

# Elior UK statement on modern slavery

Compliance with Modern Slavery Act 2015 statement, financial year [2015 – 2016]

## Elior UK

 **10,000**  
people

 **+600**  
sites

## Elior Group

 **13**  
countries

 **106,000**  
staff

**3.8 million**  
customers daily



### About Elior

Elior UK and its subsidiaries is an award-winning contract caterer which provides services to a number of sectors, including business and industry, education, defence, leisure and care.

Elior has a large and diverse workforce and is one of the Sunday Times Top 25 Best Big Companies to Work For 2015. Elior relies on and values each and every one of its people and is determined to be a responsible company, committed employer and active partner.

Operations in the UK are overseen by Catherine Roe, the Chief Executive Officer of Elior UK, and her board of directors. Elior UK is also part of Elior Group. The Group has a management team in each country and overall operations are lead by Philippe Salle, the Group Chief Executive Officer.

The group has been a signatory of the United Nations Global Compact since 2004. As a signatory, Elior Group has pledged to uphold ten principles. Principle 4 is the “elimination of all forms of forced and compulsory labour” and Elior is committed to ensuring it complies with this principle.

To help regulate and ensure compliance, Elior has introduced various policies which outline how its people are to act with regard to ethical trading. The following policies can be found on our website [www.elior.co.uk/sites/default/files/pictures/policy\\_documents.pdf](http://www.elior.co.uk/sites/default/files/pictures/policy_documents.pdf)

- Elior’s Corporate Responsibility policy outlines the company’s ultimate goal, to promote sustainable growth with responsible, innovative and ethical business practice
- Elior’s Purchasing policy states that Elior’s people are committed to purchasing in an ethical and transparent manner and operate a rigorous approach to selecting suppliers

- This is reinforced by Elior’s Standards of Business Conduct policy, this outlines that colleagues who are in contact with suppliers and contractors (including external consultants) are to abide by Elior UK’s Supplier Code of Conduct at all times

### Right to Work in Elior

Elior UK is committed to ensuring that right to work checks are carried out consistently and diligently in line with current UK legislation.

- Copies of documents from List A or B (the official documentation that must be checked by employers in order to prevent illegal working) are retained on the colleague file, with regular audits carried out to ensure that all sites are compliant with internal procedures
- Right to work in the UK checks are supplemented by additional security checks within areas of the organisation that are subject to satisfactory DBS disclosure prior to employment
- Full guidance relating to the importance of all pre-employment checks is provided to line managers, along with various training guides and online tools designed to ensure that illegal working is prevented
- In addition, the company standard is to reference check the last five years of employment of all new colleagues (2 references)

Following the completion of satisfactory background checks, all Elior colleagues are given contracts at the start of employment. These are given to the colleague for review, then signed by both the colleague and Elior UK, clearly stating the terms and conditions of engagement, and the voluntary nature of employment. Colleagues have the freedom to leave our employment at any time (subject to contractual notice) and any overtime in excess of standard contracted hours is also voluntary.

Over the past 20 years, working arrangements have been changing rapidly and new working patterns have emerged – it's now less common for our colleagues to work full time for their whole career. In our industry, part-time, agency and casual workers are more typical than the traditional full time employee.

Casual workers agreements enable us to maintain a pool of individuals who may or may not be available at short notice to help out at busy times of the year or when there is a major event/function which requires extra people (e.g. a banquet, conference, race meeting, etc.).

In these instances, Elior UK controls when, how and where the work is to be done and is not obliged to provide any specific individual worker with the work. Similarly, each individual is free, without penalty, to accept or reject any offer made by Elior.

Such an individual might be, for example, someone who works on match days occasionally through the football season, or someone who works at specific functions, conferences or banquets throughout the year.

To assist with the elimination of Modern Slavery and to ensure it does not occur within the business; this year Elior launched Managers' Guidance Notes. This document was made available to all managers via company email and is also available to download from the internal Elior extranet.

The document outlines specifically how the hospitality sector is affected by Modern Slavery, what areas are more at risk and recent figures. It reaffirms the processes that managers need to take when hiring new starters and lists the legal documents required.

The document also includes a section on common signs to spot potential victims, including:

- Legal documents
- Behaviour
- Pay
- Medical care
- Transport
- Appearance
- Fear of authorities
- Debt bondage

The document also explains what the manager should do and who they need to contact if they believe someone is affected by Modern Slavery.

Furthermore, Elior has also created an HR Toolkit session on the internal extranet to provide additional information and guidance. This interactive session allows managers to work through the content with their staff, discuss modern slavery and how they can work together to help eliminate it.

Additionally, all senior management have benefited from presentations and operational briefings on modern slavery.

## Supply Chain Transparency

The Elior UK Purchasing Department's principal commitment is to ensure suppliers deliver products and services to the business through a safe and auditable supply chain, ensuring compliance with legislative, food, safety and welfare regulations. The Purchasing Department works alongside the Elior UK Safety and Wellbeing Team to maintain the highest standards for clients and customers.

Elior UK is committed to purchasing in an ethical and transparent manner and operates a rigorous tender approach to select suppliers. Elior requires suppliers to meet its corporate responsibility requirements related to:

- Transparency of ingredients e.g. allergens
- Sustainability e.g. sustainable palm oil
- Prevention of undesirable ingredients e.g. trans fats and GM ingredients
- A responsible approach to the environment, regulation and welfare e.g. adhering to the Modern Slavery Act

As a signatory of the UN Global Compact, Elior UK is committed to upholding the ten principles surrounding human rights, labour, environment and anti-corruption. This means always operating in ways which meet fundamental responsibilities in these areas.

Elior also encourages responsible business practices throughout its supply chain by only engaging with suppliers which approach and manage their business in an ethical, social and responsible manner, in line with national legislation. To ensure these objectives are met, Elior requires all suppliers sign up to its Supplier Code of Conduct.

Elior UK will not knowingly engage with any suppliers that operate poor labour practices which breach Elior's code of conduct and the company reserves the right to audit suppliers where it considers it necessary.

With the introduction of the Modern Slavery Act, Elior UK has contacted all nominated suppliers to ensure their ongoing commitment to the new legislation and will remove any suppliers unable to demonstrate compliance. Elior has highlighted this in its supplier code of conduct and tender pre-requisites.

It is Elior's intention to review this statement on an annual basis in line with the requirements of the Modern Slavery Act and update on progress made to ensure full compliance with the act.



Catherine Roe ■ Chief Executive, Elior UK  
October 2016