



FRANCHISE
BRANDS

Franchise Brands Plc
Anti-Slavery & Anti Human Trafficking Policy

January 2022

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1 ANTI-SLAVERY & ANTI HUMAN TRAFFICKING POLICY

- 1.1 References to **we**, **our** or **us** in this privacy notice are to **Franchise Brands Plc** of Ashwood Court, Tytherington Business Park, Macclesfield SK10 2XF (Registered number **10281033**) and each of its direct and indirect subsidiaries, trading under the “**Franchise Brands Group**” including **Metro Rod, Willow Pumps, ChipsAway, Ovenclean, The Handyman Van and Barking Mad**. Details of our brands are as follows:

Metro Rod Limited is a limited company incorporated in England and Wales. Registered Number: **04235803**. Registered Office: Ashwood Court Springwood Close, Tytherington Business Park, Macclesfield SK10 2XF, also trading as **Metro Plumb** and **Kemac Services**; and

Willow Pumps Limited is a limited company incorporated in England and Wales. Registered Number: **02762063**. Registered Office: Ashwood Court Springwood Close, Tytherington Business Park, Macclesfield SK10 2XF; and

ChipsAway International Limited is a limited company incorporated in England and Wales. Registered Number: 2962763. Registered Office: Ashwood Court Springwood Close, Tytherington Business Park, Macclesfield SK10 2XF; and

Oven Clean Domestic Limited is a limited company incorporated in England and Wales, Registered Number **04944186**. Registered Office: Ashwood Court Springwood Close, Tytherington Business Park, Macclesfield SK10 2XF, also trading as **Ovenclean**; and

The Handyman Van Limited is a limited company incorporated in England and Wales, Registered Number **07117588**. Registered Office: Ashwood Court Springwood Close, Tytherington Business Park, Macclesfield SK10 2XF; and

Barking Mad Limited is a limited company incorporated in England and Wales. Registered Number: **04207457**. Registered Office: Ashwood Court Springwood Close, Tytherington Business Park, Macclesfield SK10 2XF; and

Azura Group Limited is a limited company incorporated in England and Wales. Registered Number: **02531777**. Registered Office: Ashwood Court Springwood Close, Tytherington Business Park, Macclesfield SK10 2XF.

- 1.2 The purpose of this policy is to set out the values, principles and responsibilities we adhere to and expect all of our employees, franchisees, advisors, consultants, contractors, suppliers and other intermediaries representing us and all of our group of companies with regard to slavery and human trafficking. All directors and employees are required to comply with this policy. This policy also applies to all persons with whom we are associated from time to time such as but not limited to: franchisees, suppliers, representatives, intermediaries, consultants and contractors. Local laws, custom and practice are not to be applied to justify any departure from this policy.
- 1.3 Franchise Brands plc has a zero-tolerance position on violations to the UK’s anti-human trafficking and anti-modern slavery laws. It is a fundamental policy of Franchise Brands plc to conduct its business with honesty and integrity and in accordance with the highest standards of conduct, ethics and fairness.

2 WHAT IS MODERN DAY SLAVERY & HUMAN TRAFFICKING

- 2.1 Modern Day Slavery and Human Trafficking can take on many forms, i.e. slavery, servitude, forced labour, compulsory labour and human trafficking, and can include restricted freedom

of movement or decision making by individuals, the provision of shared accommodations and central payment for services to a single person.

Such activities are an offence in UK law and completely contrary to the values of Franchise Brands plc and we are committed to implementing and enforcing effective systems and controls that seek to ensure that modern slavery is not taking place in its business or supply chains.

Franchise Brands expects that any organisation within the scope of the legislation will also apply the same high standards.

3 COMPLIANCE

3.1 Franchise Brands will maintain its compliance with the policy as follows:

- a. Maintaining and updating HR policies in line with legislation; and
- b. Adhering to Group recruitment policies; and
- c. Tracking and monitoring the potential risks; and
- d. Investigating thoroughly any issues or concerns raised; and
- e. Communicating with employees; and
- f. Providing appropriate training for employees; and
- g. Providing a confidential 'Whistle-blowing' service.

4 BUSINESS SUPPLIER & CONTRACTORS CONTRACTS

4.1 All departments entering into business relationships with suppliers, (sub)contractors, consultants and business partners are to provide a copy of this policy. Each supplier, contractor and business partner will be required to complete a '**Supplier Confirmation Statement**' (see Appendix 1). The department managing the business relationship is to retain evidence that this confirmation has been obtained from the supplier, contractor or business partner with whom we receive supply or service from them.

5 SCOPE

5.1 The Franchise Brands plc 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.

5.2 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 its content together with the issue of modern slavery in supply chains.

5.3 The prevention, detection and reporting on modern slavery in any part of our business is the responsibility of all those working within the Franchise Brands group. All individuals working with the group are required to avoid any activity that might lead to a breach of this policy.

5.4 Every one of us must take individual responsibility for complying with this policy.

6 REPORTING CONCERNS

- 6.1 You are encouraged to raise concerns about any issue or suspicion of modern-day slavery or human trafficking as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, notify either Peter Molloy, Managing Director B2B or Tim Harris, Managing Director B2C at peter.molloy@metrorod.co.uk or tim@franchisebrands.co.uk or contact the whistle-blowing service and your concerns will be investigated.

7 BREACHES OF THE POLICY

- 7.1 Any breach of our Anti-Slavery & Anti Human Trafficking Policy by any employee will result in disciplinary action which could result in dismissal for gross misconduct.

The company will terminate any commercial relationships with suppliers if they are in breach of our policy and/or are found to have been involved in modern slavery.

8 REPORTING OF CONCERNS (WHISTLEBLOWING)

- 8.1 You must report suspicious activity: you will not be penalised after you do so.

Franchise Brands will support anyone who raises a genuine concern in good faith under this policy. The company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of the business or in any of its supply chain.

Please see our Confidential Reporting (Whistleblowing) Policy for further details.

Appendix 1: Template Supplier Confirmation Statement & Questionnaire

To be issued to all Franchise Brands Group suppliers, contractors, subcontractors, consultants

We confirm that we have read and understand the MOTUS UK Modern Day Slavery & Human Trafficking Policy and understand that the MOTUS UK Group does not accept any form of modern slavery and other human rights abuses in their operations.

By signing the below, you acknowledge and are in agreement with the principles of the Franchise Brands plc **Anti-Slavery Slavery & Anti Human Trafficking Policy** and confirm that all information provided below (on the attached questionnaire) is true and accurate.

We confirm that:

- we have our own Anti-Slavery & Human Trafficking Policy (where required);
- that all materials incorporated into products supplied to Franchiser Brands plc (and its subsidiaries) comply with the laws regarding slavery;
- we confirm that we have thoroughly investigated our labour practices and those of our direct suppliers to ensure there is no slavery or forced labour used anywhere in this organisation or by any of its direct suppliers to this organisation; and
- we have put in place all necessary processes, procedures, investigations and compliance systems to ensure that the situation will continue to be the case at all times from and after the date of this declaration.

The attached questionnaire has been completed (and requested documents supplied).

Yours sincerely,

Name

Position held (Must be an Officer of the Company)

Question	
Do you have an Anti-Slavery & Anti Human Trafficking Policy?	Please supply copy.
Do you produce a 'Modern Day Slavery Statement' (if applicable)?	Please supply copy (if applicable).
Do you currently have a program to ensure that human trafficking and slavery does not exist in your operations and supply chain?	If yes, please describe your program.
Do you currently work with a third party to identify the overall risks of slavery and human trafficking in your supply chain?	Please explain:
Do you currently conduct independent, unannounced audits of your operations and suppliers?	Please explain (including description of audit frequency and selection process, e.g. are audits random? Risk based? If risk based, how is high risk identified?)
Does your auditing program include auditing personnel recruitment sources, including overseas recruitment agencies?	Please explain:
Are your audits based on company standards for suppliers that include clauses on anti-slavery and anti-human trafficking?	Please explain:
In the event that non-compliance by your suppliers is discovered, do you have a program to tackle noncompliance?	Please explain:
Do you require your direct suppliers to certify that all materials incorporated into your final product were sourced, processed and manufactured in compliance with the human trafficking and slavery laws of the country or countries in which they operate?	Please explain:
Do you have company standards on human trafficking and slavery for your employees and contractors?	Please provide information on your standards and relevant sections:
Do you have internal accountability standards and procedures in place to hold your employees and contractors accountable for non-compliance with your standards on slavery and human trafficking?	Please explain:
In the event that non-compliance by your employees/contractors is discovered, do you have a program to remediate such infractions?	Please explain:
Have your management employees, particularly those in charge of supply chain management, been trained to understand what slavery and human trafficking are and how to mitigate the risk of them in their respective supply chains?	Please explain: