



Financial Year October 2018 – September 2019

This statement is made by Templeton Holdings Limited on behalf of itself and its subsidiary undertakings, Harnbury Holdings Limited, Ibla International Franchising Limited, Signor Sassi Limited and Harnbury Limited (together the “Group”).

We recognise that we have a responsibility to prevent modern slavery and human trafficking both within our business and in our supply chain. We are committed to making a positive contribution to preventing modern slavery and human trafficking by developing and implementing business practices that allow us to reach our commercial goals whilst conducting our business operations in a responsible manner. We are committed to improving our practices to combat slavery and human trafficking.

Our Structure and Business

The Group operates 19 restaurants throughout the UK under the San Carlo, Fumo, Cicchetti, Flying Pizza, Gran Café and Signor Sassi brands. We also operate two franchisee businesses in Bangkok, Thailand and Doha, Qatar under the Cicchetti and Signor Sassi brands. The Group has over 800 employees.

Our Supply Chains

Our supply chains include over 500 suppliers covering food and drink suppliers for our restaurants, as well as goods and services not for resale such as equipment used in our restaurants, point of sale materials, IT equipment, utilities and waste services, contractors building, fitting out, repairing or cleaning our restaurants, marketing, advertising, accounting, legal and other professional services, recruitment and training.

Our suppliers vary in terms of their size, expertise and industry and many of those will also be reliant on their own supply chain in order to be able to supply goods or services to us.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due diligence Processes for Slavery and Human Trafficking

We are currently reviewing our systems and procedures to:

- Identify and assess potential risk areas in our supply chains.
- Reduce the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

By managing our restaurant’s ourselves, we are best positioned to ensure that we do not have modern slavery or human trafficking within our business. This includes controls over rates of pay, working conditions and hours, thereby reducing such risks within our business. We are seeking to ensure that relevant individuals across our business are given training on these



issues so that they can assess any risks in their areas of responsibility and take steps to reduce any risks.

We will expect all major suppliers to have suitable anti-slavery and human trafficking policies and processes in place. Any suppliers in businesses or regions perceived to be most at risk and any significant suppliers will be asked to confirm their compliance with our values and ethics or to confirm that they have their own equivalent arrangements. This will be rolled out to our other smaller suppliers over time.

We have a Whistleblowing Policy which aims to support employees, agency workers and self-employed contractors to disclose any suspected malpractice, whether internal or external to our business, including in our supply chains.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we are developing training to our staff on relevant issues.

Our Effectiveness in Combating Slavery and Human Trafficking

We are reviewing our methods for monitoring the effectiveness of our practices to ensure that modern slavery and human trafficking is not taking place in our business or supply chains, including developing key performance indicators to measure how effective we are.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 30 September 2017.

Signed by Marcello Distefano,
Managing Director

A handwritten signature in black ink, appearing to read "M. Distefano", written over a horizontal dotted line.

On behalf of Harnbury Holdings Ltd and Templeton Holdings Ltd
March 2019