



Empire Industrial Estate
Brickyard Road
Aldridge
Walsall
WS9 8UR

T: 01922 745 500
F: 01922 743 582

Modern Slavery Policy

1. Policy statement

1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners and, as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

2. About this policy

2.1 The purpose of this policy is to:

- (a) set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking; and
- (b) provide information to those working for and on our behalf on how to identify and report concerns regarding modern slavery and human trafficking.



Empire Industrial Estate
Brickyard Road
Aldridge
Walsall
WS9 8UR

T: 01922 745 500
F: 01922 743 582

- 2.2 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 2.3 This policy does not form part of any employee's contract of employment and we may amend it at any time.
- 2.4 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2.5 The Managing Directors and the Head of People have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 2.6 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- 2.7 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Head of People

3. Your responsibilities and how to raise a concern

- 3.1 You must ensure that you read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 You must notify your manager as soon as possible if you believe or suspect that a breach of this policy has occurred, or may occur in the future.



Empire Industrial Estate
Brickyard Road
Aldridge
Walsall
WS9 8UR

T: 01922 745 500
F: 01922 743 582

- 3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 3.5 If you believe or suspect that a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.
- 3.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or Head of People.
- 3.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Head of People immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

4. Our Commitment in Practice

- 4.1 Child Labour – we comply with all relevant legislation relating to the employment of children and young people including, standard set by the International Labour Organisation, The Children and Young Persons Act 1933, The Management of Health and Safety at Work Regulations 1999, The Working Time Regulations 1996. The Company does not employ anyone who has not reached the age of completion of compulsory schooling in England and Wales. Those under the age of 18 are not permitted to perform hazardous duties. The Company requires its suppliers, contractor's agents and all other businesses with who it works, to comply with the standards set by the International Labour Organisation relating to the child labour.



Empire Industrial Estate
Brickyard Road
Aldridge
Walsall
WS9 8UR

T: 01922 745 500
F: 01922 743 582

- 4.2 Complying with the law – we comply with all applicable local and national laws. In this respect the Company consults with external legal advisors where necessary.

Employees are required to read and ensure they understand policies on Food Hygiene, No-Smoking, Equal Opportunities, Anti-Harassment and Bullying, Anti-Corruption and Bribery, Substance Misuse, Whistleblowing and Health and Safety. The Company has also implemented systems and equipment to ensure that its drivers comply with all road traffic legislation.

- 4.3 Employment Practices – Workers at Chicken Joes are able, without restriction, to terminate their employment when they wish subject to legally compliant, reasonable notice periods.

At the recruitment stage the Company complies with its obligations to ensure that the individual has the right to work and to do work of the nature of the job applied for, original passport, vis and other applicable documents are viewed and copied but never retained by the Company

The Company does not endorse the practice of worker-paid recruitment fees and ensures that if using a recruitment agency, that the agency does not charge a fee for finding or trying to find work for an individual.

Worker at Chicken Joes are never forced to work overtime.

- 4.4 Essential Freedoms – Workers at Chicken Joes enjoy all the freedoms they are entitled to under UK law and international law.

Article 11 of the Human Rights Act 1998 entitled individuals to the freedom of association. Workers at Chicken Joes enjoy the freedom to join groups and to promote and to protect the interests of the members of these groups, including political parties and trade unions. This is underpinned by the Company's Anti-Harassment and Bullying Policy and Equal Opportunities Policy.



Empire Industrial Estate
Brickyard Road
Aldridge
Walsall
WS9 8UR

T: 01922 745 500
F: 01922 743 582

Chicken Joes Limited does not place any restriction on its workers' in respect of freedom of movement aside from legal limits placed on individuals by the state and the obligation to abide by the terms of their employment contract which places restriction on movement only within the confines of the working day and the job role. Workers are not forced to work and may resign at any time in compliance with the reasonable notice period set down in their contracts of employment. The Company complies with the Working Time Regulations 1998 in respect of holidays and rest breaks.

Chicken Joes Limited is committed to providing a working environment free from harassment and bullying and ensuring all staff are treated, and treat others, with dignity and respect. This underpinned by its Anti-Harassment and Bullying Policy.

Chicken Joes Limited is committed to promoting equal opportunities in employment. Workers and job applicants will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation, this is underpinned by its Equal Opportunities Policy.

- 4.5** Justice for Victims – The Company ensures that all staff are familiar with the Whistleblowing Policy where concerns about modern slavery can be flagged up internally and also externally via the Protect Whistleblowing Charity. If the Company discovers evidence of modern slavery within the business, its supply chain, with contractors and business partners or otherwise it will report the matter to the Modern Slavery Helpline and / or the police and as far as it is able, co-operate with any investigation.

5. Communication and Training

- 5.1 Training on this policy and all related policies referred to in this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training is provided as necessary.
- 5.2 Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis. To this extent the Company requires all suppliers to complete a Modern Slavery Questionnaire and to supply a copy of their policy.



Empire Industrial Estate
Brickyard Road
Aldridge
Walsall
WS9 8UR

T: 01922 745 500
F: 01922 743 582

6. Breaches of this policy

- 6.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 6.2 We may terminate our relationship with individuals and organisations working on our behalf if they breach this policy.