

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2024

(Financial year July 2023-June 2024)

INTRODUCTION AND COMPANY STRUCTURE

We present our 2023–2024 statement as required by section 54 of the Modern Slavery Act 2015. This report has been endorsed by the Board of Oaxaca Ltd (Wahaca and DF Tacos) on 17th December 2024 and covers our financial year from July 2023 until June 2024.

Although no issues were identified during the reporting period, we remain fully committed to preventing modern slavery and human trafficking across our business and supply chain.

Modern slavery remains a significant global issue, driven by several interrelated factors. These factors vary across regions but often share underlying themes related to socio-economic, political, and systemic vulnerabilities. Poverty and economic inequality, migration and displacement as well as consumer demand for cheap goods and services are some of the main contributing factors.

Whilst combating modern slavery requires comprehensive efforts that address its root causes, we acknowledge that we all play a crucial role in the fight against it. We welcome the sharing of our statement as an opportunity for us to have meaningful conversations both internally and externally and set out further steps to prevent modern slavery and human trafficking where it may touch our business.

Since our founders, Mark Selby and Thomasina Miers, opened their first restaurant, they have been striving for ways to make a positive impact through our restaurants and food, always with our planet and its communities in mind.

We are the UK's first carbon neutral restaurant group (since 2016) and on our journey to Net Zero. We work tirelessly to reduce the plastic we use in our restaurants and the impact from buildings and operations on our planet. From the very first Wahaca we have taken steps to minimise the resources we use across our restaurants, from the initial build, to using heat produced by our fridges to heat our water. Our most recent opening, Wahaca Paddington has recently achieved a 3-star SKA rating; and is our first restaurant to be fully electric.

Our 14 Wahaca restaurants and 5 DF Tacos sites across the UK serve fresh, vibrant, Mexican-inspired food with sustainability at the core of everything we do. We are committed to reducing our environmental impact on the planet and improving our practices.

We are also a proud 3-star member of the Sustainable Restaurant Association and are honoured to have received numerous awards in this area, including:

- 2024 Which? recognised us as Most Sustainable Restaurant Chain based on an analysis of companies' green credentials.
- The Peach Award in 2022 for the Business who has shown true innovation and leadership in addressing the sustainability agenda.
- the R200 sustainability award in 2021 for our improvements in sourcing, the impact on society (both employees and the wider community) and on the environment.
- Large Group of the Year at the 2016 "Food Made Good" awards.

We are passionate about sharing our knowledge and values with our employees, external partners and customers, recognising that everyone has a role in driving change and making informed decisions to minimise our collective impact on our environment and communities.

Our Company values - Be Humble, Choose Integrity, Have Fun, Show Pride and Think Positively - help us navigate both the day-to-day challenges that come our way; but also determine who we build external relationships with, as we seek out like-minded partners.

OUR PEOPLE - RECRUITMENT AND EMPLOYMENT PRINCIPLES

People are the key to our business and their human rights, a top priority. We embrace the principles developed by the United Nations and Institute for Human Rights and Business regarding migrant workers.

We currently employ around 700 people and are committed to providing fair and rewarding employment for everyone.

In particular: -

Recruitment Practices and Values

- No recruitment fees - We bear the full costs of recruitment and do not charge staff fees for hiring, placing or promoting them.
- Contracts - 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.
- Fair pay - We provide pay and benefits that are fair and competitive for the job and experience. We pay at least national living wage (regardless of age) and 100% of the tips are paid directly to the team. 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.
- Freedom of movement - We do not coerce anyone to work for us. When you choose to work for us you do so voluntarily. We do not impede anyone's freedom of movement or their opportunity to seek employment elsewhere.
- Guidelines - From day one, we share our values and the importance of respecting one another. We make clear that we have a zero-tolerance approach towards discrimination, abuse or any type of harassment.
- Trade unions - Everyone has the right to join or not join a trade union at their complete discretion.

Due Diligence

- Right to work in the UK - We always ensure that everyone in our teams has the legal right to work in the UK. However, we do not hold or retain original passports, identity documents or residency papers. Each staff member retains such documents personally.
- We undertake monthly due diligence checks to ensure bank details provided by our employees are in their name using personal bank accounts. We also routinely monitor if more than one employee is living in the same address.

Training and Development

- We have a clear progression route to support career development and internal promotion.
- We provide safe working conditions with suitable training as necessary and promote high standards of occupational health and safety
- We train our team on the importance of sustainability and the role they can play in our current practices.

Whistleblowing and Reporting Mechanisms

- We support and encourage our employees to report any concerns. They can find the different reporting channels displayed in posters in each site as well as our internal communication platform.
- Our internal communication platform also allows anyone to contact senior management directly from day one.
- We provide formal grievance and confidential reporting provisions through which staff are free to lodge a work-related complaint or raise a matter of concern. We additionally have a confidential internal line available for anyone wanted who needs to bring an issue to our attention.

Further Support

- We have a number of Mental Health First Aiders across our business who have been trained to identify symptoms of poor mental health and support anyone who may need help.
- We have a directory of external support services that can be accessed 24/7 for help and advice. We also have offer counselling sessions when needed.

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, diversity and inclusion 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 and diversity Policy
- Non-Harassment and bullying policy (including sexual harassment)
- Bribery provisions
- Confidential Reporting and 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 SUPPLY CHAIN, PROCUREMENT AND PAYMENTS

We take our inspiration from the street markets of Mexico and aim to emulate their character and flavours in the most sustainable way possible.

The nature of our activities means that we rely on a complex ingredient supply chain to ensure high quality and strong provenance. Where possible, we source our produce from the UK although due to seasonality and impacts on availability, this is not always possible.

We currently work with over 50 companies, the majority of which operate under UK law; including legislation on Human Trafficking. Although we do work with some companies that are based outside the UK, in the majority of instances we use UK-based distributors with strong industry credentials.

We are pleased to report that no suppliers were identified as high risk, and no issues were flagged during the reporting period.

With any new suppliers we undertake a Financial, Safety and Legal Due Diligence to ensure there is nothing publicly available that may deem that supplier to be a risk or not aligned with our values. We also assess any risk indicators such as the nature of the workforce, the supplier location and the context in which the supplier operates.

Millions of people are annually affected by environmental disasters and consequently displaced and being more vulnerable to Modern Slavery. As the number of climate migrants continues to grow, we believe that we have a responsibility towards the environment and communities and that goes beyond legal and regulatory requirements.

We are very proud of the sustainable steps we've taken and our Co-Founders, together with our Sustainability Lead continue to challenge the way we do things; with an emphasis on continuing to elevate our sustainability credentials and push ourselves and our industry even further.

Our [Environmental and Social Policy](#) reflects our commitment to reducing our environmental impact. Over the last year we have focused our values into three key areas:

Animal Welfare	Reducing Climate impact	Caring for the natural world
Investing in Free range chicken and pork	Carbon neutral since 2016 and on our journey to Net Zero	Promoting biodiversity. Mexico is officially classified as 'mega bio-diverse' which has inspired us to try to work with a diverse set of ingredients across our menus.
Choosing organic milk	Reducing Plastics and packaging	Investing in supply chain projects & ingredients which have a long-term benefit to the natural world
Choosing Free range Eggs	Reducing impact through our builds and operations	Working with organic and regenerative farmers where we can.

We also extend this approach to all new suppliers prior to bringing them on board. This means making sure that they agree with our Environmental and Social policy before they become a partner.

We try to use local UK suppliers as much as possible to support our local communities and reduce our environmental impact. As examples –

- Our menu is 50% plant-based and we use seasonal specials throughout the year to make the most of the ingredients while they are fresh and can be sourced locally.
- Our free-range pork and grass-fed beef are sourced from British farmers we know and trust.
- We are committed to serve free-range chicken currently sourced from farms in Northwest France and in the UK in Somerset.
- We added a carbon emissions impact of our dishes to our menu with the aim of encouraging more sustainable choices that are better for the planet. We have created alternatives to the popular dish guacamole, to reduce the use of avocados.
- We are guided by the Food Made Good (Sustainable Restaurant Association) framework and partner with suppliers championing sustainable and regenerative farming like Hodmedods and Riverford Organic, Grassroots Farming and WildFarmed.

Although the UK is perceived as a low-risk country because of the relatively ample resources and strong political will, we remain vigilant against the risk of modern slavery throughout our supply chain.

Where local sources are not a possibility, we aim to source ethically. As examples -

- Whilst we continue to use avocados in our classic Guacamole, they are sourced from reputable sources with at least GlobalGap certification which ensures good agricultural practices including respect to the environment and communities.
- Our coffee and hot chocolate are ethically sourced and Direct Trade, our partners at Origin coffee, annually publish a coffee transparency report.
- Our tea is sourced from social enterprise – Nemi teas, who provide employment to refugees. It is Organic certified and working on fairtrade terms.
- We understand the negative impact of over-fishing on fish stocks and the associated labour practices on fishing boats. With that in mind, we only source our seafood from reputable suppliers who have rigorous modern slavery policies and check in place. As an example, we purchase fish from MSC (Marine Stewardship Council) fisheries whose aim is to protect our oceans and the fish within it, and combat climate change. They also work towards mitigating forced and child labour risks and require their fisheries to submit forced and child labour statements annually. They withdraw certification of any fisheries convicted of forced or child labour abuses.

We acknowledge that, as a relatively small business, we do not have resources to verify secondary sources of supply, however where possible we try to visit farms and other suppliers, especially when considering new suppliers.

We operate a legally compliant, planned approach to procurement and payment. We acknowledge that the current economic challenges are having an adverse effect on our supply chain, but we ensure that we make timely payments of outstanding debts to all suppliers for orders placed by us.

OUR COMMUNITIES - CHARITY WORK

Our passion and commitment to giving back to our community and charities has (and always will be) part of what we do. In order to achieve this, we work with some key charity partners here in the UK and in Mexico.

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.

EDNICA – Inspiring young lives in Mexico

In Mexico, we work with EDNICA, a UNESCO backed charity supporting vulnerable children whose parents live and work on the street. Our donations (so far over £233,000 since 2012) provide education, help and support the human rights of children in Mexico giving them the opportunities their parents never got.

KITCHEN SOCIAL – Fuelling the next generation in the UK

Through our 'street food specials' we help Kitchen Social, a charity supporting over 100 community hubs in London to provide good food and enriching activities to children from low-income families during the school holidays when free school meals are not available.

CARBON OFFSETTING PROJECTS – helping the planet and its people

We choose our carbon offsetting projects and partners carefully, so that we're not only helping the planet, but its people too.

In FY21 we supported Oaxaca Wind, they produce enough electricity to power 700,000 households each year with renewable wind turbine energy! Not only that, but they are award winners for their wider positive impact on their community.

In FY22 we supported a Global renewable energy project, to help reduce greenhouse gas emissions. Not only does this provide finance for renewable energy, but the project also supports: Affordable and Clean Energy, Decent Work and Economic Growth, Industry Development and Innovation.

In FY23 we supported The Patsari Cookstove project based in Michoacan, Mexico which helps rural communities' quality of life while significantly mitigating greenhouse gas emissions and preserving nearby endangered wildlife habitats. The project supports the following United Nations' Sustainable Development goals (SDGs): Good health and Wellbeing, Affordable and clean energy, Decent work and economic growth, Sustainable cities and communities and No poverty.

OUR COMMITMENTS

Although we have not encountered any instances of modern slavery or human trafficking in the last 12 months, we understand the risk and will continue operating a zero-tolerance approach to modern slavery in our operations as well as our supply chain.

Our annual review gives us a chance to familiarise ourselves with any new risks arising due to global or UK events and how this can affect modern slavery.

We are passionate about our business, our people and the wider community and are committed to eradicate unethical practices that go against our values. We are committed to achieving a working environment which provides equal opportunity and freedom within our teams as well as in the communities we are a part of through our supply chain.

Whilst 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. We commit to continue -

- to raise awareness on the risks of Modern Slavery amongst our teams and delivering appropriate training, especially to those involved in commercial and procurement.
- to monitor all existing suppliers.
- to ensure that all new suppliers align with our values, and they are risk assessed before bringing them on board. In addition, we will be including our expectations regarding suppliers' staff treatment in our Environmental and Social Policy for all new suppliers' contracts to place sustainability, our planet and its communities at the heart of everything we do.

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



MARK SELBY

Co-Founder



GEMMA GLASSON

Managing Director