THE FENDALE GROUP

Anti-Slavery and Human Trafficking Policy

Policy Owner: The Fendale Group – Board of Directors
Applies to: All Fendale Group companies, employees, contractors, suppliers and partners
Date: January 2026
Review Date: January 2027

1. Policy Statement

The Fendale Group is committed to conducting business ethically and with integrity. We have a zero-tolerance approach to modern slavery and human trafficking in all its forms, and we are committed to ensuring that these practices have no place within our business operations or supply chains.

This policy applies to all individuals working for or on behalf of The Fendale Group and its subsidiary companies, in any capacity, including employees at all levels, directors, officers, agency workers, freelancers, contractors, consultants, suppliers and business partners.

We are committed to acting with transparency and to continuously improving our practices to identify, prevent and address any risks of modern slavery.

2. Scope and Definitions

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, all of which involve the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. As defined under the Modern Slavery Act 2015, modern slavery includes:

- **Slavery:** the exercise of powers of ownership over a person
- **Servitude:** the obligation to provide services imposed by coercion
- **Forced or compulsory labour:** work or service extracted from a person under threat of penalty and for which the person has not offered themselves voluntarily
- **Human trafficking:** arranging or facilitating the travel of another person with a view to their exploitation

This policy covers all activities across The Fendale Group, including the procurement of goods and services, the engagement of staff and freelancers, and relationships with suppliers and business partners.

3. Our Commitment

The Fendale Group is committed to:

- Ensuring that modern slavery and human trafficking are not taking place in any part of our business or supply chains
- Conducting our business in a manner consistent with the Modern Slavery Act 2015, the Human Rights Act 1998, the Equality Act 2010 and all other applicable legislation
- Maintaining fair, transparent and ethical employment practices across all group companies

- Paying all employees at least the National Living Wage, with The Fendale Group proudly accredited as a Living Wage Employer
- Building long-term relationships with suppliers based on shared ethical standards and mutual accountability
- Encouraging the reporting of concerns and ensuring that anyone who raises a concern in good faith is protected from retaliation

4. Responsibilities

4.1 Board and Senior Leadership

The Board of Directors has overall responsibility for ensuring this policy complies with legal and ethical obligations and that all those under our control comply with it. Senior leadership within each group company is responsible for implementing this policy within their operations.

4.2 All Employees

All employees are responsible for reading, understanding and complying with this policy. Employees must report any concerns or suspicions of modern slavery in any part of our business or supply chain immediately, using the reporting channels set out in this policy.

4.3 Procurement and Supplier Management

Those involved in procurement and supplier management must ensure that anti-slavery considerations are embedded into sourcing decisions, supplier onboarding, contract terms and ongoing supplier relationships.

5. Due Diligence and Supply Chain Management

The Fendale Group operates primarily within the UK hospitality and events sector. Our supply chain includes food and beverage suppliers, staffing agencies, equipment hire companies, transport providers and subcontractors. We recognise that certain elements of our supply chain may present higher risk, particularly where labour-intensive services or recruitment agencies are involved.

To manage these risks, we take the following steps:

5.1 Supplier Assessment

- All new suppliers are assessed as part of our onboarding process, which includes evaluation of their own anti-slavery policies and practices
- We prioritise long-term relationships with a curated network of trusted suppliers, allowing for stronger oversight and accountability
- Suppliers are required to confirm their compliance with the Modern Slavery Act 2015 and to demonstrate that they have appropriate policies and procedures in place

5.2 Contractual Requirements

- All supplier contracts include anti-slavery and human trafficking clauses
- Contracts include the right to audit, inspect and terminate the relationship in the event of non-compliance
- Suppliers are required to cascade equivalent standards to their own supply chains

5.3 Recruitment Practices

- We recruit employees directly wherever possible, using robust recruitment processes that include identity verification, right to work checks and fair employment terms
- Where recruitment agencies or staffing providers are used, we require them to demonstrate compliance with employment law and anti-slavery legislation, including transparent pay practices and the prohibition of recruitment fees charged to workers
- Agency staff and freelancers engaged across the group are subject to the same ethical standards as directly employed team members

5.4 Ongoing Monitoring

- We conduct periodic reviews of our supply chain to assess and manage modern slavery risk
- Any supplier found to be in breach of this policy will be subject to review, which may include additional due diligence requirements, suspension or termination of the relationship

6. Risk Assessment

The Fendale Group assesses modern slavery risk on an ongoing basis, with particular attention to the following areas:

- **Labour supply:** the engagement of temporary, agency or freelance staff, particularly in roles involving manual or service-based work
- **Food and beverage sourcing:** ensuring that supply chains for food, drink and related products are transparent and ethically managed
- **Third-party services:** including equipment hire, transport, cleaning and other outsourced services
- **International supply chains:** where goods or services are sourced from regions with higher prevalence of forced labour or exploitation

We are committed to continuously reviewing and improving our risk assessment processes as the business evolves.

7. Indicators of Modern Slavery

All employees should be aware of the potential indicators of modern slavery. These may include, but are not limited to:

- Workers who appear to be under the control of others and reluctant to interact
- Workers who are transported to and from work by another person
- Signs of physical abuse, malnourishment or neglect
- Workers who are not in possession of their own identity documents
- Workers who appear fearful, withdrawn or unable to speak freely
- Evidence that wages are being withheld or that workers are being charged unreasonable fees
- Workers living in overcrowded, unsanitary or otherwise unsuitable accommodation provided by their employer
- Workers who are unable to leave their workplace or accommodation freely

If any of these signs are observed, they should be reported immediately using the channels set out in Section 8.

8. Reporting Concerns

The Fendale Group encourages anyone who has concerns or suspicions about modern slavery in any part of our business or supply chain to come forward. We are committed to ensuring that all reports are taken seriously and handled sensitively.

Concerns can be raised through the following channels:

- Directly to a line manager or member of senior leadership
- To the HR department
- Via the company's confidential reporting process, as set out in our Whistleblowing Policy

No employee will suffer any detrimental treatment as a result of raising genuine concerns about modern slavery, in line with the protections afforded under the Public Interest Disclosure Act 1998. Any individual found to have retaliated against a person who has raised a concern will be subject to disciplinary action.

In cases where there is immediate risk to an individual, employees should contact the police. Concerns can also be reported externally to the Modern Slavery Helpline on 08000 121 700.

9. Training and Awareness

The Fendale Group is committed to raising awareness of modern slavery across the organisation. This includes:

- Ensuring all employees are made aware of this policy as part of their induction
- Providing targeted training to those in roles with higher exposure to modern slavery risk, including procurement, HR, operations and management
- Periodic refresher training and awareness updates for all staff
- Incorporating modern slavery awareness into supplier communications and onboarding materials

10. Breaches of This Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

The Fendale Group may terminate its relationship with any supplier, contractor or other business partner found to be involved in modern slavery or human trafficking, or found to have failed to implement adequate measures to prevent it within their own operations or supply chains.

11. Review

This policy will be reviewed annually by the Board of Directors to ensure it remains effective and reflects current legislation, best practice and the evolving nature of our business and supply chains. Any material changes will be communicated to all employees and relevant stakeholders.

This policy does not form part of any employee's contract of employment and may be amended at any time.