



MODERN SLAVERY STATEMENT 2024



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CEO'S INTRODUCTION

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.

Across the last 12 months we have both strengthened our understanding of issues surrounding modern slavery and improved our vigilance against it. Through our cross functional working group, we have conducted a training needs assessment and begun delivering training across the business. Our Modern Slavery Policy was published in 2024 following consultation and guidance from The Slave Free Alliance.

We remain focused on delivering our action plan, established in 2022. We have included modern slavery within our internal control self-assessment process in our enterprise risk management programme to ensure leaders are aware of risks and opportunities in their individual areas of responsibility.

Moving forward our priority remains to increase our two-way conversation with suppliers across a range of issues, including modern slavery, and develop our action plan for our high-risk suppliers.



Nick Mackenzie
CEO Greene King



Nick
Mackenzie
CEO



OUR BUSINESS

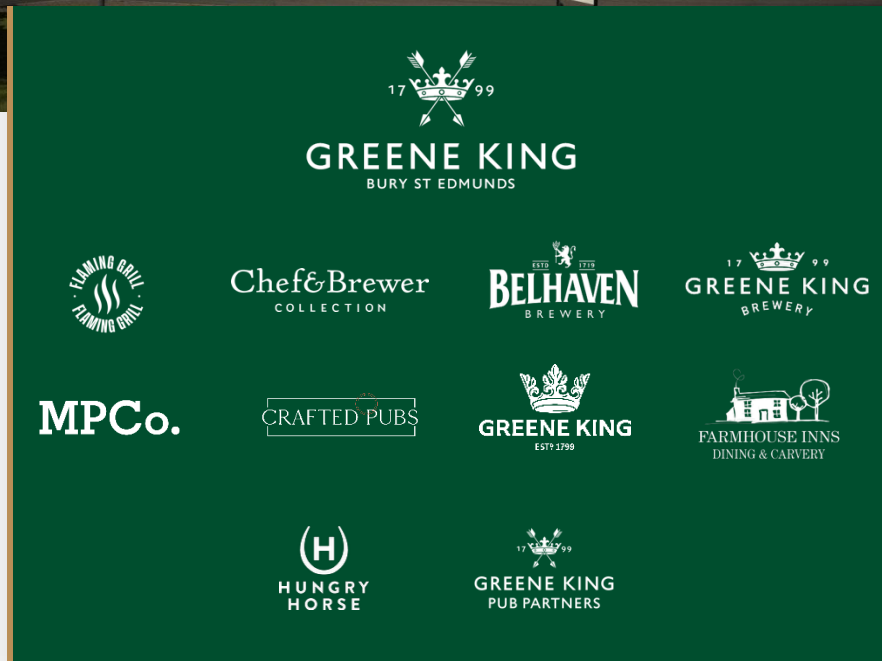
Greene King is the country's leading pub company and brewer with c.2,600 pubs, restaurants and hotels across England, Wales and Scotland.

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 & Ventures, Pub Partners and Brewing & Brands.

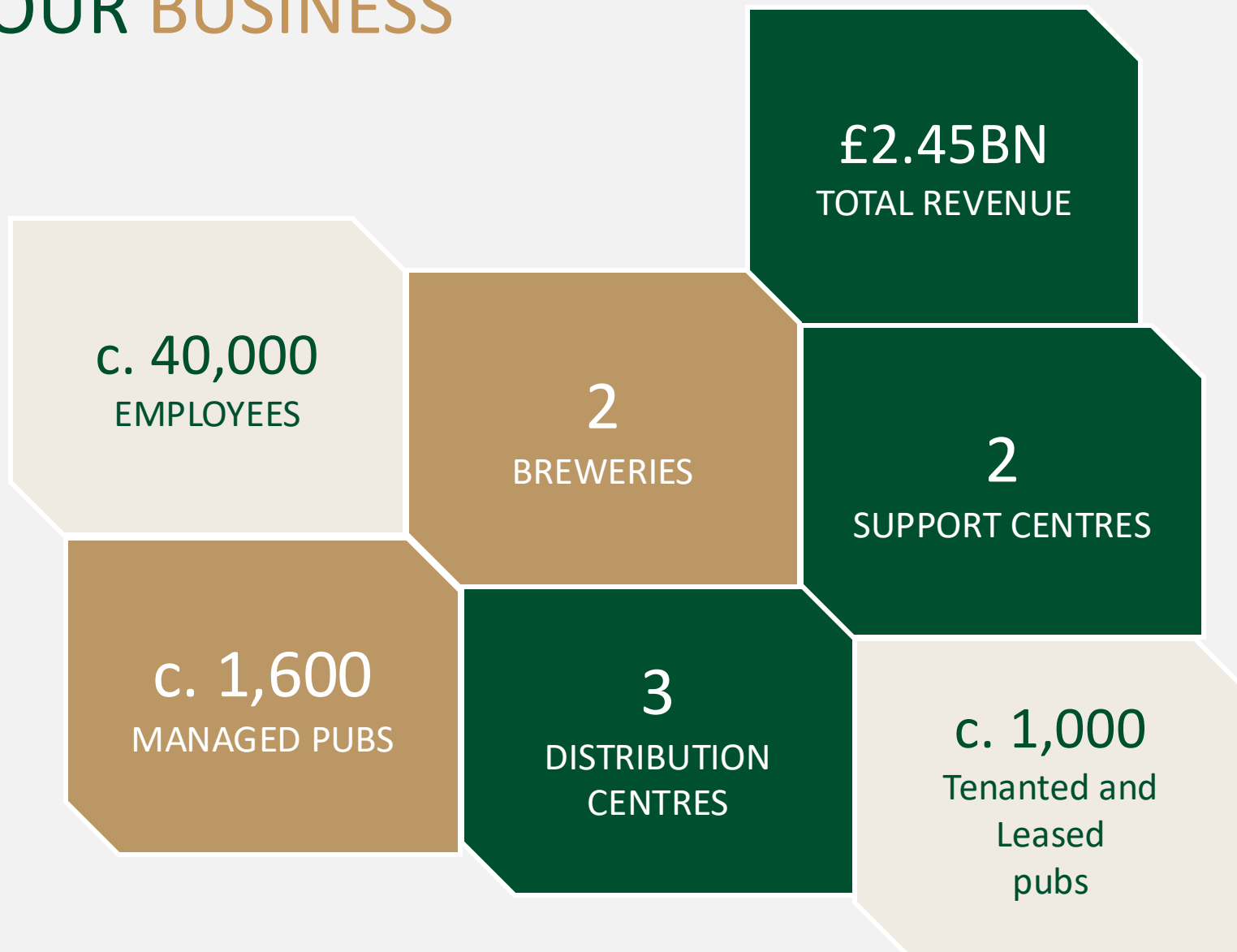
Our leading managed brands and formats include Greene King pubs, Hungry Horse, Farmhouse Inns and Chef & Brewer. Our Brewing & Brands division brews quality ale brands and premium beers at our two breweries, Westgate Brewery in Bury St Edmunds and the Belhaven Brewery in Dunbar. Our industry-leading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

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

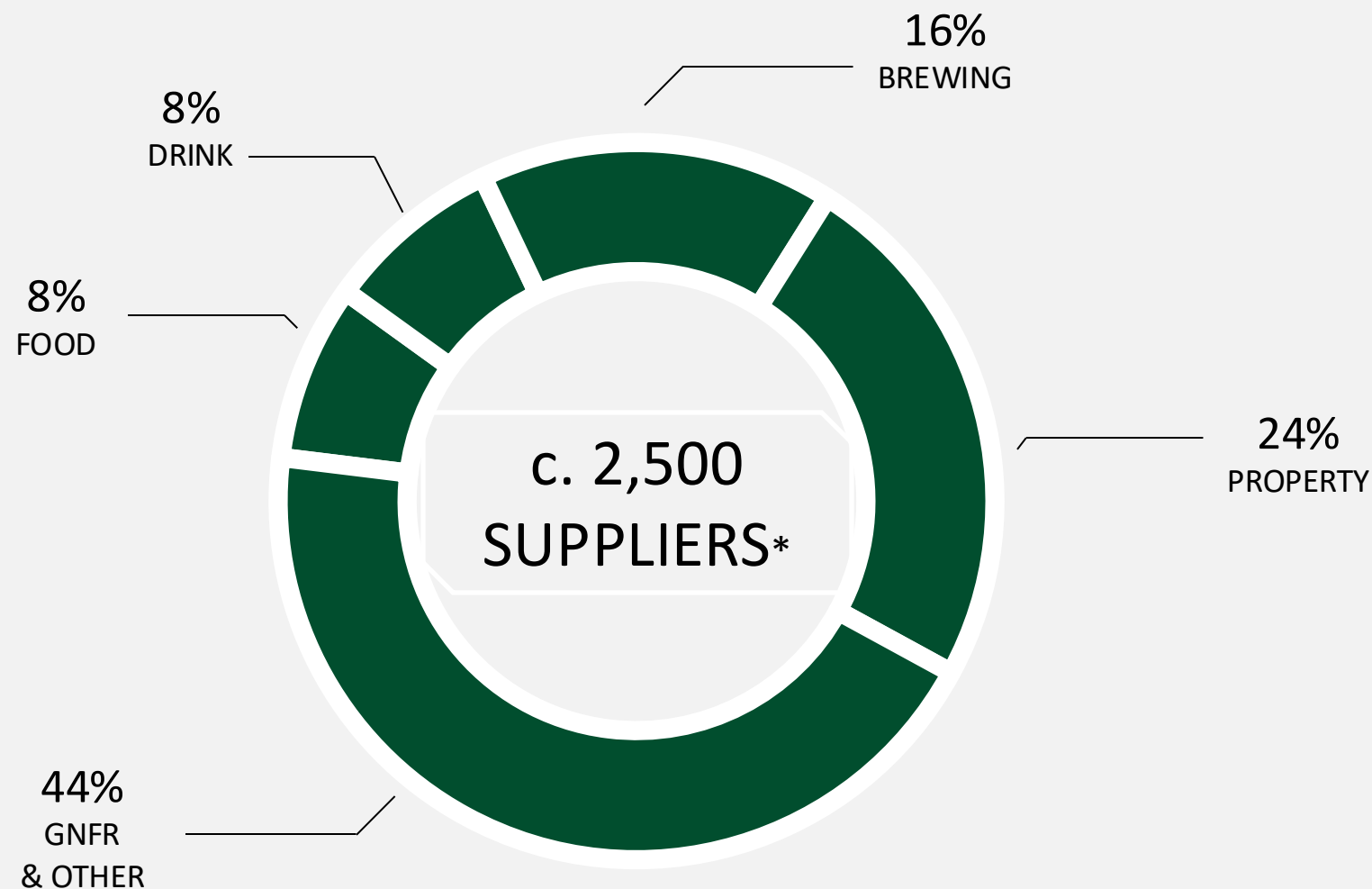
Our suppliers vary enormously in terms of the scale of their business and scope of product or service offering. Many will themselves be reliant on their own supply chain, across many countries, in order to be able to supply relevant goods or services to us.



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 modern slavery abuse and the clear expectations for both our employees and suppliers.

Key Policies

- Our Supplier Code of Conduct. This was launched in March 2024 and continues to be issued to suppliers as well as being included as part of supplier onboarding.
- Our Modern Slavery policy launched in January 2024.
- Our Human Rights policy launched in April 2024.
- Our Employee Code of Conduct launched in November 2023

All internal HR people policies are shared through multiple communication channels across the business, including weekly newsletters, our intranet and our Employee App, Kingdom. Key policies are included within our onboarding process and induction programmes and are stored within our HR system.

Our policies, including our Employee Code of Conduct strengthen the core principles we expect our employees to comply with. Failure to comply with the provisions of the Employee Code of Conduct may result in disciplinary action, which could result in immediate suspension or the termination of employment.

Our Modern Slavery Policy supports our commitment to act ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery does not exist in our business or in any of our supply chains.

We have a Technical Policy for suppliers which includes asking them to adhere to the Ethical Trading Initiative (ETI) base code.

Key Focus Areas 2025/26:

- Complete annual review of the Modern Slavery Policy and other relevant policies
- Review escalation and remediation policy and processes annually



Key Focus Areas 2025/26:

- Develop and promote investigation procedures for whistleblowing cases
- Supplier risk assessment and due diligence process development
- Executive training



DUE DILIGENCE

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

In 2024 we evolved our corporate governance and have launched a new Sustainability Steering Committee. Accountability for our Modern Slavery Policy and actions arising from our modern slavery action plan falls within the scope of the Sustainability Steering Committee. The Sustainability Steering Committee 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 Experience 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 Sustainability Steering Committee.

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.

In 2024 we trained the Greene King investigations team to enable the team to identify, escalate and manage issues 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.

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 continues to adopt a proactive approach to enterprise risk management (ERM), 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 Sustainability team, the consideration of modern slavery risks. A new ERM tool has been introduced which will provide better visibility of modern slavery risks that exist in different areas of the business.

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. We continue to assess our supply chain to identify areas of potential risk and vulnerability.

There is also a potential risk that vulnerable people could be exploited across our network of c. 1,000 tenanted estate where we have less control over recruitment and working practices due to the nature of the leased and tenanted model. Our tenants are required to agree to our code of practice which is accredited by key industry bodies, and we continue to consider ways of raising awareness and upskilling with our partners.

We recognise that hotels and sites with staff accommodation represent areas with higher risk of modern slavery within our estate and we continue to regularly review risks as part of our ERM process.



Key Focus Areas 2025/26:

- Include modern slavery within internal control self assessment process to ensure leaders are aware of risks and opportunities in their individual areas of responsibility.
- Develop divisional risk registers to include modern slavery risks where these exist.

OUR 3-YEAR PLAN

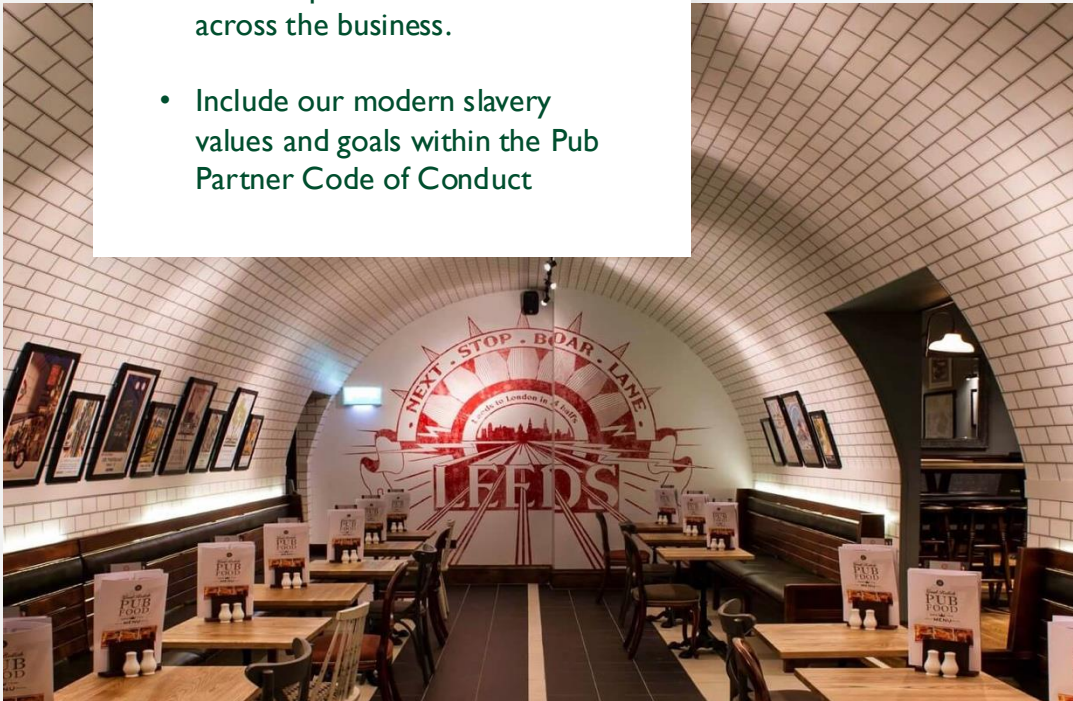
Action	2025	2026	2027
Policy and process			
Develop and publish our modern slavery policy			
Monitor & Review Modern Slavery Policy			
Develop a formal escalation process to manage reports of modern slavery and ensure appropriate safeguarding			
Develop and promote investigation procedures for whistleblowing cases			
Training			
Workshops for identified teams and embedding awareness & response training			
Implement mandatory e-learning			
Monitor & Review e-learning module			
Suppliers			
Perform a risk assessment and develop management plan for tier 1 suppliers			
Engage with suppliers in relevant ways, based on their risk profile, to minimise risk			
Conduct an audit of third party hiring agencies			
Complete due diligence check for all suppliers			
Pub partners			
Include our modern slavery values and goals within the Pub Partners code of conduct			
Audit Recruitment Process			
Engage with partners via documentation			
Risk			
Embed modern slavery into group-wide risk registers			
Monitoring of HR processes and programmes			

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.

(Lighter Green colours denotes projects completed at time of publication)

Key Focus Areas 2025/26:

- Launch a company-wide e-learning module on modern slavery awareness and escalation
- Conduct modern slavery awareness and escalation workshops for identified teams across the business.
- Include our modern slavery values and goals within the Pub Partner Code of Conduct



TRAINING & AWARENESS

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

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 webinars and spotlight videos that focus on transatlantic slavery and modern slavery. In 2025 we will deliver an e-learning that is specific to Greene King and relevant to our people.

We have taken steps to support our identified key risk teams with their modern slavery approach, including

- inviting Slave-Free Alliance to conduct bespoke training sessions for our procurement, investigation, legal, sustainability and hotel teams
- engaging with our tenanted estate to embed our modern slavery values and goals.



**SLAVE-FREE
ALLIANCE**

Working Towards a
Slave-free Supply Chain

EFFECTIVENESS OF OUR DUE DILIGENCE

We partner with Navex to provide a confidential and protected whistleblowing helpline to all employees and to our suppliers. In the last 12 months, there have been seven 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 were 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.





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