

The Restaurant Group Modern Slavery Statement 2025

This document has been published in accordance with the Modern Slavery Act 2015 and constitutes the Modern Slavery Statement for The Restaurant Group Limited and subsidiaries during the reporting year including TRG (Holdings) Limited, Brunning & Price Limited, Blubeckers Limited, Ribble Valley Inns Limited, Wagamama Limited, Wagamama International (Franchising) Limited, Wagamama CPU Limited, TRG Concessions Limited and Barburrito Group Limited for the financial year ended 29 December 2024.

Introduction

As an employer and provider of goods and services we have a key role to play in the fight against slavery, servitude, forced labour and human trafficking (“Modern Slavery”). The Restaurant Group (“TRG”, the “Company” or “Group”) has a zero-tolerance approach to Modern Slavery of any kind in both our operations and our supply chain. We have a responsibility to prevent and detect exploitation and to influence and work together with suppliers and business partners to raise labour standards in our industry. Although our operations and employees are primarily based in the UK, and our key supply chain partners are UK companies, some of the ingredients and food products we buy are produced in other parts of the world, and it is our responsibility to promote high standards of ethical behaviour throughout our supply chain.

Our business

TRG is a significant player in the UK casual dining market, operating approximately 300 restaurants pubs and concessions and employing approximately 15,000 colleagues. Our brands currently include Wagamama, Brunning & Price pubs and Barburrito, as well as a multi-brand Concessions business which trades principally in UK airports. As a responsible business, we recognise our obligation to ensure that our activities are guided by ethical principles and managed in the interests of all our stakeholders. For this reason, the Group has established environmental and social policies and procedures, as well as programmes that protect and sustain the environment, workers within our restaurants and supply chains, and our guests, which are all communicated to suppliers and staff as appropriate. The key policies and statements are also published on our website.

Our policies

Our policies include a broad Human Rights Policy, affirming our commitment to preventing or mitigating human rights impacts both in our own operations and within our supply chain. This is published on our website along with other Company policies including those relating to Whistleblowing and Equality & Diversity. We also have a Safeguarding Policy to address staff welfare issues, which is overseen by a dedicated safeguarding officer.

In addition, our Ethical Sourcing Policy provides further details in respect of human rights in our supply chain and confirms our zero-tolerance approach to Modern Slavery. This policy is based on the Ethical Trading Initiative (“ETI”) Base Code for labour practice and the UN Guiding Principles on Business and

Human Rights, and sets out our expectation for each supplier to thoroughly assess and ensure that all aspects of their supply chain are compliant.

The Ethical Sourcing Policy explicitly prohibits suppliers, among other things, from: using any forced, bonded or indentured labour; employing child labour; charging workers fees or requiring them to lodge identity papers with employers; relying on workers who have been trafficked or transported for the purposes of exploitation; and imposing any form of harsh or inhumane treatment. Suppliers are also required to ensure they provide a safe and hygienic working environment, abide by national employment laws, and pay a fair wage. Suppliers are required to show compliance with this policy and to have their own policies and monitoring systems in place, as well as maintaining appropriate records.

Our people

All our employees undertake right-to-work checks and are required to provide a National Insurance number and their own bank account details. Wages and salaries are paid by bank transfer, and we do not allow payment to be made into third-party bank accounts. All prospective employees participate in a comprehensive interview process. A number of mental health first aiders are trained across the Group to support anyone who may need help and also to help identify symptoms when something may be impacting an individual's ability to perform at work or their well-being outside of work. We also have an employee assistance programme. We encourage colleagues to speak up and inform their line manager or the People team if they are a victim of Modern Slavery, in which case appropriate action will be taken and supportive measures put in place. Whistleblowing arrangements are in place for the whole Group, with Wagamama employees also having access to an external whistleblowing reporting line.

All employees over 21 are paid at least the National Living Wage, and Wagamama and TRG Concessions pay all teams the National Living Wage regardless of age. All tips are paid directly, with no deductions for any administration or processing charges. Within Brunning & Price, during peak season we employ a number of agency staff to help support the operations. All of these temporary agency employees are vetted based on our Company criteria, and we ensure the same principles apply as if they were direct TRG employees, namely in terms of applicable policies, equal pay, payment methods and ensuring they are protected under the Modern Slavery Act.

Employees can raise any suspicions they may have from time to time that Modern Slavery or human trafficking may be taking place within the Group or its supply chain and will be protected under our Whistleblowing Policy where those concerns relate to criminal or illegal activity.

Supply chain purchasing model

In terms of potential Modern Slavery within our supply chain, which covers more than 70 countries, we consider food and beverage purchases a key risk area, given known issues in the agriculture and food production sectors. We operate a centralised procurement model across our brands and divisions for food and beverage supplies as well as for other products such as uniforms and equipment and certain services provided to our sites, which is managed by our Group purchasing team, amounting to around £200 million of annual spend. We have established strong relationships with our suppliers, and we set minimum standards to be adhered to across the Group. We require all our direct suppliers to work closely with their own suppliers, distributors, agents and producers to promote best practice and transparency within our supply chain. Around one fifth of the sites run by our Concessions division are franchises managed on behalf of other brands, who in some cases require us to source from their suppliers. Where this is the case, we will undertake reviews of supplier policies in order to assess alignment with our own standards.

New suppliers

We have a rigorous process for assessing new suppliers on their technical capabilities and ethical credentials. We do not engage with business partners, including suppliers, who do not meet our high standards. New suppliers in our managed supply chain are required to complete a declaration on Responsible Sourcing and Modern Slavery as part of their onboarding. Our procurement contract templates include explicit clauses under which suppliers confirm their compliance and that of their own suppliers with the requirements of the Modern Slavery Act. In addition, under the contract, when a supplier sub-contracts, they are required to conduct a third-party audit of that sub-contractor's Modern Slavery compliance.

Members of our procurement team have been trained to identify the risk indicators of Modern Slavery in our supply chains and receive annual refresher training on the Modern Slavery Act 2015, with emphasis on Section 54 (Transparency of Supply Chains).

We are committed to staying up to date with any relevant changes and amendments to the legislation and will ensure that the key members of our procurement team complete all the necessary refresher training as required.

Supplier Ethical Data Exchange (SEDEX) and ethical audits

Suppliers managed by the procurement team are also required to register with SEDEX, which is one of the main platforms through which companies can manage and improve working conditions in their global supply chains, and complete the supplier assessment questionnaire within the SEDEX system.

In 2024, 14 suppliers were identified as a potential risk based on their SEDEX score (as calculated from questionnaire responses and inherent country/site activity risk). These suppliers have been required to complete SMETA audits (SEDEX Members Ethical Trade Audit), the outcomes of which are shared with us via the platform. Other suppliers may also complete audits, either of their own accord or because of a request from another customer – a total of 102 suppliers have completed audits in the last two years, with the outcomes again being shared with us.

SMETA audits provide information on labour standards, health and safety issues, environmental performance and ethical matters, and are designed to help protect workers from unsafe conditions, overwork, discrimination, low pay and forced labour. Suppliers may be provided with a corrective action plan to help improve performance and resolve any issues identified by the audit findings.

We are in the process of ensuring that any managed suppliers who are not in the SEDEX system are onboarded in a timely manner. We have 276 suppliers registered and linked within the SEDEX platform who supply to our business.

Other suppliers

For those suppliers not managed through central procurement (for example certain non-food suppliers, including property services, and suppliers of head office services including IT providers), different procedures apply. Site maintenance suppliers, for example, are managed through external facilities management platforms which have a formal onboarding process – the platform used for Wagamama, Barburrito and Concessions sites requires suppliers to hold an active SafeContractor accreditation and to confirm their compliance with the reporting requirements of the Modern Slavery Act and whether they have appropriate policies in place and whether any awareness training has taken place.

Potential breaches and reporting

If any breaches of our processes or potential cases of Modern Slavery are identified – whether through internal audit, whistleblowing or any other route – these should be reported to the General Counsel and the Group People Director (if involving TRG staff) or the Group Procurement Director (if supply chain related). If, following consideration, it appears that the case involves possible criminal offences under the Modern Slavery Act (or any other law), the matter should be referred up to the CFO and CEO and the police informed.

Governance

Heads of each relevant business area or function, including brand and divisional managing directors, and the heads of the procurement, legal, property, finance and IT teams have responsibility for their department's compliance with relevant policies. All key Group policies are approved at Board or senior executive level and are reviewed annually to assess their effectiveness for the future.

Assessment of effectiveness in preventing Modern Slavery

We will continue to keep under review new risks as they emerge and carefully monitor both existing and new suppliers and business activities. Our procurement team have a robust verification programme in place to confirm our suppliers' compliance with the Modern Slavery Act and TRG policies, based on SEDEX registration (where appropriate), regular supplier visits, ongoing communication, and supplier reviews and audits. We believe in continuous improvement in the prevention of Modern Slavery and we will continue to review our processes annually to ensure they reflect best practice – for example, we are looking to ensure improved onboarding, review and audit procedures are in place for suppliers not managed through central procurement, and at expanding the scope of our Modern Slavery training programmes.

This statement was approved by the Board of The Restaurant Group Ltd on 18 June 2025 on behalf of all Group entities during the 2024 reporting year.

Signed by



Andy Hornby

Chief Executive Officer

The Restaurant Group Limited

18 June 2025