

Rare Restaurants: Modern Day Slavery Statement

INTRODUCTION

This statement sets out Rare Restaurants actions to understand all potential modern slavery risks related to our business. It also highlights the steps that work toward eliminating all slavery or human trafficking risks in our business and supply chains. It is in accordance with the requirements of the Modern-Day Slavery Act 2015. This statement relates to actions and activities for the financial year 2021/2022.

As part of the hospitality industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The organisation is committed to preventing slavery and human trafficking in its activities, and to ensuring that our supply chains are free from slavery and human trafficking.

THE COMPANY

Rare Restaurants is a group of two restaurant brands; Gaucho, an Argentinian Steak restaurant and M, multi-faceted venues with restaurants, private members lounge and wine shops. Collectively there are 19 locations in the UK. We have over 850 employees.

OUR POLICIES

Both our Human Resources and Operations teams have developed policies to ensure that there is clear direction and clarity on the Company's approach to eliminate any possibility of modern-day slavery and human trafficking. In addition, the policies outline our provisions to proactively educate our supply chains and own people. These include: supplier policies to ensure our suppliers meet our expectations, Whistleblowing & Open Door policy to encourage people to come forward to notify concerns or unethical behaviour, Payroll policies, ensuring that we pay directly to the employee and not third parties to minimise the risk of forced labour.

OUR SUPPLIERS

We use various suppliers based in the UK, we are committed to sharing our expectations with our suppliers and maintaining strong relationships with them. We will conduct annual reviews and request each to have their own statements and policies. We also use suppliers based in Argentina, these are existing relationships that also adhere to our supplier policy. We maintain close relationships and on-location reviews with these suppliers. New suppliers will also need to ensure they meet these expectations.

OUR FOCUS

Within our industry the risk of Modern-Day Slavery is high due to the nature of a very transient work force and extensive supply chain. We are committed to preventing modern day slavery and human trafficking, as such we have developed a strong relationship with the Not For Sale foundation to help fight against this important issue, raise awareness for our employees, our guests and provide support for those impacted by these issues.

Responsibility for the organisation's anti-slavery initiatives include:

- **Policies:** both our Human Resources and Operations teams have developed policies to ensure that there is clear direction and clarity on the Company's approach to eliminate any possibility of Human trafficking. In addition, the policies outline our provisions to proactively educate our supply chains and own people.
- **Annual Review:** an annual look at our suppliers both of produce and outsourced labour. In addition, a review of our practices each year to ensure we continually improve how we minimise any potential risk.
- **Investigations:** In cases where we identify signs of potential slavery or human trafficking, the Human Resources team will be alerted and will work with our identified partners to raise concerns and take appropriate action immediately.
- **Support:** we will continue to support Not for Sale through our events, education and fundraising to ensure that our people, our guests and society become more aware and take proactive action to prevent issues.
- **Training:** every six months our Learning & Development Team deliver workshops to educate our teams on the significant size of this issue, signs to spot, how to respond to the identified slavery and human trafficking risks. In addition, we provide briefing tools to our on-site Leaders to ensure these issues are spoken about regularly. This training has been created in partnership with the Not For Sale organisation.
- **Outsourced workers:** the organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. All agencies must have their own Modern-Day Slavery & Human Trafficking policies in order to partner with us.