



## **HMSHost Modern Slavery Statement – Reporting period 1<sup>st</sup> December 2018 to 30<sup>th</sup> November 2019**

### **Statement**

This statement is made in line with the Modern Slavery Act 2015 and relates to business practices undertaken by HMSHost UK Ltd for the period 1st December 2018 to 30th November 2019.

### **About HMSHost UK Ltd**

HMSHost UK Ltd is part of HMSHost International, a subsidiary of Autogrill SpA, the world's leading travel food and beverage operator. We operate food and beverage outlets in travel and retail hubs across the UK with one outlet also in Calais, France. Our supplier relationships are managed through our central food and beverage team in line with our global company policies.

Our employees are predominantly permanent, although we do offer some seasonal positions to deal with uplift in demand during peak seasons.

We are committed to factoring in fair labour costs across our business and supply chain, to build and maintain a sustainable model which is both profitable and ethical.

### **HMSHost Policies**

As a company we are committed to ensuring that we act in line with our corporate values, and that there is no known slavery or human trafficking taking place in any part of our company, or the suppliers we deal with. We have implemented vigorous policies and systems in place to ensure that we do not knowingly work with suppliers who partake in modern slavery, which has been assessed as the area with a higher risk within our company.

As part of its ethics and compliance awareness program HMSHost has renewed its employee Code of Ethics and developed a global Speak Up Policy allowing for transparency and the opportunity to report any suspicions of misconduct. Where any case of modern slavery and/or forced labour to be found, HMSHost is committed to ensuring that all involved are protected from further victimisation and are supported with dignity and respect.

In addition to our Code of Ethics the HMSHost Supplier Code of Conduct forms part of new contracts with suppliers. This code should ensure consistency when managing our supplier partnerships and enables us to manage them ethically and with transparency. This code sets out our expectations that our suppliers should have policies, procedures and practices in place to ensure they conduct business in an ethical and legal manner which, at a minimum, requires compliance with all applicable laws, rules and regulations of the countries in which they operate, including the Modern Slavery Act.

### **Due diligence**

Our suppliers are contractually obliged to sign-up to the HMSHost Supplier Code of Conduct, to work with us. We audit selected suppliers on an annual basis, to ensure they continue to adhere to the Modern Slavery Act. Were any supplier to be found in breach of the Modern Slavery Act, there are clear processes to hold them to account and/or terminate any working agreement where necessary.

Senior management takes responsibility for ensuring that the policies mentioned above are followed at all times. Leadership at all levels are responsible for ensuring their direct line reports understand and comply with HMSHost policies and are given adequate and regular training on the issue of



modern slavery. It is reported to our global Board annually, to ensure that compliance remains at the top of each countries agenda.

With regards to our direct employees, we ensure that all our team are provided with their terms and conditions of employment in writing, which meet the legal minimum wage, and in many cases significantly exceeds it. A wage alignment exercise within the reporting period allowed us to increase wages beyond the legal minimum wage which was applied to support our team with the cost of living in their area. Recruitment processes allow for thorough checks of documentation and as such allow opportunity to highlight where there may be ethical issues relating to the employment of an individual, such as the withholding of documents through forced labour.

#### **Risk management**

We have identified our supply chain as being the area of our business with the higher risk, and as such we have taken steps to implement policies, procedures and due diligence checks to ensure that we do not work with any suppliers who do not conduct business in an ethical and legal manner.

#### **Effectiveness**

As all suppliers are obliged to work in line with our company policies, we are able to clearly document our compliance through written agreements with suppliers, as such we measure our effectiveness based on the adherence to our company policy which is 100%.

#### **Training and awareness**

At HMSHost we encourage openness and awareness of ethical issues and will support anyone who raises any issues relating to modern slavery or any other ethical matter. We are committed to ensuring that anyone who does raise an issue is treated with respect, and that swift action is taken (if required). As part of the ethics and compliance awareness program, HMSHost has developed and started the roll-out of a training plan raising further awareness on the Code of Ethics, the Speak Up Policy and other related policies.

We regularly engage with our suppliers to ensure that they have the most up to date knowledge of these areas and are working in line with best practice.

I confirm that the Modern Slavery Statement provided for HMSHost UK Ltd above is accurate and has been produced in accordance with the published guidelines.

**Signed:**

*Kimberly DeMello*

**Date:** *December 19, 2019*

**Name:** Kimberly DeMello

**Position:** Vice President Human Resources, HMSHost International