

## **Modern Slavery and Human Trafficking Policy**

### **1. Policy Statement**

Federico is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain. We recognise our responsibility to take a robust approach to slavery and human trafficking and we will not tolerate any form of exploitation.

### **2. Purpose**

This policy sets out our approach to ensuring that modern slavery and human trafficking are not taking place in any part of our business or supply chains.

### **3. Our Business and Supply Chains**

Federico operates hospitality venues across the UK, working with a wide range of suppliers, contractors and service providers. We expect all those in our supply chain to share our values on ethical conduct.

### **4. Our Commitments**

We will:

- Carry out due diligence on suppliers where appropriate.
- Include anti-slavery and human trafficking clauses in relevant contracts.
- Provide training and guidance for managers and staff to identify and report concerns.
- Encourage reporting of any concerns related to slavery or human trafficking.

### **5. Responsibilities**

The Directors and senior management are responsible for ensuring this policy is implemented and reviewed annually. All employees are expected to comply with this policy and raise any concerns.

### **6. Reporting Concerns**

Staff are encouraged to report any concerns about suspected modern slavery practices. Reports will be investigated and appropriate action taken. We operate a zero-tolerance approach and will terminate relationships with any individuals or organisations working with us who are found to be involved in slavery or human trafficking.

### **7. Review**

This policy will be reviewed annually and updated where necessary to ensure it remains effective and relevant.