

Following our seventh statement published at the end of Whitbread's 2023/24 financial year, this document provides an update on our work over the past 12 months to mitigate the risks of modern slavery across our business and supply chain. This report is pursuant to the **UK Modern Slavery** Act 2015.

### This report is interactive.

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 $\mathbb{R}$  Find our report and policies for the reporting suite online



At Whitbread, we are committed to upholding human rights and preventing modern slavery across our business and supply chain. As the UK's largest hospitality company, and with a growing presence in Germany, we recognise our responsibility to ensure that everyone who works with or for us is treated fairly, with dignity and respect. Through our Force for Good sustainability programme, focused on enabling people to live and work well, we continue to embed strong ethical and responsible sourcing practices into our operations.

The challenges of geopolitical instability continue to impact global supply chains, reinforcing the importance of our approach. We remain committed to providing a safe, ethical and healthy environment for all workers and customers.

Our Responsible Sourcing programme remains a core focus, continuously evolving to strengthen risk assessment and enable swift responses to emerging issues. Our International Sourcing team implements enhanced due diligence in high-risk regions, adapting our approach based on global developments. By working closely with factories and accredited auditing bodies, we conduct rigorous risk assessments and support the resolution of identified concerns.

Our policy is clear: everyone within our business and supply chain must be treated with fairness, dignity and respect. We collaborate with suppliers and stakeholders to improve standards and mitigate risks. If a supplier falls short of our expectations, we engage with them to drive improvements. However, where non-compliance persists, we will take decisive action, including ending the business relationship.

Looking ahead to 2025/26, we will continue to enhance this programme, working with partners and stakeholders to implement best practices that prevent exploitation, uphold human rights and strengthen our ethical commitments across our value chain.

This statement covers the period 29 February 2024 to 27 February 2025. It builds on our historic statements which outline the strategy and policies that underpin our due diligence programme. This modern slavery statement was approved by our Executive Committee and by the Whitbread PLC Board on 24 April 2025.



Dominic Paul Chief Executive 24 April 2025





Whitbread PLC is the UK's largest hospitality company and owns the country's favourite hotel business, Premier Inn.

Premier Inn is the leading budget/economy brand, with the largest network in the UK.

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### Structure

### Whitbread PLC is the UK's largest hospitality company and owns the country's favourite hotel brand, Premier Inn.

Premier Inn is the leading hotel chain in the midscale and economy sector, with the largest network in the UK. We have 852 hotels in the UK and Ireland and 62 in Germany (including one in Austria), with more than 100,000 rooms in total. All our hotels are operated by us, and we have a hot food offer in almost every location.

We share ownership of a joint venture with Emirates which operates 11 Premier Inn branded hotels in the Middle East.

For the purpose of this document, the references to policies and procedures relate to the Whitbread UK and Ireland operation (and incorporates all Whitbread's subsidiaries in the UK and Ireland). Our newly published human rights strategy statement, pursuant to the German Due Diligence in the Supply Chain Act (LkSG), is published separately on our website and can be found:



Human rights strategy statement



# **Supplier network**

We purchase our goods and services to support our UK&I business directly from over 1,500 suppliers (also known as tier 1<sup>1</sup>).

Our German business is supported by over 1,100 suppliers.

Most of our suppliers are manufacturers of finished products (e.g. beds and furniture), food processors, construction contractors and providers of services (e.g. technology and laundry). The majority (approx. 90%) of our tier 1 supplier network is based in the UK, supported by a global supply chain.

A full list of our supplier country locations can be found in the appendix - direct supplier location.

The Procurement team in the UK is positioned in the Property and International function, led by our MD, Property and International. The Sustainability team works very closely with this team to ensure our policies and processes related to modern slavery and other elements of responsible sourcing are adhered to and implemented effectively across our value chain. We ensure that a sustainability representative is present within procurement and supply chain leadership calls, on a monthly basis, to support alignment.

<sup>1</sup> We refer to those suppliers from whom we directly procure as tier 1 and, therefore, indirect suppliers are classified as tier 2.

# Accountability for modern slavery risk management

The CEO and members of the Executive Committee have overarching accountability for the standards of our supply chain, the treatment of our team members and the safety of our guests.

### **Supply chain**

The General Counsel has overarching accountability for setting the right policies to enable ethical performance of our supply chain.

Accountability for measuring, monitoring and making recommendations for mitigating and remediating risk in the supply chain lies with the Head of Sustainability, supported by the Responsible Sourcing Manager in our General Counsel function.

Accountability for managing supplier participation in the Responsible Sourcing programme and responding to any risk sits with our Procurement function, overseen by the MD, Property and International.

### **Team members**

The Chief People Officer has overarching accountability for ensuring that the right policies and processes are in place to mitigate modern slavery risks.

Day-to-day management of the policy compliance is managed by the individual teams across the business.



### Guests

The Managing Director of UK Hotels & Restaurants and the CEO Germany have overarching accountability for Health & Safety. They are supported by the Director of Safety and Security (UK) and Head of Health, Safety & Security (Germany) in policy development.

Day-to-day management of safety and security is the responsibility of the respective Operational lines, including Hotel & Restaurant managers and their teams, who are supported by their Multi-site Hotel Managers, Regional Operations Managers and Operations Directors.







of modern slavery across the business

### We continue to recognise that there are several ways in which our business could be affected by modern slavery.

How we assess and mitigate that risk is dependent on the type of risk, our leverage and ability to manage it, and where accountability for doing that sits within the business or supply chain.

The fundamental areas of risk and the accountabilities for managing them remain unchanged from last year's report: team members, supply chain and our guests.

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## **Policies**

We have more than 32,000 team members in the UK and Ireland and 1.500 in Germany, working across the Whitbread brands, directly employed by Whitbread. As a hospitality business, we recognise that ensuring people are treated fairly and are empowered to develop their skills and fulfil their potential is what allows us to continue delivering high standards for our customers every day - and this is at the heart of our strategy.

Modern slavery is a risk recorded within our People team risk log and is, therefore, incorporated into our human resource risk management process.

Having direct control over how the people working in our hotels and restaurants are employed reduces the risk that someone working for our business might be a victim of modern slavery. We recognise that certain roles have higher levels of modern slavery risk, such as housekeeping, which is why we have ensured this role is directly employed in the UK and Ireland. However, we still ensure that we do all we can to mitigate that risk through our clear employment policies and processes. We also recognise that migrant employees may be more vulnerable, and we, therefore, ensure that all employees hold a valid right to work as part of our recruitment process.

Below is a list of these policies and an outline of their purpose and process of implementation:

### **Code of Conduct**

This document outlines the way we do things at Whitbread and is provided to all employees upon joining. The Code of Conduct is part of induction training and every two years team members complete online training and assessment. Teams in the Procurement, Supply Chain and Property functions also have targeted sessions annually, due to the heightened risk in these functions. All employees are required to read the Code upon onboarding. It signposts to useful and relevant policies including Speaking Out, Grievance and Diversity and Inclusion, ensuring our employees have an ongoing awareness of the policies Whitbread has in place to support them. It also explains, through our values, how we intend to do business everywhere by working responsibly and ethically to be a positive part within the communities that we operate.



### Our new values



warm+ welcoming

to our guests and each other



passionate +proud

about the big picture and the little things that matter



in everything that we do



#### **TEAM MEMBERS CONTINUED**

### **Policies** continued

### **Human Rights Policy**

This policy defines the most relevant human rights for our business and value chain and the standards, related policies and processes we put in place to ensure they are respected. It also outlines the standards that must be followed and describes who is accountable and responsible for making it work, both within our organisation and influencing our business partners.

### **Speaking Out Policy**

This document outlines the process we follow when our employees raise a concern about wrongdoing, danger or breach of the Code of Conduct, or criminal activity such as human trafficking. The policy ensures that concerns raised are dealt with without fear of reprisal, can be raised anonymously and will be investigated in line with a robust and transparent procedure. Any such concern may be raised internally, or through our independent and confidential Speaking Out service provided by Safecall. Safecall can be used by employees within Whitbread as well as third parties, including suppliers, to raise a concern. Reports can be made in multiple languages online, or via telephone, or on handheld devices by scanning the QR code displayed in all Whitbread locations as well as communicated to suppliers.

### **Grievance Policy**

This policy supports and provides guidance to employees and managers regarding any concerns raised by an employee in relation to their work. This process encourages concerns to be raised informally in the first instance in order to encourage an open and honest culture; however, it also outlines the formal process in the event that concerns raised cannot be resolved through the informal route or, in more serious cases, where it is appropriate to deal with matters formally at

the outset. As such, the Grievance Policy provides clear guidelines on how individuals can raise their concerns, along with what will happen at that point and the potential outcomes of any investigation into the issues raised. Individuals are also welcome to have union representation during any grievance process.

### **Diversity and Inclusion Policy**

This policy outlines our active commitment to provide equal opportunities and embrace diversity and inclusion throughout employment. This policy also clearly explains what individuals can do in the event they do not feel they are being treated fairly or equally.

### **Right to Work Policy**

This policy reflects Whitbread's commitment to recruit talented people and ensure legal compliance. Whitbread will not employ anyone who cannot demonstrate their legal right to work. All candidates progressing to an interview are required to upload evidence of their right to work directly to a secure online platform, where they are checked by a specialist third-party organisation. Through automating the checks in this way, we have an even greater level of confidence that the legislative requirements are applied consistently and in a non-discriminatory fashion.

### Implementation tools

Performance of right to work checks is formally reported as part of our internal operational performance management and auditing processes. Our Speaking Out and Grievance policies are supported by internal processes for confidential reporting which are reported to our General Counsel. Our Code of Conduct is embedded through training.



### **TEAM MEMBERS** CONTINUED

# **Due diligence**

### **Modern slavery training**

Recognising the risk that our hotels could be used as locations for trafficked individuals to be harboured or exploited, we have taken steps to empower our team members to respond in the right way if they suspect that something is not right.

All team members working across our hotels and front of house teams in restaurant sites are required to undertake a mandatory e-learning module on modern slavery within 90 days of starting their roles. This is embedded into our induction processes for all team members joining the business and we have undertaken similar training with all our People teams, including shared services, resourcing, operations and employee relations. Following the e-learning module, team members must answer questions correctly to pass the module.

This bespoke training focuses on raising awareness of human trafficking and modern slavery issues, empowering our teams to identify indications of human trafficking abuse in our sites and providing them with the tools to report it quickly and effectively. Our training has been informed by experts at Stop the Traffik and uses real-world case studies to better inform the various signs of modern slavery that could be observed in a hospitality environment. With all team members being aware of the risks that modern slavery presents and knowing how to safely report concerns, we can work to make all our sites safe places for our guests and team members alike.

All our team members have access to whistleblowing services, called 'Speaking Out', that are available 365 days a year and can be used to raise concerns of major business wrongdoing in a confidential and anonymous manner. The Audit Committee oversees the Speaking Out programme and is provided with detailed reports twice a year, in April and October, detailing the number of reports received, the nature of the reports, and other particulars, with no identifiable information within the reports of who raised the concern to maintain anonymity.

We have established our Speaking Out service via Safecall, through which reports can be made by team members across all Whitbread sites, employees in the Support Centre (head office) and Contact Centre and third parties, including suppliers across the UK and Germany and other overseas territories in over 100 languages, through web-based reporting or via a hotline.

The Speaking Out service can be used to report major business wrongdoings, such as:

- bribery/corruption;
- theft/fraud;
- mismanagement of funds;
- misuse of corporate assets;
- serious health and safety violations;
- serious environmental concerns;
- misleading marketing/advertising; and
- data privacy breaches.



We encourage team members to speak to their line manager if they are comfortable doing so and raise a grievance in line with the Grievance Policy, if the concern relates to any of the following:

- harassment/bullying;
- discrimination:
- physical violence;
- · unfair treatment;
- · management behaviour; or
- behaviour in any other way not aligned with our Code of Conduct.

**SUPPLY CHAIN** 

# **Policy**

This year, we have continued to focus our efforts on working closely with high-risk suppliers to address and mitigate our risk by working through our 'Human Rights in the Supply Chain' due diligence process (figure 1) and our enhanced due diligence process (figure 2).

Our programme is underpinned by our Responsible Sourcing Policy outlining the minimum standards we require all suppliers, across all geographies, products and services, to comply with. Our policy is aligned with the International Labour Organization (ILO) Convention, the UN Guiding Principles on Business and Human Rights and now the German Due Diligence in the Supply Chain Act (LkSG). This policy is reviewed annually.

Specifically, with regard to modern slavery, it states that there will be:



 no trafficked individuals working in any part of our supply chain;



 no forced, bonded, indentured or involuntary prison labour or any other labour of a similar conduct in any part of our supply chain; and



 no payment of recruitment fees on behalf of the worker, no lodging 'deposits' or identity papers with their employer,



 and states that workers must be free to leave their employer after legal or statutory notice.

We have an embedded high-risk countries list, where additional mandatory due diligence disclosures are carried out during tender. These country risk assessments are based on over 20 open-source data fields, as well as additional information on real-world events and intelligence reports. We will update these lists annually during a formal review process led by the Force for Good team.

Our internal supplier data management system allows us to record our suppliers' commitment to work to the standards outlined in this policy and measure their performance against it through questionnaires, supporting evidence and verification. Ethical sourcing, sustainability credentials and modern slavery prevention are fully integrated into our core contract management framework platform (Trade Interchange).

This process means that new suppliers<sup>2</sup> cannot be introduced without Whitbread understanding their approach and commitment to responsible sourcing. The platform is continually monitored by our Procurement and Sustainability teams.

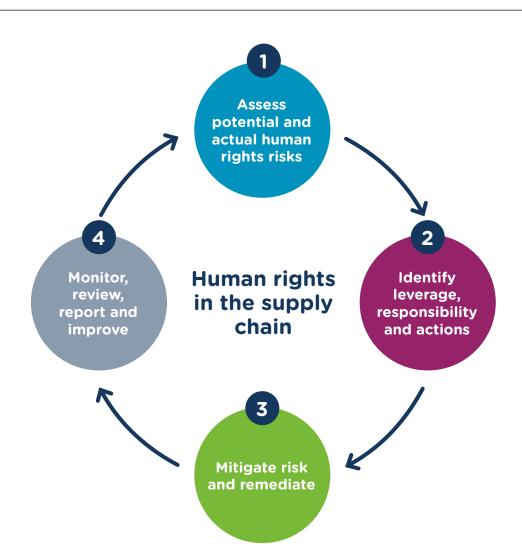
# **Due diligence**

### Figure 1:

'Human rights in the supply chain' due diligence process

### Overview of process

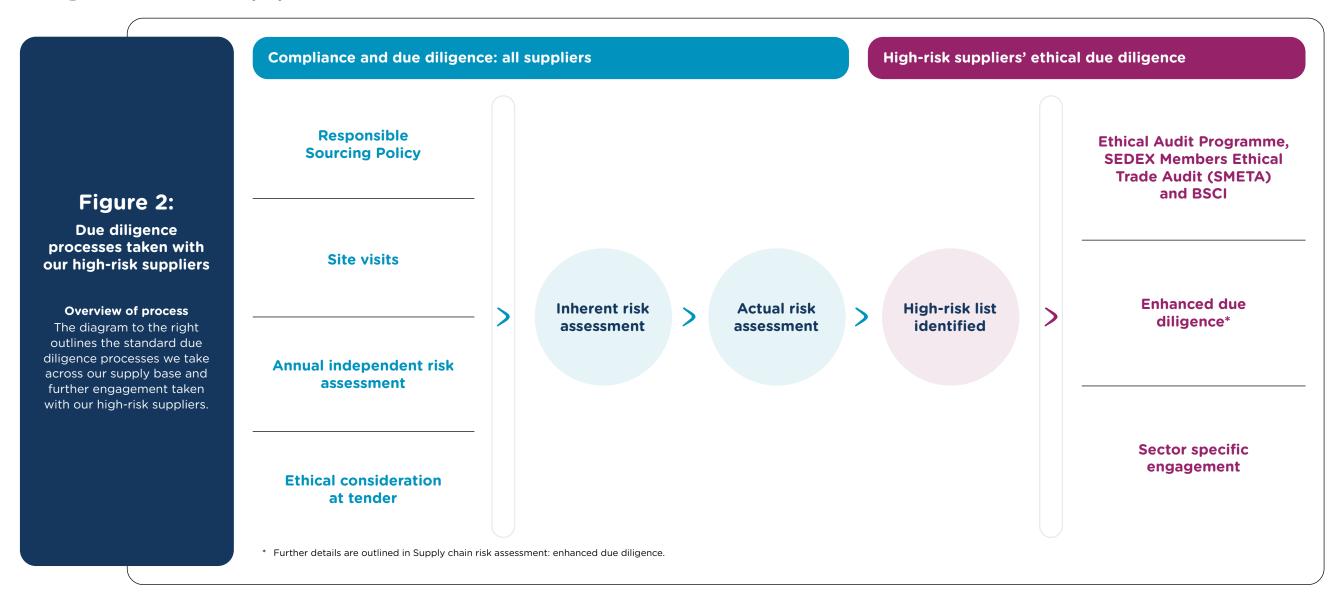
Since the beginning of our Responsible Sourcing programme, we have conducted due diligence processes across every tier 1<sup>3</sup> supplier to:



This is a continual cycle through which we work with our suppliers. Within these categories, we can then identify any risk areas that require further engagement or remediation.

The diagram overleaf outlines the standard due diligence processes we take across our supply base and further engagement taken with our high-risk suppliers.

# **High-risk suppliers**



### **SUPPLY CHAIN CONTINUED**

# Risk assessment

Our risk assessment process consists of two key stages: inherent risk assessment and actual risk assessment. The goal is to identify high-risk sectors and geographies within our supply chain and evaluate their potential material impact on our business.

We integrate due diligence findings from the Supplier Ethical Data Exchange (SEDEX) platform, reviewing corrective action plans from supplier audits. When Whitbread identifies high-risk areas, we mandate ethical audits and work closely with suppliers to manage and address any issues.

The key sectors identified in our business with high inherent ethical risk are:



### **Services**

Housekeeping and contract cleaning

Construction

**Laundry services** 

Logistics and waste management



# Food and beverage

Meat and poultry suppliers

**Food manufacturing** 



### Non-food

Case goods suppliers

**Manufactured furniture** 

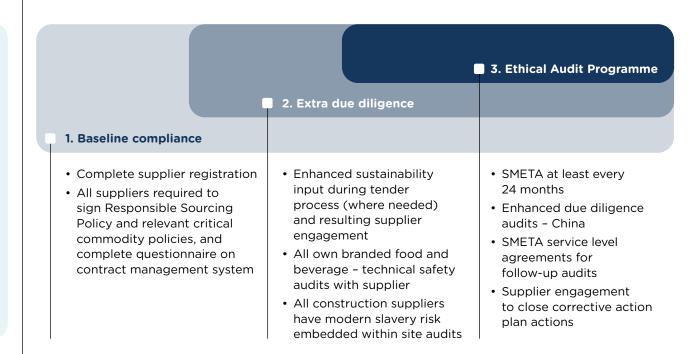
**Consumable items** 

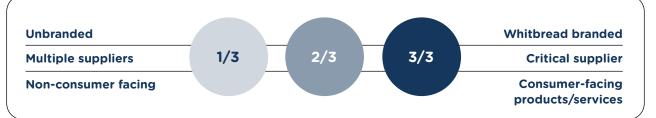
Production of cotton-based fibres

From this inherent list, we assign each supplier with an 'actual risk' rating according to our existing knowledge of its business and level of risk management, as well as our relationship, leverage and partnership with each supplier. Once the inherent risk assessment is completed, we conduct an actual risk assessment for suppliers with a procurement spend over £50,000.

Our risk assessment process is embedded as a standard, ongoing, internal practice for any supply chain change or addition that falls in an inherent risk area. The number of high-risk suppliers is dynamic and may change throughout the year as new high-risk suppliers are added, and any suppliers that may have a change in circumstance or loss of contract are removed.

The below process highlights our ongoing risk assessment process for new suppliers, commodities or services and the actions associated with the risk given.





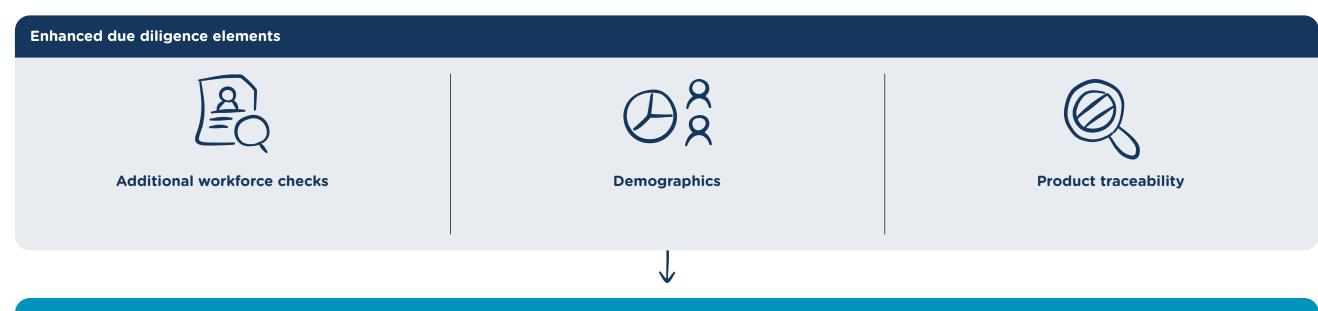
### **SUPPLY CHAIN CONTINUED**

### Risk assessment continued

### Supply chain risk assessment - international sourcing, beyond tier 1

We work closely with our International Sourcing team in China, ensuring every factory has an ethical audit every 24 months, and we work with a local consultancy to ensure that all factories have desk-based research conducted to assess risk in addition to the provision of ethical audits.

If after desk-based research there is additional risk highlighted, then Whitbread may deploy enhanced audits which could comprise the following:



### **Key components**



Bespoke checks relating to worker conditions, contracts and factory conditions



**Country specific** demographic record



Confirmation of product processing on site, raw material checks on site, batch reference numbers check

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#### **SUPPLY CHAIN CONTINUED**

# **Ethics**

### **Ethical Audit Programme: overview**

Working with an independent, third-party auditor Intertek, we conduct SMETA audits for suppliers that we recognise as high risk. These audits assess compliance against our Responsible Sourcing Policy using the SMETA guidelines for best practice.

We appreciate that meaningful change needs collective effort and consistent activity. Therefore, after audits are conducted, we work closely with our suppliers to address and help remediate any issues that are uncovered. We welcome the efforts of the suppliers that have been actively engaged this year in our audit programme. However, we do state in our Responsible Sourcing Policy that we reserve the right to cease trading with suppliers that demonstrate a persistent disregard for our standards.

### **Ethical Audit Programme: update**

This year we have continued to work with our suppliers who conduct audits, and work on corrective action plans, highlighted by the SMETA audit process.

The graph on the right shows the non-compliance identified through audits, which have been closed, across all suppliers linked to us on the SEDEX platform.

This year we have continued to work with our suppliers to conduct audits, and work on corrective action plans, highlighted by the SMETA audit process.

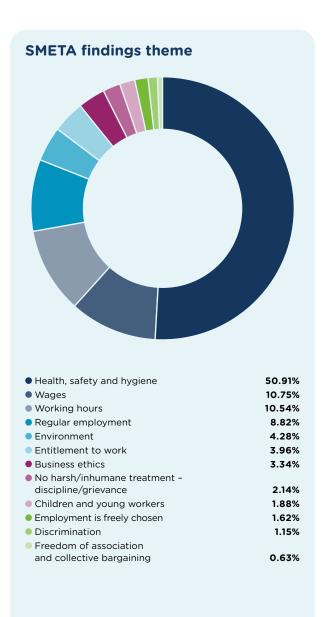
# **Ethical Audit Programme:** international sourcing

We recognise the inherent risks associated with ethical trade that sourcing in China can bring, and we are pleased that, through our International Sourcing team, we are able to work directly with these factories. This allows us greater leverage and control to influence positive change and ensure human rights are respected.

### This year we:

- completed risk assessments for all newly proposed tier 1 or tier 2 sites as part of our enhanced due diligence process; and
- completed three enhanced ethical audits.

The ongoing collaboration with the International Sourcing team and our suppliers helps us to strengthen our due diligence process and procedures.



"Engaging in the Responsible Sourcing programme has been critical to our International Sourcing function. Through training and a clear process in engaging with suppliers, we recognise we have an opportunity to influence positive mitigation for human rights and modern slavery risk at supplier sites. This vear we have focused efforts on developing our enhanced due diligence process and embedding this process into business as usual for our International Sourcing team. Open, transparent and honest relationships with suppliers are the key to ensuring we uphold our responsibility to respect the human rights of workers across our supply chain and I look forward to strengthening our work as we move into the next year."

#### **Ben Fricke**

Procurement and Supply Chain Director

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#### **SUPPLY CHAIN CONTINUED**

### **Ethics** continued

# Grievance mechanism: supply chain - whistleblowing

This year, we have maintained the use of our whistleblowing hotline, which is available to both our team members and those across our supply chain.

### Incorporating modern slavery risk into commercial risk

Our ethical risk assessment process has been embedded into wider risk reviews in the Procurement and Supply Chain function. The ethical high-risk list forms part of a holistic risk assessment of suppliers that also includes any other business risks that could exacerbate one another.

In addition to audits, we recognise that site visits by our Procurement Managers are also opportunities for working conditions and workers' rights to be assessed. This integrated approach to continual monitoring of risk is an aspect that the Force for Good team encourages and continues to build into everyday practices.

To ensure teams are equipped with the right knowledge, this year we will conduct further modern slavery training with our Procurement and Supply Chain teams.

### **Supplier Ethical Data Exchange (SEDEX)**

We are members of SEDEX, giving us improved visibility of the supply chain, including beyond our directly contracted suppliers. It also provides us with better information on the employment processes and practices at manufacturing sites. Some suppliers conduct their own SMETA audits on an 18 to 24-month cycle. On a monthly basis, the Responsible Sourcing and Sustainability Manager monitors the SEDEX platform to ensure that these suppliers are, where applicable, closing down corrective actions in a timely manner. Procurement Managers can then escalate this insight to suppliers to ensure they are maintaining expected standards.

Understanding modern slavery and human rights in the context of supply chains



The specific forms of modern slavery that could be present on site



How to spot the signs of modern slavery



How to report concerns safely and effectively



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### **SUPPLY CHAIN CONTINUED**

### **Ethics** continued



### **Ethical Audit Programme: 2025**

Looking forward, we will continue to:

- complete our inherent and actual risk assessment across all our key UK and German suppliers, and develop our supplier audit plans in line with this; and
- conduct enhanced due diligence with our international sourcing office where necessary.

### **International business: Germany**

We currently have 62 operational hotels in Germany and one in Austria, and a strong growth pipeline as detailed in our latest Annual Report. From 1 January 2024 Whitbread PLC has been required to operate under the due diligence requirements of the German Due Diligence in the Supply Chain Act (LkSG). Whitbread has:

 established a whistleblowing mechanism facility, available to all our team members, suppliers and and supplier stakeholders - more detail can be found in the team member policies section.

In FY 2025/26, we will continue to implement the Whitbread Human Rights Due Diligence Programme and ensure any changes in applicable corporate social responsibility legislation, including the German Due Diligence in the Supply Chain Act (LkSG), are informing our programme.

# International business: Middle East joint venture

Whitbread also participates as a minority shareholder in a joint venture with Emirates, which operates 11 Premier Inn branded hotels in the Middle East. The joint venture follows the local labour laws relevant to the jurisdictions of the hotels. As part of ongoing risk management, we continue to review relevant policies and procedures in place with respect to modern slavery. We undertook a human rights risk review, which identified the most salient human rights risks across our organisation, with a specific focus on the joint venture in the Middle East.

The review has led to the implementation of a Human Resource System (HRS) aimed at enhancing the transparency of our backend HR processes, particularly concerning the onboarding and departure procedures of our employees. As part of our commitment to ethical practices, a comprehensive Code of Conduct has been introduced across our entire business. This Code ensures compliance with migrant worker rights in the Middle East.

The Code of Conduct is published on the Middle East Company website to strengthen our commitment to transparency and promote awareness and adherence to the principles of ethical employment practices.

Premier Inn remains dedicated to the eradication of modern slavery and will continue to assess and enhance its practices to ensure a fair and responsible working environment for all involved in its operations.



### **Guests**

### **Policy**

We take the potential issue of child or adult exploitation very seriously. We recognise that there is a risk in all hospitality companies that hotels might be used for the sexual exploitation of adults or children, or the harbouring/movement of adults and children for the use of forced labour.

Whilst we recognise that this is a risk which we cannot always directly control, there are actions we can take to make sure that our own team members are properly trained to spot the signs of exploitation and empowered to act on any suspicions quickly and effectively.

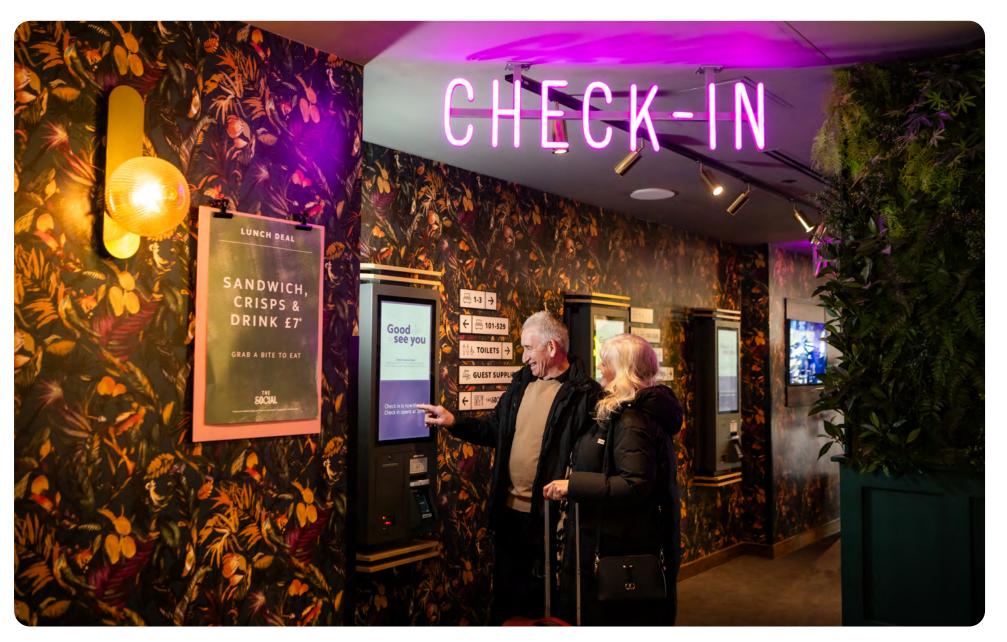
As such, we have our own dedicated, bespoke e-learning training course covering Child Sexual Exploitation (CSE) which all team members can complete. This module illustrates the bespoke nature of our training for team members on modern slavery and how spotting the signs adapts to specific forms of exploitation, better protecting our colleagues, guests and local communities.

We are part of a small working party of large hospitality companies that work closely with the National Police Lead of CSE as part of Operation Make Safe, to improve awareness of CSE in hotels.

### **Due diligence**

As at the end of December 2024, 8,531 team members had completed our CSE training module.

No cases of modern slavery have been identified for guests.



# Partnerships and collaboration

We recognise that managing the risk of modern slavery is complex and we value the positive impact that collaboration and partnerships can have in tackling these issues, both across our supply chain and with other stakeholder groups.

We have continued to strive with our partnership with Intertek to continue to support our Ethical Audit Programme with UK and Ireland and our international supply chain. We look forward to continuing these relationships as we delve deeper into our supply chains in the coming year.

Working collaboratively with our supplier network allows us to develop a deep understanding of how compliance with our policy works in practice.

We are continually improving and developing our strategy as we learn from our compliance and remediation actions. We will continue to build on our strong supplier relationships to drive meaningful change.

## **Partner testimonials**



"Whitbread continues to be a leader in the hospitality space by embedding SEDEX into its responsible sourcing practices. We are proud to continue our partnership together and demonstrate the benefits of SEDEX membership for assessing risk and improving ethical practices throughout the global supply chain."

SEDEX



"We are delighted to be working with Whitbread as the auditing partner for SMETA audits in the UK, Ireland and internationally. We continue to adapt our approach to support the diverse supply chain of Whitbread. We support a whistleblowing hotline as part of our ethical audit interviews and this year have been working with Whitbread to develop their enhanced due diligence approach to work with a broader range of ethical standards (SMETA and BSCI). We continue to partner with Whitbread to evolve this programme as we look to address new frontiers in the changing face of modern slavery and ethical operations in global supply chains."

Intertek



"Whitbread has engaged Bernard Sims Associates (BSA) to monitor its construction sites as far as potential issues with the Modern Slavery Act are concerned. This pro-active approach by Whitbread demonstrates its commitment to the drive throughout the UK to ensure the safety of those engaged in the construction sector. BSA reports on anything that it discovers during its inspections to Whitbread who then is able to further investigate and take appropriate action. We are pleased to work with Whitbread in this important area of compliance."

**Bernie Sims** 







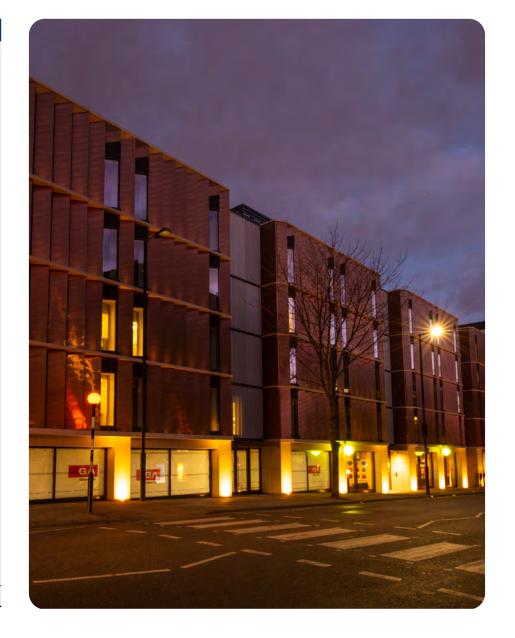
# Performance indicators for supply chain

You can find our updates for 2024/25 on our key supply chain performance indicators here:

| Objectives                        | Metrics   | <b>)</b> Update   | Impact                             |
|-----------------------------------|---|---|------------------------------------|
| Due diligence in our supply chain | Annual assessment of risk   | 100% of our suppliers are risk assessed<br>on an annual basis for inherent human rights risk  | See Ethical Audit Programme update |
| Pieces of intelligence shared     | Information sharing (received or reported)  Corrective action plans shared and agreed with suppliers  | All our tier 1 suppliers are required to sign our Responsible Sourcing Policy  Where suppliers are SEDEX members, all CAPs are published in SEDEX | See Ethical Audit Programme update |
| Partnerships<br>and collaboration | Improvement programmes with suppliers (where appropriate)  Collaborative activities with NGOs and other organisations  Participation in industry events | Ongoing collaboration with Intertek, SEDEX and Bernie Sims  N/A   | See partner testimonials N/A       |
| Increasing awareness              | Events and activities within our business   | Modern slavery training   | See modern slavery training        |

# **Direct supplier location**

| Country              | Count of supplier |
|----------------------|-------------------|
| United Kingdom       | 1,371             |
| Germany              | 1,108             |
| Ireland              | 82                |
| United States        | 23                |
| Jersey               | 17                |
| Guernsey             | 13                |
| Netherlands          | 9                 |
| China                | 7                 |
| Spain                | 5                 |
| Austria              | 4                 |
| Hong Kong            | 4                 |
| Switzerland          | 3                 |
| Belgium              | 3                 |
| Isle of Man          | 3                 |
| Sweden               | 2                 |
| Canada               | 2                 |
| United Arab Emirates | 2                 |
| Australia            | 2                 |
| France               | 2                 |
| Denmark              | 1                 |
| Norway               | 1                 |
| Taiwan               | 1                 |
| Malaysia             | 1                 |
| Luxembourg           | 1                 |
| Indonesia            | 1                 |
| Singapore            | 1                 |
| Japan                | 1                 |
| Grand total          | 2,670             |



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