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Anti - Slavery Policy

2025/2026

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Introduction

Paul & Mathew Group of Companies is committed to ensuring that all its business operations are free from involvement with slavery or human trafficking.



Annual Statement

Although Paul & Mathew Group of Companies does not meet the requirements of the Modern Slavery Act 2015 that would legally require Paul & Mathew Group of Companies to produce a slavery and human trafficking statement, we recognize the importance of preventing modern slavery and therefore we will voluntarily produce an annual slavery and human trafficking statement. A link to this statement will be on the homepage of our website and will be signed and approved by Biju Paul – Director – Paul & Mathew Group of Companies

Biju Paul –Director of Paul & Mathew Group of Companies is responsible for ensuring that this statement is published and reviewed on an annual basis.

The statement will explain the steps that the Paul & Mathew Group of companies has taken to ensure that slavery and trafficking are not taking place in any of its supply chains, or any part of its own business. Our organization is committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chain is free from Slavery and human trafficking. This policy applies to all our employees, temporary employees, contractors, or any individual acting on or behalf of us.

As part of the Retail and Hospitality industry, we recognize that we have a responsibility to take a robust approach to slavery and human trafficking. Paul & Mathew Group of Companies is committed to a zero-tolerance approach to modern slavery and is committed to conducting its business with ethics and integrity. We diligently establish and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

Paul & Mathew group of companies fully supports the government’s objective to eradicate modern slavery and human trafficking, focusing on ethical and labor standards abuses in its supply chains and business activities, and supporting victims.

Organizational Structure and Supply Chains

Paul & Mathew group of companies is a diverse chain of hospitality and retail companies operating across Scotland is managed by General Manager operations and Location Managers at respective locations.



- Aberdeen Business Limited
- Angus Business Limited
- Fraserburgh Business Limited
- Bucksburn Business Limited
- Inverness Business Limited
- Aberdeen Retailers Limited

Due diligence process

At Paul & Mathew Group of Companies due diligence processes that we carry out to ensure that there is no slavery or human trafficking in our business and supply chains. We promote a workplace environment that is fair, open, and respectful and one that protects the rights and dignity of all employees. We operate people practices, contracts of employment and collective agreements that are lawful and aligned to our Code and values.

- ▶ We confirm the identities of all new employees, temporary workers and contractors and their right to work in the United Kingdom, and pay all our employees the correct wages.
- ▶ Our Respect at Work, Grievance, and Voicing Concerns for Staff policies additionally give a platform for our employees to raise concerns about poor working practices.

Communication and Awareness of Policy

Training will be made available as needed, both on this policy and on the potential threats our business may encounter concerning modern slavery within its supply chain. Our unwavering commitment to zero tolerance for modern slavery will be clearly communicated to all employees, suppliers, and contractors at the commencement of our business relationship with them, and it should be reinforced as appropriate over time.



Compliance With the Policy

To implement this policy effectively and to ensure transparency in our business, we expect a high standard and cooperation from our employees. They have a duty to see whether this policy is rightly implemented.

- ▶ It is the duty of every individual operating within our organisation or under our authority to actively participate in the prevention, identification, and reporting of modern slavery in any aspect of our business or supply chain. Employees are expected to refrain from engaging in any actions that could potentially result in or imply a violation of this policy
- ▶ Employees must notify the concerned HR manager of the business as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.
- ▶ If you have uncertainties regarding whether a specific action, the treatment of workers in a broader sense, or the working conditions at any level of our supply chain might involve any of the different manifestations of modern slavery, raise them with your HR Manager.
- ▶ The HR Manager holds the central and daily responsibility for executing and overseeing the utilisation and efficiency of the policy. This includes addressing any inquiries related to the policy and conducting internal audits of control systems and procedures to verify their effectiveness in combating modern slavery.

Procurement and our supply chain

- ▶ Our current due diligence process includes a modern slavery assessment
- ▶ When procuring goods and services, we additionally apply specific Terms and Conditions that require suppliers to comply with relevant legislation



Review of effectiveness

We intend to take further steps to identify, assess and monitor potential risk areas in terms of modern slavery and human trafficking, particularly in our supply chains.

We will assess the efficiency of our actions to ensure there is no slavery or human trafficking in our business or supply chain if:

No reports are submitted by our employees, members of the public, or law enforcement agencies indicating the presence of modern slavery practices.

In addition to producing the annual statement, Paul & Mathew Group of companies is committed to:

- ▶ Ensuring that slavery and human trafficking are considered and addressed in our approach to corporate social responsibility
 - ▶ Ensuring that any concerns about slavery or human trafficking can be raised through our whistleblowing procedure
 - ▶ Carrying out regular audits to ensure that all our employees are paid at least the National Minimum Wage and have the right to work in the UK
 - ▶ Ensuring that all commercial agreements include an obligation on our suppliers to operate in accordance with the Modern Slavery Act 2015, and to ensure that any of their suppliers and sub-contractors also operate in accordance with the Act
 - ▶ Location Managers to oversee compliance with the Modern Slavery Act 2015
 - ▶ Identifying and addressing any areas of high risk in our supply chain
- ▶ Provide training for all employees who are involved in the supply chain on issues relating to slavery and human trafficking.

Declaration and Sign off

This policy is reviewed and signed off by the Director

Biju Paul, Director
24-03-2025