

## The Restaurant Group Modern Slavery Statement 2023

*This document has been published in accordance with the Modern Slavery Act 2015 and constitutes the Modern Slavery Statement for The Restaurant Group and its relevant subsidiaries (including The Restaurant Group (UK) Limited, Brunning & Price Limited, Blubeckers Limited, Wagamama Limited, Wagamama International Franchising Limited, Wagamama CPU Limited, TRG Leisure Limited and TRG Concessions Limited) for the financial year ended 1 January 2023.*

### Introduction

As an employer and provider of goods and services we have a key role to play in the fight against slavery, servitude, forced labour and human trafficking (“Modern Slavery”). The Restaurant Group (“TRG”) has a zero-tolerance approach to Modern Slavery of any kind in both our operations and our supply chain. We have a responsibility to prevent and detect exploitation and to influence and work together with suppliers and business partners to raise labour standards in our industry. Although our operations and employees are primarily based in the UK, some of the ingredients and food products we use are sourced internationally, and it is our responsibility to promote high standards of ethical behaviour throughout our supply chain.

### Our business

TRG is a significant player in the UK casual dining market, operating approximately 400 restaurants, pubs and concessions and employing approximately 16,000 colleagues. Our brands include Wagamama, Frankie & Benny’s, Chiquito, Coast to Coast, Firejacks and Brunning & Price, as well as a multi-brand Concessions business which trades principally in UK airports. As a responsible business, we recognise our obligation to ensure that our activities are guided by ethical principles and managed in the interests of all our stakeholders. For this reason, the Company has established environmental and social policies and procedures, as well as programmes that protect and sustain the environment, workers within our supply chains and restaurants, and our guests, which are all communicated to suppliers and staff as appropriate. The key policies and statements are also published on our website.

### Supply chain purchasing model

Our international supply chain covers over 70 countries. We operate a centralised procurement model in which we have established strong relationships with our food, drink, and non-food suppliers. We require all our direct suppliers to work closely with their suppliers, distributors, agents and producers to promote best practice and total transparency within our supply chain.

### Our policies

Our Ethical Sourcing Policy, which is published on our website along with other Company policies including those relating to Whistleblowing and Equality & Diversity, confirms our zero-tolerance approach to Modern Slavery in our supply chain. This policy is based on the Ethical Trading Initiative (“ETI”) Base Code for labour practice and the UN Guiding Principles on Business and Human Rights, and sets out our expectation for each supplier to thoroughly assess and ensure that all aspects of their supply chain are compliant. In addition, we have recently introduced and published a broad Human Rights Policy, affirming our commitment to preventing or mitigating human rights impacts both in our own operations and within our supply chain.

The Ethical Sourcing Policy explicitly prohibits suppliers, among other things, from: using any forced, bonded or indentured labour; employing child labour; charging workers fees or requiring them to lodge identity papers with employers; relying on workers who have been trafficked or transported for the purposes of exploitation; and imposing any form of harsh or inhuman treatment. Suppliers are also required to ensure they provide a safe and hygienic working environment, abide by national employment laws, and pay a fair wage. All suppliers are required to show compliance with this policy and to have their own policies and monitoring systems in place, as well as maintaining appropriate records.

### **New suppliers**

We have a rigorous process for assessing new suppliers on their technical capabilities and ethical credentials. We do not engage with business partners, including suppliers, who do not meet our high standards. New suppliers are required to complete a declaration on Responsible Sourcing and Modern Slavery as part of their onboarding. Our procurement contract templates include explicit clauses requiring suppliers to warrant their compliance and that of their own suppliers with the requirements of the Modern Slavery Act. In addition, under the contract, when a supplier sub-contracts, they are required to conduct a third-party audit of that sub-contractor's Modern Slavery compliance.

Members of our procurement team have been trained to identify the risk indicators of Modern Slavery in our supply chains.

We are committed to staying up to date with any relevant changes and amendments to the legislation and will ensure that the key members of our procurement team complete all the necessary refresher training as required.

### **Supplier Ethical Data Exchange (SEDEX) and ethical audits**

Purchased goods and services suppliers are required to register with and complete assessments within SEDEX, which is one of the main platforms through which companies can manage and improve working conditions in their global supply chains. Following a review of the outcomes of these assessments, ethical audits may be carried out by SEDEX, who have established a scoring system which identifies higher priority suppliers. Based on this risk assessment score, SEDEX will carry-out supplier ethical (SMETA) audits as and where required.

We are in the process of ensuring that any suppliers who are not in the system are onboarded in a timely manner. We have 330 suppliers registered and linked within the SEDEX platform who supply to our business. Twenty-eight suppliers have completed a SMETA audit within the last two years.

SMETA audits use the ETI Base Code, founded on the conventions of the International Labour Organization, as well as relevant local laws. SMETA audits can be conducted against two or four auditing pillars. The two pillars mandatory for any SMETA audit are Labour Standards and Health & Safety. The two additional pillars of a four-pillar audit are Business Ethics and Environment. These were introduced to further deepen the social responsibility aspect of SMETA audits.

### **Our people**

All our employees undertake right-to-work checks and are required to provide a National Insurance number and their own bank account details. Wages and salaries are paid by bank transfer, and we do not allow payment to be made into third-party bank accounts. All prospective employees participate in a comprehensive interview process. A number of mental health first aiders are trained across the Group to support anyone who may need help and also to help identify symptoms when something

may be impacting an individual's ability to perform at work, as well as ensuring their well-being outside of work, and we have an employee assistance programme. We encourage colleagues to speak up and inform their line manager or the People team if they are a victim of Modern Slavery, in which case supportive measures will be put in place. Whistleblowing arrangements are in place for the whole group, with Wagamama employees also having access to an external whistleblowing reporting line.

All employees are paid at least the National Minimum Wage or, for those over 23, the National Living Wage. Wagamama pays all teams the National Living Wage, regardless of age. All tips are paid directly, with no deductions for any administration or processing charges. Within the Concessions and Brunning & Price parts of the business, at peak season we employ a number of agency staff to help support the operations. All of these temporary agency employees are vetted based on our Company criteria, and we ensure the same principles apply as if they were direct TRG employees, namely in terms of applicable policies, equal pay, payment methods and ensuring they are protected under the Modern Slavery Act.

Employees can raise any suspicions they may have from time to time that Modern Slavery or human trafficking may be taking place within the Group or its supply chain and will be protected under our Whistleblowing Policy where those concerns relate to criminal or illegal activity.

### **Governance**

Heads of each relevant business area or function, including brand and divisional managing directors, and the heads of the procurement, legal, property, finance and IT teams have responsibility for their department's compliance with our Ethical Sourcing Policy and other relevant policies. All key Group policies are approved at Board or senior executive level and are reviewed annually to assess their effectiveness for the future.

### **Assessment of effectiveness in preventing Modern Slavery**

We will continue to keep under review new risks as they emerge and carefully monitor both existing and new suppliers and business activities. We have a robust verification program in place to confirm our suppliers' compliance with the Modern Slavery Act and TRG policies. We achieve this through regular supplier visits, communications and reviews. We believe in continuous improvement in the prevention of Modern Slavery and we will continue to review our ethical trading programme annually to ensure it reflects best practice.

This statement was approved by the Board of The Restaurant Group on 20 June 2023.

Signed by

A handwritten signature in black ink, appearing to read 'Andy', with a long, sweeping horizontal stroke extending to the right.

Andy Hornby

**Chief Executive Officer**

The Restaurant Group

June 2023