

# MODERN SLAVERY STATEMENT 2022





# CONTENTS

A message from Nick Mackenzie	3
Our Business	4
Supply Chain	6
Policy	7
Due Diligence	8
Risk	9
3-Year Plan	10
Training & Awareness	11
Collaboration	12
Effectiveness	13



# NICK MACKENZIE CEO



The exploitation of vulnerable people is a growing concern across the world and has become more prevalent in the last few years due to the COVID-19 pandemic and ongoing war and conflict. As the UK's leading pub company and brewer, we will not tolerate any exploitation of vulnerable people within our own business or wider supply chain.

At Greene King, we are passionate about delivering our purpose to 'pour happiness into lives' - for our customers, our team, our pub partners, our suppliers and the communities in which we live, operate and serve. We are committed to being a true force for good, and therefore continue to review and strengthen our approach to protecting the human rights of people within our business and supply chain.

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.



Founded in 1799 with offices in Bury St. Edmunds, Suffolk and Burton on Trent in Staffordshire, we employ approximately 38,600 people across the group with four divisions: Greene King pubs, Destination Brands, Partnership and Ventures, and Brewing & Brands.

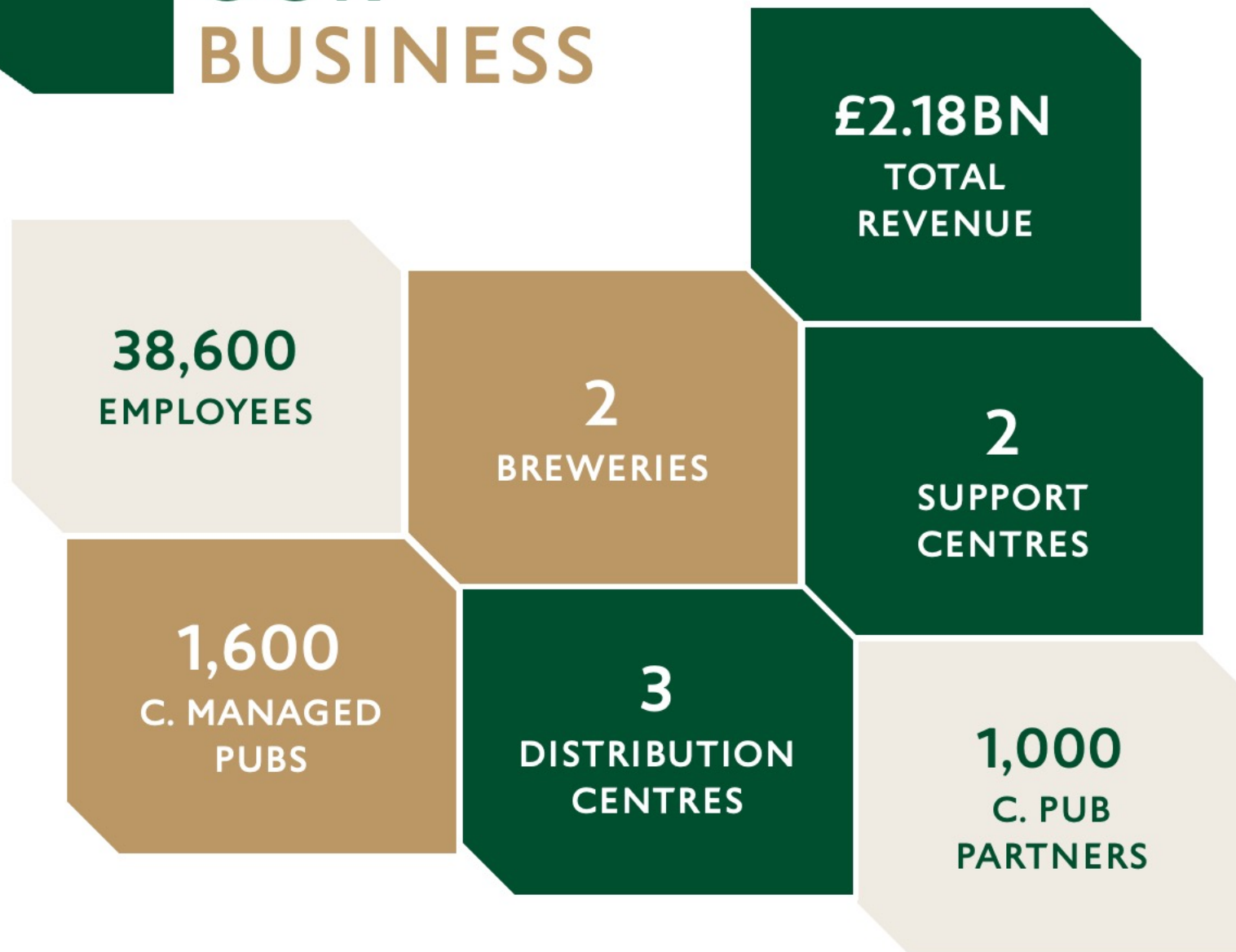
Our leading managed brands and formats include Hungry Horse, Farmhouse Inns and Chef & Brewer. Our Brewing & Brands division brews quality ale brands and premium beers at our two breweries, Westgate Brewery in Bury St Edmunds and the Belhaven Brewery in Dunbar. Our industry-leading portfolio includes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

We work with thousands of suppliers. These include food and drink suppliers for our pubs and raw materials for our beers, as well as goods and services not for resale. Examples of these include 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 2023.

# 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 include our code of conduct, anti-bribery and whistleblowing policies. These are available to all employees via our intranet system. We are currently in the process of updating our code of conduct and will be creating separate versions for our employees and suppliers. The aim of this is to 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.

All new suppliers that we engage with are currently required to agree to our Technical policy, which asks them to adhere to the Ethical Trading Initiative (ETI). We are reviewing our code of conduct for suppliers and will align with international human rights frameworks, such as the UN Guiding Principles and ILO standards.

As part of our risk analysis, we identified that a vulnerable group within our business could be our young workers in pubs. We therefore introduced a new safeguarding of young workers policy in June 2022, which ensures all new employees must have reached school leaving age. To support this, we also introduced a robust risk prevention system that alerts us if an applicant has not yet reached the minimum age requirement. Our deployment team monitors reports to ensure younger workers between 16 and 17 are not working above the appropriate number of hours per shift or week.

## KEY FOCUS AREAS 2023/24:

- Review and republish our employee code of conduct
- Develop and publish our modern slavery policy on the Greene King website

## KEY FOCUS AREAS

2023/24:

- Establish working group responsible for delivery of our action plan

In May 2022, we established an Environmental Social Governance (ESG) Board, which is made up of senior representation from across our core business functions and has overall responsibility for defining our social responsibility strategy, which includes modern slavery. 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, Chief People Officer and Chief Financial Officer.

We took another step forward towards integrating modern slavery into the business in June 2022 by introducing Environment and Social as a key strategy driver. This means that each of our divisions are required to include Environment and Social initiatives within their divisional plans and activities – modern slavery being one example of this.

We have continued to work closely with the Slave-Free Alliance to build a three-year action plan to minimise the risk of modern slavery. This is alongside our ESG operational risk register, which itself includes risks and mitigations relating to modern slavery. Together they give us a clearer view of human rights risks across our business and supply chain. A working group of key stakeholders across functions such as Supply Chain Procurement, Legal and HR will be responsible for the delivery of our action plan, and will be reporting progress back to the ESG board in line with our governance structure.

# 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.

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 are required to agree to our code of practice which is accredited by key industry bodies, but we will also be looking at how we better align our partners with our values regarding modern slavery.

Modern slavery is included within our ESG risk register, however we recognise that a more detailed analysis of risks across our business and supply chain is key to mitigating incidents of human rights abuse and we will therefore continue to work closely with the Slave-Free Alliance to conduct a thorough risk assessment over the coming year.

## KEY FOCUS AREAS 2023/24:

- Develop our modern slavery risk assessment
- Develop a formal escalation process to manage reports of modern slavery and ensure appropriate safeguarding

# OUR 3YR PLAN

## FY23

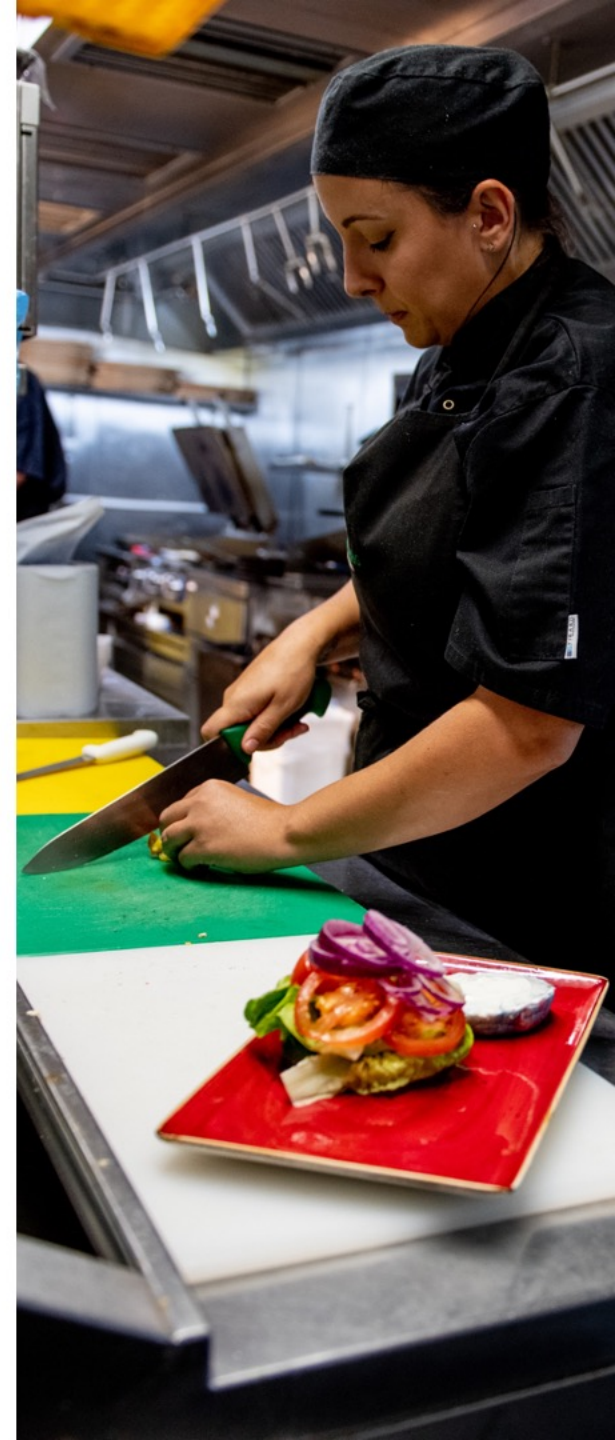
- Establish supplier engagement platform
- Establish modern slavery working group of key internal stakeholders
- Develop a formal escalation process to manage reports of modern slavery and ensure appropriate safeguarding
- Conduct a revised training needs assessment with the Slave-Free Alliance
- Promote our Whistleblowing pathways via internal comms channels
- Conduct training for working group

## FY24

- Develop our modern slavery risk assessment
- Develop and publish our modern slavery policy
- Review and republish our Code of Conduct
- Develop our procurement policy
- Roll out of training modules and workshops for relevant employees
- Develop modern slavery material for induction programmes

## FY25

- Host events to engage suppliers with our modern slavery values and goals
- Invite our pub partners to engage with our modern slavery values and goals
- Expand our whistleblowing policy to include third-party employees
- Develop toolbox talks to educate and signpost reporting pathways for third-party employees
- Embed awareness and response training



## KEY FOCUS AREAS 2023/24:

- Conduct a revised training needs assessment with the Slave-Free Alliance
- Roll out of training modules and workshops for relevant employees
- Induction training on modern slavery for all employees

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.

We have also taken steps to support a selection of our supply chain partners with their modern slavery approach. In 2022, we invited the Slave-Free Alliance to conduct a training session with our procurement and supply chain team. The Slave-Free Alliance also joined our 500 senior leaders to highlight modern slavery at our leadership conference. As a result of this, we were delighted to make introductions for two key suppliers to the Slave-Free Alliance, as well as increase awareness of the issue of modern slavery with some of our key internal and external stakeholders.

Following implementation of our new supplier engagement platform in late 2023, we will be creating a toolkit of resources for our suppliers to access via the platform, which will help to increase their awareness of modern slavery and human trafficking.

## 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

In the last 12 months, there have been seven whistleblowing reports raised via our third party partner NAVEX which were categorised as instances of modern slavery. Each case has been investigated and it has subsequently been found there was no substance to the reports, but were mostly explained by miscommunication within teams.

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

In November 2022, 82% of our resourcing team completed Inclusive Hiring training. This is an annual training programme and will be completed by the remainder of the team in the later part of this year.



**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
- Greene King Services Limited
- Spirit Pub Company (Managed) Limited
- Spirit Pub Company (Services) Limited
- Spirit Pub Company (Supply) Limited
- Spirit Pub Company (Trent) Limited

Approved on behalf of the board of Greene King Limited

Nick Mackenzie  
Chief Executive Officer  
June 2023