

## **The Restaurant Group Modern Slavery Statement 2021**

*This document has been published in accordance with the Modern Slavery Act 2015 and constitutes the Modern Slavery Statement for The Restaurant Group plc 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 2 January 2022.*

### **Introduction**

As an employer and provider of goods and services we have a role to play in the fight against slavery, servitude, forced labour and human trafficking (“Modern Slavery”). The Restaurant Group plc (“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 over 400 restaurants, pubs and concessions and employing c. 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 business activities are guided by 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.

### **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 Responsible 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 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.

The 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.

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

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

Our 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. We are in the process of ensuring that any suppliers who are not in the system are onboarded in a timely manner. Following a review of the outcomes of these assessments, ethical audits may be carried out. It is our policy that any suppliers who are deemed high risk, as identified by the SEDEX risk assessment score, undertake an audit within three months of being identified as high risk. No suppliers were identified as high risk during 2021. We currently have 322 suppliers registered and linked within the SEDEX platform who supply to our business.

### **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, and we have an employee assistance programme. We encourage our teams 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. Wagamama employees have access to an external whistleblowing contact line.

All employees are paid at least the National Minimum Wage or, for those over 23, the National Living Wage. All tips are paid directly. Within the Concessions and Brunning & Price parts of the business, at peak season we employ a number agency staff to help support the operations. All of these staff 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 Responsible Sourcing Policy and other relevant policies. All key Group policies are approved by the Board 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 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 plc on 1 July 2022.

Signed by

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

Andy Hornby  
**Chief Executive Officer**  
The Restaurant Group plc  
1 July 2022