Modern slavery is a crime and a violation of fundamental human rights pursuant to Section 54 of the Modern Slavery Act 2015. 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. Pabulum has a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

This policy should be read in conjunction with the Company's Recruitment & Retention, Safeguarding and Whistleblowing policies.

1. Responsibility

- 1.1 The Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. Policies are reviewed annually.
- 1.2 The Head of People has responsibility for ensuring that our employees are aware of the Modern Slavery Act 2015 through routine bulletins.
- 1.3 The Sales & Marketing Director and Head of Purchasing have responsibility for the company's partnership with our suppliers. In collaboration with our Head of People they measure the possible risks to ensure our supply chains are free from modern slavery activities.
- 1.4 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

2. Training and Awareness

- 2.1 The first step in reducing the risk to our workforce is the education of our managers and staff to raise awareness of the signs that an individual may be at risk. These signs include:
 - General behaviour – showing high levels of anxiety or fear, scavenging for food, poor levels of personal hygiene and appearance.
 - Physical appearance – regularly shows indications of injury or attack.
 - Accommodation – may be unclear of where they live or indicate residence is occupied by large numbers of fellow workers.
 - Financial – lack of access to money, salary is paid into bank account held in a third parties name or multiple employees sharing a single account.

- Restricted movement – not in possession of personal documentation such as a passport, only able to travel to and from work with a certain individual.
- 2.2 As a provider of catering to the education sector we have established procedures which include ensuring that our employees:
- Have a right to work in the UK. This involves asking the individual direct to view their passport. A delay in providing the passport might indicate a modern slavery issue.
 - We check that all our employees have a bank account in their own name into which their remuneration is paid.
 - We apply for an enhanced DBS check for all our employees.
 - In the event of any applicant who has worked or lived abroad in the last 5 years applying for employment, we will ask the applicant to provide their own letter of good conduct or written confirmation from the relevant police authorities confirming a clean police record.
 - If agency (non-Pabulum employees) are required at a school, they will be required to provide DBS clearance and carry this at all times. The supplying agency will be required to satisfy Pabulum of assurances in their process with regards to Modern Slavery.

3. Supply Chain Due Diligence

- 3.1 We are committed to ensuring there is transparency not only in our own business but in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 3.2 Our zero-tolerance approach and commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them, checking what assurance arrangements are in place and reinforced as appropriate thereafter.

4. Reporting and Breaches of this Policy

- 4.1 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest possible stage by reporting these to the Head of People.
- 4.2 If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify the Head of People as soon as possible.
- 4.3 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 4.4 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Nelson Williams
Managing Director

(This policy will be reviewed in May 2024)

