

Modern Slavery Statement 2025/26

WHITBREAD PLC



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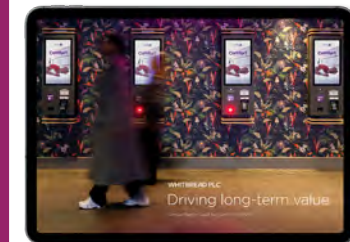
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This statement provides an update on our work over the past 12 months to mitigate the risks of modern slavery across our operations and supply chain, pursuant to the UK Modern Slavery Act 2015 (including the Transparency in Supply Chains Statutory Guidance) and the Act on Corporate Due Diligence Obligations in Supply Chains (LkSG). It was developed in consultation with internal functions including Responsible Sourcing, Sustainability, Procurement, People, Operations, Group Risk and across the UK and Germany. Our Human Rights Strategy statement, pursuant to the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG), is published separately on our website.

Whitbread Reporting suite

Find our report and policies for the reporting suite online.



Whitbread Modern Slavery Statement 2025/26

Introduction from our CEO

“We are committed to playing our part in eradicating modern slavery by assessing and addressing risks across our operations and supply chains. We continue to strengthen our processes and training so our colleagues are equipped to identify and respond to emerging risks. We recognise that this is an ongoing journey and remain focused on continuous improvement and collaboration.”

Dominic Paul
Chief Executive



At Whitbread, we are committed to respecting human rights and preventing modern slavery across our business and supply chain. We believe that everyone who works with or for us deserves to be treated fairly, with dignity and respect, and we remain resolute in our commitment to providing a safe, ethical and healthy environment for all workers, team members and guests.

Our policies are unequivocal on this. This commitment sits at the heart of our Force for Good sustainability programme, focused on enabling people to live and work well whilst having a positive impact on the world around us. Operating and sourcing responsibly, with integrity, and partnering with suppliers who share our standards, is fundamental to how we do business.

Where human rights risks or impacts are identified in our supply chain, we will work collaboratively with our suppliers and stakeholders to take preventive and remedial action, supporting continuous improvement. Our approach is clear: we engage constructively to drive meaningful change, but where non-compliance persists, we will take appropriate and responsible action.

I am pleased to report that we have further improved our governance and controls this year, in line with international standards. We have reviewed the group-wide Human Rights Strategy aimed at mitigating human rights risks across our operations and supply chain and have established a new cross-functional Human Rights Working Group to better embed responsible business conduct across our business and supply chains. We have enhanced our risk assessment processes, working in partnership with independent human rights experts, to deepen our understanding of human rights risks. By continuing to engage directly with suppliers and listen to workers, we are designing targeted action plans to manage Procurement categories which carry inherently higher potential risk, gaining a clearer understanding of actual risk on the ground. Our approach prioritises prevention, collaboration and continuous improvement.



We recognise that modern slavery is a complex and evolving challenge, and we are committed to continuous improvement to strengthen our due diligence and meet our responsibility to respect human rights and safeguard the dignity of all those connected to our business.

Looking ahead to 2026/27 our priorities include developing and implementing plans to further address the highest potential risks of human rights and labour exploitation in our business, engaging internally and with suppliers and partners.

This statement covers the period 28 February 2025 to 26 February 2026 and was approved by our Executive Committee and by the Whitbread PLC Board on 18 June 2026.

Dominic Paul
Chief Executive



Business and supply chain

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.

Inside this section

- 3 Scope, Definitions & Organisational Structure
- 5 Our Procurement Function and Supplier Network
- 7 Governance and accountability for modern slavery
- 9 Our policies

Scope and definitions for the purpose of this statement

- **Whitbread/Business:** Whitbread plc and its subsidiaries in the UK and Crown Dependencies, Ireland, Austria and Germany¹.
- **Policies and procedures** – all policies and procedures relate to the Whitbread UK, Ireland and Germany operations unless otherwise stated.
- **Tier 1 suppliers** – suppliers with which Whitbread has a direct contractual relationship.
- **Tier 2 suppliers** – suppliers to our Tier 1 suppliers.
- **Inherent risk** – potential human rights risks based on our suppliers’ sector and country-level human rights and environmental exposure. This approach aligns with the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG) definition of ‘abstract risk assessment’.
- **Actual risk** – an assessment of the specific human rights risks of our suppliers, based on supplier specific information such as workforce characteristic and the adequacy of management systems, considering severity and likelihood of potential impacts. This is in line with the German LkSG’s definition of ‘concrete risk assessment’.



Organisational structure

Whitbread PLC comprises Whitbread Group plc, the UK’s largest hospitality company and owner of Premier Inn, the leading hotel chain in the midscale and economy sector, with the largest network in the UK. It also includes Premier Inn Holding GmbH, the holding company of the Premier Inn hotel operations in Germany.

We have a unique vertically integrated model, which combines the ownership of property, hotel operations and brand.

Whitbread also participates as a minority shareholder in a joint venture with the Emirates, which operates 11 Premier Inn branded hotels in the Middle East, including Dubai, Abu Dhabi and Qatar. Details of the due diligence processes implemented in the Joint Venture can be found on page 19. All other disclosures included in the statement relate solely to Whitbread plc excluding the Joint Venture.



- 1 A list of our subsidiaries can be found in the Appendix
- 2 Includes workers in higher risk categories in scope of SEDEX including Food, Beverage and Logistics, Laundry and Goods Not For Resale.

Our company

£2.9bn

sales/turnover

c.850

hotels in the UK and Ireland

65

hotels in Germany (including 1 in Austria)

11

hotels in the Middle East, minority shareholder in a JV with Emirates

100,000

rooms

42

construction projects under way

55

construction projects in development

c.31,500

Team members working across the Whitbread brands, directly employed by Whitbread

Our supply chains

~2,500

Direct suppliers (Tier 1)

94%

of spend with suppliers based in UK & Germany

53%

of suppliers representing 87% of spend are based in the UK

39%

of suppliers representing 7% of spend are based in Germany

47%

of suppliers we have a commercial relationship with us for more than 5 years

> 40,000

supply chain workers in higher risk categories of spend², 91% are permanent workers and 44% are classified as migrant workers

Our Procurement Function and Supplier Network

The Group Procurement & Supply Chain function is firmly embedded within our senior leadership structure.

In the UK, the team is led by the Group Procurement & Supply Chain Director, who reports into the Managing Director, Property and International – a member of the Group Executive Committee and direct report to the Chief Executive Officer.

In Germany, the Head of Procurement reports to the Chief Financial Officer, Germany, and ultimately to the Chief Executive Officer, Germany.

Across both markets, the UK and Germany Procurement teams work in close partnership. To support alignment and consistency, the Head of Procurement, Germany, also maintains a dotted-line relationship with the Group Procurement & Supply Chain Director.

This year we streamlined our procurement of food and some consumables by partnering with wholesale and logistics suppliers to serve our UK and ROI operations. This provided an opportunity to embed responsible sourcing and modern slavery requirements into the tender process and contractual obligations. By consolidating spend and working closely with Tier 1 suppliers, we have increased leverage with Tier 2 suppliers, enabling better risk management, transparency and ethical compliance.

We are incredibly proud of our long-standing relationships with suppliers: we have maintained a commercial relationship for more than 5 years with 47% of our suppliers.

Our Tier 1 suppliers include:

Product suppliers

Businesses and supplying sites that carry out the last step of production (manufacturing or processing) for a product procured by Whitbread, such as beds and furniture or own branded food suppliers

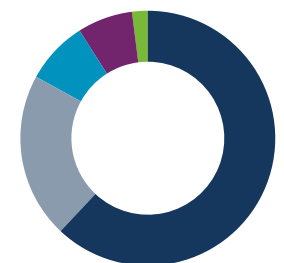
Service providers

Businesses that provide services or contract labour to Whitbread, which includes corporate services such as technology and finance, property services including construction, facilities management such as laundry, cleaning & housekeeping, and temporary and contract labour, workers that are hired by third parties such as labour providers to complete a specific project or service

Wholesale and Logistics Suppliers

Businesses that carry out logistics services and have warehouses which are used to hold or cross-dock Whitbread products sourced from their direct Product Suppliers (Whitbread Tier 2 suppliers)

Procurement category & percentage spend



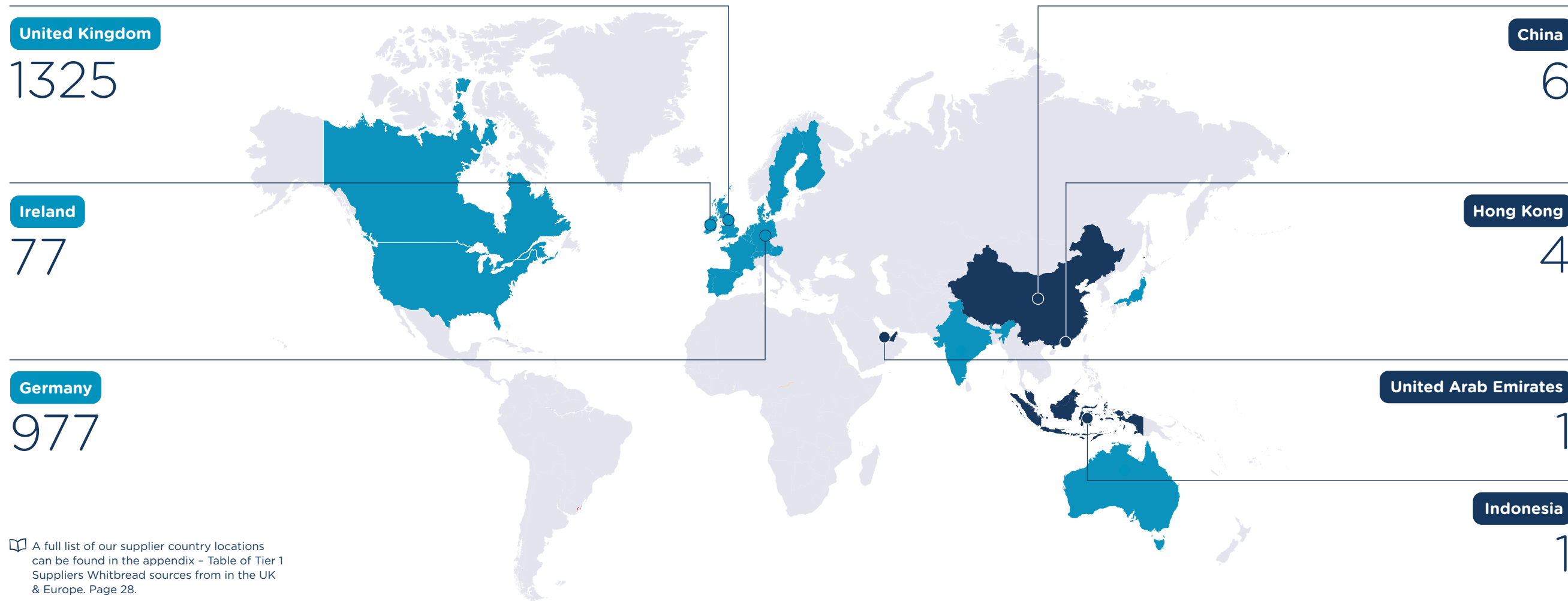
Property	62%
Corporate Services	21%
Food	8%
Information Technology	7%
Drinks	2%



Our Procurement Function and Supplier Network continued

Number of Tier 1 suppliers, based on country of registration and coded for country risk

Key: Low and medium risk High risk



📖 A full list of our supplier country locations can be found in the appendix - Table of Tier 1 Suppliers Whitbread sources from in the UK & Europe. Page 28.

Governance and accountability for modern slavery

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

Human Rights risks are included on the Sustainability Risk register, which is managed by the Group Risk team. The risk register is reviewed regularly during meetings of the Risk Working Group led by the Internal Audit and Risk Director. Any significant risks are brought in front of the Board twice a year. The Sustainability Steering Committee has oversight of sustainability issues and, this year, provided input on the updated Human Rights strategy.



Strategic Approach & Supply Chains

Responsibility for the Human Rights strategy (including approach to managing modern slavery risks) that is implemented in our supply chains sits with the Sustainability team, which reports into the Group General Counsel. Accountability for policy implementation, supplier engagement and embedding responsible sourcing sits with the Responsible Sourcing Manager in the UK and the ESG Manager in Germany alongside Procurement, Operations and the People team. Commercial decision making and action in case of non-compliance rests with the Procurement team, reporting to the Managing Director, Property and International. Both the Group General Counsel and the Managing Director, Property and International are members of the Executive Committee and provide updates to the Board.

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

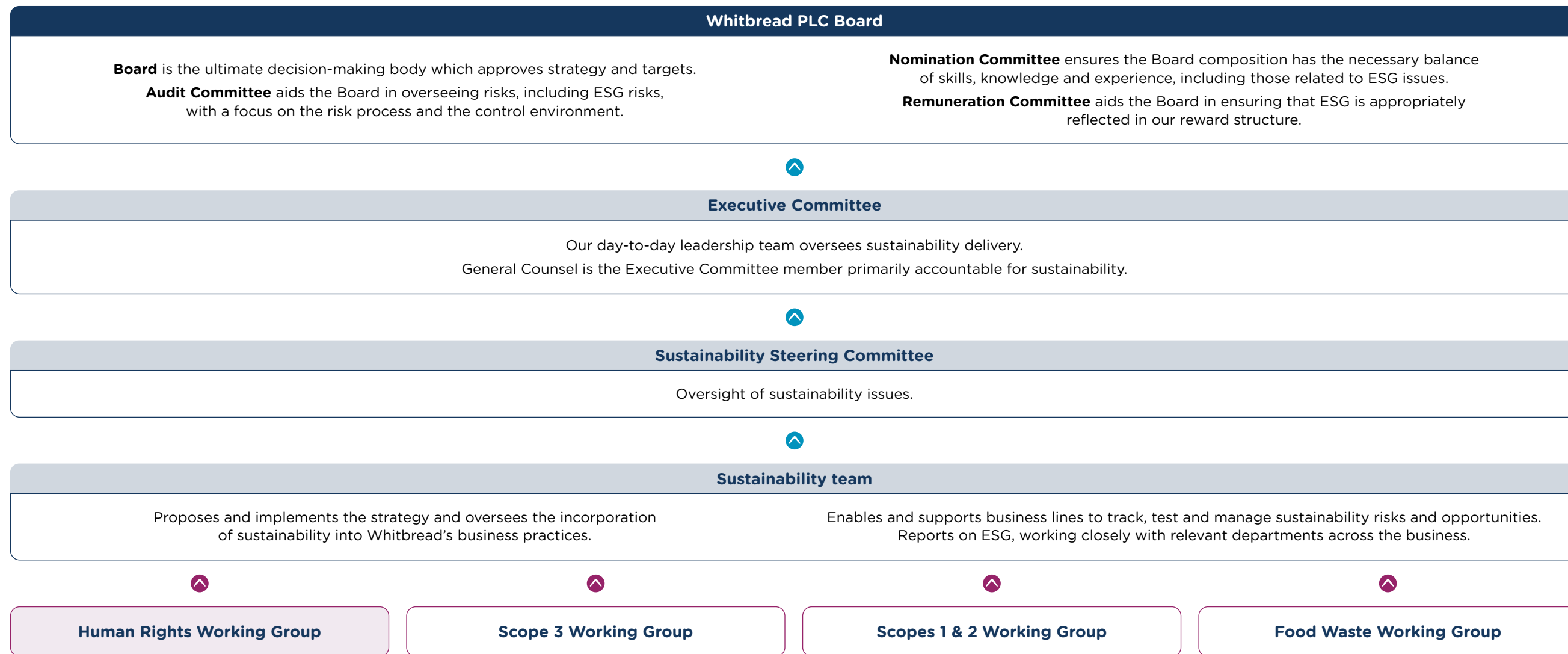
Guests

The Managing Director of UK Hotels & Restaurants and the CEO Germany have overarching accountability for guests' Health & Safety. This includes the risk of human trafficking and child sexual exploitation of guests which is set out in our Operations risk register. Both are supported by the Director of Safety and Security (UK) and Head of Health, Safety and Repairs & Maintenance (Germany) in policy development. Day-to-day management of safety and security is the responsibility of the respective Operational lines, including Hotel Managers & Restaurant General Managers and their teams. Support is provided by Multi-site Hotel Managers, Regional Operational Managers, Operational Directors and Managing Directors of Restaurants. Multi-site Hotel Managers, Regional Operations Managers, and Operations Directors.

Human Rights Working Group

This year, we established a Human Rights Working Group to provide cross-functional oversight and support the ongoing implementation of our Human Rights strategy and supply chain due diligence processes, and have provided training on human rights best practice to the members of the Group.

Governance and accountability for modern slavery continued



Non-exhaustive list of cross-functional working groups that provide oversight and drive implementation of sustainability initiatives.

Our policies

Whitbread is committed to protecting people across all parts of our value chain. Our Human Rights approach and policies are grounded in internationally recognised frameworks, including the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises (OECD Guidelines). These standards provide the foundation for the expectations we set for our team members and suppliers to guide continuous improvement across operations.

Policy	Description	Relevance to modern slavery	Communication and enforcement
Code of Conduct	Sets expectations for all Whitbread team members, including our commitment to human rights, in line with the UNGPs, and responsibility to uphold ethical standards in our supply chain.	Includes our commitment to respect human rights in our operations and supply chain, in line with the UNGPs. Provides details on how to report misconduct including through our whistleblowing mechanism.	All team members are required to read the Code and this forms part of induction training. Team members complete online training and this is refreshed every year.
Human Rights Policy	Defines the most relevant human rights issues for our business and supply chain, outlining commitments and accountability, in line with the UNGPs and OECD Guidelines.	Sets out expectations to respect human rights and ILO core conventions including prohibition of forced, bonded, indentured or involuntary prison labour, and expectations regarding child labour.	The Human Rights Policy is published on our website and referred to in our Code of Conduct. We encourage team members to read the Policy, understand the role they play and report any abuses of the policy to their line manager or our whistleblowing mechanism, Safe Call.
Human Rights Strategy Statement	Outlines our commitment to detecting and addressing human rights and environmental risks within our supply chain and business operations, in line with the UNGPs and OECD Guidelines and pursuant to the German Due Diligence in the Supply Chain Act (LkSG).	Sets out our commitment and approach to detecting and addressing human rights and environmental risks within our supply chain and business operations.	In accordance with LkSG requirements, this is published on our website. By doing so, we provide our stakeholders with transparency regarding our standards and how they are implemented in practice.

Our policies continued

Policy	Description	Relevance to modern slavery	Communication and enforcement
Speaking Out Policy	Outlines the process we follow when our team members or third parties raise a concern about wrongdoing or breach of the Code of Conduct.	Ensures that concerns raised, including of serious health and safety concerns or criminal activity such as human trafficking, are dealt with without fear of reprisal, can be raised anonymously and will be investigated in line with a robust and transparent procedure.	Whitbread provides clear guidance on raising concerns through its Speaking Out Policy and on the business' intranet. The process is implemented through access to the independent Safecall whistleblowing service and independent investigations.
Right to Work Policy	Sets out that Whitbread will not employ anyone who cannot demonstrate their legal right to work.	We recognise that workers that lack the legal right to work, are more vulnerable to modern slavery and human trafficking.	Performance of Right to Work checks is formally reported as part of our internal operational performance management and auditing processes.
Responsible Sourcing Policy	Specifies standards and expectations for suppliers, contractors, and business partners, ensuring goods and services are produced and delivered in ways that respect human rights, protect the environment, and uphold ethical and legal standards.	<p>Sets out our responsibility to respect human rights and prohibits all forms of forced, bonded, indentured, trafficked, or involuntary prison labour. It includes reference to core ILO forced labour standards.</p> <p>It specifies that workers must not be required to pay fees, either directly or indirectly, to obtain work. It also sets out our commitment to work to fair, transparent and mutually agreed terms and conditions and make payments for services provided on time and in full - which is important to enable our suppliers to respect their workers' labour rights and prevent modern slavery.</p>	<p>The Policy is shared with suppliers who complete a pre-qualification questionnaire managed through the Whitbread Procurement system to assess their alignment with our Responsible Sourcing Policy at the point of onboarding. We seek formal acceptance of the principles included in the Policy at the point of onboarding.</p> <p>High risk suppliers are expected to share details of the policy with their workers.</p> <p>We monitor and work together with suppliers to review their level of compliance to this Policy and to implement corrective actions towards improvement.</p>

Looking ahead, our priorities include reviewing our policies and codes of conduct to formalise requirements for high risk categories.



Risk Assessment and Due Diligence



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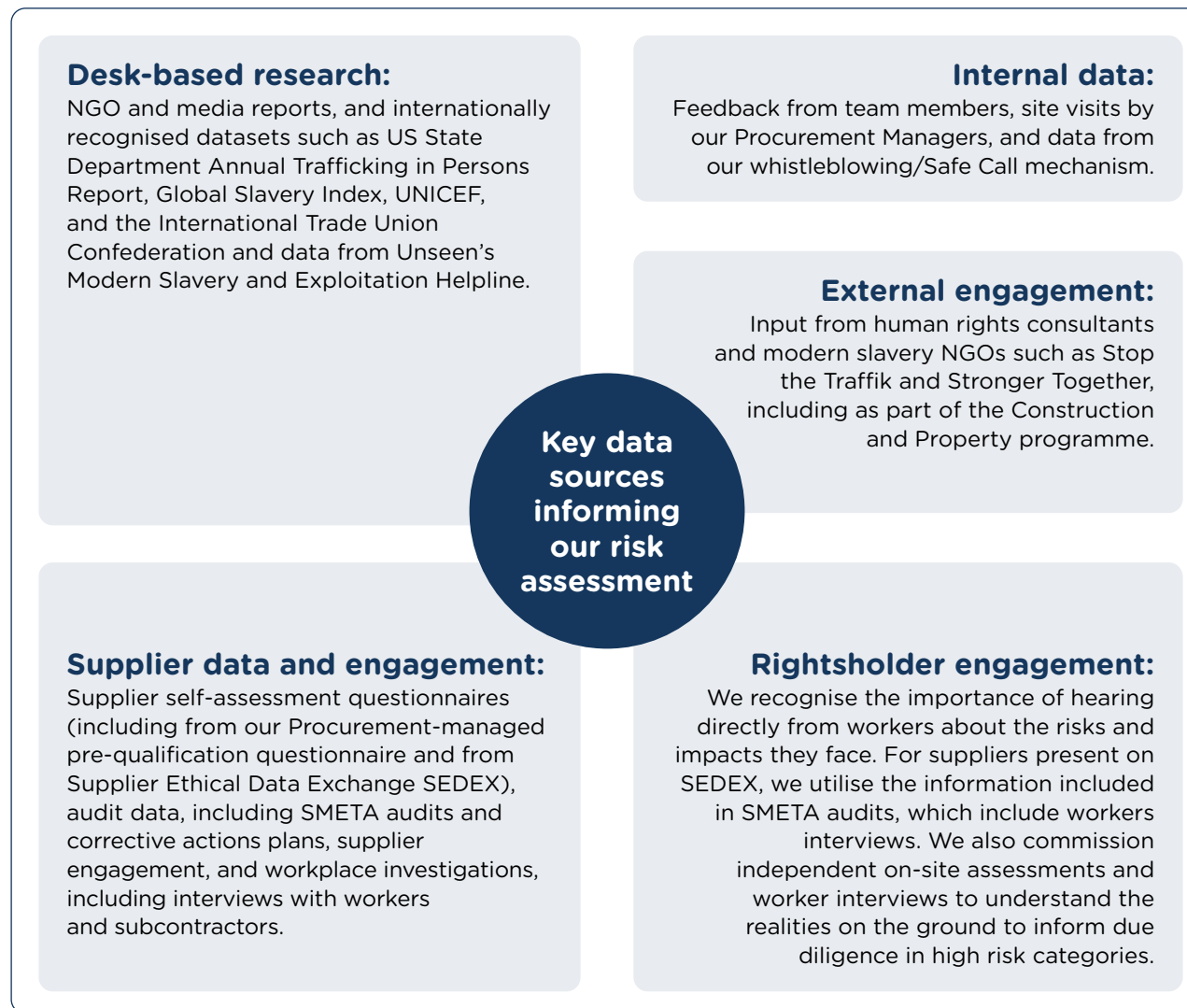
Our supply chains

Our Human Rights strategy is designed to identify and manage human rights concerns in the highest risk sectors across our own operations and supply chains

It is underpinned by an assessment of our salient human rights risks, a comprehensive supply chain risk assessment, and an evaluation of current strengths and opportunities for improvement. Areas of the business where we have identified risks of modern slavery and labour exploitation include workers in the supply chain, own operations, and human trafficking and sexual exploitation of guests.

Supply chain due diligence is a fundamental part of our commitment to being a responsible and sustainable business. Our approach to supply chain due diligence is grounded in internationally recognised frameworks including with the UNGPs and OECD Guidelines.

We have a multi-dimensional approach to assessing human rights and modern slavery risks in our supply chain. This is based on assessing inherent³ risks associated with the sectors and countries our suppliers operate in, and on an evaluation of a supplier's actual risk profile to assess how well they are managing the risks that they are exposed to.



Inherent supplier risk assessment

In FY26, we evolved our inherent¹ supplier risk assessment to enable more granular identification and prioritisation of high risk spend categories. The assessment covered all Tier 1 suppliers that our business made payments to. It allowed us to identify suppliers operating in countries and sectors considered high risk from an environmental and human rights point of view, including modern slavery. Overall, 1,076 suppliers were identified as high inherent (abstract) risk for environmental and/or human rights concerns, representing approximately 41% of suppliers and 38.5% of spend. High risk categories of spend include services that may rely on lower skilled and paid workers, including contract labour and migrant workers and manufactured consumer goods with complex global supply chains.

The categories of spend with the highest inherent human rights risk include:

Services:

- **Construction:** The building and refurbishment of our hotels and restaurants. Forced labour and modern slavery is a systemic issue in construction sites especially given complex labour supply chains and informal recruitment practices. No cases have been identified in any construction projects managed on our behalf; we take into consideration that there are documented cases in both the wider UK and German markets for the construction sector.

¹ "abstract" risk assessment for LkSG

Our supply chains continued

Inherent supplier risk assessment continued

- **Housekeeping and contract cleaning:** On-site facilities management and cleaning services in our hotels and restaurants. The nature of the work is highly labour-intensive and often involves low-wage, temporary, or migrant workers who are more vulnerable to labour exploitation. In the UK & Ireland, we directly employ housekeepers and use contract cleaning for some restaurants. In Germany, due to the small scale of the business, we use third party labour providers.
- **Laundry services:** Cleaning services which are carried out at third-party supplier facilities, concentrated in the UK and Germany. Workers may be exposed to health and safety risks as well as low pay, excessive working hours and discrimination.
- **Temporary or contracted labour:** In the UK, we use one labour provider to recruit non-payroll staff. In general, temporary or contracted workers can face heightened vulnerability to exploitation, including unfair recruitment practices, excessive deductions, and limited control over their employment conditions.

Manufacturing

- **Food and logistics:** The manufacture and distribution of food products for our hotels and restaurants. There are documented cases of forced labour in global food supply chains that have affected other businesses. Workers in manufacturing can be exposed to risks including health and safety, low pay, excessive working hours and poor working and living conditions. Migrant workers are often more at risk.

- **Goods Not For Resale:** The manufacture of goods purchased to operate our hotels which are not directly sold to guests, including products such as beds, furniture, fixtures, fittings and equipment. The manufacturing sector holds high inherent forced labour risks, in particular in relation to migrant workers.

This inherent risk assessment will be repeated annually, in line with the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG) with input from the Responsible Sourcing team in the UK and Germany and external human rights experts.

We monitor countries with sanctions or heightened human rights risks and expect suppliers to be transparent and demonstrate robust due diligence when operating there.

Actual risk assessment:

We employ several methods to understand the specific risk profile of suppliers and to prioritise our resources based on severity and likelihood of risk.

- Suppliers are asked to complete a pre-qualification questionnaire managed through the Whitbread Procurement system which combines core and category-specific questions to identify and understand suppliers' risk profiles and alignment with our Responsible Sourcing Policy at the point of onboarding. This includes specific questions related to forced labour and working conditions.

1 These elements collectively aim to satisfy what the LkSG refers to as the "concrete" risk assessment.

2 In the context of LkSG, BAFA stands for the Bundesamt für Wirtschaft und Ausfuhrkontrolle, which translates to the Federal Office for Economic Affairs and Export Control. It is the competent supervisory authority responsible for monitoring compliance, enforcing regulations, and imposing fines.

- For priority suppliers in scope for our SEDEX due diligence we take into consideration the SEDEX self-assessment questionnaire and the SEDEX combined risk score.
- For suppliers identified as potentially facing high 'actual' risk, based on questionnaire responses, we undertake further due diligence. This includes, for example, reviewing severity and likelihood of potential impacts, workforce characteristics (e.g. percentage migrant workers, temporary labour), site level audit findings (SEDEX/BSCI), and the adequacy of management systems to understand the actual risk a supplier may pose¹.

We follow a risk-based approach consistent with BAFA² guidance, focusing enhanced due diligence on suppliers where potential risks are most severe, probable, or where information is insufficient. Our prioritisation of suppliers, and the action that we take, is also influenced by our potential leverage with suppliers, considering factors such as the level and significance of our spend, the duration of our relationship with suppliers and their strategic importance.

Suppliers considered as holding high potential risk are subject to additional category-specific due diligence and controls to understand and prevent human rights and environmental violations. This includes the completion of SEDEX SMETA audits, BSCI Audits and other on-site worker interviews. We use accredited and approved SEDEX auditing bodies as well as auditors specialising in human rights.



Our supply chains continued

Actual risk assessment continued

Priority high risk Procurement categories with increased likelihood of occurrence:

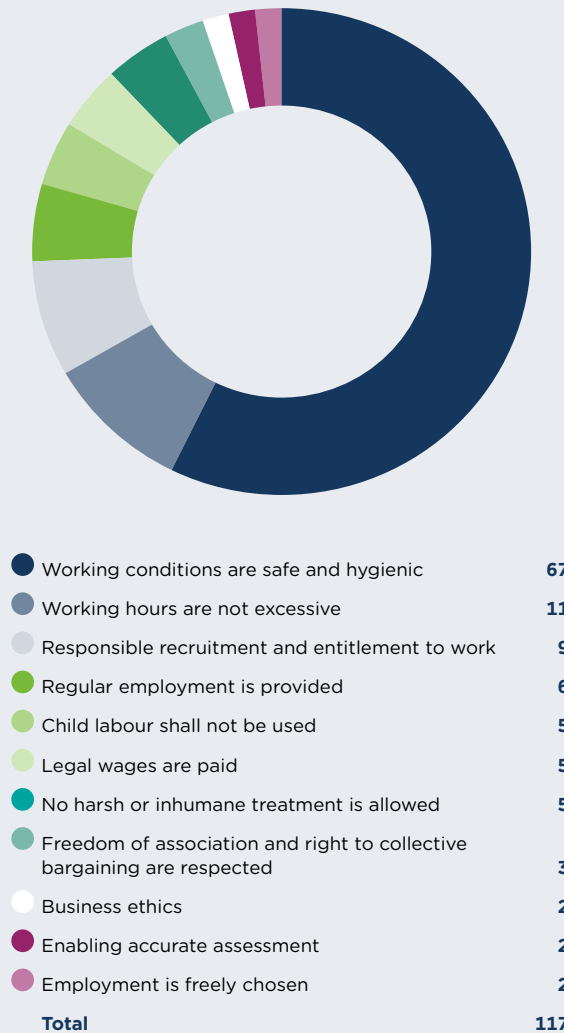
High risk category	Scope	Salient human rights risks & occurrence
Food and Logistics	Tier 1 wholesalers and their direct suppliers (Whitbread Tier 2 suppliers), representing ~250 manufacturing sites Tier 1 suppliers of products where Whitbread has a direct relationship with the manufacturing site, representing 49 sites	Modern slavery & forced labour, discrimination, unsafe working conditions Risks are more likely to occur in Tier 2 manufacturing sites and the upstream manufacturing and raw material stages
GNFR, including Laundry	Suppliers that manufacture goods present in our hotel rooms or carry out laundry services for the linen available to our customers, representing 68 production sites	Modern slavery & forced labour, discrimination, unsafe working conditions, unfair pay, excessive working hours Risks could occur at Tier 1 manufacturing sites, including through the use of labour providers, or in the upstream supply chain
Housekeeping	Outsourced labour providers in Germany	Modern slavery & forced labour, discrimination, fair pay Risks could occur at our operations including through the use of labour providers
Construction	Main contractors	Modern slavery & forced labour, discrimination, unsafe working conditions Risks could occur at our construction sites, including through the use of sub-contractors, labour providers and intermediaries. There are also risks in the raw material and manufacturing supply chains.

Actions taken to prevent, mitigate and remedy modern slavery in our supply chain

We aim to work closely with our suppliers to address and help remediate any issues that are identified. We monitor the SEDEX platform to ensure that these suppliers are, where applicable, closing non-conformances in a timely manner. As set out in our Responsible Sourcing Policy, we reserve the right to cease trading with suppliers that demonstrate a persistent disregard for the standards set out in our policy, or where there is a significant breach. In such an instance, we commit to considering the impact of ceasing trading on suppliers, workers and the communities in which they operate, to mitigate the risk of negative impacts on those most vulnerable.

The graph on the right shows the non-conformances identified through audits, which have been closed, across all suppliers linked to us on the SEDEX platform, covering high risk categories including Food & Logistics and GNFR, including Laundry.

Number of Tier 1 closed SMETA audit non-conformances by topic



Our supply chains continued

Actions taken to prevent, mitigate and remedy modern slavery in our supply chain continued

Key high risk categories with human rights risks and how they are managed:

High risk category	Scope
Food and Logistics	Responsible sourcing and modern slavery requirements are included in the tender process and contractual obligation for our wholesale and logistics suppliers. These mandate that Tier 1 and Tier 2 suppliers are members of SEDEX, including conducting SMETA audits for sites with a SEDEX combined risk score that is high and successfully resolving non-conformances.
GNFR, including Laundry	<p>Due diligence for the suppliers and production sites in scope is currently managed through SEDEX. >90% of priority GNFR production sites (68) have a SEDEX profile and have completed the SEDEX self-assessment questionnaire.</p> <p>Based on the SEDEX risk assessment methodology, most sites (56, 82%) are considered Medium or Low risk. 12 sites (18%) are considered High Risk. This can be due to historical ethical audit non-conformances that have not been closed during the timescale indicated by the auditor and/or due to site management systems that require improvement. We are actively engaging suppliers so they can take the necessary steps to address ethical audit non-conformances and improve management systems. 10 of the suppliers identified as High Risk have had an ethical audit in the past 2 years, with the remainder booking one for the first half of FY27.</p> <p>Out of the 68 priority GNFR production sites, regardless of risk, 56 (82%) have had an ethical audit (SMETA¹ or BSCI²) in the past 2 years. We are actively working with suppliers to address ethical audit non-conformance.</p>

High risk category	Scope
Housekeeping (Germany)	We have strengthened our human rights due diligence by integrating enhanced questions and requirements into our tendering and supplier screening processes for this category. These updates reflect insights gained from our investigation into supplier practices and worker experiences while helping us assess the safeguards suppliers have in place to prevent exploitation, including protections for migrant workers, the prohibition of recruitment fees, and controls to mitigate risks of forced labour. The information suppliers provide informs both our contracting decisions and how we target capacity-building support according to each supplier's current level of maturity.
Construction	<p>Building on our established approach to main contractor selection through a Procurement-based questionnaire and robust contractual requirements, we have sought to gain a deeper understanding of worker experiences across Whitbread construction sites.</p> <p>A pilot is underway with 5 main contractors at five sites across UK, Ireland and Germany representing the different types of construction projects we have under way (new builds, refurbishments and maintenance). The main contractors selected represent ~40% of our spend in this area. The pilot involves carrying out on site audits aimed at assessing the workers' experiences in relation to eligibility to work in the country, compliance with the national minimum wage, fair treatment, safe and hygienic working environments, access to remedy.</p> <p>The insights on suppliers' current practices and workers experience will be used to shape our due diligence and controls for this high risk category.</p>

¹ SMETA – SEDEX Members' Ethical Trade Audit

² BSCI – Business Social Compliance Initiative

Our supply chains continued

Strengthening risk management in the Food and Logistics supply chain

This year we transformed how we source food and key consumables by streamlining our procurement model and partnering with two wholesale and logistics providers for our UK and Republic of Ireland operations.

Responsible sourcing and modern slavery standards were key selection criteria during the tender process, thus strengthening how we identify, manage and mitigate risk across our supply chain.

As part of these new partnerships, non-branded and own-label suppliers brought into the Whitbread supply chain (our Tier 2 suppliers) must now be SEDEX members, complete annual Self-Assessment Questionnaires, resolve any overdue non-conformances, undergo SMETA audits if high-risk and not audited within the last 24 months, and actively support the closure of any non-conformances identified.

To maintain momentum, the Responsible Sourcing Manager met regularly with the wholesalers, ensuring consistent progress and compliance. In turn, the wholesalers expanded their own resources to meet these expectations, working directly with suppliers to improve standards. By using this unified approach we accelerated supplier engagement, resulting in more than 250 manufacturing sites onboarded onto SEDEX, which represents over 95% of the sites engaged through the two wholesalers.

Over 93% of the manufacturing sites engaged reviewed or completed for the first time a Self-Assessment questionnaire, which contributed to establishing the actual risk associated with the sites. At the end of FY26, 6% (15) manufacturing sites were highlighted as actual high risk, with 13 of those having had a SMETA in the past 2 years and the rest having one scheduled for Q1 of FY27. Sites are working to close non-conformances raised in historic audits.

By streamlining our Food and Logistics supply chain, we significantly increased our visibility, strengthened our due diligence processes and enhanced our ability to uphold ethical standards across this high-risk category.



Our supply chains continued

Sponsoring the Stronger Together Construction and Property Programme to identify risks of modern slavery in the construction sector

This year, we strengthened our commitment to protecting workers in our Construction and Property supply chain by joining Stronger Together's Construction and Property Programme, an important step in enhancing our human rights due diligence in this high-risk category.

Stronger Together is a not-for-profit organisation that supports businesses to embed responsible recruitment and employment practices and mitigate labour exploitation in their operations and supply chains. They partner with Lived Experience Consultants and survivors of modern slavery in order to design responses that are more impactful.

As part of this partnership, we launched a pilot project with Stronger Together and their specialist audit partner, The Reassurance Network, to carry out five on-site human rights assessments and conduct interviews with subcontracted workers across five main contractors in the UK, Ireland and Germany. Four assessments were carried out in FY26, with 49 workers being interviewed. The remaining fifth assessment will be carried out in H1 of FY27. This pilot is designed to give us a direct understanding of workers' recruitment journeys, working conditions and overall experiences, as well as insights into suppliers' management practices.



The findings will shape the next generation of our due diligence tools: updated self-assessment questionnaires, expectations for main contractors, subcontractors and labour providers, and clearer requirements that embed responsible recruitment and worker protection into every project. They will also guide our approach to remediation where workers are affected.

Through our sponsorship of the programme, all construction suppliers have free access to dedicated tools, guidance and resources, including Construction-specific modern slavery training—supporting consistent standards, greater capability, and continuous improvement across our entire construction supply chain.

Strengthening due diligence in our German housekeeping supply chain

In the UK and Ireland, Whitbread directly employs the teams who deliver our housekeeping services. In Germany, these services are delivered predominantly through contracted labour. Because housekeeping is typically low skilled, relies heavily on migrant workers, and often involves labour providers and subcontractors, we recognise it as a higher inherent risk category for modern slavery.

This year, prompted by concerns raised both internally and externally, we carried out unannounced human rights workplace assessments at selected hotels in Germany and assessments of management controls at the head office of three of our suppliers. These assessments involved onsite reviews of management controls, mapping of subcontracting arrangements, and confidential interviews with 16 workers to better understand their recruitment journeys and working conditions. While no cases of modern slavery or indicators of forced labour were identified, the assessments did highlight gaps in some areas of the suppliers' management systems, particularly around the recruitment of migrant workers and the provision of payslips.

With the housekeeping services contract due for renewal, we worked closely with external experts and our Procurement team to embed strengthened human rights questions into the tendering and suppliers' screening process. These focus on suppliers' controls to protect migrant workers, prevent forced labour, and prohibit recruitment fees. We have also developed tailored guidance to support the evaluation of tender responses, outlining minimum expectations and clear red flags, alongside enhanced monitoring requirements.

Supplier responses to questionnaires will be used to segment suppliers by maturity level, enabling us to prioritise engagement and support through a targeted, risk based approach aimed at driving continuous improvement and worker protection.



Our Operations and Guests

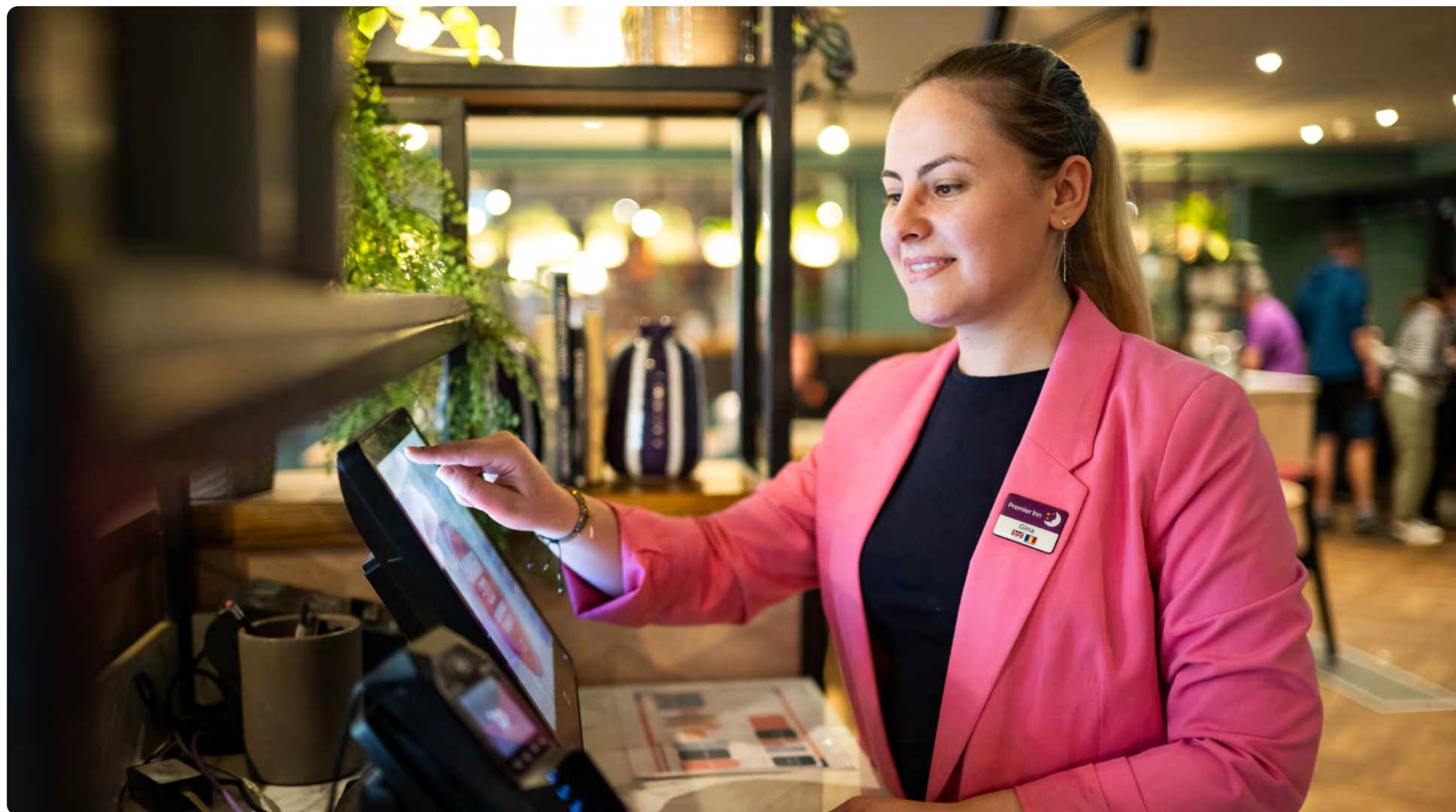
Our Operations

Modern slavery is a risk recorded within our People team risk log. We ensure that all team members hold a valid right to work as part of our recruitment process. Successful candidates 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. Performance of right-to-work checks is formally reported as part of our internal operational performance management and auditing processes.

We carry out regular payroll audits to identify multiple uses of the same bank account. This helps us detect potential signs of financial control or coercion that may indicate exploitation. If issues are identified, we investigate the circumstances and ensure corrective actions are implemented promptly.

Our guests

We recognise that there is a risk that our hotels could be used for the sexual exploitation of adults or children, or the harbouring/movement of adults and children for the use of forced labour. We have created bespoke training focused 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 Joint Venture

The joint venture in the United Arab Emirates and Qatar represents a unique operating model that blends Premier Inn brand standards with the local expertise and management structures of the majority owner, The Emirates Group. Whitbread plc holds a minority share in the joint venture, which operates 11 Premier Inn Branded Hotels in the Middle East.

The joint venture operates its own corporate policies and standards on ethical sourcing, human rights and modern slavery, reflecting the regulatory and operating environments in the UAE and Qatar, with clear accountability mechanisms in place to ensure compliance across both employment practices and the supply chain.

As part of their ongoing due diligence approach, the vulnerabilities associated with operating in higher-risk geographies and a reliance on migrant labour are considered alongside modern slavery, forced labour and other human rights risks. In the UAE and Qatar, particular consideration is given to risks associated with migrant labour, subcontracting, and the use of third-party suppliers, and these areas are a key focus of the joint venture's risk assessment and control processes.

The joint venture is supported by approximately 600 team members, including both those directly employed and those engaged through third party suppliers. The business carries out legal employment checks to ensure all team members have the appropriate right to work and are employed in line with local labour laws. Their team members have access to a Safecall whistleblowing mechanism, where they can raise concerns, which are then investigated by their management. During the year, the joint venture transitioned from an internally managed reporting process to Safecall, strengthening independence and accessibility. In the past year, no modern slavery or forced labour cases have been reported through their channels. The business continues to promote awareness of reporting channels and encourages team members to raise concerns, with a focus on ensuring that reporting can be done confidentially and without fear of retaliation. Strengthening the quality and confidence of reporting remains a key area of focus.

Managing modern slavery risks in the Middle East also requires strengthening capability within the JV. Over the year, the joint venture delivered targeted training to team members through the rollout of the Middle East Code of Conduct, which incorporates Speaking Out and guidance on ethical behaviour, alongside dedicated training focused on modern slavery risks, including identifying and reporting indicators of forced labour and human rights concerns.

This training also reinforced expectations relating to the Middle East Supplier Code of Conduct, ensuring awareness of the standards required from third-party suppliers and the responsibility to raise concerns where these may not be met.

Modern slavery, forced labour and other human rights risks are also considered as part of the joint venture's supply chain due diligence processes. Suppliers are required to adhere to the Premier Inn Middle East Supplier Code of Conduct that is included in their Terms and Conditions of purchase and clarifies a zero-tolerance approach to forced labour and modern slavery and human rights violations. Suppliers identified as holding higher inherent risk are required to formally acknowledge the Middle East Supplier Code of Conduct and are obligated to comply with its requirements.

During the year, the business implemented a structured risk assessment of its supply base, with suppliers categorised and prioritised based on risk. Suppliers identified as higher inherent risk are required to complete an enhanced and formalised questionnaire in which they provide specific details regarding their management of human rights risks such as forced labour and child labour. The Middle East Supplier Code of Conduct has also been reviewed and strengthened during the year to ensure alignment with modern slavery requirements and expectations. This includes requirements relating to the accommodation and welfare of workers where provided by the supplier, with site visits conducted where appropriate to review living conditions and ensure compliance

with expected standards. The responses from the questionnaire are reviewed to inform the business' engagement approach and any additional due diligence actions.

The joint venture continues to strengthen its approach to managing modern slavery risks across both its operations and supply chain. They have ongoing monitoring and review processes in place to ensure that employment practices and supplier compliance remain aligned to required standards, supported by training and whistleblowing mechanisms. The focus remains on continuous improvement, increased visibility of risk, and the consistent application of controls across all locations.





Whistleblowing mechanisms and remedy



There is a formal channel (whistleblowing mechanism) for people connected to our business, including team members, guests, and supply chain workers, to report concerns and wrongdoing and to seek remedy for harms caused.

Beside this, sometimes reports come through as personal grievances, via emails or post addressed to senior members in the organisation. The reports that come through informal channels are either handled locally through line management or logged onto a formal channel for case management purposes.

We encourage team members to speak to their line manager if they are comfortable doing so, and to raise a grievance in line with the Grievance Policy. How to raise a concern forms part of team members' induction training and the Employee Code of Conduct.

Our whistleblowing service provided by Safecall is available to our team members across all Premier Inn Hotels and Branded Restaurants, team members in the Support Centre (head office) and Contact Centre and third parties, including all suppliers. It is an independent external reporting service, available 365 days a year in over 100 languages, and can be used to raise concerns of major business wrongdoing in a confidential and anonymous manner. The service is accessible online, via telephone, or on handheld devices by scanning QR codes, which are displayed across business locations and on the intranet.

Team members' awareness of our Speaking Out services and how to report concerns via Safecall is assessed yearly as part of the employee survey "Your Say". This year's results highlighted >80% of staff are aware of how to report concerns to Safe Call. Within the business, awareness is reinforced through posters displayed across sites, a pinned intranet tile linking to a dedicated Safecall information page, the Speaking Out Policy published on the website, regular messaging in weekly informative packs received by all team members and occasional attendance at departmental huddles to reiterate key points.

Details of how suppliers and their employees can access Safecall are included in our Responsible Sourcing Policy, which is shared with our suppliers.

Providing remedy is part of our Force for Good commitment to source and operate responsibly, with integrity and to collaborate with our suppliers to do the same. We commit to working with our suppliers when human rights risks or issues are identified and to take preventive and remedial actions to support continuous improvement.

The effectiveness of the Safecall reporting channel is regularly reviewed. The Audit Committee 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, while maintaining the anonymity of the person who raised the concern. The effectiveness of the above-described processes is continuously reviewed and adapted.





Training



We recognise the importance of raising awareness about the risk of modern slavery and ensuring that people connected to our business know what actions they are expected to take.

This year we developed training for the Human Rights Working Group to enable members to manage human rights risks across the business and support the implementation of our new Human Rights Strategy. The training included foundational context on business and human rights as well as how they are connected to our business and supply chain, our commitments to human rights, an overview of key frameworks and legislation Whitbread needs to comply with, and the steps that the business is taking to manage these risks.



Code of Conduct & Modern Slavery Training

All team members complete training to ensure they understand our Code of Conduct, which sets out how we intend to operate responsibly and ethically, our policies to achieve this, and our expectations of team members. The Human Rights Policy, which relates to how to identify and manage risks of modern slavery in our operations is signposted in the Code of Conduct. This forms part of our team members' induction training and is refreshed every year.

UK team members are required to complete a mandatory modern slavery training module as part of their induction, within 60 days of starting their role. In FY26, 93% (over 5,700) of new joiners have completed the mandatory Modern Slavery Training course. The training is aimed at increasing awareness of what modern slavery is, how front line teams can recognise signs of modern slavery and how they can report it.



Child Sexual Exploitation 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.

Team members based in the UK who work across the front of house of our hotels and restaurants are required to undertake a mandatory e-learning module on Child Sexual Exploitation within 30 days of starting their roles. In FY26, 98% (over 6,700) of new starters completed this training within their first 30 days. Team members receive refresher training every year. 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.

Measuring the effectiveness of our programme

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Impact and Monitoring

We are committed to continuous improvement. Our Human Rights Strategy is based on an evaluation of strengths and opportunities to improve and sets out a structured plan to enhance our effectiveness to prevent, identify, and respond to modern slavery.

We have set a number of goals to ensure we make progress year on year, as set out below.

Objective	Target FY27-28	Performance FY26
Improve ability to identify modern slavery within our supply chain	100% of suppliers assessed for inherent risk	100% (2,631) suppliers
	>80% of spend from service & manufacturing sites in categories identified as inherently high risk complete a self-assessment questionnaire to assess actual risk exposure (In FY26 we focused on the SEDEX self-assessment questionnaire. In FY27 we will assess how this process can be further improved)	Goods Not for Resale, including Laundry: >60% spend (49) sites Food, including Tier 1 (direct commercial relationship) and Tier 2 sites managed through wholesalers ¹ : 311 sites
	>80% of spend from Construction & Housekeeping suppliers (utilising outsourced labour and identified as inherently high risk) complete a self-assessment questionnaire to assess actual risk exposure (Whitbread-managed self-assessment questionnaire)	Construction: 72% Housekeeping: 57%
Improve ability to prevent modern slavery in our business and supply chain through category-specific additional due diligence and controls for our high risk sectors	100% of actual-high risk service & manufacturing sites requiring an on-site audit, have one in date or scheduled	GNFR including Laundry: 100% (10 sites) Food: 100% (6 sites)
	100% of actual high risk Construction & Housekeeping suppliers complete additional due diligence and controls	No actual high risk has been identified in Construction. In FY26, we conducted 5 exploratory audits to gain greater insight into our partners in this sector. Reported against the stated metric will begin in FY27. A potential high risk housekeeping supplier was identified and audited in FY26, with no evidence of modern slavery or forced labour found. Housekeeping: 3 suppliers assessed constituting 47% of spend.
Improve ability to prevent modern slavery in our supply chain through meaningfully engaging rightsholders	Engage workers in our supply chain to improve understanding of risks and how to address them	1557 workers engaged through due diligence assessments (SEDEX audit interviews, our construction pilot and housekeeping investigations)
Improve ability to identify and prevent modern slavery risks in our operations through internal engagement and training	Across our Operations teams, continue to deliver mandatory e-learning module on modern slavery within 90 days of onboarding and on child sexual exploitation within 30 days of onboarding	93% new members (>5,700) completed the modern slavery mandatory e-learning within required induction timescale 98% team members (>6,300) completed the child sexual exploitation mandatory e-learning within the required timescale

¹ Due to changes to the procurement model through FY26, it is difficult to reliably calculate the % spend

Next steps

Looking ahead, we remain committed to continually strengthening our human rights due diligence and building on the progress we have made this year.

In line with our commitment to prevention, collaboration and continuous improvement, we will continue to enhance how we identify, mitigate and address human rights and modern slavery risks across our operations and supply chain. As our business evolves, so too will our approach, guided by evidence, informed by rightsholders, and grounded in internationally recognised standards.

Our priorities for FY27 are:



1.

Embed our updated supply chain due diligence approach in the highest risk categories.

Focusing on rolling out preventative actions in construction, housekeeping (Germany), laundry, and food supply chains in Germany.



2.

Strengthen rightsholder engagement by increasing direct worker voice in high risk supply chains.

We continue our programme of worker interviews and on-site assessment across priority categories where higher potential risks are identified.



3.

Build internal capability with targeted training for Procurement and Operational teams.

Deliver new modern slavery and human rights training aligned with the updated Human Rights Strategy and Responsible Sourcing Policy.



Appendix



Inside this section

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- 29 Whitbread Company & Subsidiaries

Table of Tier 1 Suppliers Whitbread sources from in the UK & Europe

Supplier Country	Supplier Count
United Kingdom	1325
Germany	977
Ireland	77
United States	28
Jersey	15
Guernsey	11
Netherlands	9
Spain	7
China	6
Austria	5
Belgium	4
Hong Kong	4
Denmark	3
Switzerland	3
Finland	2
Isle of Man	2
Sweden	2
Australia	1
Canada	1
France	1
India	1
Indonesia	1
Japan	1
Luxembourg	1
Malaysia	1

Supplier Country	Supplier Count
Malta	1
Monaco	1
Portugal	1
Singapore	1
United Arab Emirates	1
Grand total	2494



Whitbread Company & Subsidiaries



- AIRE HIEX Stuttgart Verwaltungs GmbH
- Elm Hotel Holdings Limited
- Farringdon Scottish Partnership
- Leeds City Hotels Limited
- London Hotel Holdings 2 Limited
- London Hotel Holdings 3 Limited
- London Hotel Holdings 4 Limited
- London Hotel Holdings 5 Limited

- London Hotel Holdings Limited
- Manchester Hotel Holdings Limited
- Milton (SC) 2 Limited
- Milton (SC) Limited
- Milton 1 Limited
- Moorgate Scottish Limited Partnership
- Newbury Park Hotels Limited
- PI Hotels and Restaurants Ireland Limited

- Premier Inn (Bath Street) Limited
- Premier Inn (Guernsey) Limited
- Premier Inn (Isle of Man) Limited
- Premier Inn (Jersey) Limited
- Premier Inn (UK) Limited
- Premier Inn AT Holding GmbH
- Premier Inn AT Hotelbetriebsgesellschaft GmbH
- Premier Inn AT Immobilienbesitz GmbH
- Premier Inn Dortmund Königswall GmbH
- Premier Inn Essen City Hauptbahnhof GmbH
- Premier Inn Flensburg City GmbH
- Premier Inn Frankfurt City Ostbahnhof GmbH
- Premier Inn Frankfurt Eschborn GmbH
- Premier Inn Glasgow
- Premier Inn GmbH
- Premier Inn Hamburg Nordkanalstrasse GmbH
- Premier Inn Holding GmbH
- Premier Inn Hotel GmbH
- Premier Inn Hotels Limited
- Premier Inn Hotels LLC
- Premier Inn Hotels Qatar LLC
- Premier Inn Immo 19 GmbH
- Premier Inn Immo 20 GmbH
- Premier Inn Immo 21 GmbH
- Premier Inn Immo 22 GmbH
- Premier Inn Immo 23 GmbH
- Premier Inn Immo 24 GmbH
- Premier Inn Immo 25 GmbH

- Premier Inn Internation Development Limited
- Premier Inn Manchester Airport Limited
- Premier Inn Mannheim Quadrate T1 GmbH
- Premier Inn Munchen Frankfurter Ring GmbH
- Premier Inn Ochre Limited
- Premier Inn Rostock City Hafen GmbH
- Premier Inn Verwaltungsgesellschaft Süd GmbH
- Premier Inn Westminster Limited
- Premier Travel Inn India Limited
- PT Whitbread Indonesia Limited
- PTI Middle East Limited
- Quay House Admirals Way Land Limited
- Silk Street Hotels Limited
- St Andrews Homes Limited
- Swift Hotels Limited
- T.F. Ashe & Nephew Limited
- UNA 312. Equity Management GmbH
- UNA 352. Equity Management GmbH
- Wembley Park Holdings Limited
- Whitbread Group PLC
- Whitbread Hotel Company Limited
- Whitbread International Sourcing Business Services (Shanghai) Co Ltd
- Whitbread PLC
- Whitbread Properties Limited
- WHRI Development DMCC
- WHRI Holding Company Limited

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