

## **Modern slavery statement for financial year 2017/18**

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that the D&D London group has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. D&D London has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### Our business

D&D London is a group of luxury restaurants, bars and hotels based principally in the UK and particularly in London, but also with venues in Paris, New York and Tokyo. D&D London has 600 suppliers in the UK and 100 suppliers internationally.

### Our high risk areas

In 2016 we reviewed the existing systems in place to prevent breaches of our commitment to making sure that there is no modern slavery or human trafficking within our business or supply chain.

We source food and non-food products from the UK and abroad. We currently buy from around 250 first tier suppliers who are material to our business and who in turn source their own ingredients, products and components in the UK and internationally. We conducted a modern slavery risk assessment to assess the level of risk that we might be exposed to in our supply chain. We calculated risk ratings by reference to (a) each company in the D&D London group; and (b) the product/supplier.

We then carried out a desk review to analyse the types and levels of risk in order to establish a baseline for compliance, monitoring, systems, activities and reporting.

### Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Modern slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Equal Opportunities and Dignity at Work. This policy sets out our commitment to diversity in the workplace, together with our anti-harassment measures.
4. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

5. Corporate Social Responsibility policy. This policy explains the manner in which we behave as an organisation in relation to the environment and our society including our commitment to charity volunteering and support.
6. Business conduct and ethics. This code explains the manner in which we conduct our business in the UK and the ethics that underpin our organisation together with how we expect our employees and suppliers to act]

We have added modern slavery to our employee handbook, employment contracts, consultancy agreements and on boarding of our employees.

#### Our suppliers

D&D London operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery [and on site audits which include a review of working conditions]. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light.

#### Training

We regularly conduct training for our Purchasing team so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

#### Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

#### Approval for this statement

This statement was approved by the Board of Directors on 10<sup>th</sup> April 2017:



Sarah Jackson, People Director