



FORCE FOR
GOOD



WHITBREAD

Whitbread's Corporate Modern Slavery Statement 2021/22

Whitbread Modern Slavery Statement 2021/22

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 that we serve every day.

COVID-19 has continued to have a significant impact on the Hospitality industry and Whitbread is no exception to that. The pandemic has impacted our business, our teams and our supply chains across the globe. However, our strong commitment to remaining a Force for Good has underpinned our response to these challenges through 2021 and into 2022.

We have monitored closely any existing, or new risks which global and national supply chains have faced in light of the pandemic, Brexit and labour shortfalls and we have been unwavering on our commitment to mitigate these risks in partnership with our suppliers.

Our responsible sourcing programme has continued throughout the pandemic. Where physical visitations have been restricted, we have continued to maintain communication and controls over our supply chain through remote tools.

Having completed a supply chain mapping and risk assessment beyond Tier 1 suppliers for our Premier Inn bedroom in partnership with STOP THE TRAFFIK, this year we focused on mitigating those risks. We have implemented a new enhanced due diligence process including supplier visits and worker interviews for suppliers identified as being high-risk or where their physical location may heighten the risk of forced labour.

As ever, we remain 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. However, where a supplier demonstrates a persistent disregard for our standards, we will cease working with them.

In light of the ongoing disruption caused by COVID-19 during 2020, 2021 and into 2022, we have continued to ensure that our team members across the Premier Inn and Restaurants estate have the knowledge and tools to recognise and report a suspected case of modern slavery in our sites. This helps us ensure the well-being of our teams and our guests, and do our part as a global citizen in tackling the issue of modern slavery.

As we go forward into 2022, we will continue to learn, develop our programme and retain robust processes to maintain our high standards and ensure human rights are respected across our business and supply chains.

This statement covers the period 26th February 2021 – 3rd March 2022. This Modern Slavery Statement was approved by our Executive Committee and by the Whitbread PLC Board on [BOARD DATE 2022].



Alison Brittain

CEO 20th April 2022

Introduction

Following our fourth statement published at the end of Whitbread's 2020-21 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 Modern Slavery Act of 2015, including its' definition.

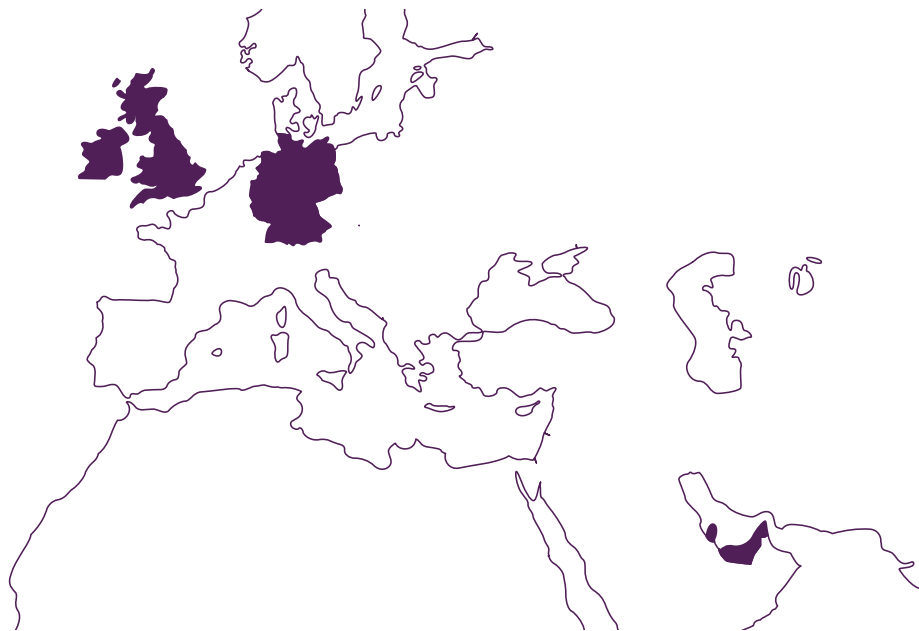
The report is split into the following sections:

1. Business and supply chain structure	Page 4 - 5
2. Risks of modern slavery across the business	Page 5
2.1. Team members	Page 6
2.1.1. Policies	Page 6
2.1.2. Due Diligence	Page 6
2.2. Supply chain	Page 6
2.2.1. Policies	Pages 7
2.2.2. Due Diligence	Pages 8 - 10
2.2.3. Progress and Highlights in 2020/21	Page 11
Ethical Audit Programme	Page 12 - 15
2.3. Guests	Page 15
2.3.1. Policies	Page 15
2.3.2. Due Diligence	Page 15
3. Partnerships and Collaboration	Page 15 - 16
4. Performance Indicators	Page 17
4. Appendix	Page 18

1. Business and supply chain structure

Whitbread 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 & Ireland we have 841 hotels and more than 82,000 rooms. In addition, we now have 35 hotels which are open in Germany and a further 40 in the pipeline We also operate ten hotels in the Middle East (through a joint venture).

All of our UK located hotels and restaurants are operated by us and we have a hot food offer in almost every location. Our unique joint site model means that approximately half our UK & Ireland hotels are located alongside our own restaurant brands (Bar & Block, Beefeater, Brewers Fayre, Table Table and Cookhouse & Pub).



For the purpose of this document, the references to policies and procedures relate to the Whitbread UK & I operation (including the procurement function which also services property elements of our German business).

1.1 Supplier Network and Supply Chain Structure

We purchase our goods and services from over 2,600 direct suppliers. Most of our suppliers are manufacturers of finished product (beds, furniture), food processors, construction contractors and providers of service (e.g. technology and laundry). The majority (circa 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 27 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 core procurement team in the UK is positioned in the Group Operations Director Function, led by our Group Operations Director. Our sustainability team work very closely with this team to ensure our policies and processes related to modern slavery are adhered to and implemented effectively across our supply chain. We ensure that a sustainability representative is present within procurement and supply chain leadership calls, on a monthly basis, to guarantee alignment. In addition, we update objectives and KPI's annually across the functions to align and embed our responsible sourcing policy and processes.

Accountability for modern slavery risk management

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

1 - Supply Chain

- 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 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, led by the Group Operations & Transformation, supported by the Procurement & Supply Chain Director.

2- Team members

- 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 policy compliance is managed by the business unit MDs and COOs.

3- Guests

- The Business MDs and Director of Safety & 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 the business unit MDs and COOs and at site level, by all team members.

2. Risks of modern slavery across the business

We continue to formally 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.

2.1. Team members

We have approximately 35,000 team members working across the Whitbread brands, directly employed by Whitbread. As a hospitality business, we recognise that ensuring people are treated fairly, are empowered to develop their skills and fulfil their potential as future leaders 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.

2.1.1 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. 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 also carry a higher risk, and we therefore ensure that all employees have a valid right to work permit as part of our recruitment process.

In 2021 we chose to enhance our team members pay, so that all team members were paid in excess of National Living Wage in the UK. On top of this, we have put some in year retention packages in place to support our focus on team retention. More detail on this can be found in the people section of this year's Annual Report.

A list of these policies and an outline of their purpose and process of implementation can be found in our previous report here: [Whitbread 2019/20 Modern Slavery Statement](#).

2.1.2 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.

We have trained all team members working across our hotel and restaurant sites through a mandatory e-learning training. 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.

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 provide them with the tools to report it quickly and effectively.

All of our team members have access to the Hospitality Action Speaking out hotline. This hotline is available 365 days a year and is available to all team members to highlight any concerns on an anonymous basis .

There have been no identified cases of modern slavery amongst our team member stakeholders this year.

¹ This facility is not available in China, so a training session and internal procedure has been established.

2.2. 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 – 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 2) and our enhanced due diligence process (figure 3).

2.2.1. Supply chain: Policy

Policy Overview

We have continued to strengthen our Responsible Sourcing programme over the past 12 months despite the ongoing turbulent global and national situation. We recognise that more than ever it is vital that we retain our high-level due diligence process.

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 Organisation (ILO) convention and the UN Guiding Principles on Business and Human Rights. 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 the supply chain
- Forced, bonded, indentured or involuntary prison labour or any other labour of a similar conduct in any part of our supply chain
- Payment of recruitment fees on behalf of the worker, lodge ‘deposits’ or identity papers with their employer and workers are free to leave their employer after legal or statutory notice.

Our internal supplier data management system allows us to record our suppliers’ commitment to work towards 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 any new suppliers cannot be introduced without Whitbread understanding their approach and commitment to responsible sourcing. The platform is continually monitored by our procurement and sustainability teams and the compliance embedded within KPI’s and objectives.

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.

Updates to supplier contracts

In 2021, we updated supplier contracts strengthen our position to cease business immediately should evidence of modern-day slavery be identified.

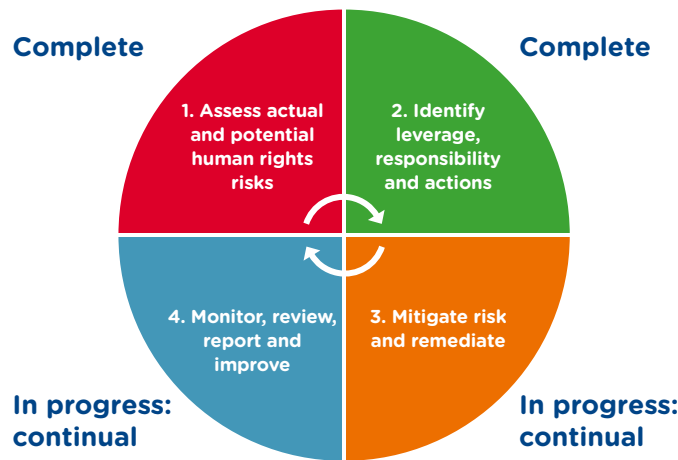
2.2.2. Supply chain: Due Diligence

Overview of process

Since the beginning of our **Responsible Sourcing programme**, we have conducted due diligence processes across every Tier 1² supplier to:

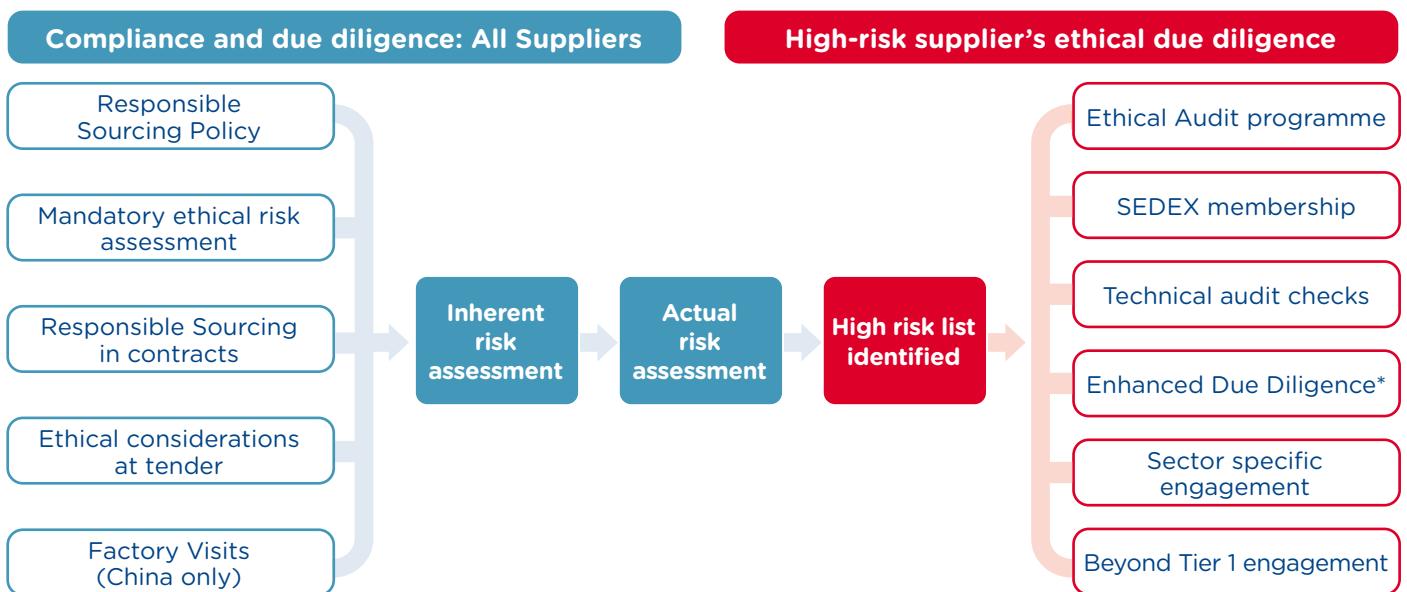
1. Assess actual and potential human rights risks
2. Identify leverage, responsibility and actions
3. Mitigate risk and remediate
4. Monitor, review, report and improve

[Figure 2 Human Rights in the supply chain due diligence process]



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

[Figure 3 - Due diligence actions taken for Whitbread Suppliers]



² Tier 1 – Suppliers direct to Whitbread UK operation and with contractual value >£50k.

* New tool developed as part of our audit programme. Further details are outlined [Supply chain Risk Assessment - Enhanced Due Diligence](#)

Whistleblowing

During onsite audits, our auditors provide details of our Whistleblowing contact line, for supply chain members to contact anonymously. Any cases are then passed onto the Responsible Sourcing and Sustainability Manager via a central email inbox. This year, we have had no reported cases of modern day slavery through this hotline. This hotline is currently unavailable in China for audits, however we intend to explore options for this in the coming year.

Internal processes also provide for whistleblowing to take place within the organisation. This year we had one incident of whistleblowing related to traceability issues for a consumable product. The concerns were not directly related to modern slavery or forced labour but recognising the associated risk that lack of supply chain integrity can have on our management of forced labour due diligence, the Responsible Sourcing team were involved from an early stage. They supported the investigation, the enhanced due diligence processes that ensued to ensure no link to modern slavery and subsequent exit of the supplier in question. No incidents or indication of modern slavery or forced labour were found.

Supply chain risk assessment

Our risk assessment is comprised 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 will also take into account the results of due diligence assessments undertaken, through the SEDEX platform and review any Corrective Actions Plans in place as a results of those audits.

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

[Figure 4 - High inherent risk sectors in Whitbread supply chains]



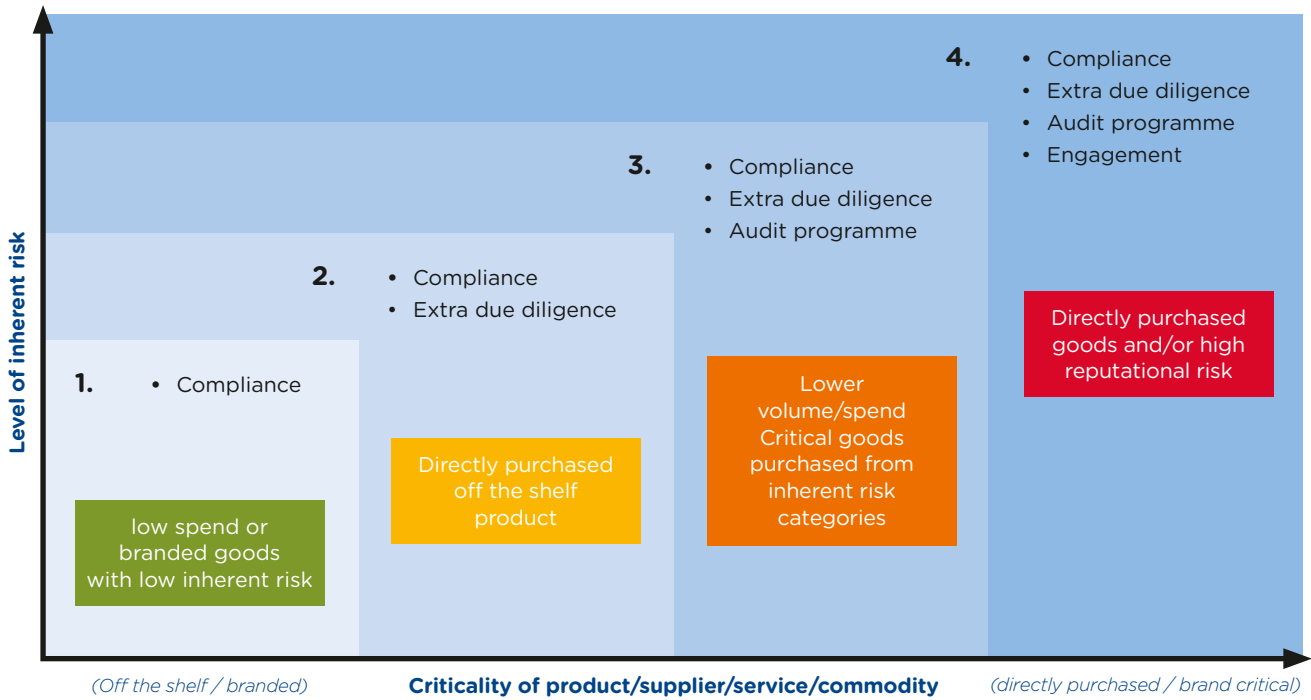
From this inherent list, we assign each supplier with an ‘actual risk’ rating according to our relationship, leverage and partnership with this supplier. This initially resulted in 109 suppliers across our supply chain which were deemed to be actual high risk.

Currently, our high-risk supplier list is comprised of 97 suppliers.

This risk assessment process is now embedded as a standard, ongoing, internal practise for any supply chain changes or additions that fall in an inherent risk area. The number of high-risk suppliers is flexible as new high-risk suppliers are added, and any suppliers who 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 associated actions associated with the risk given.

[Figure 5 - Ongoing risk assessment process for new suppliers, products and services]



2.2.3. Supply Chain: Due Diligence - Enhancements made this year

Supply chain risk assessment - Enhanced Due Diligence

Through our work with (STT) Centre for Intelligence Led-Prevention, this year we have identified and mapped forced labour and exploitation risk hotspots across our global supply chain. This enables us to engage with any factories located within close proximity of identified hotspots, undertaking the enhanced due diligence and mitigation activity and ultimately, it will inform our responsible procurement decisions.

We have developed a new risk assessment model and enhanced our due diligence checks (in addition to SEDEX Members Ethical Trade Audit (SMETA) 4 pillar audits). Our enhanced due diligence checks incorporate the following items and are undertaken with semi announced, SMETA 4 pillar audit.

Enhanced Due Diligence Elements	Key Components
<u>Additional Workforce Checks</u>	46 Bespoke checks relating to worker conditions, contracts & factory conditions
<u>Demographics</u>	Country specific demographic record
<u>Product Traceability</u>	Confirmation of product processing on site, raw material checks onsite, batch reference numbers check

Supply chain risk assessment - Beyond Tier 1

As a result of work completed in 2020/21, we have now extended the risk assessment process to our

Tier 2 suppliers for the Premier Inn Bedroom, a critical segment for our business. We recognise that this visibility at factory level and lower manufacturing tiers is vital to genuinely mitigating the risk of modern slavery in global supply chains. We identified 17 Tier 1 suppliers operating, or with Tier 2 + sites operating, within 50 miles of risk hotspots. Whitbread is now in the process of conducting semi-announced enhanced due diligence audits on these sites which will continue into the next financial year.

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.

International Business due diligence

We currently have 35 hotels open in Germany, and this is forecast to increase to 45 by the end of February 2023. With our growing presence in Germany, we are now in the process of assessing the impact of the new German Supply Chain Due Diligence Act, coming into force in 2023. We are doing this by:

- Conducting a gap assessment of our existing due diligence policies and procedures against the requirements of the new law; and
- Adding our German suppliers into our existing risk assessment process.

Whitbread also operates 10 Premier Inn hotels in the Middle East, in a joint venture with Emirates. Whitbread follows to the local labour laws relevant to the jurisdictions of the hotels, however as part of ongoing risk management, we are currently reviewing relevant policies and procedures in place with respect to Modern Slavery. We welcome the recommendations from the 2021 Business and Human Rights Resource Centre report 'Checked Out' and we will use these as a framework to support our internal review.

Ethical Audit Programme

Working with an independent, third party auditor Intertek, we have conducted SMETA (Sedex Members Ethical Trade Audit) audits for suppliers who we recognise as high risk for over 6 years.

These audits assess compliance against our Responsible Sourcing Policy using the SMETA guidelines for best practice. [An overview of this programme and the SMETA audits](#) can be found in our previous statement here.

Due to the ongoing pandemic, this year we have continued to audit our supply chain in person when possible and remotely where appropriate. Where possible and suitable, we have worked with our third-party partner to deliver remote audits to continue checks against our Responsible Sourcing Policy. Where neither a physical or remote audits are suitable. We have maintained regular communication and engagement with our high-risk list through our Sustainability team and our procurement managers, ensuring we understand any impacts of the pandemic on their business that may increase ethical risks. Where physical audits can take place, our auditors will visit sites of production and conduct anonymous interviews with workers as part of the audit process.

We appreciate that meaningful change needs collective effort and consistent activity. Therefore, we work closely with our suppliers to address and remediate any issues that put workers at risk. We welcome the efforts of the suppliers who 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 who demonstrate a persistent disregard for our standards. We have also updated supplier contracts to strengthen our position should we find evidence of modern day slavery within our supply chain, see updates to [Supplier Contracts](#).

This year we have found no cases of modern slavery within our supply chain.

Technical team

We continue to provide ethical performance and due diligence checks to our food and beverage technical team to enable them to embed a high level 'temperature check' of our suppliers' ethical performance in their regular supplier visits and technical audits on supplier sites.

Supplier Ethical Data Exchange (SEDEX)

We are members of the Supplier Ethical Data Exchange (SEDEX) giving us improved visibility of the supply chain beyond our directly contracted suppliers and provides us with better information on the employment processes and practices at manufacturing sites.

We were incredibly proud to be the first large hotel business to become members of SEDEX as well as encouraging many of our suppliers, whom had not previously used the tool also to do so. It has enabled us to better understand our supply chain through connecting direct and indirect suppliers, initiate audits and crucially monitor and remediate issues.

Ethical Audit Progress and Highlights

Ethical Audit Programme Update

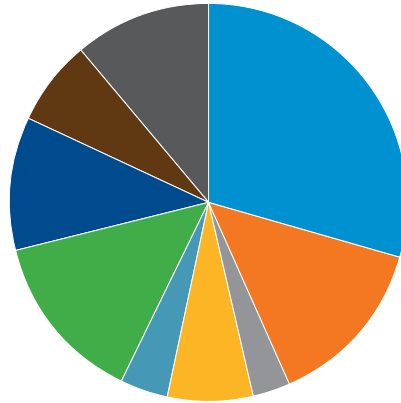
COVID-19 restrictions have continued to challenge our ability to schedule on site audits, however, we are proud of the achievements this year and the supplier engagement we have received. We have continued with Tier 1 audits and will commence Tier 2 sites in China shortly.

This year we have worked with our suppliers to resolve issues highlighted by the SMETA audit process. As a result of this collaboration, we resolved a series of issues across a variety of topics. 86% of issues closed were in relation to policies, procedures and controls regarding worker hours, wages, discrimination, free and regular employment and Health, Safety and Hygiene³.

Impact of NCI's and Major Issues Closed Down

Non Compliances Resolved

An estimated 1800 supplier team members impacted by policy, procedure and control improvements relating to working hours, discrimination, regular employment, health, and safety.



Health, Safety & Hygiene 30%

Management Systems 14%

Wages 14%

Regular Employment 11%

Working Hours 14%

Discrimination 7%

Entitlement to work 7%

Environment 4%

Employment is freely chosen 2%

Supply Chain Mapping Beyond Tier 1: Premier Inn Bedroom

This year we began to conduct enhanced due diligence audits where the material risk is high to our business. This work continues on from the Beyond Tier 1 mapping which commenced in the prior financial year.

International Sourcing Update

We know China is attached to high inherent ethical risk, and we are pleased, through our international sourcing team we can work directly with factories in China. This allows us greater leverage and control to influence positive change and ensure human rights are respected.

Our international sourcing team follow all our high-risk key due diligence steps with the addition of factory visit reports. This is a simple yet robust visit report that our Whitbread colleagues in China populate and send to the UK team for assessment after signed off the product and approval the supplier. This visit report is aimed to highlight any hidden, or obvious breaches, against our Responsible Sourcing Policy if found during the factory visit. It allows for one further touchpoint to engage with our suppliers, reiterate our minimum expectations and build a relationship that can provide a basis for continuous improvement.

This year, in conjunction with our international sourcing team and STT we have created enhanced due diligence checks to extend our ethical audits and these audits will be implemented on a semi - announced basis. We have also coupled the development of this new process by delivering additional training to the International Sourcing team in collaboration with STT.

³Data Source - SEDEX for audits completed in FY21. Suppliers who are not SEDEX members are excluded from the data set.

⁴Improvements classed as closed 'Non - Conformities and Major' issues via SMETA audit process. Issues must be closed in our financial period. Supplier team members attributed to site numbers logged via SEDEX or via SEDEX site report values.

We welcome the ongoing collaboration with the international sourcing team and our suppliers to support us in strengthening our due diligence process and procedures.



Dogie Knight

International Head of Supply Chain

“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”

Construction Industry Engagement - CIPS award

In 2021, Whitbread was awarded the Best Initiative to Deliver Social Value through Procurement from the Chartered Institute of Purchasing and Supply. This award recognised the efforts initiated in 2019, as a result of our supply chain risk assessment. This work identified modern day slavery risk in the construction industry, and led to Whitbread developing an industry engagement programme.

This has resulted in all Health and Safety audits now having modern slavery questions and our health and safety audit requiring sites to have modern slavery information available, teams to be aware of confidential support lines and for this to be included in regular toolbox talks. See the Press Release [here](#).

Modern Slavery Awareness - Industry Awareness Sessions

As part of Whitbread’s commitment to eliminating Modern Slavery, and in partnership with STT we also hosted two industry specific training events for our laundry and construction partners. These events provided:

- Partners with an overview of modern slavery;
- Specific industry and localised context to modern slavery; and
- Key warnings signs and routes of reporting modern slavery.

Ethical Audit Programme - FY22

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;
- Complete the enhanced due diligence audits in high risk factories; and
- Develop further industry engagement.

2.4. Guests

2.4.1. Guests: Policy

We take the potential issue of child or adult exploitation (sexual or otherwise) 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 some 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.

To this end, during the year to the 3rd March is 24,261 Team Members have completed our E-Learning module on the issue of Child Sexual Exploitation (CSE).

2.4.2. Guests: Due Diligence

During the calendar year to end of December 2020, 8,789 Team Members have completed our ELearning module on the issue of Child Sexual Exploitation (CSE), To date 99.7% of all Premier Inn Team members have completed training on CSE. Furthermore, Whitbread has worked closely with the National Business Crime Centre, attached to the Metropolitan Police Force, to establish a sector wide working group with the aim of developing National Guidance for Hotels regarding CSE. The expectation at the end of last year was that National Guidance would be ready for launch by August 2020. Due to the pandemic, this was halted and restarted at the end of 2020, a draft of this document has been commented on and we are awaiting a second draft.

No cases of modern day slavery have been identified for guests.

3. Partnerships and Collaboration

We recognise that managing 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.

Throughout the year, we have continued to strengthen our partnership with STOP THE TRAFFIK, who provide us with specialist knowledge and expertise on modern slavery. This year, we've worked closely on our supply chain mapping beyond Tier 2 suppliers and running industry training events. We look forward to continuing this relationship 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.

3.1 Partner Testimonials



Jack Nunn

Head of Business Engagement, STOP THE TRAFFIK

“Over the last 6 years Whitbread and STOP THE TRAFFIK have developed a relationship; from a service provider to a trusted partner. Whitbread’s aim to be a ‘force for good’ can be seen clearly in their focus and dedication to identifying and mitigating modern slavery linked to their business, as well as addressing the risk found within the wider hospitality sector and other sectors such as construction. Through our partnership we aim to continue delivering innovative projects to effectively map forced labour hotspots beyond the first tier of suppliers and take a leading, holistic approach to corporate social responsibility”.



Intertek

“Together Whitbread and Intertek work in partnership to maintain a robust due diligence programme, enhancing Whitbread’s decision making about their global supply chain. With SMETA as a core deliverable, we have adapted to address new and unique challenges that Whitbread has faced, including tailored audits for the service provider and construction sectors, implementing a whistle blowing process for reporting and investigation of worker concerns, and trialling a remote audit approach to maintain supply chain integrity during the COVID-19 pandemic. We continue to work together, evolving the programme in support of new frontiers in the changing face of modern slavery and ethical operations in global supply chains”







Bernie Sims

Managing Director at Bernard Sims Associates

“The team at Bernard Sims Associates is working closely with Whitbread to help address modern slavery across the business for the Whitbread team members, suppliers and guests. We do this as part of our health and safety compliance role for Whitbread. We have attended 2 events presented by STT and found the presentations to be informative and enlightening. The presenters were very knowledgeable and it is very reassuring to understand what support STT can give to people to help eradicate Modern Slavery in construction and other sectors”

4. 4.Performance Indicators for Supply Chain

	Example metrics	Update	Impact
Due diligence in our supply chain 	Annual assessment of risk	Risk assessment fully integrated process into wider procurement strategy to ensure we see a holistic view of 'risk' across our business.	See Testimonials
	Action plans created, audits and investigations completed	Suppliers identified as high risk will go through our due diligence procedures and complete CAP's where needed.	See Ethical Audit Programme Update
Pieces of intelligence shared 	Information sharing (received or reported)	100% of tier 1 suppliers are risk assessed through our contract management system and are required to sign our Responsible	See Ethical Audit Programme Update
	Corrective Action Plans shared and agreed with suppliers	Where suppliers are SEDEX members, all CAP's are published in SEDEX.	
Partnerships and Collaboration 	Improvement programmes with suppliers (where appropriate)	See Ethical Audit Programme Update	
	Collaborative activities with NGO's and other organisations	Support NSF technical food team	See Technical Team See Testimonials
	Participation in industry events	Ongoing collaboration with STT	Not applicable
Increasing Awareness 	Events and activities within our business	Developed Enhanced due diligence checks and rolled out related training.	See International Sourcing Update
	Events and activities in our supply chain	We held two external events with STT. See Industry Training Sessions	See Testimonials

Appendix Supplier Location

A list of our suppliers and locations for the UK & Ireland business.

Country	Number
United Kingdom	1189
Ireland	59
United States of America	20
Germany	13
Jersey	10
China	8
Netherlands	5
Switzerland	4
Hong Kong	3
Spain	2
Guernsey	2
Isle of Man	2
India	2
Sweden	2
United Arab Emirates	1
Australia	1
Belgium	1
Canada	1
Denmark	1
Italy	1
Luxembourg	1
Malaysia	1
Singapore	1
Grand Total	1330