



Slavery and Human Trafficking Statement



Slavery and Human Trafficking 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 has been approved by the Directors on (Date), is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 3 October 2025.

Our Business

Graysons is a leading food service partner working with organisations across a range of market sectors, primarily in the events venues, cultural visitor attractions, business and industry & Higher Education sectors in the UK.

We know that great food, service and experiences are important to everybody. Our teams share a passion for hospitality, delivering great things for our people, partners and communities. Protecting and respecting human rights is central to our wider ESG strategy and entrenched in our business practices. We have robust standards in place for our suppliers and are committed to identifying, preventing and mitigating the risk of slavery and human trafficking within our operations and our supply chain.

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

Our Supply Chain

Graysons supply chains primarily operate within the UK and include, but are not limited to:

- Labour agencies providing temporary workers, including hospitality and catering staff.
- Suppliers of goods and services, such as uniform, laundry and facilities services.
- Other professional and operational service providers.

Working with suppliers

We expect our suppliers and business partners to share our commitment to ethical and responsible business practices. Our approach includes the following measures:

- 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.
- All new and existing suppliers are expected to confirm that they adopt and continuously enforce relevant legislative requirements in relation to the use of labour throughout their supply chain.
- Graysons has a comprehensive approach to responsible sourcing, underpinned by our Business Conduct Policy (BCP) and Human Rights Statement, which set our expectations for ethical business practices across our business.
- We contractually require suppliers to respect our BCP and to comply with the standards in our Supplier Code of Conduct, which covers social, labour, human rights and environmental issues.
- We expect our suppliers to have a sustainability policy relevant to their business and industry.
- We have processes in place to evaluate suppliers prior to selection and throughout the contract term.

Policies and Codes

We maintain a framework of policies and standards that set our expectations regarding ethical conduct and responsible business practices:

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
- We regularly review and update our policies and procedures to ensure that they remain effective in preventing modern slavery in our supply chains.

Our People

Raising awareness of modern slavery within our business and ensuring fair, ethical recruitment practices is an important part of our due diligence framework. Some of the steps we take include:

- All new joiners receive an induction into the core principles of Graysons Code of Conduct and are required to complete mandatory annual Code of Conduct training.
- Managers, supervisors and HR professionals receive training on creating and maintaining people practices that are not only legally compliant, but that create a positive workplace culture where people are treated with fairness, dignity and respect.
- Ensuring that all employees undertake a range of interactive e-learning modules annually in areas such as modern slavery, human rights, safeguarding, and anti-bribery and corruption.
- Regularly reviewing employees' salaries to ensure compliance with the National Minimum Wage Act 1998 and applicable employment legislation. A thorough recruitment process is carried out through ethical practices overseen by dedicated HR experts.
- Graysons works in partnership to manage all our temporary UK labour agencies. New agencies are only onboarded onto this platform once they have met our requirements relating to modern slavery policies and practices.
- A process is in place for employees to raise concerns through our internal grievance and whistleblowing procedures, which can be accessed via our internal portal.

Commitments Going Forward

We are committed to continuous improvement and will continue to strengthen our approach to preventing modern slavery and human trafficking. Our ongoing and future actions include:

- Enhancing systems and controls to identify potential risks, including improved processes to flag duplicate addresses and bank account details and to ensure we take appropriate steps to support our colleagues.
- Increasing awareness of potential modern slavery indicators via our internal communication platforms and encouraging our colleagues to raise any concerns to the business or via the Modern Slavery Helpline.
- Increasing the frequency of modern slavery refresher training for all colleagues.
- Improving right to work checking processes via utilisation of an Identity Service Provider (IDPS) and imposter detection checks.
- Exploring opportunities to collaborate with external specialist organisations such as the Slave Free Alliance.

Improving human rights and championing efforts to end modern slavery and human trafficking for all remain central to our commitments. We will continue to raise awareness internally and work with our partners and suppliers to further enhance transparency, address any risks and tackle any occurrences of human trafficking or slavery.



Jon White
Managing Director
Graysons
31 March 2026