



Modern Slavery Policy

Sands Catering is committed to driving out acts of modern day slavery and human trafficking within its business and from within its supply chains, including sub-contractors, and partners.

The Company upholds the spirit and intentions of the Modern Slavery Act 2015, through publication of a policy statement setting out the steps we take to prevent modern slavery and related abuses.

We will ensure transparency within the Company and suppliers of goods and the larger supply chain and services to the Company through steps which include:

- Assessing and reducing the risk in the business of modern slavery practices occurring e.g. checking the authenticity of papers proving a right to work in the UK • Having robust procurement policies that ensure our supply chain is scrutinised for compliance and consequences of non-compliance are clear and actioned i.e. that commercial relationships with suppliers, contractors and other business partners will not be entered into (or terminated if existing)
- Providing information to staff on the warning signs that might indicate that modern slavery is taking place
- Promoting to staff the importance of raising immediately any concerns they may have
- Protecting staff who are 'whistleblowers' in respect of concerns they have about modern slavery

This statement sets out Sands Catering 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.

The Company 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.

Company structure and supply chains

This statement covers the activities of Sands Catering Services

- Sands Catering Services is a catering delivery company operating in the UK
- The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations
- Whistleblowing policy the Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can contact the management team confidentially on 0207 619 7788

- Employee code of conduct the Company's code makes clear to employees the actions and behaviour expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- Supplier/Procurement code of conduct the Company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate 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. The Company works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the Company's supplier code of conduct will lead to the termination of the business relationship.
- Recruitment/Agency workers policy, the Company uses 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. As well as training staff, the Company has raised awareness of modern slavery.

This statement has been approved by the Company's Directors, who will review and update it annually.

Signature: Michael Rapacioli MD

A handwritten signature in cursive script, appearing to read "Rapacioli".

Date: 01/10/2025