

# Modern Slavery Statement

2024



## Modern Slavery Statement 2024 Pret A Manger Limited

This report follows guidance from section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015, outlining the steps Pret A Manger UK has taken between January and December 2024, and continues to take, to identify and mitigate risks of modern slavery throughout our business and supply chain.

Pano Christou, CEO, Pret A Manger

10/10/2025

# **Contents**

Introduction	4
Organisational structure	5
Fair working conditions	7
Supporting vulnerable people into employment	9
Policies in relation to slavery and human trafficking	10
Training and governance	11
Looking ahead	12

## Introduction

At Pret, we have zero tolerance for modern slavery in any form. Caring deeply and welcoming everyone are fundamental pillars of our culture, and we are dedicated to upholding these values, not just within our company but across the communities we serve; we expect the same from each of our employees and we know these principles and values are a large part of why our employees chose to come to Pret. We recognise the role we play in respecting and protecting human rights, and our responsibility to take proactive measures to prevent modern slavery and ensure transparency in our practices.

## 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

## **Key improvements in 2024 at a glance:**

- Launched new Code of Conduct for UK, EU and US suppliers
- Rolled out Right to Work training for UK General Managers
- Updated technical audits for food suppliers to include focus on human rights
- Joined Tent, a global alliance of businesses supporting refugees into employment



## A global business

Pret A Manger ("Pret") is a private company limited by shares, incorporated, domiciled and registered in England and Wales in the UK. Our registered number is 13383560, and principal executive office is located at 75B Verde, 10 Bressenden Place, London, SW1E 5DH.

The principal activity of the Pret A Manger ("Pret") Group is to offer freshly prepared, delicious, food and coffee in a welcoming and convenient setting. Pret began with a little London sandwich shop in 1986, and we have expanded and continue to expand globally both through our equity model and franchise model.

The Group operates in four core markets: the United Kingdom and Ireland ("UK"), North America, Europe, and Asia, Middle East and Africa ("AMEA"). Throughout 2024 the Pret brand expanded into two new markets; Portugal and Saudi Arabia, with one new market planned for 2025; South Africa.

- 11,000+ employees globally
- 20 markets
- 717 shops
- 57% equity owned shops
- 43% franchise owned shops
- 17 Pret shops located in countries with high risk\* of modern slavery, with 7 shops in the United Arab Emirates, 8 shops in Kuwait and 2 shops in Saudi Arabia. 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
- In 2024 our UK business sourced products and ingredients from 86 food and drink suppliers
- 4,309 total number of food and drink ingredients / components sourced for the UK business
- 58 ingredients/components sourced for the UK food and drink business comes from countries with high risk\* of modern slavery and so working together with our suppliers to ensure workers are not at risk of modern slavery is essential.

\*Countries with highest prevalence of modern slavery: Eritrea, Mauritania, and South Sudan (Africa); Venezuela, Haiti, and El Salvador (Americas); Saudi Arabia, the United Arab Emirates, and Kuwait (Arab States); North Korea, Afghanistan, and Myanmar (Asia and the Pacific); and Türkiye, Tajikistan, and Russia (Europe and Central Asia) (Source: Global Slavery Index 2024, Walk Free)



\* PRIT A MANCER \* Modern Slavery Statement 5.

# A global business



\* PRET A MANGER \* Modern Slavery Statement

# Fair working conditions: for our employees

People are fundamental to the Pret business - they're the magic ingredient. And so, we're committed to making sure Pret is a safe space for our employees, and we're doing our bit to ensure all workers in our supply chain have safe and fair working conditions.

## What's new for 2024?

- Implemented changes to improve wellbeing for shop teams, after an expert external review by The Wellbeing Project
- Introduced 'Pret's Little Conversation', a mid-year touchpoint for employees to offer anonymous feedback on working conditions and raise any concerns, in addition to our annual 'Pret's Big Conversation' employee survey

## What did we continue to do in 2024?

- Ensured robust recruitment practices and policies are in place including regular reporting on visa expiry documents and avoiding zero-hour contracts
- Worked with franchise partners to ensure additional due diligence for recruitment of employees in markets at highest risk of modern slavery, including reviewing employment contracts between franchise partners and candidates/ employees and ensuring visibility of recruitment agency terms and conditions
- Supported our five Belonging Groups made up of colleagues around the world, creating a safe space to raise issues of concern including those related to modern slavery
- Employees around the world can access a whistleblowing email address which is regularly monitored to raise concerns, including those relating to modern slavery



\* PRET A MANCER \* Modern Slavery Statement

# Fair working conditions: in our supply chain

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

## What's new for 2024?

- Rolled out updated mandatory Third Party Code of Conduct for UK, EU and US which requires new suppliers to sign as part of legal terms of trade. This Code prohibits third parties from engaging in any activity, practice or conduct that would constitute as modern slavery
- Updated technical audits for UK food suppliers to include a focus on human rights including modern slavery
- Conducted full review of SEDEX to ensure supplier information is up to date and took action on issues
  identified, working together with suppliers to find solutions. Introduced new way of working to ensure
  oversight of SEDEX is part of wider monthly due diligence sustainability and technical team reviews

## What did we continue to do in 2024?

- Expect all our UK food and packaging suppliers to use Sedex Ethical Trade Audit (SMETA), or an equivalent standard, to ethically audit their sites and share audit data through the SEDEX platform. We expect suppliers to have 100% completion rate for Supplier Assessment Questionnaire (SAQ), have up to date ethical audits and close any non-compliances within the designated timeframe
- Capture country of origin data from our UK food and packaging suppliers to ensure greater visibility of our supply chain
- Conduct additional due diligence when franchise partners opened shops in high-risk markets, including transparency in recruitment agency terms and conditions to ensure no recruitment fees are charged to overseas candidates

## Integrating human rights into our food supplier audits

Our supply chain includes sourcing raw materials, manufacturing and distributing a wide range of food and drink products. We work closely with our suppliers to ensure they share our commitment to ethical business practices and the protection of human rights. All food and drink suppliers to the UK business have regular technical and food safety audits conducted by our third-party partner. The frequency of these audits depends on levels of risk, but at a minimum every food supplier will be audited in person every three years.

In 2024, these audits were updated to include a focus on human rights and modern slavery in alignment with the Ethical Trading Initiative (ETI) base code on metrics such as:

- Employment is freely chosen
- The right to freedom of association and collective bargaining is respected
- Working conditions are safe and hygienic
- Worker welfare facilities adequate
- Zero tolerance of child labour
- Wages comply with minimum wage legislation
- Working hours are not excessive
- The site operates an Equal Opportunities policy
- Regular employment is provided
- Accommodation (where supplied) is safe and hygienic
- No harsh or inhumane treatment of staff

## 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 supported community organisations around the world to donate unsold food at the end of the day to those who need it most, and in the UK supports vulnerable people into employment.

We don't just offer jobs; we offer fresh starts. As an activator of The Royal Foundation Homewards programme, we continue to support their quest to prove that together we can end homelessness. Through our Rising Stars programme, we've provided training, support, and opportunities to help people facing homelessness rebuild their lives. There's no formal application process to the 12-week programme, and travel costs and support are covered.

In 2023, we announced our commitment to support a further 500 new Rising Stars roles at Pret over the next five years. In the first full year working towards this target, we supported 126 Rising Stars in 2024.

The impact of the Rising Stars Programme in 2024 includes:

- 79 Pret shops welcomed 126 Rising Stars in the UK
- 49% of the new joiners graduated and took the next step
- 63% of the new joiners secured jobs and newfound stability
- 26% of the new joiners explored new opportunities, finding their footing
- 12 Rising Stars further progressed to Shooting Stars, a nine-month journey of workshops, offsites, learning and development opportunities, and confidence building

#### Supporting refugees into employment

In 2024 the Pret Foundation joined the Tent Partnership for Refugees. Operating across the Americas and Europe, Tent helps to mobilise leading businesses to connect refugees to employment through hiring, training, and mentorship. Pret will work with Tent to build better practices in supporting people with barriers into training and employment.

## **Policies**

Our policies are reviewed periodically and updated in line with emerging best practice, as part of our commitment to continuous improvement. In 2024, we updated or developed over 30 internal Group and sub-level policies, including those relevant to modern slavery such as our Conflict of Interest Policy. Nine policies in place key to combatting modern slavery are detailed here:

#### **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.

\* PRIT A MANGER \* Modern Slavery Statement

## What's new for 2024?

- Updated global ESG risk register, including reviewing modern slavery and human rights related risks, and presented to members of the Board at Audit Committee meeting
- Launched our Right to Work training, mandatory for General Managers and optional for Operational Managers. The training illustrates the steps our managers need to follow when checking right to work documents, understanding what documents are acceptable and the importance of recording these correctly on workday to ensure they are notified when documents are reaching their expiry

## What did we continue to do in 2024?

- Mandatory Business Ethics e-learning training for all global support centre staff and hiring
  managers across our shop teams, with a 2024 global completion rate of 95% (vs 98% in 2023). This
  e-learning module requires applicable colleagues to confirm they have read, understood and
  signed the policies
- Held ESG Steering Committee meetings quarterly for the UK business

## Governance of modern slavery issues

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 ESG Steering Committee governs ESG topics including modern slavery risks and meets quarterly. The principal risk 'ESG & Sustainability Commitments' is owned by the Chief Customer & Product 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 global franchise growth.

The sustainability and risk teams oversee a stand-alone ESG risk register, which is updated annually, primarily through desk-based research.

\* PRET A MANGER \* Modern Slavery Statement

# **Looking ahead**

While we have made important progress in 2024, there is much more to do to identify and address modern slavery across Pret's global operations. We are committed to continuous improvement and our areas of focus for 2025 include:

- Continue roll out of mandatory Third Party Code of Conduct to key markets and to franchise partners
- Identify and map high risk suppliers and establish audit approach for human rights topics
- Review approach to whistleblowing, with a particular focus on franchise partners
- Review our modern slavery key performance indicators to better measure the effectiveness of our efforts to combat modern slavery, as part of broader refresh of materiality analysis and ESG strategy

This statement has been prepared by the internal sustainability team, in collaboration with the internal technical and people teams, including accessing supplier information from our digital platform. We have used the new Transparency in Supply Chains Statutory Guidance to improve this statement, where possible.



