

## Graysons – Modern Slavery and Human Trafficking Policy Statement

This statement has been issued in accordance with Section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015 and covers Graysons Hospitality Ltd (07403174) and its subsidiary Graysons Restaurants Ltd (04654181), collectively referred to as Graysons. This statement was approved by the directors on 28<sup>th</sup> March 2025 and relates to the financial year ended December 2024.

Graysons provides catering and hospitality services to organisations and individuals in the UK primarily in the cultural visitor attractions, event venues, and business and industry markets

Modern slavery is a crime that can take many forms and affects millions of people around the world. Sadly, vulnerable people from overseas as well as across the UK are forced to work illegally against their will across many different sectors. Graysons' policy is to assess and address the risks of violations of anti-human trafficking and anti-modern slavery laws.

We adopt procedures that contribute to ensuring modern slavery does not occur in our business or supply chains and we expect organisations with whom we do business to adopt and enforce policies to comply with the legislation.

We are a responsible and ethical business committed to sustainable food and fair working practices.

### Our Procedures

We have a number of procedures in place that contribute to ensuring modern slavery does not occur in our business or supply chains.

- We have a robust recruitment processes in line with UK employment laws, including: 'right to work' document checks; contracts of employment and security checks to ensure everyone employed is 16 and above
- Market-related pay and rewards reviewed annually
- Wellbeing activities and initiatives to support our people's physical and mental wellbeing and lifestyle choices
- Employment policies that protect our people from unfair treatment and promote a fair and inclusive workplace

### Our Policies

Graysons' operational policies related to respecting, protecting and remedying the human rights of all those who work on behalf of Graysons, as well as related supplier policies that support action on modern slavery are:

- Responsible Sourcing Policy
- Environmental Policy
- Anti-Bribery and Corruption Policy
- Whistleblowing Policy
- Health and Safety Policy
- CSR Policy
- Employee Code of Conduct
- Supplier Code of Conduct
- Anti Harassment Policy
- Business Conduct Policy
- Positive Work Environment Policy

Graysons Hospitality Limited

Head Office  
Halford House,  
2 Coval Lane  
Chelmsford, CM1 1TD

T: 01245 200100

W: [graysons.com](http://graysons.com)

## Training

We aim to provide training for our procurement team and the programme is designed to raise awareness of the issue of slavery and human trafficking and to help identify and mitigate potential risks from our supply chain. The programme includes:-

- How to assess the risk of slavery and human trafficking
- 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
- What steps should the organisation take if suppliers or contractors do not implement anti- slavery policies in high-risk scenarios.

## Due Diligence for Suppliers

All Graysons suppliers and subcontractors are expected to apply the principles of the Modern Slavery Act 2015 and Ethical Trading Initiative, as well as our standard terms and conditions of supply.

Our supplier approval process incorporates a review of the controls undertaken by the supplier and a risk-based assessment of their policies and practices. Prior to nominating suppliers our Commercial Director audits the supply chain. Our supply base is then monitored for continued adherence through an annual 'due diligence' questionnaire.

We understand that our suppliers often have their own complex supply chains, which makes it difficult for us to directly monitor or control the working conditions of each individual entity within a supply chain. We make it clear to our suppliers that they have a responsibility to ensure that their own supply chains remain free from abuse.

In December 2024, Graysons became a member of SEDEX (Supplier Ethical Data Exchange). SEDEX is a global membership organisation and a collaborative platform that helps businesses assess, manage, and improve their supply chain sustainability practices, focusing on ethical and responsible business conduct.

We are developing an assessment audit, in conjunction with SEDEX, to assess suppliers' credentials in terms of adhering to employment laws and modern slavery due diligence. Moving forward, it will be a requirement of Graysons that all suppliers are members of SEDEX.

The company directors and senior management have responsibility for implementing this policy statement and shall provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organisation and within our supply chain.

Our Managing Director, Tim O'Neill, has Board responsibility for legal compliance.



Tim O'Neill  
Managing Director  
31<sup>st</sup> March 2025

