# TGI Friday's Modern Day Slavery Statement – Jan 18

TGI Fridays recognises that the prevention of modern slavery is a global challenge that businesses must address through their own operations, supply chain and with business partners.

We are committed to working with others to prevent slavery and human trafficking and this statement outlines how we are doing this in accordance with the Modern Slavery Act 2015. It sets out continuous programme that we are undertaking to understand all potential modern slavery risks and prevent any incident of slavery or human trafficking in our business or supply chains.

TGI Fridays recognises that it is our responsibility to address this issue very seriously however complex and we have worked with our suppliers to strengthen our supply chain activities in social, environmental and ethical standards whilst recognising that many may need practical help and support in implementing these.

In our last financial year, there were no modern slavery incidents identified in our own operations or within our supply chain. However, we fully acknowledge that this is not a guarantee that modern slavery doesn't exist and we will address any issues that may be identified in the future by working in partnership with our suppliers and other industry partners.

### **Our organisation**

TGI Fridays employs around 6000 people and serves more than 13 million meals at 81 locations. We have a centralised procurement team who work with 160 food, drink and non-food 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.

### 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

TGI Fridays encourages its employees to report in confidence any concerns relating to any part of the organisation. This will extend to suppliers and 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 Fridays has employment 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. 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.

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 will be enhancing staff training and introducing a mobile learning platform.

### **Risk Assessment and Compliance**

All our first tier i.e. direct suppliers of food, drink and non-consumable products are required to provide full traceability back through their own supply chains through to the primary production sites at any time on request. Whilst TGI Fridays do not carry out specific ethical audits at site level, we are working with these suppliers to ensure that they are actively involved in audit and traceability digital sharing platforms such as Surecloud and Sedex. By sharing their information in this transparent way on policies, processes and audits, we will be able to assess any high risk situations and develop corrective action plans with suppliers.

We absolutely understand that modern slavery can occur in the most obscure and hidden of places and therefore we will review our approach and processes with suppliers in 2018. Any non-compliances identified will be addressed by TGI Friday's relevant functional head and Procurement & Supply Chain Director in collaboration with suppliers and industry experts.

### Next Steps in 2018

In the year ahead, we will ensure that all our direct suppliers are fully embedded into the audit sharing platforms and that they will provide the most up to date information on ethical policies, audits undertaken with any corrective action plans and staff training. We will also ensure that Modern Slavery awareness and understanding is also incorporated into any procurement onboarding and training programmes within our own operations.

## Governance

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

TGI Fridays believes in a continuous improvement approach and our progress on compliance with the Modern Slavery Act 2015 is reviewed on a quarterly basis by our Risk Management committee and on a six monthly basis by our senior Executive team.