

Modern Slavery and Human Trafficking Policy

At Home Catering Limited

Policy reference	AHC-STM-MSA
Status	Version 1.0 — approved 27 October 2026. Website publication and tender and buyer use authorised on 27 October 2026. Not yet in effect: approval and these authorisations do not make the policy operational
Section 54 status	This policy is not a section 54 annual statement. At Home Catering Limited's section 54 classification remains pending verified total-turnover evidence
Version	Version 1.0 — approved 27 October 2026 (the controlled source on file before approval was draft 0.1)
Prepared	Wording prepared 20 October 2026; release edition generated 29 October 2026
Legacy statement	The legacy Policy Statement on Slavery and Human Trafficking remains on record pending confirmation of At Home Catering Limited's section 54 turnover position. This Version 1.0 policy does not replace any statutory annual statement that may be required.
Policy owners and approvers	John Walker and Christophe Perrier, jointly
Contact for this policy	Jessica Perrier — jessica@athomecatering.co.uk
Review	At least every 12 months once in effect, and earlier on a relevant change
Law checked	Against current official sources on 20 October 2026. Final legal review is still outstanding; no external legal advice has been obtained

1. Our commitment

At Home Catering Limited, including the work we carry out under our At Home Events brand, opposes slavery, servitude, forced or compulsory labour and human trafficking — in our own business and, so far as we reasonably can, in our supply chains. We commit to:

- respecting the dignity and freedom of everyone who works with us, including their freedom to leave in the ordinary lawful way;
- taking every concern seriously, and treating anyone who raises one fairly;
- never retaliating against anyone who genuinely raises or supports a concern;
- cooperating with the police and other competent authorities;
- improving our controls in proportion to the risks we actually identify;
- being honest about what is in place and what is not, including in tenders and supplier questionnaires.

We say plainly what we cannot claim. We do not claim there is no risk of modern slavery in catering and events work or in the supply chains that serve it. We cannot guarantee a supply chain free of it. Due diligence reduces risk; it does not remove it. And a written policy does not by itself show that prevention works.

2. What we mean by modern slavery

Modern slavery covers holding someone in slavery or servitude, requiring them to do forced or compulsory labour, and human trafficking — arranging or helping someone to travel so that they can be

exploited. These are serious crimes under the Modern Slavery Act 2015. Whether particular conduct is a crime is for the police, prosecutors and courts to decide, never for this policy.

A few things matter in practice:

- A person's consent does not settle the question. Someone who says they are content may still be being exploited, and being young, or having a mental or physical illness, can make a person more vulnerable.
- A warning sign is not proof. Any single indicator can have an innocent explanation.
- Poor employment practice is not automatically forced labour or trafficking. A late payment or a badly explained deduction is a problem to put right, not a criminal finding.
- Zero-hours, casual, freelance and agency work are lawful and are not exploitative in themselves. What matters is whether the work is genuinely voluntary and the person is genuinely free to leave.

3. Who this policy applies to

This policy applies to everyone who works for us or with us — owners and senior management, employees, zero-hours and casual workers, agency and temporary staff, freelancers and contractors — and sets the standard we expect of the suppliers, labour providers and other businesses we work with. Legal duties differ between these groups, and nothing in this policy turns one relationship into another. We expect our suppliers to hold their own suppliers to the same standards.

4. Our business and where risk can arise

We provide catering and event services, delivered at clients' premises, private homes and third-party venues rather than from a single fixed site. Our work is event-based and seasonal, with demand concentrated around event dates, evenings, weekends and busy periods. The goods and services a business like ours buys typically include food and drink, equipment and hire, venue services, staffing, transport, accommodation for some events, cleaning and waste services, and professional services.

Factors that can raise the risk of exploitation in this kind of work include:

- short-notice and temporary staffing for busy periods, and layers of intermediaries between the worker and the business benefiting from the work;
- undisclosed subcontracting;
- fees charged to workers to be recruited or to get work;
- identity documents held by someone other than the worker;
- unexplained or coercive deductions from pay, or pay going into an account the worker does not control — including several workers paid into one account;
- threats, intimidation or debt;
- dependence on transport or accommodation supplied by an employer or a labour provider, or being unable to leave a job, a site or accommodation freely;
- excessive or coerced hours;
- young or isolated workers, language barriers, or reliance on one person to interpret;
- complex or overseas supply chains with limited visibility.

5. Our standards for the people who work for us

For everyone we engage directly:

- work is voluntary, and people are free to leave, subject only to lawful notice arrangements;
- nobody is charged a fee to be recruited or to get work with us;

- original identity documents are never kept. Where the law requires a copy for a right-to-work check, the copy is kept securely for the period the law sets, and the original is returned at once;
- pay and any deductions are lawful, transparent and explained;
- there are no threats, coercion, intimidation or debt, and no arrangement that makes a person financially dependent on staying;
- hours, rest and pay follow the law;
- everyone can use the reporting routes in section 9, and nobody is treated badly for raising a concern.

6. Recruitment, right to work and labour providers

- Right-to-work checks must be carried out lawfully, consistently for every person, and without discrimination. Since 1 October 2026 the legal duty to prevent illegal working extends beyond employees to workers and individual sub-contractors, and our checks must cover every arrangement the law includes.
- A person's immigration position never makes them blameworthy, and is never a reason to treat a potential victim of exploitation as an offender. A concern that someone may be being exploited is not an immigration report, must not be framed as one, and must never be used as a threat against a worker.
- When this policy is in effect, where we use an agency or labour provider, our proportionate checks will consider who employs and pays the worker, how and into what account they are paid, whether the provider subcontracts, whether any fee is charged to the worker, whether transport or accommodation is supplied and whether the worker could leave freely, and whether workers have a way to raise a concern that does not run only through the person they might complain about.
- Whether a particular labour provider needs a licence from the Gangmasters and Labour Abuse Authority depends on the sector and the work, and is checked at the time rather than assumed.

7. Suppliers and contractors

When this policy is in effect, due diligence on suppliers and contractors must be proportionate to the risk. Depending on the relationship, it may look at a supplier's identity and ownership, its reputation and track record, where it operates and sources from, what it supplies, how its own workforce is engaged, whether and how it subcontracts, and unusual pricing or payment routes.

We have contractual influence, not control. We can set expectations, ask questions and act on what we find within our commercial relationship; we cannot direct another organisation's workforce or guarantee its conduct.

8. What we expect of suppliers and labour providers

The expectations we will set for suppliers, contractors and labour providers are:

- compliance with the law, including the Modern Slavery Act 2015;
- no slavery, servitude, forced or compulsory labour or human trafficking, involving adults or children;
- no recruitment fees charged to workers at any point in the chain, and no retention of workers' identity documents;
- cooperation with reasonable enquiries, and prompt notice of any serious concern affecting our work;
- appropriate control of their own subcontractors and suppliers;
- putting things right where a concern is substantiated.

Where a serious concern is substantiated, any decision about the relationship is proportionate and taken with advice. Ending a relationship abruptly can leave workers worse off, so the first question is always what happens to the people affected.

9. Raising a concern

You do not need proof, and you should not wait until you are certain. Raise what you actually know.

Route	How
If anyone is in immediate danger	Call 999. Do not wait for any internal route or permission.
Police – not an emergency	Call 101, or report online.
Modern Slavery Helpline	0800 0121 700, or report online. This is a national, confidential service run independently of us – it is not our helpline.
Inside the company – normally	Jessica Perrier, our HR contact – jessica@athomecatering.co.uk .
Your line manager or event manager	You may start there if you prefer. A manager who receives a concern must pass it on promptly.
If the normal route is not right	Go to Christophe Perrier or another appropriate senior manager. You can bypass any route.
A senior alternative	John Walker. A private direct route to John is maintained internally and is not a shared mailbox; it will be made available internally before this policy is brought into effect.
A child or an adult at risk may be involved	Georgie Butchart, our Safeguarding Officer. Her operating contact route must be recorded in our controlled implementation records and communicated before this policy is brought into effect. If it cannot wait, call 999 or go to a senior manager.
Without giving your name	A concern raised without a name will be considered where there is enough information to act on.

- Do not investigate yourself, confront anyone or gather evidence – doing so can put a potential victim in greater danger.
- Nothing in this policy restricts reporting directly to the police, the Modern Slavery Helpline or another competent body. Internal reporting is never a precondition.
- We are not a designated first responder under the National Referral Mechanism and cannot make an NRM referral ourselves. Where an NRM referral may be appropriate, we will contact the police or another designated first responder. The Modern Slavery Helpline can also provide confidential advice and help identify the appropriate route.
- Technical anonymity cannot be guaranteed. We do not operate a hotline, a reporting portal or an anonymous reporting platform, and we do not claim to.
- A concern that is also a protected disclosure is covered by our Whistleblowing Policy once it is in effect; the legal protection for whistleblowers applies in any case.

10. How we respond

- The first consideration is the immediate safety of anyone who may be at risk.
- Safeguarding is considered straight away where a child or an adult at risk may be involved.
- Nobody handles a concern about themselves or someone they are close to.
- We do not confront anyone whose conduct is in question, and we take specialist advice – legal, safeguarding or law enforcement – rather than guess.
- We refer the matter externally where that is appropriate.

- Everyone involved is treated fairly. An allegation is not proof, and an internal view is not a criminal or regulatory finding.
- Any remediation is designed not to worsen the harm to workers.

11. Records and personal information

When this policy is in effect, records about a concern will be kept only where they are necessary, accurate and proportionate, held securely, and accessible only to the people who need them. Information connected with a concern may include health, immigration, safeguarding or criminal-offence information, depending on its content, and is handled with corresponding care. The arrangements for those records are being settled in a privacy review before this policy takes effect.

12. Training and communication

Before this policy takes effect we will give proportionate awareness of what modern slavery looks like and how to report it — recognising warning signs without jumping to conclusions — with particular guidance for managers and anyone who recruits staff or engages labour providers, and we will communicate our expectations to suppliers and labour providers where that is proportionate. No modern-slavery-specific training has been evidenced as delivered, and none is claimed by this policy.

13. Measuring progress

Once controls are in place we will measure progress only in ways we can evidence — for example, awareness completed by the people who need it, whether a risk assessment has been carried out and reviewed, how far due diligence covers higher-risk suppliers and labour providers, concerns raised and how they were handled (in aggregate only), and corrective action completed. No modern-slavery results, targets or baselines have been evidenced in the policy programme record. A low number of reported concerns does not prove low risk: people who are being exploited are often unable or afraid to report.

14. Review

Once in effect, this policy is reviewed at least every 12 months, and earlier after a relevant change in the law, in how we operate, in our workforce or suppliers, or after an incident. Changes require approval by John Walker and Christophe Perrier jointly.

Who we are

Legal entity	AtHome Catering Limited
Company number	02763948 (registered in England and Wales)
Registered office	Kings House, 9-10 Haymarket, London, England, SW1Y 4BP
Trading and contact address	40 High Street, Cobham, Surrey, KT11 3EB, United Kingdom
Email	parties@athomecatering.co.uk
Telephone	+44 (0)1932 862026
Brands	AtHome Catering is our public business name. AtHome Events is a customer-facing events brand of AtHome Catering Limited. It is not a separate company and never the contracting party.