



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2020

INTRODUCTION AND COMPANY STRUCTURE



We present our 2019– 2020 statement as required by section 54 of the Modern Slavery Act 2015. This report has been endorsed by The Board of Oaxaca Ltd and also incorporates our DF Tacos subsidiary.

Due unprecedented challenges surrounding Covid-19 and reduced staff capacity during this time, we have been forced to delay the publication of their modern slavery statement.

As the co-founders of our company we are proud to present this public statement and will continue to display it prominently on our website.

The last few months have seen a change to the structure of our business due to the effects of Covid 19. These changes are still ongoing at the time of this report. Our previous portfolio of 25 Wahaca restaurants, 2 DF Tacos and 1 Burrito Mama sites is expected to have 14 Wahaca restaurants and 2 DF Tacos across the UK. These changes are being approached with the same principles and ethics that guided us from day one.

We understand that we are living in a context of a rapidly changing landscape, and that this may see new or increased modern slavery risks. We welcome the sharing of our statement as an opportunity for us as a business to have meaningful conversations and together with our teams, take action and challenge ourselves to work towards preventing modern slavery and human trafficking where we can.

OUR SUPPLY CHAIN, PROCUREMENT AND PAYMENTS



We are a young, restaurant group which takes its inspiration from the street markets of Mexico. We aim to emulate their character and flavours. Sustainability is at the heart of our business. Thus, we are committed to source locally and responsibly wherever we can. Where we source products locally, it is somewhat easier to verify that they are not tainted by slavery or human trafficking.

The nature of our activities means that we do rely fairly significantly on our product and ingredient supply chain. This currently extends to over 50 companies. We source ingredients, condiments, beverages, promotional items, tableware, office supplies, consumables etc.

In the last twelve months we have not encountered any instances of modern slavery or human trafficking. This applies both within our own organisation and our supply chain. We would describe our overall risk level as low. This is because most suppliers are reputable organisations located in the UK.

We acknowledge that, as a relatively small business, we do not have resources to verify secondary sources of supply. Neither can we routinely visit further-flung suppliers located outside the UK. We are examining some possibilities and will report further on this in our next annual statement.

We operate a legally compliant, planned approach to procurement and payment. As one element of our procurement policy, we undertake due diligence with suppliers. We attempt to ascertain that goods and services we purchase are not tainted by slavery, exploitation, coercion or human trafficking.

The Coronavirus pandemic put a pause to our regular activities, and we acknowledge that the lack of activity may have caused an effect on our supply chain with the decreased demand for their products. Although we are unable to ascertain the full effect this had on our supply chain and their workers, we have ensured that all suppliers, no matter how big or small received payment for any orders placed.

We continue to review our contracts in an attempt to ensure that any new supplier has a contractual obligation to ensure their own staff are working legally in the UK that their recruitment and employment policies are aligned with ours (based on the United Nations and Institute for Human Rights and Business).

OUR RECRUITMENT AND EMPLOYMENT PRINCIPLES



We embrace principles supportive of equal treatment without discrimination and with the protection of employment law for all staff.

They are broadly based on principles developed by the United Nations and Institute for Human Rights and Business regarding migrant workers. However, we have chosen to extend relevant principles to all our staff.

We treat all staff equally; without discrimination and with respect for their human rights. All staff enjoy the protection of relevant UK law in respect of their employment.

We always ensure that everyone we engage has the legal right to work in the UK. Our recruitment and promotion policy enshrines a modern slavery and human trafficking guarantee. No member of staff is subject to forced labour or coercion: every member of staff enjoys 100% legally compliant employment.

In particular: -

- ✓ We bear the full costs of recruitment and do not charge staff fees for hiring, placing or promoting them.
- ✓ We provide written statements of terms and conditions of employment to all staff as required by law. These documents explain everything in a clear and transparent way.
- ✓ We support the right to seek, obtain and hold employment without discrimination and with complete respect for dignity.
- ✓ We do not coerce anyone to work for us. When you choose to work for us you do so voluntarily.

- ✓ Everyone must prove their entitlement to work in the UK. However, we do not hold or retain original passports, identity documents or residency papers. You should retain such documents personally.
- ✓ Everyone is paid regularly, in accordance with their terms and conditions. We provide a written summary of pay and deductions (pay slip) on every occasion.
- ✓ We pay national living wage, regardless of age and have a clear progression route to support career development and internal promotion.
- ✓ Everyone has the right to join or not join a trade union at their complete discretion.
- ✓ We provide safe and decent working conditions with suitable training as necessary. Our operations comply with or exceed statutory health and safety standards.
- ✓ We provide formal grievance provisions through which staff are free to lodge a work related complaint or raise a matter of concern.
- ✓ We do not impede anyone's freedom of movement or their opportunity to seek employment elsewhere.

During the pandemic we have done everything possible to keep our staff employed through the Furlough Scheme and continued to pay them regularly in accordance with their terms and conditions and the scheme. We have ensured all our employees received support information to help them navigate this difficult time, provided letters for their landlords, information on benefits and housing allowance and access to a confidential external helpline.

Furthermore, the Health and Safety of our employees has remained at the top of our priorities during this challenging times. We train all our team members on Covid Health and Safety measures, monitor social distance in our sites and follow Sickness Procedures and Statutory Sick Pay to avoid the risk of the spread of the virus.

OUR POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

We continue to provide clear guidance to staff about tackling bribery and corruption. We operate specific provisions through which they can confidentially report any concern or “blow the whistle”. We promote equality and diversity and have adopted measures to deal with any instances of intimidation, bullying or harassment. All members of staff have access to our grievance procedure.

Our list of relevant policies includes -

- ✓ Equal Opportunities Policy
- ✓ Bullying and Harassment policy
- ✓ Bribery provisions
- ✓ Whistleblowing policy
- ✓ Grievance procedure
- ✓ Recruitment and employment policy

Provisions such as these not only reflect our commitment to the highest employment standards; they can also play an important supportive role in our opposition to modern slavery and human trafficking.

OUR CHARITY WORK



Wahaca drew its inspiration from Mexico's colourful street markets. We saw for ourselves the desperate plight of Mexican street children. In Mexico City alone it is estimated that over 14,000 children live or work on the streets. Some are there because of abandonment, others because of social disintegration or domestic violence. Many are themselves violently exploited; ending up in a life of drug abuse, crime or prostitution.

We know there is very little we can do about the wider issues of modern slavery and human trafficking. However, through our chosen charities, we feel that we and our customers are making a difference in other ways. Through our 'street food specials' we have raised over £100,000 for Ednica, a charity based in Mexico City that seeks to reverse street children's vulnerability. It provides education, welfare and support for their human rights. We have also been contributing to a number of child food education and food poverty charities through our children's meals, and also supporting charities like Magic Breakfast and Social Kitchen.

During pandemic we have increased our support to Chefs in Schools, a charity that works to improve the health of children through better school food and education. We have supported the charity by donating surplus produce, kitchen space and chefs to make meals for the local families at risk of going hungry during the Covid-19 pandemic.

Over the last year we have also increased our work with charities that help ex-offenders back into work. We have successfully employed some fantastic people and are incredibly proud of their journey with us.

OUR COMMITMENTS



Our concern for the environment has driven us to challenge ourselves to minimise the environmental impact we have since we opened our first restaurant. We are a proud member of the Sustainable Restaurants Association and are honoured to have received numerous awards in this area (Sustainable Restaurant of the Year Group Award in both 2012 and 2013 as well as Large Group of the Year at the 2016 "Food Made Good" awards). We are equally proud to be the UK's first carbon neutral restaurant chain.

We continue to place sustainability and the treatment of our staff at the heart of everything we do. We are committed to achieving a working environment which provides equal opportunity and freedom within our business as well as in the communities we are a part of through our supply chain.

We absolutely recognise the government description of modern slavery as "criminality hidden in plain sight" and recognise the increased risk of modern slavery as an effect of current pandemic and challenges presented by it worldwide.

Although we acknowledge that we can only play a small part in the eradication of modern slavery and human trafficking, we take our responsibilities in this respect incredibly seriously and will continue to do what we can to oppose and prevent it.

A handwritten signature in black ink, appearing to be 'MS', written in a cursive style.

MARK SELBY

Co-Founder

A handwritten signature in black ink, appearing to be 'Thomasina Miers', written in a cursive style.

THOMASINA MIERS

Co-Founder