



BLUE STRAWBERRY GROUP

modern SLAVERY & HUMAN TRAFFICKING POLICY

Our commitment to dignity, freedom and ethical working practices

Policy owner	Managing Director
Applies to	All Blue Strawberry Group businesses, brands, venues and operations
Approval	Managing Director / Board, as appropriate
Version	1.0
Effective date	October 2026
Review date	October 2027, or sooner if required
Status	Company policy; does not form part of an employment contract



1. Policy statement

Blue Strawberry Group Ltd and its associated businesses, brands and venue operations (“Blue Strawberry” or “the Company”) are committed to conducting business ethically, responsibly and with respect for human rights. We have zero tolerance for modern slavery, human trafficking, forced or compulsory labour, servitude, debt bondage and unlawful child labour in our own operations or our supply chains.

Modern slavery is a serious crime and a fundamental abuse of human rights. It can affect people of any nationality, age or background and may be hidden behind apparently legitimate employment, recruitment, subcontracting or supply arrangements. No commercial, operational or financial consideration justifies exploitation.

We will take proportionate, risk-based steps to prevent, identify and address exploitation. We will listen to concerns, protect people who raise them in good faith, and work with appropriate specialist organisations and authorities where necessary. We recognise that responsible action may require us to investigate our own practices, change suppliers or remedy harm rather than simply end a contract.

2. Purpose and scope

This policy sets out the standards expected of everyone working for, with or on behalf of Blue Strawberry and the steps we take to reduce the risk of modern slavery.

It applies to:

- all employees, directors, officers, managers and workers, whether permanent, temporary, full-time or part-time;
- agency workers, casual and seasonal staff, apprentices, interns, work-experience participants and secondees;
- recruitment agencies, labour providers, contractors, consultants, subcontractors, agents and other representatives; and
- suppliers and business partners providing food, drink, equipment, uniforms, flowers, props, cleaning, security, transport, accommodation, facilities, event production or other goods and services.

The policy applies across all Company activities, including event catering, private events, venue catering, office hospitality, kitchens, bars, delis, warehouses, transport, event set-up and breakdown, and work undertaken at client or third-party premises.

3. What modern slavery can look like

Modern slavery can include forced labour, human trafficking, servitude, debt bondage and the exploitation of children. Warning signs may include, but are not limited to:

- a person being threatened, controlled, intimidated or unable to leave their job or accommodation freely;
- someone else holding a worker’s passport, identity documents, phone, bank card or wages, or restricting access to them;
- recruitment fees, unexplained deductions, debt repayment demands or wages being paid to another person;



- workers being required to work excessive hours, denied breaks or holidays, or prevented from refusing additional shifts;
- workers living in overcrowded or employer-controlled accommodation, or being transported and supervised in a controlling way;
- a worker appearing fearful, withdrawn, injured, malnourished or unable to speak privately, particularly where another person answers for them;
- unclear employment arrangements, false identity or payroll records, cash-only payment without a legitimate explanation, or unusually low supplier prices that may not cover lawful wages and conditions; and
- the use of unapproved labour providers or subcontractors, or reluctance by a supplier to disclose who employs or supplies its workforce.

No single indicator proves that modern slavery is taking place. Do not make assumptions based on nationality, language, immigration status or appearance. If something feels wrong, raise the concern and seek advice.

4. Our commitments and standards

4.1 Recruitment and employment

- We will use lawful, documented recruitment processes and appropriate checks to establish the identity and right to work of employees, in line with applicable law.
- Workers will receive clear information about their role, pay, working hours and employment terms. Employees will be provided with written particulars and contracts as required by law.
- Pay, deductions, working time, rest breaks, holiday and other employment practices must comply with applicable legal requirements.
- Workers must not be charged recruitment fees by the Company. We expect recruitment agencies and labour providers engaged by us not to charge workers fees for obtaining work.
- Workers must retain control of their own identity documents and personal belongings. The Company will not retain a worker's passport or identity documents as a condition of employment.
- Workers must be free to leave employment in accordance with their contractual terms and the law, without threats, coercion or unlawful penalties.
- Managers must be alert to exploitation risks affecting agency, casual, seasonal, migrant and subcontracted workers, including workers engaged for events, overnight shifts, set-up or breakdown.

4.2 Suppliers, contractors and labour providers

- We will take a risk-based approach to supplier due diligence, considering the nature of the goods or services, location, labour intensity, use of temporary or migrant labour, subcontracting and any known risk indicators.
- We may ask suppliers to confirm their compliance with applicable employment and modern slavery laws, explain their recruitment and labour-provider arrangements, identify relevant subcontractors and provide evidence of their controls.



- Suppliers must not use forced, bonded or trafficked labour, unlawful child labour, or practices that restrict workers' freedom or exploit their vulnerability.
- Suppliers must be transparent about who employs the workers delivering goods or services to Blue Strawberry and must obtain our approval before subcontracting where our contract requires it.
- Contracts or purchase terms may include modern slavery commitments, audit or information rights, notification requirements and remedies for non-compliance.
- Where concerns arise, we will assess the facts and the risk to affected workers. We may require corrective action, suspend new work, commission further checks or terminate a relationship where appropriate. Immediate termination will be considered where necessary to protect people or meet legal obligations, but will not be treated as the only available response.

4.3 Purchasing and commercial decisions

Those responsible for buying goods and services must not knowingly place orders at prices, lead times or service levels that make lawful pay and safe working conditions unrealistic. Commercial teams should consider labour risks when evaluating unusually low prices, urgent sourcing, complex subcontracting or suppliers that cannot explain how they deliver the required service.

5. Responsibilities

- Managing Director: has overall accountability for this policy, ensures significant concerns are escalated, and approves material responses where appropriate.
- Senior Leadership Team and managers: implement the policy in their areas, assess relevant risks, brief teams, ensure concerns are acted on and avoid retaliation against anyone raising a concern.
- People/HR and recruitment leads: maintain appropriate recruitment processes, communicate standards to agencies and labour providers, and support workers who raise concerns.
- Procurement, finance and operational leads: apply proportionate supplier checks, retain relevant records, raise unusual pricing or labour arrangements, and ensure contracts and purchasing practices support compliance.
- All employees and workers: read and follow this policy, remain alert to warning signs, complete any required training and raise concerns promptly.
- Suppliers and business partners: communicate these standards to their own staff and relevant subcontractors, comply with applicable law and cooperate reasonably with due diligence or remediation.

6. Raising a concern

Anyone who suspects modern slavery or exploitation in our business or supply chain must raise the concern as soon as possible. You do not need proof, and you should not try to establish the facts yourself.

Concerns can be raised with any of the following:

- your line manager or another senior manager;



- the People/HR lead or Managing Director; or
- the Company's Whistleblowing Policy or other approved confidential reporting channel, where available.

If the concern involves your line manager, or you do not feel comfortable raising it with them, use another route. Concerns may be raised by employees, agency workers, suppliers, contractors or other third parties. We will treat information sensitively, share it only with those who need to know and explain that confidentiality cannot be guaranteed where disclosure is necessary to protect someone or meet legal obligations.

If someone appears to be in immediate danger, call 999. For a non-emergency police report, call 101. You can also contact the UK Modern Slavery & Exploitation Helpline on 08000 121 700 or use its online reporting service. Do not confront a suspected exploiter or take action that could put a worker or yourself at risk.

7. How Blue Strawberry will respond

When a concern is raised, the Company will, as appropriate:

- take it seriously and make an initial assessment of immediate safety and safeguarding needs;
- contact emergency services or specialist support where necessary, without delaying urgent protection;
- appoint an appropriate person to assess the concern, independent of anyone implicated where practicable;
- preserve relevant records and handle personal information lawfully and sensitively;
- avoid actions that could increase risk to the person affected, including confronting a suspected exploiter without advice;
- seek specialist guidance and cooperate with the police, relevant authorities or support organisations where appropriate;
- consider appropriate support and practical remedies for affected workers, including pay or recruitment-fee issues where identified;
- require a supplier or labour provider to take corrective action where appropriate, and monitor whether that action is effective; and
- record the concern, decisions, actions and outcome on a restricted-access basis.

The Company will not expect an individual who may be a victim to prove their situation before their concern is considered. Any decision to refer information to an external body will take account of immediate safety, legal requirements and applicable safeguarding guidance.

8. Protection from retaliation

Blue Strawberry will not tolerate victimisation or detrimental treatment of anyone who raises a concern in good faith, reports a suspicion, assists with an enquiry or refuses to participate in conduct that may breach this policy. Retaliation may include dismissal, disciplinary action, threats, intimidation, reduced shifts, exclusion or other unfavourable treatment.



Anyone who believes they have experienced retaliation should report it to the Managing Director, People/HR lead or through the Whistleblowing Policy. Allegations of retaliation will be addressed promptly. Knowingly making a malicious or deliberately false allegation may be dealt with under the relevant Company procedure; a concern that is not substantiated will not, by itself, be treated as misconduct.

9. Training, communication and records

We will communicate this policy to relevant employees, managers, suppliers and labour providers in a manner proportionate to their role and risk exposure. Relevant colleagues may be required to complete training on recognising indicators, raising concerns and responding safely. Managers must ensure that new starters and relevant temporary or agency teams know how to report a concern.

The Company will maintain proportionate records of risk assessments, supplier checks, training, concerns raised, investigations and corrective actions. Access will be restricted to those who need the information for legitimate business, safeguarding or legal purposes, and records will be retained in accordance with the Company's data protection and retention requirements.

10. Monitoring, review and reporting

The Managing Director, supported by relevant operational, People/HR and procurement colleagues, will review the effectiveness of this policy at least annually and following a significant incident, material change in the business or relevant change in law or official guidance. The review may consider supplier risk, completion of due diligence, training, concerns raised, outcomes and corrective actions.

Where the Company is required to publish an annual modern slavery statement under section 54 of the Modern Slavery Act 2015, it will ensure the statement is prepared, approved, signed and published in accordance with the applicable requirements. Even where the statutory threshold does not apply, Blue Strawberry may publish a voluntary statement where appropriate.

11. Breaches of this policy

A breach may result in disciplinary action, up to and including dismissal, or termination or other contractual remedies in relation to a supplier, contractor or business partner. The response will depend on the facts, the seriousness of the conduct and applicable law. Suspected criminal conduct may be referred to the relevant authorities.

12. Further guidance

This policy should be read alongside the Company's Whistleblowing Policy, Grievance Procedure, Recruitment and Right to Work procedures, Supplier/Procurement terms and relevant Health & Safety and Safeguarding policies.



External guidance: the UK Government's modern slavery business guidance and reporting routes are available through GOV.UK. The UK Modern Slavery & Exploitation Helpline can provide advice and accept reports.

Policy review and approval

Policy owner: Managing Director

Next scheduled review

Approved by: _____

Date: _____ 12/10/26 _____