

Modern slavery is defined as a crime and a violation of basic human rights. Modern slavery can take various forms including, but not limited to slavery, servitude, forced labour and human trafficking. This policy applies to people working for our business, external consultants and suppliers.

The principle legislation is the Modern Slavery Act 2015 and this policy together with Troia (UK) Restaurants Ltd modern slavery statement is our company's compliance with section 54 of said legislation.

Responsibility

The Group Purchasing Director has overall responsibility for ensuring this policy complies with our legal and ethical / moral obligations and that all those within our control comply with it.

The Group Purchasing Director, with the support of our People Director, has responsibility for implementing this policy and monitoring its use and effectiveness.

Policy Compliance

The prevention, detection and reporting of modern slavery in any part of our business and/or supply chain is the responsibility of all those working for us or within our control.

We aim to make sure that all existing supplier contracts contain anti-slavery and human trafficking commitments and will provide for this provision in all new supplier contracts effective from January 2019 onwards.

We conduct annual risk assessments in those areas of our business where we have identified that the risk of modern slavery is highest. Specifically, our external supply chain.

Our business will support anyone who raises concerns even if it transpires that they were mistaken.

Communication

This policy will be included in the employee handbook and published on our public facing websites.

Policy Breach

Any breach of this policy by employees could result in disciplinary action including dismissal and reporting to external bodies responsible for law enforcement.

Where modern slavery is identified, we will try to support our business partners and/or suppliers to carry out remedial measures. We will end our relationship with individuals and/or organisations working on our behalf if they are found to be in breach of this policy.

Periodic Policy Review

Troia (UK) Restaurants Ltd takes compliance with the Modern Slavery Act seriously and we work on the basis of continuous improvement. We will therefore review and update our anti-slavery and human trafficking systems on an annual basis or as required to make sure that they reflect any changes in legislation.

Signed:



January 2021

Name:

Paul Jenkins

On behalf of:

Troia (UK) Restaurants Ltd