

## **TGI's Modern Day Slavery Statement – Jan 2019**

TGI Fridays recognises that we have a responsibility to ensure that slavery, forced labour and human trafficking does not take place anywhere within our own business operations and our supply chain. We have a zero-tolerance policy to any form of slavery and trafficking, and we are committed to taking continuous improvement steps with our employees and suppliers to mitigate any risk of such activities taking place.

This statement has been published in accordance with the Modern Slavery Act 2015 (MSA) and sets out these steps as well as considerations for the business over the coming years.

### **Scope**

TGI Fridays employs 5600 people across our 86 restaurants and in our support centre. We have a centralised procurement team who work around 100 food, drink, non-food and property suppliers and we have established strong relationships with them based on trust and transparency.

We require all of our direct suppliers to work closely with their suppliers, distributors, agents and producers to ensure the aim of 100% transparency and knowledge of operations within our supply chain.

### **Our Suppliers**

Suppliers are required to be SEDEX members to capture evidence of due diligence on ethical trading including self-assessment, third party audits and corrective action of non-compliances. This must be shown at any given time on request from TGI Fridays.

In 2017/18, we made a significant investment in a digital platform, Surecloud that incorporates a supplier questionnaire in response to Modern Slavery Act requirements. The objectives of the questionnaire are as follows:

- To raise awareness of the Act and its requirements generally amongst all our suppliers
- To risk assess new and current suppliers according to sector type, product or services supplied and geographical location
- To request that all direct suppliers confirm their own compliance with the MSA, provide due diligence records of policies, procedures and staff training as well as confirm their co-operation and transparency in the event that any incident of slavery and human trafficking is found in their supply chains

Geographical location is defined as those countries highlighted in the 2016 Global Slavery Index as being at highest risk of modern slavery and human trafficking incidents occurring.

Our supplier terms and conditions also reflect provisions to reflect good ethical trading practices and compliance requirements to our policies.

### **Our Employees**

To ensure we minimise the risk of slavery and human trafficking within our own business, our recruitment processes include rigorous ID and Right to Work checks with managers having received training on this subject. These checks will become automated via a digital platform and audits will be put into place where each restaurant will be randomly checked every six months.

## **Policies**

### **Ethical Trading**

We require all our suppliers to meet TGI's Ethical Trading & Social Policy which is based on the Ethical Trading Initiative (ETI) Base Code for ethical sourcing and reflects all relevant international, EU and UK legislation including the UK Modern Slavery Act 2015, UN Universal Declaration on Human Rights and ILO Conventions.

Our policy covers 14 key principles including prohibition of slavery and human trafficking, safe and hygienic working conditions and payment of a fair wage. All direct suppliers are required to show compliance with this Policy and to provide evidence of continuous improvement in worker welfare.

Suppliers must have in place their own policies and monitoring systems to demonstrate their own due diligence. This would include their own Modern Day Slavery statements if their annual turnovers are more than £36million.

### **Whistleblowing and Grievance**

TGI Fridays encourages its employees to report in confidence any concerns relating to any part of the organisation. We have an open-door policy on display in our restaurants, and the grievance process is accessible upon request to our team.

We have an internal function on the head office voicemail for complaint escalation, and an external body (Hospitality Action) for whistleblowing.

This will extend to other business partners and specifically include any risk of slavery or human trafficking.

### **Anti-Bribery**

TGI Fridays complies with the Anti-Bribery Act 2010. It does not tolerate any form of bribery by or of its employees, agents or any person acting on our behalf.

### **Employee Code of Conduct**

TGI Friday's Employee Handbook that outlines policies where we make clear to our employees the actions and behaviour which are expected of them whilst at work and through the course of their duties and responsibilities. This is available on our internal digital platform where employees can always have access to it.

We monitor feedback from our team in respect of the training they have received to support compliance with the Code of Conduct and hold regular team meetings both departmentally and all store to ensure they have access to any questions they may need.

We are committed to maintaining the highest standards of employee conduct and ethical behaviour in all business activities including when managing our supply chain both at home and overseas.

## **Recruitment & Training**

TGI Fridays are committed to ensuring that all new employees are recruited in a manner which is legally compliant and ethical. Approved recruitment partners are reviewed on a regular basis.

The Procurement team approve new suppliers only after a rigorous assessment of their technical capabilities and their ethical credentials. Any business partners including suppliers who are deemed to be unsuitable or do not meet our requirements are not used.

### **Governance**

All policies are developed by the relevant issue experts and responsibility is shared by the Group Directors. All policies are approved by the Operational Executive team and will undergo annual reviews to assess their effectiveness going into the future.

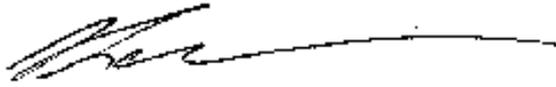
TGI Fridays believes in a continuous improvement approach and we will review our ethical trading systems each year to ensure they reflect best practice and latest developments in this area, updating them as required.

### **Next steps for 2019**

1. We will continue to review all our direct suppliers and our employees to ensure that there is no slavery or human trafficking within our supply chains and own operations. This will include ensuring all relevant policies and procedures are up to date and relevant staff are trained so that there is a complete awareness and understanding of their roles and responsibilities in achieving compliance.
2. With the information we have collected to date on Surecloud and our own knowledge gained through working with our current suppliers, we intend to do the following:
3. Request that our direct suppliers request due diligence information from their suppliers further down the supply chain.
4. Risk map suppliers based upon:
  - Their responses to certain questions in the questionnaire
  - Their level of recruitment of agency or temporary workers
  - Those suppliers operating within those services that are most closely associated with our own business operations including contract cleaners, catering staff, agencies providing workers for manufacturing and distribution facilities.

### **BOARD APPROVAL**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes TGI Fridays modern slavery and human trafficking statement for the current financial year. This statement was approved by the board of TGI Fridays Ltd on xxx 2019.



**Karen Forrester:**  
**Chief Executive Office:**  
**Date:**