

Modern Slavery Statement

Updated October 2023



Policy Statement

This statement applies to On A Roll Sandwich Company Ltd and sets out the steps we will take to understand all potential modern slavery risks related to its business and which are aimed at ensuring that there is no slavery or human trafficking in its own business or throughout its supply chains. The information in this statement refers to the financial year 2022-2023.

Whilst we are not required to publish a modern slavery statement by legislation, our own moral standards of trading means that we will adhere to the necessary demands of the Modern Slavery Act 2015 and we have taken steps to ensure that such slavery/human trafficking does not take place in our business nor the business of any organisation that supplies goods and/or services to On A Roll Sandwich Company Ltd (OAR). Within the manufacturing sector, we recognise that we have a responsibility to take a robust approach to prevent slavery and human trafficking.

Organisational Structure

OAR manufactures fresh and frozen food-to-go products for a diverse range of markets, including the retail, education and healthcare sectors. The sale of the aforementioned goods takes place on the telephone, by email and online. Demand for our products is consistently high throughout the year and therefore we would not describe it as seasonal in nature. All manufacturing is carried out in the United Kingdom, from our production facilities in Middlesbrough.

OAR considers itself to be at low risk from modern slavery. We operate from two locations in the UK, where protection against breaches of human rights can be limited. We have one additional distribution site in the UK, which remains under the control of our manufacturing location. OAR has two shareholders (a Director and Company Secretary) with a senior management team in place.

Definitions

OAR considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse, or the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement

Commitment

As part of our ongoing commitment to maintaining socially responsible behaviour throughout our operations, we adhere to high standards of labour rights including providing working conditions which are safe and hygienic; not employing child labour; ensuring that living wages are paid and that regular employment, safe from discrimination, is provided.

Modern Slavery Statement

Updated October 2023



In acknowledging our responsibilities in relation to tackling modern slavery, we commit to complying with the provisions in the Modern Slavery Act 2015 and understand that this requires an ongoing review of both internal practices in relation to our workforce and additionally our supply chains.

OAR does not enter trading relationships with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to OAR (such as via employment agencies) is obtained by means of slavery or human trafficking and where labour is supplied via an agency, agencies are only approved where a GLA licence is in place. OAR strictly adheres to the minimum standards required under relevant employment legislation in the United Kingdom.

Supply chains

In order to fulfil our activities, the main supply chains of OAR include those related to the purchase of fresh foods and raw material packaging and other goods and services from third party suppliers in the UK and elsewhere and we strive to conduct business with third party suppliers who share our commitment to high ethical standards and who operate in a responsible and ethical manner towards their workers and suppliers.

We choose our suppliers with care, acknowledging the importance of the Modern Slavery Act in the context of our supply chain. Indeed, we conduct regular supplier audits via questionnaire and we ask that our suppliers use GLA approved agencies in the employment of their own labour. We acknowledge the elevated risk of modern slavery in certain countries of the world, including some of those we trade with directly or indirectly and will develop our due diligence and evaluation processes to address those elevated risks appropriately.

Processes

OAR may carry out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of our suppliers.

OAR has not, to its knowledge, conducted business with another organisation which has been found to have been involved with modern slavery and/or human trafficking.

In accordance with the Modern Slavery Act, OAR is committed to taking the following steps to ensure that modern slavery is not taking place:

- reviewing our supplier contracts to include termination powers in the event that the supplier is, or is suspected to be, involved in modern slavery
- putting measures in place to identify and assess the potential risks in its supply chains
- creating action plans to address the risk of modern slavery

Modern Slavery Statement

Updated October 2023



- taking a zero-tolerance approach towards modern slavery
- providing training to staff, where required, regarding modern slavery

Policies

OAR is also in the process of developing a recruitment policy and a corporate social responsibility policy which will further define our stance on modern slavery.

Compliance

The development of the above policies will form part of our staff training programme which will reinforce our expected standards of conduct.

We recognise that the risks from modern slavery and human trafficking change and that efficient methods to identify and address modern slavery and human trafficking will be developed and enhanced. We will monitor and evaluate such developments and our approach to preventing modern slavery will be reviewed annually so that we can adapt and improve our approach.

Our Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public or law enforcement agencies to indicate that modern slavery practices have been identified.

Signed by:

A handwritten signature in blue ink, appearing to read 'James Stoddart', is written over a horizontal line.

James Stoddart, Managing Director

