



WESTMORLAND

## Modern Slavery Statement 2020

### **Summary**

Modern slavery is a crime that affects millions of people worldwide. It encompasses forced labour, debt bondage, human trafficking and other forms of slavery that deny people their basic human rights.

We recognise our responsibility towards those working in our supply chains to ensure that anyone working to produce the products that we sell do so freely through their own choice, not at the will of others. We are committed to preventing acts of modern slavery and human trafficking from occurring within our business and supply chains.

We have introduced measures to address this but there is more work to be done. Over the next 12 months and beyond, we will be working with our suppliers to reduce and ultimately eliminate the risks of modern slavery in our supply chains.

### **Our Business**

Westmorland Limited is a family business that has been operating for over 40 years. We operate a number of Motorway Service Areas, Farmshops, Kitchens, a Hotel and an arts and culture, retail and family venue, the Rheged Centre.

Our business is divided as follows:

- Westmorland Limited, which operates Tebay Services, Tebay Services Hotel, Cairn Lodge Services and the Rheged Centre.
- Gloucestershire Gateway Limited, which operates Gloucester Services.

Gloucestershire Gateway Limited is a wholly owned subsidiary of Westmorland Limited and this statement encompasses the activities of both Westmorland Limited and Gloucestershire Gateway Limited

We directly employ around 1,000 people, all of whom are based in the UK. The group carries out all of its business in the UK.

### **Our Supply Chain**

We have a large number of suppliers and our supply chains include supplies of fuel, catering supplies, clothing, a wide range of products to be sold in our Farmshops, as well as utilities, construction and maintenance suppliers.

The majority of our suppliers are based in the UK and wherever possible the products we sell are sourced from suppliers local to our sites. Nevertheless, we have a global supply chain with products or ingredients being sourced worldwide from the Americas to the Far East.

We recognise that some of our products are sourced from sectors that have a higher risk of modern slavery, with agriculture, fishery and clothing being identified as the highest risk sectors within our supply chain.

We endeavour to only work with suppliers in these sectors who are equally committed to the principles of ethical trade and can ensure that their own businesses and supply chains are free from modern slavery and human trafficking.

A large number of our suppliers are small scale, local producers. By working closely with such suppliers, it gives us a greater level of transparency over our supply chain and means that the risks of modern slavery with our supply chain are much reduced.

### **Our Policies**

We have a number of policies which illustrate our approach to tackling modern slavery. These include our:

- **Supplier Code of Conduct**, which explains the standards that we expect our suppliers to adhere to when providing us with goods or services.
- **Modern Slavery Policy**, which explains our approach to combating modern slavery within our organisation and our supply chains.
- **Right to Work Policy**, which outlines our commitment to the prevention of illegal working.
- **Whistleblowing Policy**, which enables colleagues to raise concerns without fear of reprisals or detrimental treatment.

### **Due Diligence Processes**

Our Supplier Code of Conduct sets out a number of labour standards that we expect and is broadly in line with the Ethical Trading Initiative Base Code and International Labour Organization (ILO) conventions.

We reserve the right to audit our suppliers to ensure compliance with our Supplier Code of Conduct and will work with suppliers to rectify any areas of non-compliance. We also reserve the right to terminate an agreement with any supplier that does not comply with the code.

### **Training**

Our procurement team have participated in modern slavery training to help them understand the risks of modern slavery and their roles as purchasing professionals in reducing the risk of modern slavery in our business and supply chains.

### **Looking ahead**

As a company, we recognise that eliminating the risks of modern slavery from our supply chains is an ongoing challenge and one that we are committed to achieving. To this end, we aim to take a

number of steps that will enable us to have a greater degree of transparency over our supply chains. These include:

- Carry out a full risk assessment to identify those areas within our supply chain that are at greatest risk of modern slavery.
- Create a new sourcing policy that determines our key principles and approaching to sourcing products and suppliers throughout our supply chain.
- Carry out a supplier vetting process, with initial focus on high risk areas, requiring suppliers to sign up to the supplier code of conduct and sourcing policy.
- Review our supplier terms and conditions to ensure sufficient focus on modern slavery.

### **Approval**

Publication of this statement has been delayed owing to the significant impact of the coronavirus pandemic on our business. This resulted in the temporary closure of parts of our business and restricted trading in others, with key personnel being away from the business for significant periods of time affecting our ability to produce this statement.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Westmorland Limited's slavery and human trafficking statement for the financial year ending 30<sup>th</sup> June 2020.

This statement has been approved by the board of directors.



Signed

Name: Nabil Subuh

Job title: Chief Executive

Date: 19<sup>th</sup> February 2021