



# Modern Slavery Statement

2023

★ PRET ★

This report outlines the progress Pret A Manger UK has taken to prevent, detect, and respond to modern slavery and human trafficking in our business and throughout our global supply chain.

It is published following the Modern Slavery Act 2015 and sets out the steps we have taken during the period January to December 2023 and has been approved by our CEO.

# Contents

Introduction	4
Organisational structure	6
Fair working conditions	8
Supporting vulnerable people into employment	11
Policies in relation to slavery and human trafficking	13
Training and governance	14
Looking ahead	15

# Introduction

The UK Modern Slavery Act 2015 requires companies to publicly disclose a statement each year demonstrating how they are addressing and mitigating modern slavery within their own operations and supply chains.

**Pret has zero-tolerance for modern slavery in our global operations, and we recognise that all businesses have a key role to play in preventing all types of modern slavery through the promotion of ethical business practices and policies.**

Pret is committed to maintaining a positive work environment that fosters respect, integrity, and professionalism and will continue to take steps to ensure that slavery and human trafficking are not taking place in any part of our business or supply chain. We demand the same commitment from our suppliers, contractors, and business partners.

We recognise that a number of challenging global socio-political factors in 2023 may have contributed to increased levels of vulnerability in communities around the world, including rising inflation and a cost-of-living crisis, together with adverse weather events and conflict leading to displacement of people. We understand that these increased levels of vulnerability can increase the risk of human trafficking, forced, bonded and child labour which all contribute to the complex issue of modern slavery.

As a business, we recognise the role Pret plays in preventing, mitigating and remedying forms of modern slavery across our business and understand our broader responsibility to respect human rights under the United Nations Guiding Principles on Business and Human Rights (UNGPs).

## What is modern slavery?

Modern slavery is 'when an individual is exploited by others, for personal or commercial gain. Whether tricked, coerced, or forced, they lose their freedom. This includes but is not limited to human trafficking, forced labour and debt bondage' (Anti Slavery International).

### Forced Labour:

Any work or service that people are forced to carry out against their will or under threat

### Human Trafficking:

The act of placing someone into a situation of exploitation

### Bonded Labour:

Forced to work to pay off a debt, working for little or no pay, without control over their debt

### Child Labour:

Any work that is dangerous or harmful to children or interferes with their education

## Pret's approach to combating modern slavery focuses on **four** key priorities:

Fair working conditions

Supporting vulnerable people into employment

Policies

Effective training and governance

### Our key KPIs:

- ★ Number of suppliers linked on SEDEX
- ★ Completion rate of the relevant workforce for our Business Ethics Policies (Leader) training module
- ★ Number of people supported via The Pret Foundation's employment programmes



# Organisational structure

**10,500+**  
Employees  
(across equity and franchise)




**647** shops

**18**  
Countries



**72%**  
Equity shops  
(owned by Pret)



**28%**  
Franchise shops



Our UK business sources from **81** food and drink suppliers across **122** manufacturing sites

## Our brand purpose & values

We exist to...

**Make every day a little bit brighter**

By...

**Generously spreading joy**

Through...

**Food with thought**

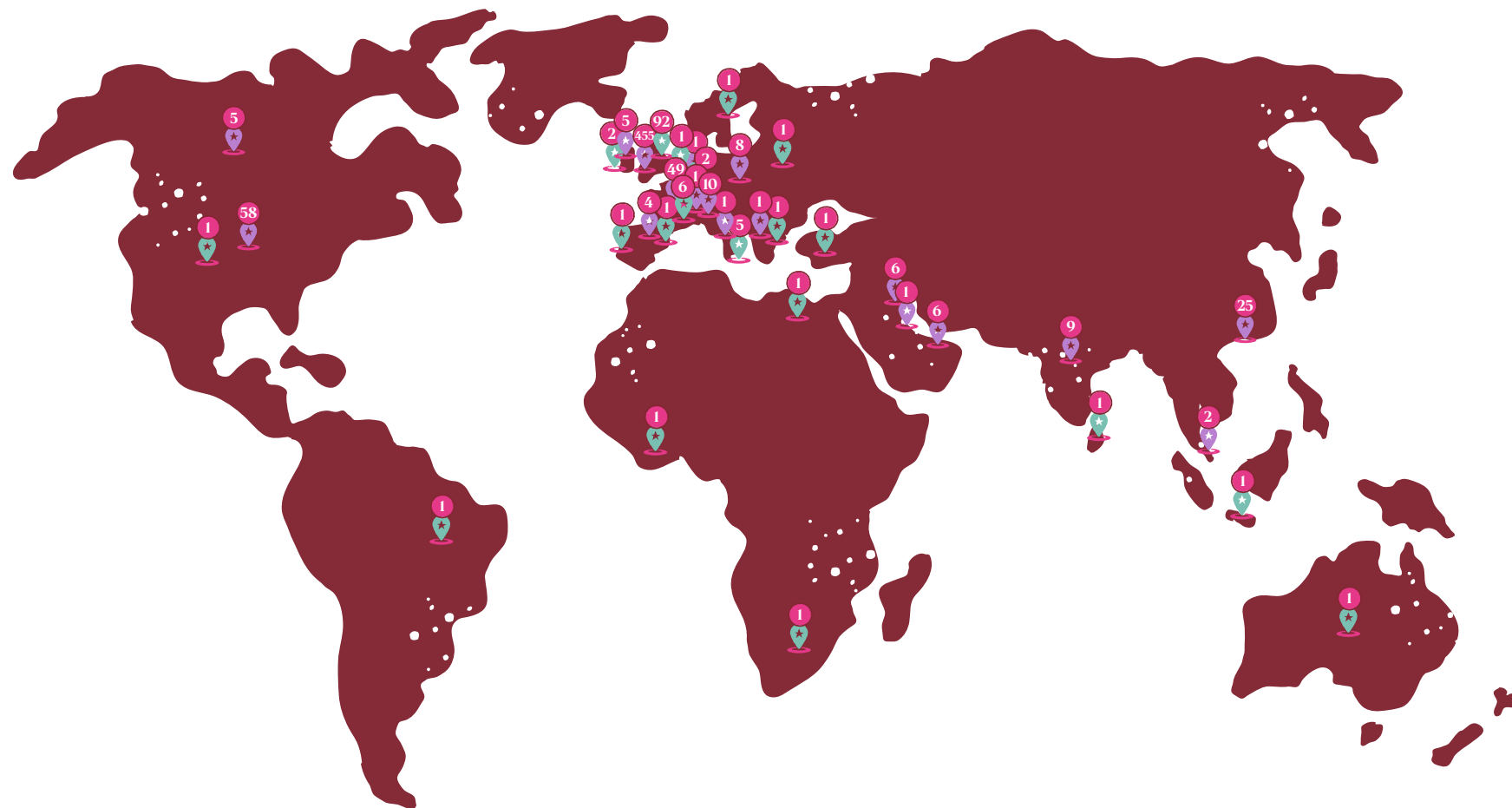


# Organisational structure

The Group operates in four core markets: the United Kingdom and Ireland (“UK”), North America, Europe, and Asia under the name of Pret A Manger (“Pret”). In 2023 our UK business sourced products and ingredients from 81 food and drink suppliers, across 122 manufacturing sites worldwide.

Number of UK suppliers with manufacturing sites in highest risk countries*	Total number of supplier manufacturing sites used for the UK business
1	122
Number of food & drink items which may include ingredients/ components sourced from highest risk countries of origin* (UK business)	Total number of food & drink ingredients / components (UK business)
120	4,369
Number of Pret shops located in highest risk countries*	Total number of Pret shops worldwide
12	647

\*Highest Risk Countries: North Korea, Eritrea, Mauritania, Saudi Arabia, Turkiye, Tajikistan, United Arab Emirates, Russia, Afghanistan, Kuwait (Source: Global Slavery Index 2023, WalkFree).



 Pret shops globally

 Food and drink suppliers' manufacturing sites (UK business)

# Fair working conditions: for our employees

People are fundamental to the Pret business, be that our amazing Team Members, supply chain partners or the communities where we operate. We believe that all workers have a right to safe and fair working conditions.

## Recruitment

We use a range of methods to recruit staff, including our company website, job boards and recruitment agencies. We only use recruitment agencies when we have a lack of applicants in a specific pool, and these are all individually approved. All staff undergo comprehensive right to work checks prior to employment. We undertake monthly reporting on visa expiry documents to minimise the risk of vulnerability due to a change in right-to-work status. We do not use any zero-hour contracts. Relevant safeguards that support the identification of risk include our Safeguarding Policy and our network of mental health champions across the business, who create a safe space for staff to raise any issues which could include those related to forced labour.

## Pay

We continued to invest into our people, increasing pay for shop staff twice in 2022 and once in 2023, so that 8,600 equity shop staff including Team Members, Baristas and Shop Managers received an average baseline pay rise of 16% since 2021.

## Wellbeing

In 2023 we launched our 'Managing Wellbeing' toolkit and mental health training, to help Line Managers to spot signs and signpost support. We made our mental health support services, such as our Employee Assistance Programme and confidential helpline, more accessible. We also conducted a wellbeing audit with an external organisation called The Wellbeing Project. They conducted stakeholder interviews, reviewed our policies, practices and ways of working – with clear recommendations for our leadership team on how to improve wellbeing at Pret.

## Whistleblowing

Employees around the world can access a whistleblowing email address which is regularly monitored to raise concerns, including those relating to modern slavery.

## Audits

We partner with NSF to audit our sites, an industry leader in auditing and reviewing compliance.





# Fair working conditions: for our employees

## Employees working in shops located in highest risk countries

In 2023, 12 Pret shops were located in countries at highest risk of modern slavery, with 6 shops in the United Arab Emirates, plus a central kitchen site, and 6 shops in Kuwait. All of these shops are operated by our franchise partners and so working together to ensure workers are not at risk of modern slavery is essential.

Both when opening shops in these markets, and for existing shops, we conduct additional due diligence including:

- ★ Ensuring that when hiring from overseas, our partners work with a select list of recruitment agencies
- ★ Ensure we have visibility of recruitment agency terms & conditions, for example ensuring no recruitment fees are charged to overseas candidates
- ★ Review employment contracts between franchise partners and candidates / employees
- ★ Ask for visibility of key HR policies including Sickness, Trial Period, Whistleblowing

## We welcome everyone

In 2023 we launched 5 Belonging Groups made up of colleagues around the world. The belonging groups create a safe space for Pret people to raise issues which could include issues related to forced labour or modern slavery.

### Each group aims to:

#### Listen

To the views, ideas and lived experience of members

#### Raise awareness

Of the lived experiences in Pret, beyond membership

#### Champion

Inclusion and belonging and deliver activity that positively contributes to Pret culture

## Fair working conditions: in our supply chain

We are committed to ensuring our products are responsibly and ethically sourced.

Our food and packaging suppliers are expected to link with us on Sedex and have 100% SAQ (Self-Assessment Questionnaire) completion rate, as well as use Sedex Members Ethical Trade Audit (SMETA), or an equivalent standard, to ethically audit their sites and be transparent about the findings. We expect suppliers to close any non-compliances within the designated time frame.

Utilising SEDEX to share audit data increases efficiencies and reduces audit fatigue for our suppliers. The platform enables ourselves and suppliers to take action on issues identified and work together to find solutions.

Partnerships between retailers, manufacturers, NGOs and government bodies are critical to help identify and prevent modern slavery. Pret is part of a number of partnerships including the United Nations Global Compact (UNGC) UK Network. Our membership with UNGC enables us to work collaboratively with companies, and broader stakeholder groups on challenging social and environmental issues, including modern slavery, that cannot be solved by individual companies working alone.

### Supporting seasonal migrant workers



Industry-wide concerns have been raised around treatment of seasonal workers entering the UK agricultural sector through the seasonal worker scheme.

In 2023 Pret worked collaboratively with the seasonal worker scheme taskforce and other businesses to ensure migrant workers are not subject to exploitation. The aim was to implement practical actions to improve the responsible recruitment and employment of migrant workers into UK farms.

This included investing in the 'Just Good Work' app, which gives migrant workers free and easily accessible information, helping them understand their rights when working abroad and supporting their migration at every stage of recruitment and employment. Multi-lingual guidance is clear, simple and up-to-date, including life outside of work, employment rights, responsibilities and practical considerations



**Our Rising Stars Programme supported  
104 vulnerable people into employment  
with Pret in 2023**

## Supporting vulnerable people into employment

At Pret, we believe in the power of employment to help transform lives and futures, including helping to prevent vulnerable people from exposure to modern slavery and human trafficking.

For nearly 30 years The Pret Foundation has offered direct support to community organisations around the world, including donating as much surplus Pret food as possible each day to those in need and supporting people experiencing, or at risk of, homelessness into employment.

Through our Rising Stars programme we work with people at risk of homelessness to help them into employment with Pret. We:

- ★ Break down the barriers to employment (no formal application process, a dedicated Employment Manager, and placed with experienced General Managers)
- ★ Offer 12-weeks of wages and travel costs, together with weekly support groups and 1-2-1 counselling if required

Our Shooting Stars programme provides additional support for people who have graduated from Rising Stars to further progress through a nine-month career development programme with Pret.

Out of the 104 people supported into employment through Rising Stars in 2023, 70% completed the programme and 35% have since worked at Pret for 6 months+. 6 further 'Shooting Stars' were supported in 2023.

The ★ PRET ★  
**Foundation**  
Registered Charity No. 1050195

# Supporting vulnerable people into employment

Building on our experience and knowledge working with refugees over many years, we set up the Ukrainian Employment Programme.

The programme offers those fleeing the war in Ukraine tailored support including:

- ★ Fast-track into employment at Pret shops in the UK
- ★ English lessons, financial support and 1-2-1 counselling

Since the programme began in March 2022, we've hired over 350 Ukrainian refugees into roles at Pret including Baristas, Front of House Leaders, and Hot Chefs - with a retention rate of over 50%.

11 participants in the programme are currently taking part in a Level 4 Business Transformation Fellowship (for Leaders and above) & Level 3 Digital Business Accelerator (for Team Members).



# Policies

We have several Group and sub-level policies in place that help us to combat modern slavery, all of which are signed off at Director-level. These are reviewed periodically and updated in line with emerging best practice, as part of our commitment to continuous improvement.

## Anti-bribery and Corruption Policy:

States Pret's zero-tolerance position on bribery and corruption and provides all employees and stakeholders with relevant information and guidance on recognising and dealing with bribery and corruption.

## Contract Engagement Policy:

Sets out the framework that must be followed in order to formalise the engagement of a supplier for food and non-food goods and/or service. The Policy aims to ensure that Pret has a consistent approach and auditable record of supplier engagement, with central oversight over all supplier contracts.

## Employee Code of Conduct:

Outlines the standards of behaviour expected from Pret employees in their day-to-day work while representing Pret. It serves as a guide to ethical decision-making and compliance with applicable policies, laws and regulations. This includes zero tolerance of modern slavery.

## Equal Opportunities Policy:

Pret is an equal opportunities employer. It is our policy that there should be no unlawful discrimination, harassment or victimisation of any employee, customer, job applicant, self-employed or other contractor or consultant, casual or agency worker and/or any other person on the grounds of protected characteristics.

## Grievance Policy:

Guides our approach to handling reports of workplace grievances.

## Third Party Code of Conduct:

Lays out the standards we expect partners including suppliers and franchise partners to be working towards. The commitment areas are based on the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles (UNGP) on Business and Human Rights, reflecting best practice industry standards.

## Safeguarding Policy:

Describes Pret's commitment and actions to the protection of all employees, with a particular focus on the safeguarding of people from vulnerable backgrounds and young people.

## Whistleblowing Policy:

Encourages employees to report any suspected wrongdoing, in the knowledge that concerns will be taken seriously and investigated as appropriate, and that confidentiality will be respected. Pret recognises that it is essential for there to be a culture of openness and accountability so that our people can freely raise any concerns without fear of reprisal, and to prevent such situations occurring or to address them when they do occur.

## Young Person Guideline:

Details all the tasks which young team members can and cannot perform in our shops, following on from a risk assessment by the Safety Team. The guide allows leaders to ensure our young team members are as safe as reasonably practicable when working in our shops.

## Training

We believe our leaders play a crucial role in helping us find and tackle modern slavery across our own business and our supply chain.

That's why we launched a mandatory business ethics e-learning module for all global support centre staff and hiring managers across our stores. The pathway is an online module which introduces different policies and includes a list of policies which employees must read and sign.

In 2023, we assigned the Business Ethics pathway training for Assistant Managers, General Managers and Support Centre employees in all 4 equity markets, with an 76% completion rate by the relevant workforce. On 31st December 2023, we launched our annual re-training for 3 markets (Hong Kong, UK and France) and we asked all employees to complete the Business Ethics training (Team Member to Support Centre employees). The US market received the annual re-training in 2024 due to a divestment in the US business. The total completion rate across all our markets was 98%, an increase of 22% vs prior completion rates.

## Governance

The Board of Directors, the highest level of Pret's governance, has oversight of Pret's Environment, Social and Governance (ESG) issues. Ultimate responsibility for ESG sits with the CEO.

The principal risk 'ESG & Sustainability Commitments' is owned by the Chief Customer Officer, who leads the Global Sustainability team. The team oversee ongoing ethical compliance across the business, including creating plans to embed and comply with the UK Modern Slavery Act 2015, and escalate any potential modern slavery concerns to appropriate group functions within the business.

The Principal risk 'People & Teams' is owned by the Chief People Officer, who leads the Global People team. The team manage everything people-related and lead The Pret Foundation and global franchise growth.

Pret has recently evolved its governance structure and following year end, and in 2023 an ESG Steering Committee was established to ensure better visibility, understanding, accountability and decision making around ESG at leadership level, which includes ensuring Pret meets its human rights' responsibilities across the business.

# Looking ahead

Looking ahead, we are committed to improving our policies, processes and KPIs, recognising that there is more to do to identify and tackle modern slavery across our operations.

As Pret continues to expand globally into new markets around the world we know that collaboration will be key to driving and embedding long-lasting change, especially with our franchise partners and our suppliers.

Our key priorities for 2024 include:

- ★ Launching a new mandatory Third Party Code of Conduct for suppliers and franchise partners
- ★ Improving global supply chain transparency to identify our highest risk suppliers, with human and labour rights as a key factor
- ★ Joining the global Tent Partnership for refugees, a network of major companies committed to integrating refugees into their businesses through hiring, training and mentorship
- ★ Enhancing our governance of modern slavery and wider human rights through the newly formed ESG Steering Committees



