

# MODERN SLAVERY STATEMENT 2023

GREENE KING



GREENE KING  
FOR GOOD





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**NICK  
MACKENZIE**  
CEO

Modern slavery, in whatever form it takes, remains a key issue for society today. At Greene King we are committed to being a force for good, delivering on our purpose of ‘pouring happiness into lives’ and our social commitment to ‘give millions of people better lives’. We recognise our company’s heritage and our founder’s links to Transatlantic Slavery in the 1800s. While we can’t change our past, we can determine the present and the future; racism and discrimination have no place within our company or broader society. We will not tolerate the exploitation of vulnerable people within our business or its supply chains.

I am pleased that in the last twelve months we have both strengthened our understanding of issues surrounding modern slavery and improved our vigilance against it. Internally we have established a cross functional working group, increased our education levels regarding modern slavery and added modern slavery concerns to our whistleblowing policy. Externally we have established a supplier code of conduct and a supplier engagement platform, allowing a two-way conversation with suppliers about a range of issues, including modern slavery.

We remain vigilant and on course to deliver the three-year action plan that we set out in our 2022 modern slavery statement. However, we went further in 2023 by seeking further assurance on our plan from an independent advisor to ensure that our actions result in a meaningful defence against modern slavery. We have strengthened our plan based on the recommendations from this review, demonstrating our continued resolve to eradicate this terrible issue.

Nick Mackenzie  
CEO Greene King

# OUR BUSINESS

Greene King is the country's leading pub company and brewer with c.2,600 pubs, restaurants and hotels across England, Wales and Scotland.



**GREENE KING**  
BURY ST EDMUNDS

**FLAMING  
GRILL**  
PUBS

**Chef & Brewer**  
COLLECTION

**BELHAVEN**  
BREWERY

**GREENE KING**  
BREWERY

**MPCo.**

**CRAFTED PUBS**

**H**  
**HUNGRY  
HORSE**

**GREENE KING**  
ESTD 1799

**FARMHOUSE INNS**  
DINING & CARVERY

Founded in 1799 with offices in Bury St. Edmunds, Suffolk and Burton on Trent in Staffordshire, we employ approximately 40,000 people across the group with four divisions: Greene King pubs, Destination Brands, Partnership and Ventures, and Brewing & Brands.

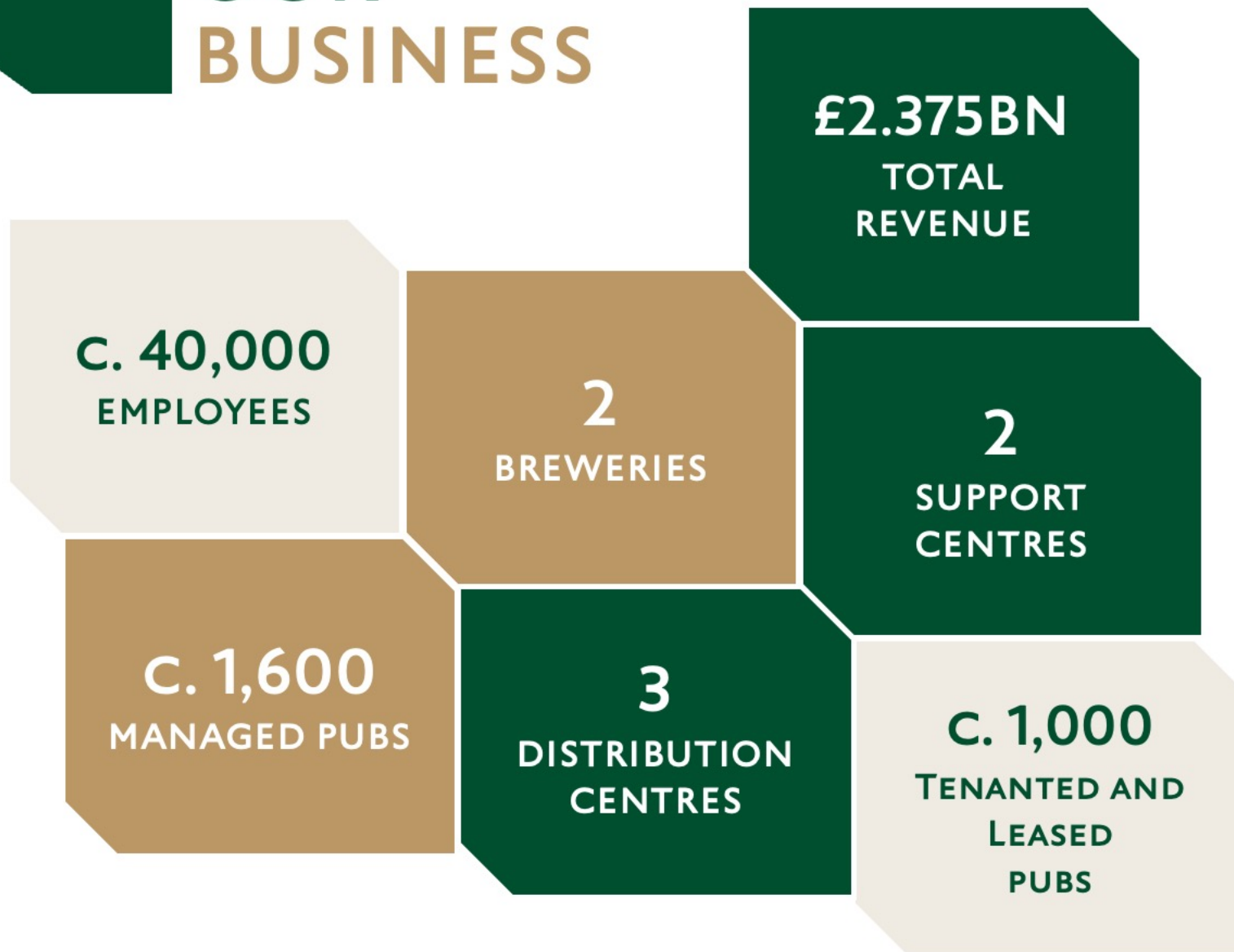
Our leading managed brands and formats include Greene King pubs, Hungry Horse, Farmhouse Inns and Chef & Brewer. Our Brewing & Brands division brews quality ale brands and premium beers at our two breweries, Westgate Brewery in Bury St Edmunds and the Belhaven Brewery in Dunbar. Our industry-leading portfolio includes Greene King IPA, Old Speckled Hen, Abbot Ale, Ice Breaker, Belhaven Best, Level Head, Hazy Day and Flint Eye.

We work with thousands of suppliers, including suppliers of food and drink, of raw materials for our beers, and of goods and services not for resale such as equipment used in our pubs, breweries, and distribution centres, IT equipment, utilities and waste services, building, maintenance or cleaning contractors, marketing, advertising, recruitment and training or professional services.

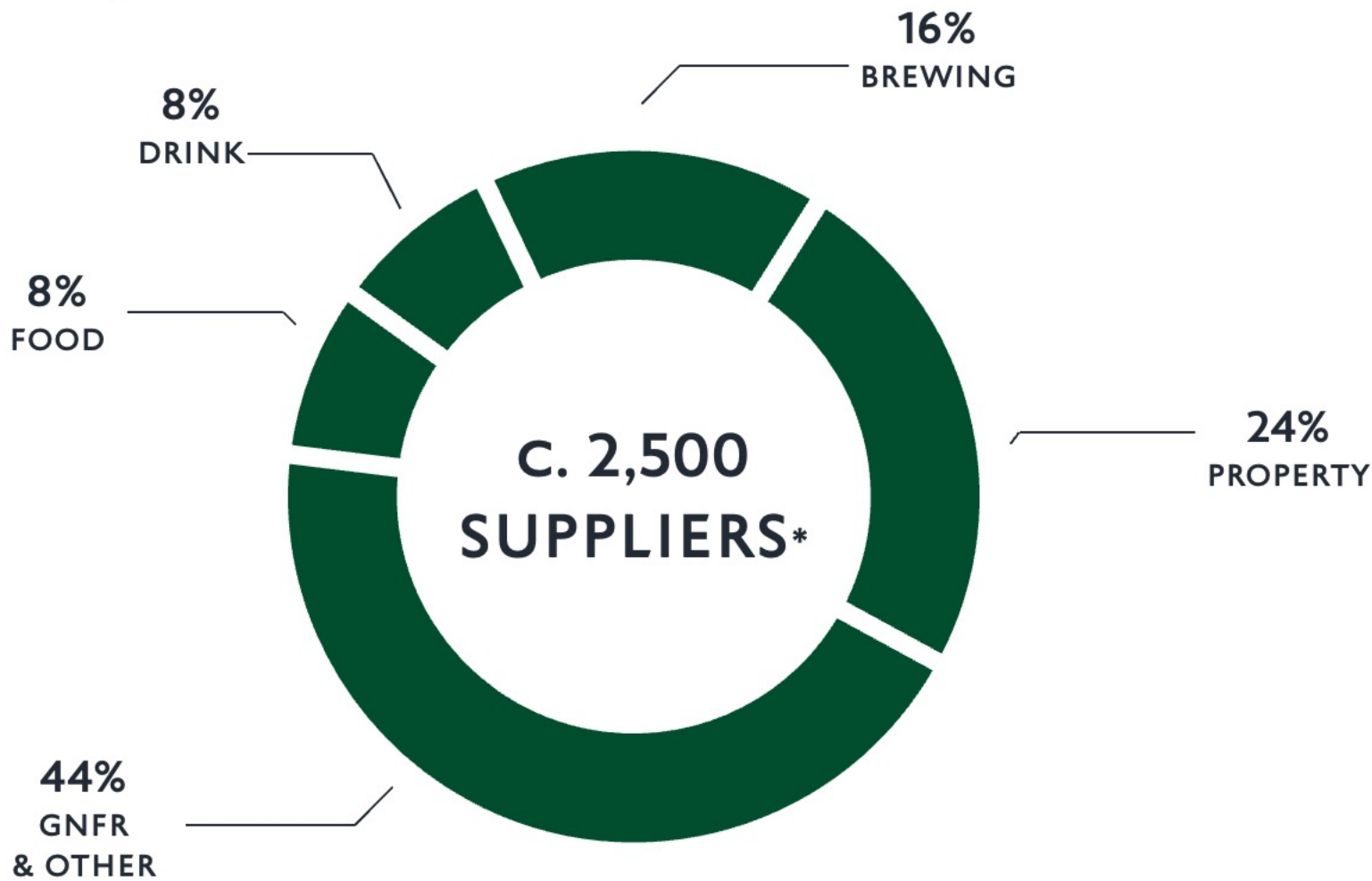
Our suppliers vary enormously in terms of the scale of their business and scope of product or service offering. Many will themselves be reliant on their own supply chain, across many countries, in order to be able to supply relevant goods or services to us.



# OUR BUSINESS



# OUR SUPPLY CHAIN



\*These are our core supplier categories. Numbers correct as of May 2024.

# POLICY

We have a number of policies that set out our approach to preventing human rights abuse and the clear expectations for both our employees and suppliers.

Key policies:

- Our employee Code of Conduct. This was re-launched in November 2023, accompanied by a new e-learning module and induction training.
- Our anti-bribery policy
- Our whistleblowing policy (with whistleblowers protected by anonymity)
- Our Supplier Code of Conduct. This was launched in March 2024 and is being issued to all suppliers as well as being included as part of supplier onboarding.
- Our Young and Vulnerable Workers Policy. This was updated in September 2023 and is supported by an e-learning module for line managers.
- Human Rights Policy, launched in 2024.

Our policies strengthen the core principles we expect our employees and suppliers to comply with. Failure to comply with the provisions of the revised employee code may result in disciplinary action, which could result in immediate suspension or the termination of employment.

Our Human Rights Policy sets out how our People Policies promote a respectful, fair and safe place for our team members to work. We won't tolerate or condone abuse of human rights within any part of our business and will investigate all allegations of human rights abuse.

All new suppliers that we engage with are required to agree to our Technical policy, which asks them to adhere to the Ethical Trading Initiative (ETI) base code.

## KEY FOCUS AREAS 2024/25:

- Conduct a scenario assessment to better understand modern slavery risks specific to our business
- Develop and publish modern slavery policy
- Develop escalation and remediation policy and process

## KEY FOCUS AREAS 2024/25:

- Develop and promote investigation procedures for whistleblowing cases
- Enhanced training for investigations team
- Executive training

Having established our Environmental Social Governance (ESG) Board and governance structure, we have clear review lines for modern slavery policy and action. The ESG Board reports to our Executive Board, which further ensures that modern slavery and our broader social responsibility plans are recognised at the most senior level within the business. Our modern slavery approach is sponsored at Executive level by our Chief Communications and Sustainability Officer, and our Chief People Officer.

Our Modern Slavery working group, comprising stakeholders and subject matter experts from across our business, is responsible for delivering our modern slavery action plan, and reports progress to the ESG Board. The modern slavery working group has undertaken training.

We continue to work closely with the Slave-Free Alliance to evolve our action plan to minimise the risk of modern slavery. Additionally we commissioned an independent review of our Modern Slavery maturity in December 2023. This work has been used to further develop our action plan.

We have established an investigations team for all employee relations matters, including reports of modern slavery.

We have continued the rollout of our supplier engagement platform, a two-way dialogue tool which allows us to explore specific issues with our suppliers. As part of our initial questionnaire on the platform, we have asked our suppliers a set of questions regarding their modern slavery approach and policies. We will expand this dialogue in future years.

# DUE DILIGENCE

Developing robust governance and due diligence processes to monitor and mitigate exploitation of vulnerable people continues to be a focus for us.



# RISK

The nature of our business means we work with thousands of suppliers across food, drink, raw materials for beer, as well as essential operational services, such as IT and cleaning.

Greene King has a proactive approach to enterprise risk management, with the identification, categorisation and mitigation of risk considered across all areas of the business. This includes, as part of the risk management approach within the ESG team, the consideration of Modern Slavery risks.

We know there are groups of people particularly vulnerable to exploitation across specific high risk sectors within our supply chain, such as migrant workers, young people and lower skilled roles employed within the agriculture or cleaning industry. Very often these people are many tiers down our supply network, but that does not mean we don't have a role to play in protecting their human rights and working conditions.

There is also a potential risk that vulnerable people could be exploited across our network of c.1,000 pub partners, where we have less control over recruitment and working practices of employees due to the nature of the leased and tenanted model. Our pub partners will be required to agree to our code of practice which is accredited by key industry bodies, and we will also be looking at how we better align our partners with our values regarding modern slavery.

We recognise that Hotels and sites with staff accommodation represent areas with higher risk of modern slavery within our estate and so will place specific focus here.

We are reflecting all risks in our training and development and policy programme as we move forward

## KEY FOCUS AREAS 2024/25:

- Develop tier I supplier risk assessment through identification of inherent risks
- Assign risk owners to key risk areas and manage through group risk governance

# OUR 3-YEAR PLAN

We have evolved our action plan, with a number of actions from our previous plan completed ahead of plan and some actions rescheduled based on latest advice.

Action	2024	2025	2026
<b>Policy and process</b>			
Develop and publish our modern slavery policy	█		
Develop a formal escalation process to manage reports of modern slavery and ensure appropriate safeguarding	█		
Develop and promote investigation procedures for whistleblowing cases	█		
Embed modern slavery into group wide risk registers		█	█
<b>Training</b>			
Conduct a scenario assessment to identify vulnerable roles, training needs and escalation requirements.	█		
Embed awareness and response training	█	█	
<b>Suppliers</b>			
Perform a risk assessment of tier 1 suppliers.	█	█	
Engage with suppliers in relevant ways, based on their risk profile, to minimise risk	█	█	
Develop risk management plan for high risk suppliers		█	█
Conduct an audit of third-party hiring agencies		█	█
<b>Pub partners</b>			
Include our modern slavery values and goals within the Pub Partners code of conduct	█		

## KEY FOCUS AREAS 2024/25

- Conduct a scenario assessment to identify vulnerable roles, training needs and escalation requirements
- Embed awareness and response training
- Include our modern slavery values and goals within the Pub Partners code of conduct

If our people have good knowledge of what human rights abuse looks like, they are more likely to report incidents and develop controls within their own roles and teams to help mitigate the risk.

Our team members have on-demand access to a series of live webinars and spotlight videos that focus on transatlantic slavery and modern slavery. In 2024 we will be producing e-learning that is specific to Greene King and relevant to our people.

We have also taken steps to support a selection of our supply chain partners with their modern slavery approach, including

- inviting Slave-Free Alliance to conduct a training session with our procurement and supply chain team
- inviting Slave-Free Alliance to join 500 senior leaders to highlight modern slavery at our suppliers conference.
- Engage with Pub Partners to embed our modern slavery values and goals.

## TRAINING & AWARENESS

Helping our employees to understand modern slavery is a crucial step in preventing and addressing potential human rights abuse across our business.



SLAVE-FREE  
ALLIANCE

Working Towards a  
Slave-free Supply Chain

# EFFECTIVENESS OF OUR DUE DILIGENCE

We partner with Navex to provide a confidential whistleblowing helpline to all employees and to our suppliers. In the last 12 months, there have been eight whistleblowing reports raised via NAVEX which were raised as instances of modern slavery. Each case has been investigated and it has subsequently been found there was no modern slavery incidents in any of the cases.

We have also ensured that our modern slavery training modules are available for all employees across the business, via our online learning platform TAP.

This year we have recruited a new specialist team within Employee Relations to conduct workplace investigations. This team will ensure any reports of modern slavery are investigated thoroughly & independently.

NAVEX  
GLOBAL



**GREENE KING**  
BURY ST EDMUNDS

This statement covers the following subsidiary entities:

- Greene King Brewing and Retailing Limited
- Greene King Retailing Limited
- Greene King Retail Services Limited
- Spirit Pub Company (Managed) Limited
- Spirit Pub Company (Trent) Limited
- Spirit Pub Company (Leased) Limited

Approved on behalf of the board of Greene King Limited

Nick Mackenzie  
Chief Executive Officer  
June 2024