



WHITBREAD PLC  
Whitbread Group PLC 2023/24

Modern  
Slavery  
*Statement*  
2023/24

Following our sixth statement published at the end of Whitbread's 2022/23 financial year, this document provides an update on our work over the past 12 months to **mitigate the risks of modern slavery across our business and supply chain**. This report is pursuant to the **UK Modern Slavery Act 2015**.

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# Whitbread Modern Slavery Statement 2023/2024

**Dominic Paul**  
Chief Executive



**As part of our Company-wide Force for Good sustainability programme, which is focused on enabling people to live and work well, we recognise our responsibility as the UK’s largest hospitality company to respect the human rights of every worker supplying goods or services to us, every team member helping us deliver great service to our customers, and the guests and communities that we serve every day.**

It has remained a challenging global context for the business with continued headwinds such as inflation and geo-political events impacting global supply chains. These events continue to highlight the importance of embedding the Force for Good programme within our systems and organisation, as we remain committed to providing a safe and healthy environment for workers and customers across our global operation.

Our Responsible Sourcing programme has remained a priority this year, with continued focus on evolving our understanding of risk and developing a dynamic programme that is fast to respond to issues as they arise. This year we welcome the launch of a refreshed Whistleblowing facility that is available to all Whitbread team members and workers in our supply chain.

Our International Sourcing team has adopted a dynamic response to human rights risk, implementing an enhanced due diligence programme for high-risk sourcing regions. These high-risk regions are not static and we will update the programme in response to real-world events. Our teams are working directly with factories, with the support of auditing bodies, to complete effective risk assessments and assist with resolving issues if they do arise.

Our policy is clear: everyone deserves to be treated with fairness, dignity and respect, whether in our business or in our supply chain. We are committed to working collaboratively with our suppliers and our stakeholder network, learning from our experiences and continually developing and improving our programme where we know there may be risk. Where suppliers demonstrate a disregard for our standards, we will work with them to improve processes. After which, our policies are clear that, where a supplier demonstrates a persistent disregard for our standards, we will cease working with them.

In 2024, I look forward to supporting the development of this programme even further. We will continue to work closely with partners and stakeholders to deliver a best-practice programme which addresses risk and promotes freedom from exploitation for all those in our value chain and the communities we serve.

This statement covers the period 1 March 2023 to 29 February 2024. It builds on our historical statements which outline the strategy and policies that underpin our due diligence programme. This Modern Slavery Statement was approved by our Executive Committee and by the Whitbread PLC Board on 25 April 2024.

  
**Dominic Paul**  
Chief Executive  
25 April 2024

# Business and supply chain structure

Whitbread Group PLC is the UK's largest hospitality company and owns the country's favourite hotel business, Premier Inn.

Premier Inn is the leading budget/economy brand, with the largest network in the UK.

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# Business and supply chain structure

We have 853<sup>1</sup> hotels in the UK and Ireland, 59 in Germany and more than 95,000 rooms. Almost<sup>2</sup> all of our UK & Ireland located hotels and restaurants are operated by us and we have a hot food offer in almost every location.

We also own a minority stake in a joint venture with Emirates which operates 11 hotels in the Middle East.

For the purpose of this document, the references to policies and procedures relate to the Whitbread UK & Ireland operation (and incorporates all Whitbread's subsidiaries in the UK & Ireland).

Our newly published Human Rights Strategy Statement, pursuant to the German Supply Chain Act 2024, is published separately on our website and can be found [here](#), the latest update on our German Supply Chain work can be found in this section.

[Human Rights Strategy Statement](#)



1 This includes one site in each of Guernsey and the Isle of Man and two sites in Jersey.  
 2 As at 29th February 2024, 44 restaurants operate under a third party and serve our hotel guests breakfast under the terms of a co-location agreement.

# Business and supply chain network

**We purchase our goods and services directly from over 1,500 suppliers (also known as tier<sup>1</sup>).**

Most of our suppliers are manufacturers of finished product (e.g. beds and furniture), food processors, construction contractors and providers of services (e.g. technology and laundry). The majority (c.90%) of our tier 1 supplier network are based in the UK, supported by a global supply chain.

 A full list of our supplier country locations can be found in the **Appendix - Direct supplier location**

Of these tier 1 suppliers, we have 22 critical suppliers. For Whitbread, a critical supplier is one that has both high strategic impact and operational criticality, and whose product or service is central to our core brand offerings.

The Procurement team in the UK is positioned in the Group Operations function, led by our Group Operations and Transformation Director. The Sustainability team works very closely with this team to ensure our policies and processes related to modern slavery and other elements of responsible sourcing are adhered to and implemented effectively across our value chain. We ensure that a sustainability representative is present within procurement and supply chain leadership calls, on a monthly basis, to guarantee alignment.



<sup>1</sup> We refer to those supplier from whom we directly procure from as tier 1 and therefore indirect suppliers are classified as tier 2.

# Accountability for modern slavery risk management

The CEO and members of the Executive Committee have overarching accountability for the standards of our supply chain, the treatment of our team members and the safety of our guests.

## Supply chain

The Group General Counsel has overarching accountability for setting the right policies to enable ethical performance of our supply chain.

Accountability for measuring, monitoring and making recommendations for mitigating and remediating risk in the supply chain lies with the Head of Sustainability, supported by the Responsible Sourcing and Sustainability Manager in our Legal function.

Accountability for managing supplier participation in the Responsible Sourcing programme and responding to any risk sits with our Procurement function, overseen by the Group Operations and Transformation Director, led by the Procurement and Supply Chain Director.



## Team members

The Group People Director has overarching accountability for ensuring that the right policies are in place to ensure that the risks are being managed.

Day-to-day management of the policy compliance is managed by the individual teams across the business.



## Guests

The business unit Managing Directors and Director of Safety and Security ('S&S') and S&S team support the CEO and Executive Committee members with the management of safety across the business.

Day-to-day management of safety and security is the responsibility of Site Managers and Team Members, who are supported by their Regional Operational Managers.



# Risks of modern slavery across the business

We continue to recognise that there are a number of ways in which our business could be affected by modern slavery.

How we assess and mitigate that risk is dependent on the type of risk, our leverage and ability to manage it, and where accountability for doing that sits within the business or supply chain.

The fundamental areas of risk and the accountabilities for managing them remain unchanged from last year's report: team members, supply chain and our guests.

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# Team members

We have 36,500 team members in the UK and Ireland, and 1,500 in Germany, working across the Whitbread brands, directly employed by Whitbread. As a hospitality business, we recognise that ensuring people are treated fairly, and are empowered to develop their skills and fulfil their potential is what allows us to continue delivering high standards for our customers every day – and this is at the heart of our strategy.

Modern slavery is a risk recorded within our People team risk log and is therefore incorporated into our human resource risk management process.

## Team members: Policies

Having direct control over how the people working in our hotels and restaurants are employed reduces the risk that someone working for our business might be a victim of modern slavery. We recognise that certain roles have higher levels of modern slavery risk, such as housekeeping, which is why we have ensured this role is directly employed in the UK and Ireland. However, we still ensure that we do all we can to mitigate that risk through our clear employment policies and processes. We also recognise that migrant employees may be more vulnerable, and we therefore ensure that all employees hold a valid right to work as part of our recruitment process.

Below is a list of these policies and an outline of their purpose and process of implementation:

**Code of Conduct** – This document outlines the way we do things at Whitbread and is provided to all employees upon joining. Code of conduct is part of induction training and every two years team members complete online training and assessment. Teams in procurement, supply chain, and property functions also have targeted sessions annually, due to the heightened risk in these functions. All employees are required to read the code and confirm every two years that they are familiar with the content. It signposts to useful and relevant policies including Speaking Out, Grievance and Diversity and Inclusion, ensuring our employees have an ongoing awareness of the policies Whitbread has in place to support them. It also explains, through our values, how we intend to do business everywhere by working responsibly and ethically to be a positive part within the communities that we operate.

**Human Rights Policy** – This Policy defines the most salient human rights for our business and value chain and the standards, related policies and processes we will put in place to ensure they are respected. It also outlines the standards that must be followed and describes who is accountable and responsible for making it work, both within our organisation and influencing our business partners.

**Speaking Out Policy** – This document outlines the process we follow when our employees raise a concern about wrongdoing, danger or breach of the Code of Conduct, or criminal activity such as human trafficking. The Policy ensures that concerns raised are dealt with without fear of reprisal, can be raised anonymously and will be investigated in line with a robust and transparent procedure. Any such concern may be raised internally, or through our independent and confidential Speaking Out service provided by Safecall. Safecall can be used by team members or employees within Whitbread as well as third parties including suppliers to raise a concern. Reports can be made in multiple languages online, or via telephone, or on handheld devices by scanning the QR code displayed in all Whitbread locations as well as communicated to suppliers.

**Grievance Policy** – Supports and provides guidance to employees and managers regarding any concerns raised by an employee in relation to their work. This process encourages concerns to be raised informally in the first instance in order to encourage an open and honest culture; however, it also outlines the formal process in the event that concerns raised cannot be resolved through the informal route or, in more serious cases, where it is appropriate to deal with matters formally at the outset. As such, the Grievance Policy provides clear guidelines on how individuals can raise their concerns, along with what will happen at that point and the potential outcomes of any investigation into the issues raised. Individuals are also welcome to have union representation during any grievance process.

**Diversity and Inclusion Policy** – Outlines our active commitment to provide equal opportunities and embrace diversity throughout employment. This Policy also clearly explains what individuals can do in the event they do not feel they are being treated fairly or equally.

**Right to work** – This Policy reflects Whitbread's commitment to recruit talented people and ensure legal compliance. Whitbread will not employ anyone who cannot demonstrate their legal right to work. In 2023 we implemented new processes and technology to enhance the quality and consistency of document checks. All candidates progressing to an interview are required to upload evidence of their right to work directly to a secure online platform, where they are checked by a specialist third-party organisation. Through automating the checks in this way, we have an even greater level of confidence that the legislative requirements are applied consistently and in a non-discriminatory fashion.

**Implementation tools** – Performance of right to work checks are formally reported as part of our internal operational performance management and auditing processes. Our Speaking Out and Grievance Policies are supported by internal processes for confidential reporting which are reported to our General Counsel. Our Code of Conduct is embedded through training.



## Team members: Due diligence

### Modern slavery training

Recognising the risk that our hotels could be used as locations for trafficked individuals to be harboured or exploited, we have taken steps to empower our team members to respond in the right way if they suspect that something is not quite right.

All team members working across our hotels and front of house teams in restaurant sites are required to undertake a mandatory e-learning module on modern slavery within 90 days of starting their role. This is embedded into our induction processes for all team members joining the business and we have undertaken similar training with all our People teams, including shared services, resourcing, operations and employee relations. Following the e-learning module, team members must answer questions correctly to pass the module. Currently 98.2% of all those team members who are required to complete the course have done so.

This bespoke training focuses on raising awareness of human trafficking and modern slavery issues, empowering our teams to identify indications of human trafficking abuse in our sites and providing them with the tools to report it quickly and effectively. Our training has been informed by experts at Stop The Traffik and uses real-world case studies to better inform the various signs of modern slavery that could be observed in a hospitality environment. With all team members being aware of the risks that modern slavery presents and knowing how to safely report concerns, we can work to make all our sites a safe place for our guests and team members alike.

All of our team members have access to whistleblowing services, called 'Speaking Out', that is available 365 days a year, can be used to raise concerns of major business wrongdoing in a confidential and anonymous manner. The Audit Committee oversees the Speaking Out programme and is provided with detailed reports twice a year, in April and October, detailing the number of reports received, the nature of the reports, and other particulars, with no identifiable information within the reports of who raised the concern to maintain anonymity.

In October 2022, the Audit Committee suggested a review of the Speaking Out services to ensure that they are working effectively and in line with current trends and industry best practices. As a result of the review, a new Speaking Out services provider was identified called Safecall, through which reports can be made by team members across all Whitbread sites, employees in the Support Centre (head office) and suppliers across the UK and Germany and overseas in over 100 languages, through web-based reporting or via a hotline.

The Speaking Out service can be used to report major business wrongdoings, such as:

- bribery/corruption;
- theft/fraud;
- mismanagement of funds;
- misuse of corporate assets;
- serious health and safety violations;
- serious environmental concerns;
- misleading marketing/advertising; and
- data privacy breaches.



We encourage team members to speak to their line manager if they are comfortable doing so and raise a grievance in line with the grievance policy, if the concern relates to any of the following:

- harassment/bullying;
- discrimination;
- physical violence;
- unfair treatment;
- management behaviour; or
- behaviour in any other way not aligned with our Code of Conduct.

# Supply chain

As reported in our earlier statements, based on a risk assessment undertaken in partnership with Stop The Traffik (‘STT’), our analysis identified that most risk lies in the lower tiers of our supply chain (ie. suppliers to our suppliers) – often several tiers away from our direct control – meaning a collaborative approach, working with our suppliers to manage the risk, is crucial to our Responsible Sourcing programme.

This year, we have continued to focus our efforts on working closely with these high-risk suppliers to address and mitigate our risk by working through our ‘Human Rights in the Supply Chain’ due diligence process (figure 1) and our enhanced due diligence process (figure 2).

## Supply chain: Policy

Our programme is underpinned by our Responsible Sourcing Policy outlining the minimum standards we require all suppliers, across all geographies, products and services, to comply with.

Our Policy is aligned with the International Labour Organization (‘ILO’) convention, the UN Guiding Principles on Business and Human Rights and now the German Supply Chain Due Diligence Act. This Policy is reviewed annually.

Specifically, with regard to modern slavery, it states that there will be:

- no trafficked individuals working in any part of our supply chain;
- no forced, bonded, indentured or involuntary prison labour or any other labour of a similar conduct in any part of our supply chain; or
- no payment of recruitment fees on behalf of the worker, no lodging ‘deposits’ or identity papers with their employer, and states that workers must be free to leave their employer after legal or statutory notice.

Last year, using data gathered internally and through our partners Stop The Traffik, Whitbread implemented a new, additional policy for sourcing requirements – creating a high-risk countries list, where additional due diligence disclosures are now mandatory during tender and a banned countries sourcing list. These country risk assessments are based on over 20 open-source data fields, as well as additional information on real-world events and intelligence reports. We will update these lists annually during a formal review process led by the Force for Good team.



Our internal supplier data management system allows us to record our suppliers’ commitment to work to the standards outlined in this Policy and measure their performance against it through questionnaires, supporting evidence and verification. Ethical sourcing, sustainability credentials and modern slavery are fully integrated into our core contract management framework platform (‘Trade Interchange’).

This process means that new suppliers<sup>2</sup> cannot be introduced without Whitbread understanding their approach and commitment to responsible sourcing. The platform is continually monitored by our Procurement and Sustainability teams.

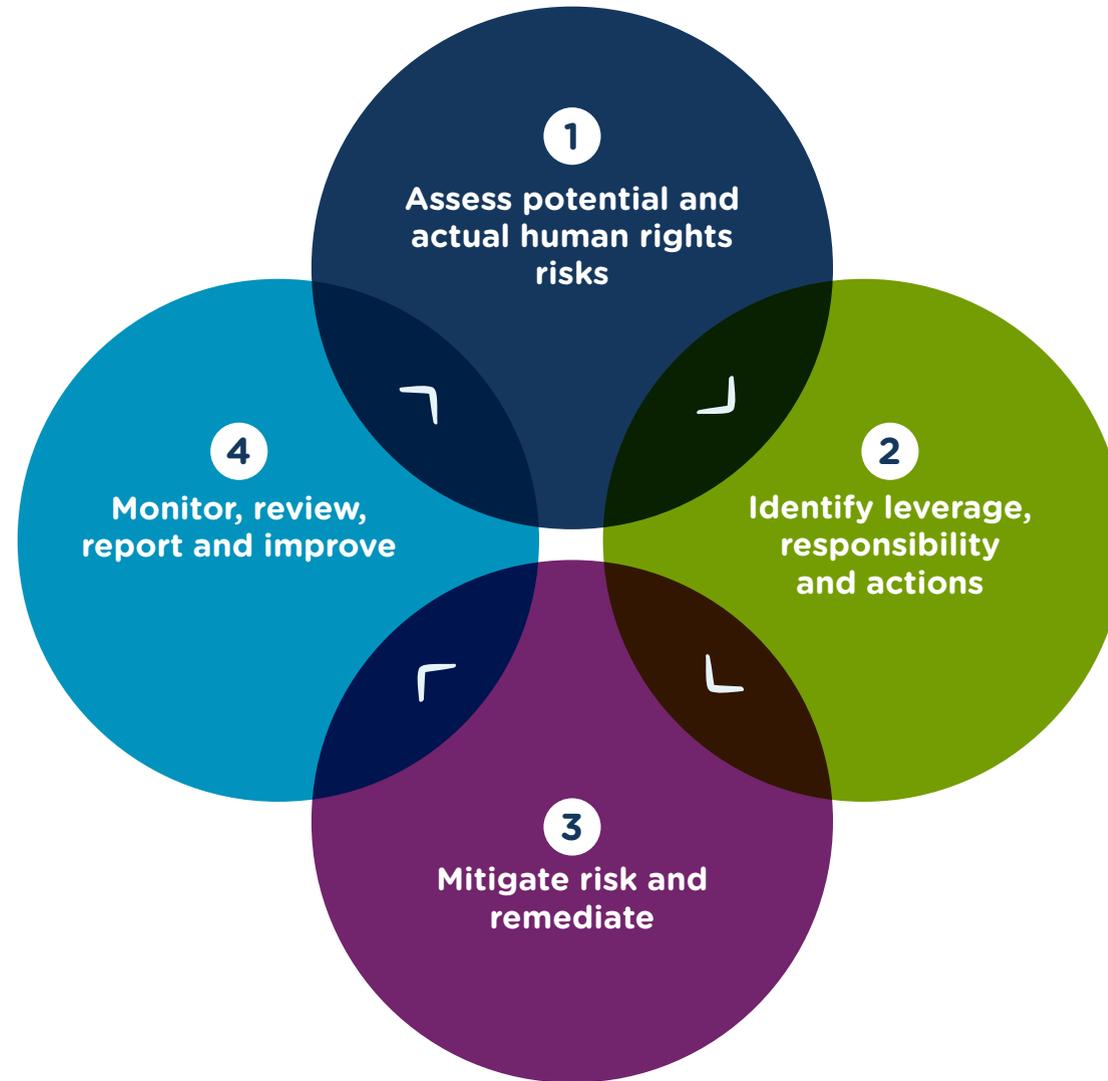
## Supplier Prompt Payment Policy and Scheme

We know that prompt payments are important for suppliers and their staff. Our supplier agreements state that invoices will be paid within the agreed service level agreements. We monitor our payments, as part of the Government prompt payment scheme, reporting our payment performance twice annually to the Government.

<sup>2</sup> For suppliers with annual value greater than £50k annual spend.

# Supply chain: Due diligence

## Human Rights in the Supply Chain



This is a continual cycle through which we work with our suppliers. Within these categories, we can then identify any risk areas that require further engagement or remediation.

The diagram overleaf outlines the standard due diligence processes we take across our supply base and further engagement taken with our high-risk suppliers.

**Figure 1:**  
**‘Human rights in the supply chain’  
 due diligence process**

**Overview of process**  
 Since the beginning of our Responsible Sourcing programme, we have conducted due diligence processes across every tier <sup>3</sup> supplier to:

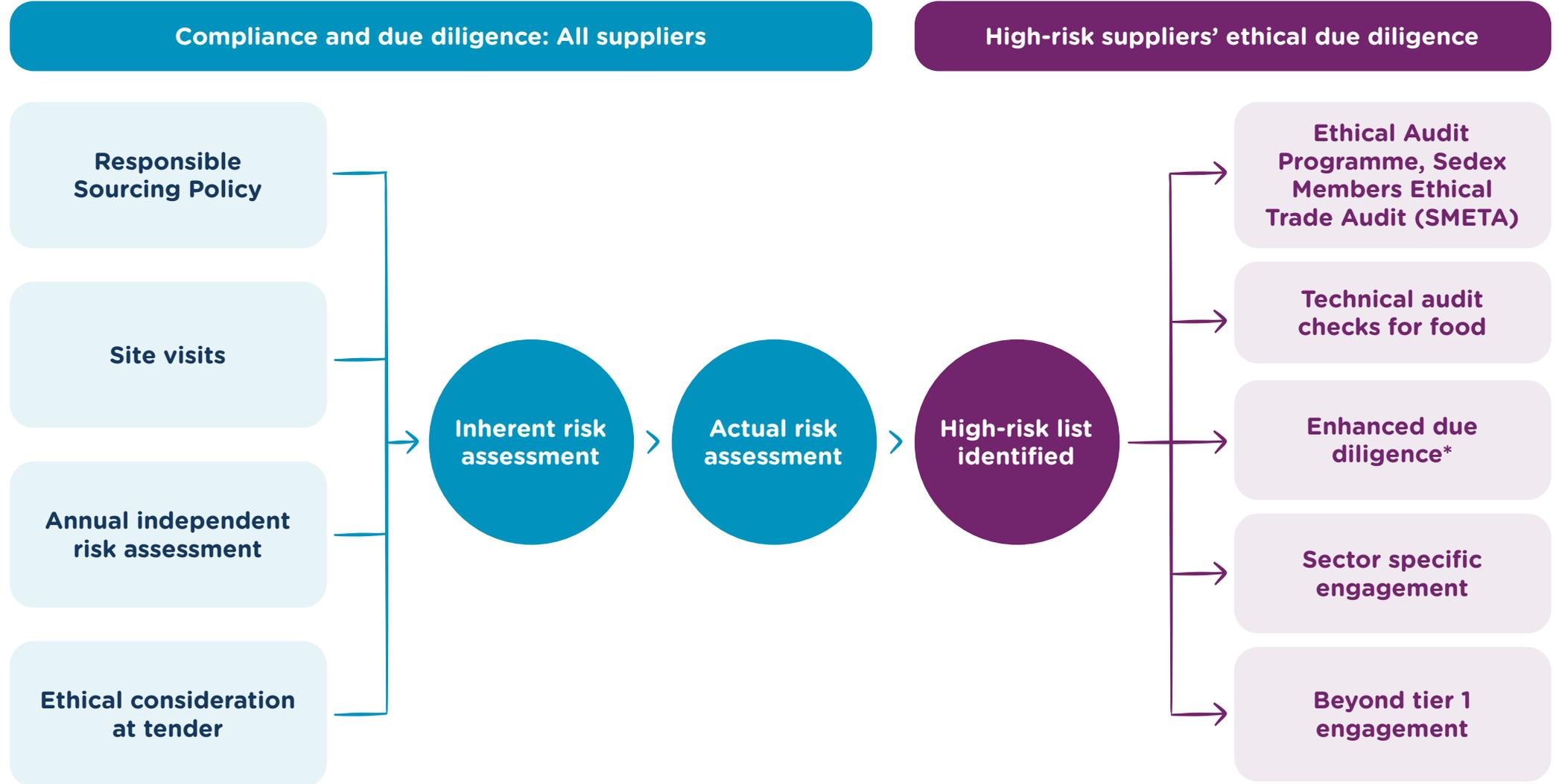
<sup>3</sup> Tier 1 – Suppliers direct to our Whitbread UK operation and with contractual value >£50k annually.

# High-risk suppliers

**Figure 2:**  
Due diligence processes taken with our high-risk suppliers

**Overview of process**

The diagram to the right outlines the standard due diligence processes we take across our supply base and further engagement taken with our high-risk suppliers.



\* Further details are outlined in Supply chain risk assessment – Enhanced due diligence.

# Assessing risks in our supply chain

## Supply Chain: Risk assessment

Our risk assessment comprises of two key stages: inherent risk assessment and actual risk assessment. The purpose is to identify key sectors and geographies in our supply chain with inherent high risk and then layer this with actual risk assessments in relation to the material impact on our business. We also take into account the results of due diligence assessments undertaken through the Supplier Ethical Data Exchange ('Sedex') platform and review any corrective action plans in place as a result of those audits.

The key sectors identified in our business with high inherent ethical risk are:



### Services

Housekeeping and contract cleaning

Laundry services

Construction

Logistics and waste management



### Food and beverage

Meat and poultry suppliers

Food manufacturing



### Non-food

Case goods suppliers

Consumable items

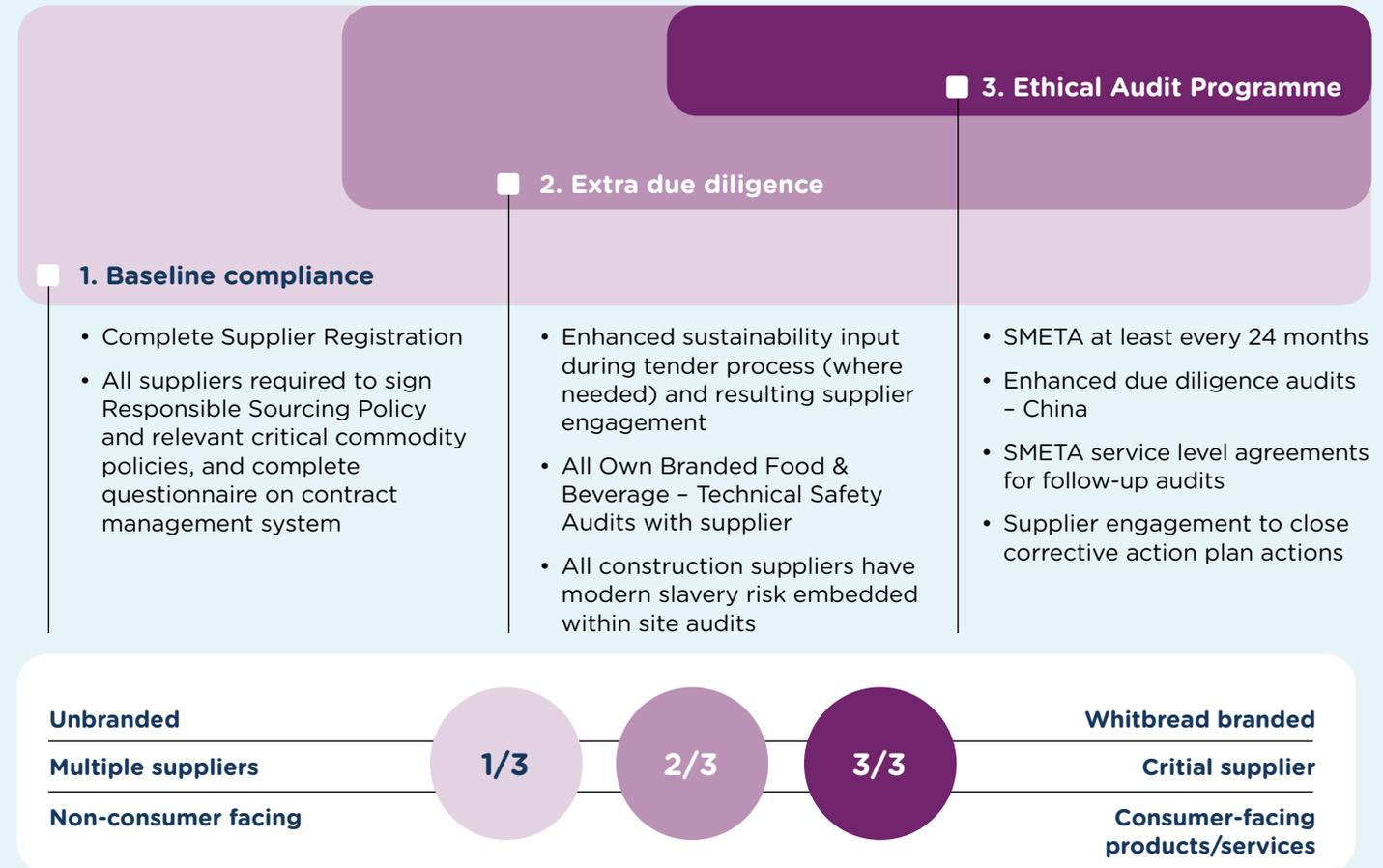
Manufactured furniture

Production of cotton-based fibres

From this inherent list, we assign each supplier with an 'actual risk' rating according to our existing knowledge of its business and level of risk management, as well as our relationship, leverage and partnership with each supplier. Currently, our actual high-risk supplier list comprises of 97 suppliers.

Our risk assessment process is embedded as a standard, ongoing, internal practice for any supply chain change or addition that falls in an inherent risk area. The number of high-risk suppliers is dynamic and may change throughout the year as new high-risk suppliers are added, and any suppliers that may have a change in circumstance or loss of contract are removed.

The below process highlights our ongoing risk assessment process for new suppliers, commodities or services and the actions associated with the risk given.



**Supply chain risk assessment – International Sourcing, beyond tier 1**

Through our work with Stop The Traffik and our International Sourcing team in Shanghai, we now map every newly identified factory (tier 1 or tier 2) located in China to assess proximity to identified risk hotspots. If factories are located within these hotspots, then Whitbread will request enhanced due diligence is undertaken prior to sourcing from the factory. Details of the enhanced due diligence process are outlined below. Our enhanced due diligence checks incorporate the following items and are undertaken with semi-announced ethical audits.

**Enhanced due diligence elements**

 <p><b>Additional workforce checks</b></p>	 <p><b>Demographics</b></p>	 <p><b>Product traceability</b></p>
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**Key components**

 <p><b>46 bespoke checks relating to worker conditions, contracts and factory conditions</b></p>	 <p><b>Country-specific demographic record</b></p>	 <p><b>Confirmation of product processing on site, raw material checks on site, batch reference numbers check</b></p>
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# Ethics

## Ethical Audit Programme: Overview

Working with an independent, third-party auditor Intertek, we conduct SMETA audits for suppliers that we recognise as high risk. These audits assess compliance against our Responsible Sourcing Policy using the SMETA guidelines for best practice.

We appreciate that meaningful change needs collective effort and consistent activity; therefore, after audits are conducted, we work closely with our suppliers to address and help remediate any issues that are uncovered. We welcome the efforts of the suppliers that have been actively engaged this year in our audit programme. However, we do state in our Responsible Sourcing Policy that we reserve the right to cease trading with suppliers that demonstrate a persistent disregard for our standards.

This year, during an ethical audit, a supplier was made aware of a number of migrant workers who had paid recruitment fees to a third party prior to traveling to the supplier location and commencing employment. Since then the supplier fully investigated the issue, improved internal controls and fully reimbursed the workers. These cases are a reminder of the importance of regular audits and continuing to engage with workers in the supply chain.

## Ethical Audit Programme: Update

This year we have continued to work with our suppliers who conduct audits, and work on corrective action plans, highlighted by the SMETA audit process. This year, an estimated 23,000 supplier employees were impacted by policy, procedure and control improvements relating to working hours, discrimination, regular employment and health and safety.

The figure across demonstrates the audits of all suppliers we are linked to in the Sedex platform.

This year we have continued to work with our suppliers to conduct audits and work on corrective action plans highlighted by the SMETA audit process.

## Ethical Audit Programme: International Sourcing

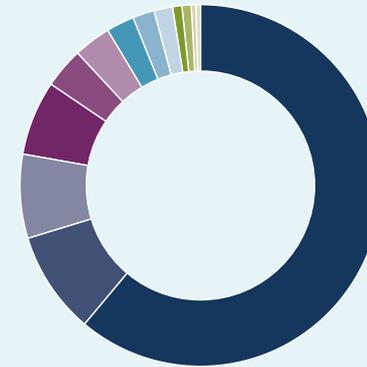
We recognise the inherent risks associated with ethical trade that sourcing in China can bring, and we are pleased that, through our International Sourcing team, we are able to work directly with these factories. This allows us greater leverage and control to influence positive change and ensure human rights are respected.

This year we:

- completed risk assessments for all newly proposed tier 1 or tier 2 sites as part of our enhanced due diligence process; and
- completed one enhanced ethical audit.

The ongoing collaboration with the International Sourcing team and our suppliers helps us to strengthen our due diligence process and procedures.

## SMETA Findings Theme



Health, safety and hygiene	61.29%
Working hours	9.09%
Wages	7.62%
Regular employment	6.45%
Management Systems	3.81%
Environment to work	3.23%
Children and young workers	2.64%
No harsh/inhumane treatment - discipline/grievance	1.76%
Environment	1.76%
Business ethics	0.88%
Discrimination	0.88%
Freedom of association and collective bargaining	0.29%
Employment is freely chosen	0.29%



Engaging in the Responsible Sourcing programme has been critical to our International Sourcing function. Through training and a clear process in engaging with suppliers, we recognise we have an opportunity to influence positive mitigation for human rights and modern slavery risk at supplier sites. This year we have focused efforts on developing our enhanced due diligence process and embedding this process into business as usual for our International Sourcing team. Open, transparent and honest relationships with suppliers are the key to ensuring we uphold our responsibility to respect the human rights of workers across our supply chain and I look forward to strengthening our work as we move into the next year.

**Dougie Knight**  
International Head of Supply Chain

# Ethics continued

## Grievance mechanism: Site visits - Whistleblowing

During on-site audits and interviews, our auditor provides details of a whistleblowing contact line enabling workers to contact us anonymously (via our auditor) to bring anything they feel is relevant to our attention<sup>5</sup>. Any information coming through this mechanism is then passed onto the Responsible Sourcing and Sustainability Manager.

## Grievance mechanism: Supply chain - Whistleblowing

This year, we are proud to have also launched a whistleblowing hotline that can be used not only by our team members but also all workers in our supply chain. Introducing this whistleblowing hotline into the supply chain extends the mechanism by which workers can reach Whitbread to raise concerns regarding human rights or the environment.

[Details on the hotline can be found here](#)

## Incorporating modern slavery risk into commercial risk

Our ethical risk assessment process has been embedded into wider risk reviews in the Procurement and Supply Chain function. The ethical high-risk list forms part of a holistic risk assessment of suppliers that also includes any other business risks that could exacerbate one another.

In addition to audits, we recognise that site visits by our Procurement Managers are an opportunity for working conditions and workers' rights to be assessed. This holistic approach to continual monitoring of risk is an aspect that the Force for Good team encourages and continues to build into everyday practices.

To ensure teams are equipped with the right knowledge, this year we will conduct further modern slavery training with our Procurement and Supply Chain teams.

This training has been designed in collaboration with our partners Stop The Traffik and covers the following:



Our Technical Food teams also continue to conduct visual modern slavery site checks during their routine site visits for our food and drink suppliers. This enables the Central Sustainability team to gather more data points to assess the health and the risk of individual sites.



<sup>5</sup> Not available for audits in China.

# Ethics continued



## Supplier Ethical Data Exchange

We are members of Sedex, giving us improved visibility of the supply chain, including beyond our directly contracted suppliers. It also provides us with better information on the employment processes and practices at manufacturing sites. Some suppliers conduct their own SMETA audits on an 18- to 24-month cycle. On a monthly basis, the Responsible Sourcing and Sustainability Manager monitors the Sedex platform to ensure that these suppliers are, where applicable, closing down corrective actions in a timely manner. Procurement managers can then escalate this insight to suppliers to ensure they are maintaining expected standards.

## Ethical Audit Programme: 2024

Looking forward, we will continue to:

- complete our inherent and actual risk assessment across all our key UK and German suppliers, and develop our supplier audit plans in line with this; and
- conduct enhanced due diligence with our International Sourcing Office.

## International business - Due diligence

We currently have 59 operational hotels in Germany, and this is forecast to increase as detailed in our latest Annual Report. As of 1st January 2024 Whitbread PLC is now required to operate under the German Supply Chain Act. In the year leading up to this, Whitbread has:

- established a whistleblowing facility, available to all our team members and suppliers – more detail can be found in the Team Members: Policies section; and
- published our first annual human rights strategy statement – which can be found [here](#).

This year we will:

- conduct a supplier human rights and environmental risk assessment of our direct German suppliers (as well as our UK supply chain); and
- manage supplier risk under a newly established risk management framework for Germany.

## International business - Middle East joint venture

Whitbread also participates as a minority shareholder in a joint venture with Emirates, which operates 11 Premier Inn hotels in the Middle East. Whitbread follows the local labour laws relevant to the jurisdictions of the hotels. As part of ongoing risk management, we continue to review relevant policies and procedures in place with respect to modern slavery. We undertook a human rights risk review in 2022. The review identified our most salient human rights risks across our organisation, with a specific focus on the joint venture in the Middle East.

The review has led to the implementation of a Human Resource System ('HRS') aimed at enhancing the transparency of our backend HR processes, particularly concerning the onboarding and departure procedures of our employees. As part of our commitment to ethical practices, a comprehensive Code of Conduct has been introduced across our entire business. This code ensures compliance with migrant worker rights in the Middle East.

Furthermore, we will be taking steps to publish this information on the Middle East, company website to strengthen our commitment to transparency and promote awareness and adherence to the principles of ethical employment practices.

Premier Inn remains dedicated to the eradication of modern slavery, and we will continue to assess and enhance our practices to ensure a fair and responsible working environment for all involved in our operations.

# Guests

## Guests: Policy

We take the potential issue of child or adult exploitation very seriously. We recognise that there is a risk in all hospitality companies that hotels might be used for the sexual exploitation of adults or children, or the harbouring/movement of adults and children for the use of forced labour.

Whilst we recognise that this is a risk which we cannot always directly control, there are actions we can take to make sure that our own team members are properly trained to spot the signs of exploitation and empowered to act on any suspicions quickly and effectively.

As such, we have our own dedicated, bespoke e-learning training course covering Child Sexual Exploitation ('CSE') which all team members can complete. This module illustrates the bespoke nature of our training for team members on modern slavery and how spotting the signs is adapted to specific forms of exploitation, better protecting our colleagues, guests and local communities.

## Guests: Due diligence

During the calendar year to the end of December 2023, 12,143 team members have completed our e-learning module on the specific issue of Child Sexual Exploitation. For more information on our mandatory e-learning module which covers the fundamentals of modern slavery, please see [page 9](#).

No cases of modern slavery have been identified for guests.



# Partnerships and collaboration

We recognise that managing the risk of modern slavery is complex and we value the positive impact that collaboration and partnerships can have in tackling these issues, both across our supply chain and with other stakeholder groups.

We were also pleased to join forces with Intertek to continue to support our Ethical Audit Programme with UK & Ireland and our international supply chain. We look forward to continuing these relationships as we delve deeper into our supply chains in the coming year.

Working collaboratively with our supplier network allows us to develop a deep understanding of how compliance with our Policy works in practice.

We are continually improving and developing our strategy as we learn from our compliance and remediation actions. We will continue to build on our strong supplier relationships to drive meaningful change.

# Partner testimonials



Whitbread continues to be a leader in the hospitality space by embedding Sedex into its responsible sourcing practices. We are proud to continue our partnership together and demonstrate the benefits of Sedex membership for assessing risk and improving ethical practices throughout the global supply chain.

Sedex

**Sedex** | Member



Together Whitbread and Intertek have collaborated to build a due diligence programme that supports Whitbread in making informed decisions about its global supply chain. With SMETA social audits as a core deliverable, we have adapted to address new and unique challenges that Whitbread has faced, including tailored supply chain audits for the service and construction sectors, implementing a whistleblowing process for reporting and investigation of workers' concerns, and adopting a remote audit approach to maintain supply chain integrity during the COVID-19 pandemic. We continue to partner with Whitbread to evolve this programme as we look to address new frontiers in the changing face of modern slavery and ethical operations in global supply chains.

Intertek



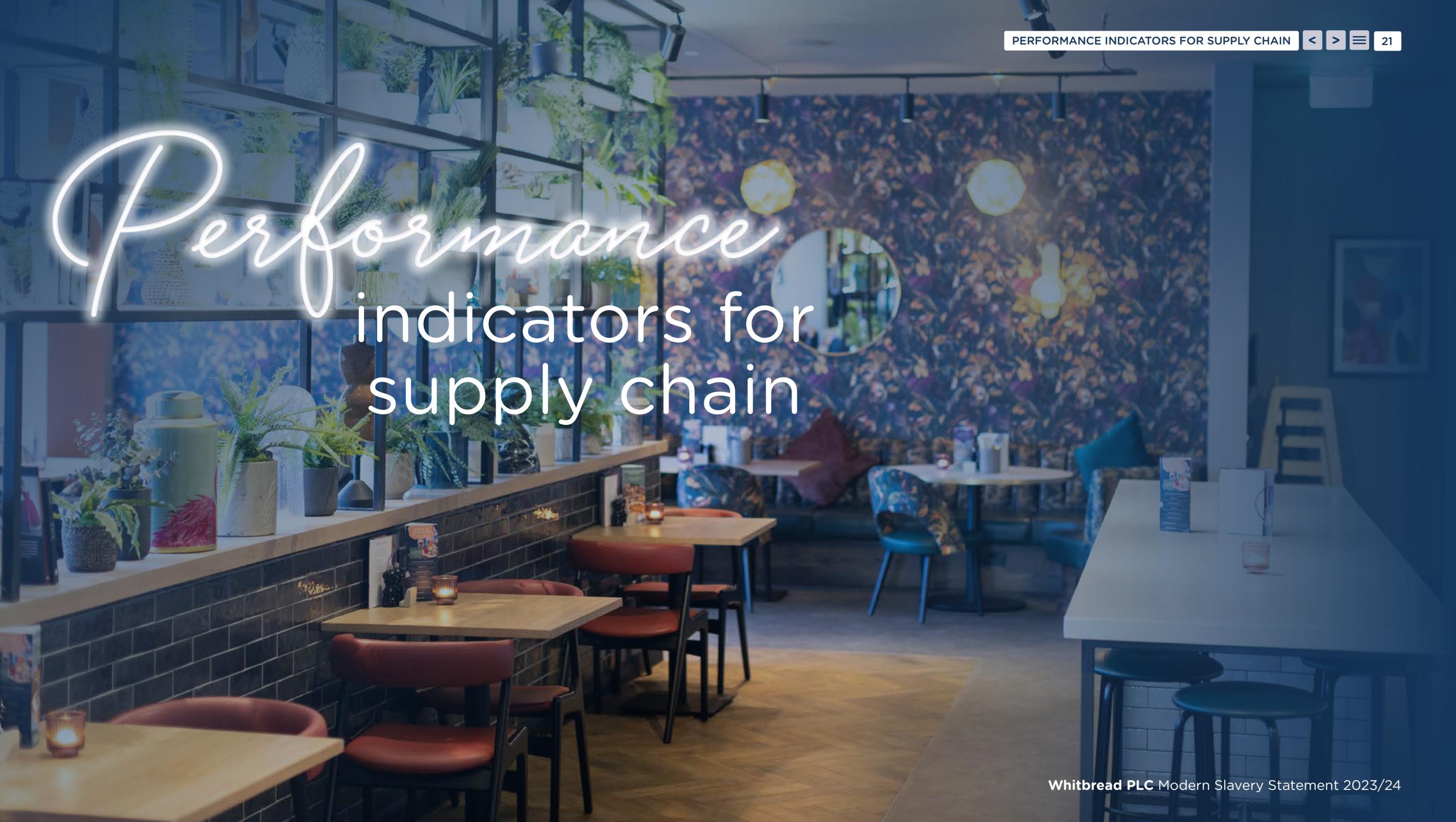
Ground Control's engagement with the SMETA audit process alongside Whitbread has helped us refine and develop our approach to Modern Slavery, as well as improving our internal controls to protect our employees and the people who work on our behalf. As a direct result of the audit process we have improved awareness of Modern Slavery throughout our entire management chain, especially those that work with and supervise all our field-based people. Compulsory training for all our employees has also been implemented, which includes information on how to safely raise any Modern Slavery concerns with an independent body. We have also refined our internal processes to ensure we can better evidence and report on our compliance with the ETI Base Code.

Ground Control



Bernard Sims Associates is proud to work for Whitbread as Principal Designers under the Construction Design Regulations ('CDM') 2015 on hundreds of its construction and refurbishment projects throughout the UK. We work with Whitbread on how we can support it in its drive to identify and eliminate issues with modern slavery on these projects. Our inspectors engage with Site Managers during our site audits and assist them wherever possible in their responsibilities under the Act. We also report accordingly to Whitbread so that issues are immediately flagged.

Bernie Sims



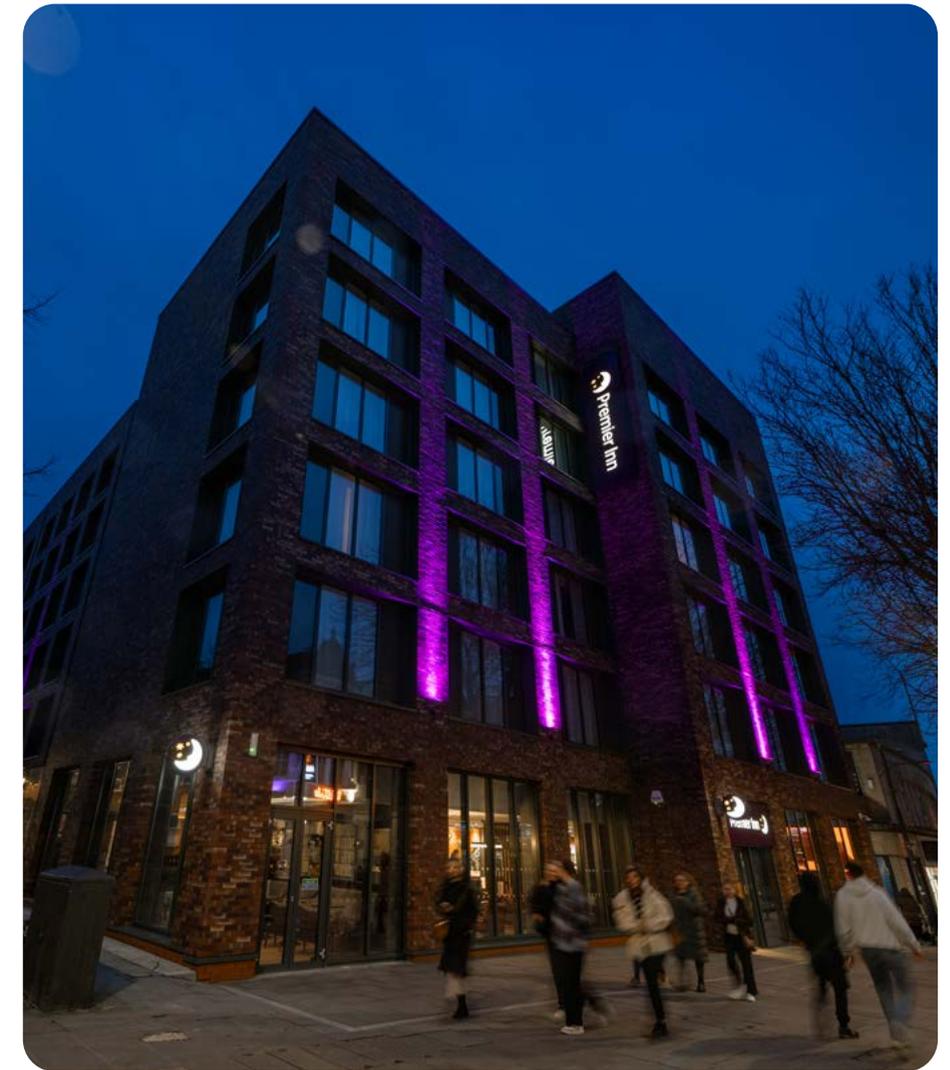
# Performance indicators for supply chain

# Performance indicators for supply chain

Objectives	Metrics	Update	Impact
Due diligence in our supply chain	Annual assessment of risk	100% of our suppliers are risk assessed on an annual basis by STT for inherent human rights risk	<a href="#">See Ethical Audit Programme update</a>
	Action plans created, audits and investigations completed	68.5% of high-risk (actual) suppliers have completed an audit in the past 24 months	
Pieces of intelligence shared	Information sharing (received or reported)	100% of tier 1 suppliers are required to sign our Responsible Sourcing Policy	<a href="#">See Ethical Audit Programme update</a>
	Corrective Action Plans shared and agreed with suppliers	Where suppliers are Sedex members, all corrective action plans are published in Sedex	
Partnerships and collaboration	Improvement programmes with suppliers (where appropriate)	<a href="#">See Ethical Audit Programme update</a>	<a href="#">See partner testimonials</a>
	Collaborative activities with NGOs and other organisations	Ongoing collaboration with Intertek, Sedex and Bernie Sims	
	Participation in industry events	N/A	
Increasing awareness	Events and activities within our business	Modern slavery training to Procurement team	<a href="#">See Modern Slavery Training</a>
	Events and activities in our supply chain	N/A	N/A

# Appendix - Direct supplier location

Country	Count of supplier
Australia	1
Austria	2
Belgium	2
Canada	1
Switzerland	2
China	4
Germany	23
Denmark	1
Spain	4
France	2
Great Britain	1,325
Guernsey	9
Hong Kong	4
Indonesia	1
Ireland	75
Isle of Man	3
India	1
Jersey	15
Luxemburg	1
Malaysia	1
Netherlands	4
Taiwan	1
USA	18
UAE	4
<b>Grand total</b>	<b>1,504</b>



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