

## Heritage Portfolio Limited – Modern Slavery Act 2015 statement

### INTRODUCTION

Heritage Portfolio Limited is committed to improving our practices to combat slavery and human trafficking. We have done this by introducing enhanced due diligence of our suppliers in respect of the requirements of the Modern Slavery Act 2015 and procedures to ensure their compliance with the same, together with introducing additional policy and processes to meet our on-going commitments under the Modern Slavery Act 2015.

### ORGANISATION'S STRUCTURE

We are a provider of catering and hospitality services in the sports, leisure and heritage sector. Our ultimate parent company in the UK is Centerplate Europe Limited, which has its head office at Mitchell House, Town Road, Stoke-on-Trent. Centerplate Europe Limited and its UK subsidiaries (the **Group**) has over 250 employees and operates across a number of partner venues in the UK.

The Group has an annual turnover of approximately £54m.

### OUR BUSINESS

Our business is organised into a number of business units located at our partner venues in the UK.

### OUR SUPPLY CHAINS

Our supply chains include providers of food and beverage products, catering consumable products and catering equipment.

### OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

### DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we require any and all suppliers to complete a due diligence questionnaire and do not engage with suppliers until such time that this due diligence has been completed and all required information and/or documentation provided. This due diligence questionnaire now includes due diligence requests in respect of our suppliers obligations under the Modern Slavery Act 2015.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.

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- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

### **SUPPLIER ADHERENCE TO OUR VALUES**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our value we have in place a supply chain compliance programme. This consists of the due diligence process referred to above and periodic audits of the supplier and its business, which may include site visits to supplier sites.

We have a dedicated compliance team, which consists of involvement from the following departments:

- Legal;
- Audit and compliance;
- Human resources; and
- Procurement.

### **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

### **OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take further steps to combat slavery and human trafficking by reissuing our due diligence questionnaire, which now includes our new requirements in respect of the Modern Slavery Act 2015, to any and all suppliers currently engaged and requiring that they provide us with the necessary information and documentation in order that we can ensure their compliance with the Modern Slavery Act 2015.

**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2016.**



**Adrian Dishington**  
Heritage Portfolio Limited  
Date: 31 May 2017