



GREENE KING MODERN SLAVERY STATEMENT

FOR PERIOD ENDING 31ST DECEMBER 2025

EXECUTIVE BOARD APPROVED JUNE 17TH 2026



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INTRODUCTION

Modern slavery, in whatever form it takes, remains a critical issue for society today. At Greene King, we are committed to being a force for good – living our purpose of ‘We pour happiness into lives’ and our social commitment to ‘give millions of people better lives’.

We acknowledge our company’s heritage, including our founder’s links to transatlantic slavery in the 1800s. While we cannot change our past, we can take responsibility for how we act today and the future we help shape. Racism, discrimination, and exploitation have no place within our company or in the wider society in which we operate.

Across Greene King, we take a zero-tolerance approach to modern slavery in any form. We are committed to conducting our business in accordance with the Modern Slavery Act 2015 and to protecting and respecting human rights in everything we do. We will not tolerate the exploitation of vulnerable people within our business or across our supply chains, and we are committed to continually strengthening how we identify, assess and address risk.

Over the past two years, we have enhanced our understanding of modern slavery risks and improved our vigilance. Through our cross-functional working group we have undertaken a training needs assessment and started delivering targeted training across the business to raise awareness and build capability. Our Modern Slavery Policy, published in 2025 following consultation with and guidance from Slave-Free Alliance, sets out a clear framework for our approach and expectations.

We recognise that tackling modern slavery requires ongoing focus, collaboration, and transparency. We remain committed to continuous improvement in our practices and to playing our part in addressing this global issue.



*“This isn’t just about policy for us - it’s about people.
It’s about making sure everyone connected to our
business is treated with fairness, dignity, and respect.”*
Nick Mackenzie
CEO



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OUR BUSINESS



Greene King is the country’s leading pub company and brewer, with a heritage dating back to 1799 and a presence that spans communities across England, Wales and Scotland. From its support centres, breweries and distribution centres to its diverse portfolio of pubs, restaurants and hotels, the business is united by a shared purpose: to pour happiness into lives – for its customers, team members, partners, suppliers and the communities it serves.

Founded in 1799 with offices in Bury St. Edmunds, Suffolk and Burton-on-Trent in Staffordshire, we employ approximately 40,000 people. During the reporting period the business was operated across three main business areas - managed pubs, Pub Partners and brewing and brands.



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2025 ACTIONS AT A GLANCE



Training Developments

We strengthened modern slavery awareness within Greene King by delivering targeted workshops and launching dedicated e-learning modules, achieving strong engagement across higher-risk and lower-risk areas.

Over 85% of pub leadership team members completed scenario-based training, demonstrating robust commitment to identifying, and addressing modern slavery risks throughout the business.

Implemented a Supplier Action Plan

A dedicated procurement working group has been created to represent all areas of our supply chain. This supports by allowing us to share knowledge, plan aligned actions across procurement teams and receive tailored support from Slave-Free Alliance (SFA).

As part of our ongoing collaboration, SFA conducted a salient human rights risk assessment of three supply chain procurement categories; (i) food and beverage, (ii) enabling infrastructure and (iii) property.

Slave-Free Alliance partnership engagement

We continue to work closely with Slave-Free Alliance, a social enterprise who play a critical friend to organisations, supporting to protect operations, supply chains and people from modern slavery and labour exploitation.

SAF have provided us with a detailed risk assessment of our tier 1 suppliers, created opportunities within the industry for Greene King to connect with other like-minded companies, and have provided bespoke in person training for some of our high-risk teams within the business.

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GOVERNANCE



Greene King is committed to embedding modern slavery resilience and mitigation into its business and has created a governance structure to ensure that its modern slavery commitments and actions are driven forward in a responsible and accountable manner.

Our Modern Slavery Working Group brings together colleagues from across the business with relevant expertise and responsibilities. The group leads the delivery of our action plan and reports on progress to the Sustainability Steering Committee.

The Sustainability Steering Committee has continued to provide a robust governance structure for overseeing our Modern Slavery Policy and supporting delivery against our action plan. Reporting directly to the Executive Board, it ensures that modern slavery is considered at the highest level of the business. Executive sponsorship for our modern slavery programme sits with our Chief Strategy and Experience Officer.

Our Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships. It sets out the systems and controls we have in place to help prevent modern slavery within our operations and across our supply chains.

Key Supporting Policies

- Supplier Code of Conduct launched in March 2024
- Human Rights Policy launched in April 2024.
- Employee Code of Conduct launched in November 2023

Modern Slavery Working Group Membership

- Sustainability
- Risk
- Legal
- Procurement
- Pub Partners
- People – Learning and Policy
- Venture Hotels
- Brewing and Brands
- Communications



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MODERN SLAVERY RISK

We continue to take a proactive approach to enterprise risk management (ERM), ensuring that risks are identified, assessed, and managed across all areas of the business. This includes the consideration of modern slavery risks as part of our Sustainability Team's risk management activities.

As a business we understand the need to constantly assess and identify vulnerable individuals who may be exposed to modern slavery risk. Through a business risk review in 2023 we identified groups who may be more vulnerable to exploitation within higher-risk areas of our operations and supply chain. These include suppliers, third party workers, hotel guests, and our pub teams. Our working group and objectives are focused to help us prioritise our efforts in these higher-risk areas.

Our Pub Partners business, which operates on a leased and tenanted, and franchise model, also presents a potential risk as individuals working within these pubs are employed by the leaseholder and franchisee rather than directly by Greene King. Our Pub Partners Leadership Team are engaged in the working group and identify this risk on their divisional risk register. Through education and due diligence via our Pub Partners management team we are striving to help our tenants understand and respond to this risk – see our case study page 10.

In 2025 we focused on a risk assessment across our priority tier 1 procurement categories. Greene King worked with the Slave-Free Alliance to assess and strengthen human rights risk management across its supply chain, identifying key high- and medium-risk areas and embedding proportionate due diligence in line with UN principles. See the focus area on page 9 for more information.



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FOCUS AREA – OUR PEOPLE

2025 was a significant year for strengthening awareness of modern slavery risks across Greene King. In partnership with the Slave-Free Alliance, we delivered seven targeted face-to-face workshops for higher-risk areas, using industry-specific scenarios to strengthen practical understanding and support confidence in identifying and responding to potential concerns.

For teams in lower-risk areas, we introduced a dedicated e-learning module providing clear guidance on recognising the signs of modern slavery and how to report concerns. This module achieved strong engagement, with over 85% completion across targeted support centre populations and positive feedback on clarity and relevance.

In addition, we launched a digital learning module on our learning experience platform, Attensi, for all pub leadership teams. Since launch, over 85% of pub leadership team members have completed the module, with an average replay rate of 2.5 times, demonstrating high levels of engagement with the scenario-based learning experience.

Alongside awareness and training activity, we continued to strengthen our people governance processes to support the identification and prevention of potential exploitation risks. This included ongoing focus on ethical recruitment practices, and payroll controls, alongside collaboration across People Operations, Payroll, Compliance and Operational teams to support earlier identification and escalation of potential concerns. We also continue to partner with Vialto to support Right to Work verification processes across Greene King, helping ensure robust pre-employment checking and compliance controls are maintained across our workforce.

We partner with Navex to provide a confidential and protected whistleblowing helpline for employees and suppliers. In the last 12 months, 23 whistleblowing reports were raised through NAVEX relating to suspected modern slavery. Each case was investigated and none was found to involve modern slavery. The number of reports was three times higher than in previous years, which reflects the success of our training and increased awareness.



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FOCUS AREA – SUPPLY CHAIN

Greene King's supply chain is diverse and extensive, reflecting the scale and breadth of our operations across the UK. It spans a wide range of goods and services, from food and drink production to logistics, facilities management and labour provision, and includes both large multinational suppliers and smaller specialist businesses. Although most of our supply chain is UK-based, we also source products and materials internationally, creating exposure to risks across multiple countries that require careful consideration.

Supply chain due diligence:

We have a publicly available Supplier Code of Conduct that sets out our expectations of suppliers and our approach to responsible business practices, including modern slavery. It also provides suppliers with access to our confidential escalation and reporting process via Navex, enabling concerns to be raised safely and appropriately. These expectations are also reflected in the standard terms and conditions of our supplier agreements.

Greene King has been a member of Slave-Free Alliance (SFA) since 2020. In 2025, as part of our ongoing collaboration, SFA conducted a human rights risk assessment across three supply chain procurement categories; (i) food and beverage, (ii) enabling infrastructure and (iii) property. Aligned with the UN Guiding Principles on Business and Human Rights, this exercise evaluated inherent risk severity in terms of scale, scope and irremediability, helping us better understand the most significant risks in our supply chain. Across these categories, 80% of procurement activities were identified as medium-risk and 19% were identified as high-risk. Recommendations from the assessment included mapping existing risk management processes and designing proportionate due diligence processes to improve human rights risk management, with a focus on the high-risk areas identified. SFA also recommended extending the assessment to all remaining procurement categories to improve visibility of relevant supply chain risks, and this work is now under way.

A workshop has also been held with SFA and Greene King procurement colleagues to begin mapping risk management processes as the next step in designing our due diligence approach.



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FOCUS AREA – PUB PARTNERS

Our Pub Partners business operates on a leased, tenanted and franchise model. Operators are self-employed and employ their own teams, so they are not Greene King employees. This means we do not have the oversight of day-to-day operations as we have in our managed estate.

In our leased, tenanted and franchise operations, we focus on raising awareness, providing clear guidance and enabling appropriate escalation. Our agreements include clauses covering conduct, ethical behaviour, and compliance with relevant legal and regulatory obligations.

We have clear escalation routes, shared through induction training and supporting guidance for our tenants and reinforced through regular engagement with business development managers. We are continuing to formalise pathways to support external reporting where appropriate, we use existing channels to reinforce expectations across our Pub Partner network.

We also prioritise awareness among those best placed to spot risks. Business Development Managers in our Pub Partners estate, who regularly visit pubs and engage with our tenants and their teams, play a critical role. In 2025, we expanded our face-to-face training programme to 43 Members of our operational team in 2025, meaning all colleagues with direct contact with pub partners have now been trained to recognise and escalate potential indicators of modern slavery.



GREENE KING
PUB PARTNERS

VENTURE HOTELS – A CASE STUDY

VENTURE HOTELS

In 2025, Venture Hotels refreshed its approach to modern slavery by turning Greene King's Modern Slavery Policy into a Venture Hotels-specific framework, that supports practical day-to-day actions. The focus was on turning policy commitments into clear behaviours, routine checks and accessible escalation routes, reinforcing that prevention, detection and reporting are everyone's responsibility. Hotel leaders and teams aligned their actions to the policy's core commitments—ethical operations, supply chain transparency, zero tolerance and risk-based due diligence—while ensuring expectations to speak up and report concerns were clear and practical.

Rather than treating modern slavery as a standalone issue, actions have been embedded into existing operational and governance rhythms. Expectations around modern slavery were incorporated into safe, clean & legal processes, supported by regular training refreshers to build confidence in identifying indicators of exploitation and taking appropriate action. Supplier and contractor diligence was strengthened through the updated supplier process, aligned to Greene King's Supplier Code of Conduct, with clear accountability for escalation and remediation. Alongside this, a strong speak-up culture was promoted, encouraging collaboration across teams and education on the appropriate escalation process.

Delivery was achieved through area meetings, cascading via Venture Hotel live calls and the annual conference, with regular checkpoints to sustain awareness and share good practice. As a result, modern slavery risk is now discussed routinely as part of safe and legal operations and considered in annual policy updates. As a direct result teams across hotels and support functions now have a better understanding of the signs to look for in recruitment, agency labour, contractors and supplier activity, and how to escalate concerns effectively.



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MOVING FORWARD: 2026 – 2028 PLANS



Over the next two years, Greene King will continue to strengthen our approach to preventing modern slavery by embedding awareness and accountability across our business and supply chain. We will expand and refresh targeted training so colleagues at all levels, including frontline pub teams, high-risk functions, and those working with customers, can recognise indicators of exploitation and feel confident to raise concerns through clear escalation routes.

Building on our partnership with Slave-Free Alliance, we will further develop risk-based due diligence by extending our human rights saliency assessment across remaining procurement categories, mapping existing controls, and implementing proportionate processes for higher-risk areas. We plan to standardise our approach and due diligence against modern slavery with our suppliers. We will maintain robust governance through executive visibility and through our Modern Slavery Working Group, using regular reporting and reviews to track progress, learn from issues raised, and continuously improve the effectiveness and transparency of our programme.

Risk Area	Objective
Supply Chain	Improve the rigour and standardisation of our supplier due diligence and supplier engagement on Modern slavery standards and position.
Supply Chain – risk assessment	Establish an audit programme for high-risk, tier 1 suppliers
People	Strengthen organisation-wide awareness of modern slavery risks by embedding targeted, scenario-based learning across all levels of the business, ensuring colleagues have the knowledge and confidence to identify and report concerns.
Hotel Guests	Embed modern slavery prevention into the guest arrival and check-in experience, ensuring risks are confidently identified, reported and escalated in real time through trained teams, clear guest reporting routes and robust governance
Pub Partners (Leased, tenanted & franchise)	To reduce modern slavery risk across the Pub Partners estate by raising awareness, setting clear expectations, and enabling timely identification escalation of concerns among self-employed lessees, tenants and franchisees and our field-based employed teams that support them.



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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 2026