

# Modern Slavery and Human Trafficking Policy

## 1. Vision and Values

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

## 2. Scope of Policy

- 2.1 This policy applies to persons working for us, external consultants, business partners and suppliers.

## 3. Responsibility for the Policy

- 3.1 The Procurement and Supply Chain Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 3.2 Our Procurement and Supply Chain Director with the support of our Head of Culture and Development has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness.

## 4. Compliance with the policy

- 4.1 The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control.
- 4.2 We aim to actively tackle the issue by conducting a sample of yearly risk assessments in parts of our operations where the risk of modern slavery is highest.
- 4.3 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

## 5. Communication and awareness of this policy

- 5.1 Training on this policy, and on the risk our business faces from Modern slavery in its supply chains, will be provided as necessary, such training forms part of the induction process for all employees.

## 6. Breaches of this Policy

- 6.1 Any employee who breaches this policy could face disciplinary action, up to and including dismissal.
- 6.2 Where modern slavery is identified, we will endeavour to support our business partners and or suppliers in a remediation process and on a case-by-case basis. We may terminate our relationship with other individuals and organisations working on our behalf if they do not enter into a remediation process and are found to be in breach of this policy.

## 7. Interaction with other Workplace Policies and Procedures

7.1 This modern slavery and human trafficking policy interacts with the following workplace policies and procedures which can be found at our on-line training platform - <https://academy.tgifridays.co.uk> for team members and <http://stripes.tgifridays.co.uk> for all salaried team . All those to whom this policy applies are encouraged to familiarise themselves with the policies detailed below. If you have any queries about this please contact Dawn Cheetham@tgifridays.co.uk.

- Anti-violence Policy
- Open Door Policy
- Recruitment Policy
- Right to work Policy
- TGI Friday's UK Business Conduct and Ethics Policy
- Whistle Blowing Policy
- Social and Environmental Policy

# Compliance with the Modern Slavery Act 2015

## Draft s54 Statement

September 2016

This statement relates to TGI Fridays UK. We fully support the provisions of the Modern Slavery Act 2015 and take our compliance seriously. During 2016, we worked with specialist external advisors to review our existing systems, benchmark our level of existing compliance and to advise on enhanced systems and due diligence.

### Slavery and Human Trafficking Policies

We are committed to ensuring there is no modern slavery or human trafficking in our supply chain or in any part of our operations. In 2016 we reviewed the existing systems in place to prevent violations of this commitment and to identify ways to strengthen them.

TGI Fridays recognises that these are complex issues within complex supply chains and so have worked directly with key suppliers and our management team to enhance awareness and build proactive systems to minimise these risks.

### Risk Assessment

TGI Fridays sources food and non-food products from the UK and abroad. We currently buy from around 40 first-tier suppliers, both food and non-food, whom we consider to be material to our business, and who in turn source their ingredients and products globally. In order to assess the level of risk to which we might be exposed, we conducted an extensive risk assessment of our supply chain. Our modern slavery risk assessment calculated a risk rating for these key suppliers and reviewed a) company risk and b) supplier / product risk.

We have used the product risk rating to undertake a desk review, which looked at the risks associated with the supplier, the industry and / or the region where ingredients and components are sourced. This risk assessment gives us a robust baseline for compliance, enhanced systems and future activity.

### Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, this year we intend to enhance staff training, and introduce a mobile learning platform.

#### Measuring our effectiveness in combating slavery and human trafficking

We aim to provide greater transparency in how our suppliers are addressing modern slavery and trafficking within their own supply chains. Ultimately we have the objective of 100% transparency of modern slavery management in our suppliers' direct operations and for the ingredients and components used within products they supply.

#### Continuous Improvement

TGI Fridays takes compliance with the modern slavery act seriously and believes in a continuous improvement approach. At least once every year we will review our existing anti-slavery and human trafficking systems to ensure that they reflect current best practice and update them as required.