



Modern Slavery Statement

This statement is published in accordance with the UK Modern Slavery Act 2015 for the financial year ending 31st December 2024. It outlines the approach we take to prevent modern slavery in our business and supply chains associated with the UK.

Caspian Networks Limited operate in line with McDonald's Restaurants Limited.

McDonald's Restaurants Limited (the "Company," or "we") published its first Modern Slavery statement in 2017. Since then, we have continued to build our knowledge of the risks of modern slavery and the areas of our business that could face some of these challenges. We work across our business and supply chain to put practices in place to help prevent and respond to any potential modern slavery-related risks.

Modern slavery is unacceptable within our business and supply chains. We believe that we have a responsibility to respect the rights of people who work for the Company and to do business with franchisees, suppliers and other businesses that respect human rights for their respective employees. We recognise there is no single solution to human rights issues, which is why we believe that it is critical that we engage with all of these stakeholders to build awareness and understanding.

McDonald's is committed to respecting human rights as set out in the Universal Declaration of Human Rights and to developing and implementing its human rights approach in line with the UN Guiding Principles on Business and Human Rights (UNGPs). We respect rights and principles in the International Bill of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the Convention on the Elimination of All Forms of Discrimination against Women, the Convention on the Rights of the Child and are signatories to the Women's Empowerment Principles.

Through the McDonald's Corporation's human rights due diligence process, we identify human rights focus areas, and these are communicated through our human rights reporting processes. The focus areas of McDonald's Corporation's current Human Rights policy (which applies to the Company), include: child labour; data privacy; inclusion; education and employment creation; effective remedy; forced labour; freedom to associate (or not associate) and collectively bargain; land rights; discrimination and harassment; nutrition; occupational health and safety working conditions (contracts, hours, overtime, wages); and workplace security. The process of identifying human rights focus areas is a dynamic one.

We pay particular attention to identifying those groups which may be especially vulnerable to negative human rights impacts, including migrant workers, Indigenous Peoples, women, socially disadvantaged minority communities, persons with disabilities or children and young people, and we commit to take appropriate steps to respect their rights. We strive to foster safe, inclusive and respectful workplaces wherever we do business and respect the fundamental rights of all McDonald's employees. We prohibit the use of child labour, human trafficking, and forced, bonded, indentured or prison labour.





New Areas of Focus

We're stepping up our efforts to tackle modern slavery risks. Following a systemic review and analysis of our UK operations through the lens of modern slavery, we introduced a suite of measures to strengthen our anti-slavery framework. These included awareness and engagement campaigns, actionable training, and collaborative partnerships. Notably, in 2024 we entered into partnership with leading anti-slavery charity, Unseen UK, to develop and implement initiatives to help us detect and prevent modern slavery across our business and supply chain.

In 2024, we introduced a bespoke Modern Slavery Policy for the UK, outlining our commitment to preventing modern slavery practices within our workforce and supply chains, educating our employees on what modern slavery may look like in our restaurants and offices, the options available for reporting concerns of modern slavery, and how we will handle the concerns raised regarding modern slavery.

To improve awareness, our Modern Slavery Policy was publicised to all our employees via internal communication platforms and modern slavery awareness posters in all Company owned and operated restaurants. All these resources were also made available to our franchisees to support their efforts in tackling modern slavery risk.

We have established clear processes to record and escalate all modern slavery related allegations received to the new Modern Slavery Response Team formed in 2024. This team is responsible for managing concerns and taking appropriate action to support potential victims. In 2024, a new Safeguarding Lead role was also established to enhance the Company's people agenda and explore contextual safeguarding within the Company.

Alongside existing reporting mechanisms such as the anonymous global Business Integrity Line, we launched a new Red Flag campaign designed by employees for employees to provide an easily recognisable way to call out unacceptable behaviours in the workplace. Employee awareness has been enhanced through various internal communication channels and internal audits are conducted to ensure employees were informed about the available reporting mechanisms.

Our Business and Supply Chains

The Company

We are proud to have operated our business in the UK for over 50 years, having opened our first restaurant in Woolwich in 1974. McDonald's is a franchising business and we and our franchisees operate over 1,500 restaurants in all corners of the UK and employ over 160,000 people. The Company's corporate function, with approximately 620 employees, is spread over three offices across the country, with our main UK office in East Finchley, London.





Approximately 11% of McDonald's restaurants in the UK were owned and operated by the Company at the end of 2024, with around 89% owned and operated by franchisees. Together, in 2024 we served approximately 3.5 million people per day in the UK. We are passionate about contributing meaningfully to the communities in which we operate and supporting the causes that matter to them, whether independently or through the national and local partnerships that we collectively hold, and we actively maintain productive relationships with key stakeholders in our communities.

McDonald's Corporation

McDonald's is a leading global omni-channel restaurant brand. The success of McDonald's is built on the way McDonald's Corporation and McDonald's Restaurants Limited (together, "McDonald's") work across all three elements of the business - the Company, the franchisees (including conventional franchisees, developmental licensees and affiliates), and our suppliers, harnessing our collective power and working together toward our purpose to feed and foster communities. Our approach to modern slavery and human rights are underpinned by the same approach.

Our supply chains

The success of McDonald's lies, in part, in our strong relationships with suppliers, all of which must meet our expectations of respecting the fundamental rights of all people.


We aim to build long-term relationships with suppliers and work closely with them to help them maintain the highest standards for protecting human rights. We require them to comply with McDonald's Corporation Supplier Code of Conduct and associated guidance, which includes requirements regarding respecting human rights, protecting against modern slavery and following practices that protect their employees' health and safety.

To help mitigate risks across our wider business, we conduct appropriate due diligence before onboarding any supplier. Our standard supplier terms and conditions now include provisions requiring supply chain transparency and compliance with the Modern Slavery Act 2015. The Supplier Code of Conduct, embedded within supplier agreements, explicitly outlines expectations around human rights and ethical behaviour.

We source all the ingredients on our menu from approved supplier partners who must adhere to our high-quality standards and who are independently audited. Where possible, our supplier partners source ingredients from farms accredited by a recognised farm assurance scheme such as Red Tractor and RSPCA Assured, with regular audits taking place on the farms to ensure that these standards are upheld. In addition, many of our supply chains are vertically integrated, meaning that our supplier partners will often have control and oversight of every step of the supply chain.

Policies





The Company supports the Modern Slavery Act 2015 and we take seriously our responsibility to act with due diligence to avoid infringing on the human rights of others and addressing any impacts on human rights if they occur.

Employment practices

Led by the UN Guiding Principles, McDonald's undertakes risk-based due diligence to identify, address and mitigate adverse human rights-related impacts. McDonald's is committed to preventing forced labour and upholding responsible and ethical recruitment standards.

We are mindful that certain groups are at greater risk, for instance migrant workers, especially if recruited directly from outside the UK. These candidates are potentially vulnerable to exploitative recruitment processes given the nature of recruiting from a distance - this can include third party recruitment agencies who charge high fees to candidates for their services, candidates having access to their government identification documents taken away during the recruitment process, or being forced to take up housing as a condition of employment. For this reason, wherever practical, the Company hires workers directly.

McDonald's and its franchisees hold themselves accountable to taking the right steps when recruiting migrant employees through the Responsible and Ethical Recruitment principles, and global migrant labour recruitment standards:


1. Workers do not pay recruitment fees, whether to a private labour broker/employment agent or to the employer itself, informed by the Employer Pays Principle.
2. Workers are provided with contracts in a language fully understandable by the workers at the point of recruitment and prior to deployment.
3. McDonald's and its franchisees do not keep or withhold any government-issued identification, monetary deposits, bonding or other collateral as a condition of employment.
4. If workers reside in employer-provided housing, there must be a plan for management of safe housing and accommodation, including that it is structurally sound and in good repair.
5. McDonald's and its franchisees apply these standards to themselves and to third parties recruiting and/or managing labour on their behalf. We make our Responsible and Ethical Recruitment Principles available to other third-party contractors to educate them on our responsible recruitment standards and encourage them to develop similar policies and procedures for their own business operations.

The above standards apply to migrant labour recruiting practices across McDonald's and its franchisees globally. In the UK, Company recruitment practices do not include recruiting from abroad - employees (including employees of Company owned and operated restaurants) are recruited directly from the UK labour market. On occasion, we may use a recruitment agency for corporate recruitment purposes, and in those instances, we undertake appropriate supplier due diligence.

Further to our responsible and ethical recruitment principles, in the UK, the Company mitigates the risk of modern slavery in the following ways:

- All new employees are subject to pre-employment checks including checks to verify they have the right to work in the UK. All employees retain these documents during the course of these





checks and only copies are taken and stored. At no point are Right to Work documents removed from the individual.

- All new employees are provided with a contract of employment outlining the terms and conditions of their employment before their first day with the Company. This includes rates, frequency and method of pay, what their role is, where they will be expected to work, the hours of work they can expect and how to end their employment.
- Implemented in 2024 as part of our suite of new measures to strengthen our anti-slavery framework, regular independent third party bank account name verification checks and internal duplicate bank account checks are run to validate that employees have access to their own accounts and to the money they receive from working for the Company.
- Reports on hours worked by employees are run regularly to check employees are not working excessive hours as a result of exploitation.
- Candidates are not permitted to be accompanied to interviews by interpreters, unless reasonable adjustments are required.

Through training offered to our franchisees and our initiatives to raise awareness of modern slavery risks, we have set out clearly our expectation that our franchisees implement the same additional mitigations in their recruitment practices. We provide franchisees with the resources to be able to support this recommendation.

Human Rights Governance

In 2018, McDonald's Corporation published a global Human Rights Policy, which reinforces McDonald's commitment to respect and promote human rights. This Policy applies to McDonald's Corporation and its majority-owned subsidiaries around the world. This was updated and relaunched in 2024.

McDonald's Corporation's Global People and Global Supply Chain functions are responsible for overarching human rights policies and performance. Human rights professionals on its Global Sustainability & Social Impact team play a key coordinating role and also manage a cross-functional Human Rights Working Group which meets quarterly, as well as on an ad hoc basis as needed.

The executive sponsors of the Human Rights Working Group are the Global Chief Impact Officer, Global Chief People Officer, Global Chief Supply Chain Officer and Global Chief Legal Officer of McDonald's Corporation. These executive sponsors report to the CEO on human rights risks and share relevant updates to the Board Committees of McDonald's Corporation.

The CEO and Senior Leadership team of McDonald's Corporation have oversight of human rights policies, commitments and management, as well as of Enterprise Risk Management, which may include specific human rights issues. The Board Committees of McDonald's Corporation have oversight of human capital management, including human rights.

A commitment to respect human rights is also set out in [McDonald's Standards of Business Conduct](#), which apply to employees of McDonald's Corporation and its majority-owned subsidiaries including the Company in the UK. Company employees are trained on the standards and are required to certify annually their understanding of and commitment to upholding them.





Reporting mechanisms

McDonald's Corporation's primary reporting mechanism is the Business Integrity Line – an anonymous channel staffed 24 hours a day, 365 days a year by a live operator from an independent company. Anyone, including Company employees and employees of business partners (such as suppliers or franchisees), can raise concerns via the Business Integrity Line. Regardless of who uses the Business Integrity Line to raise an issue, all contacts received are reviewed by McDonald's Corporation's Global Compliance team. Reporters are protected from discrimination or retaliation in accordance with the Standards of Business Conduct and Global Statement of Principles Against Discrimination, Harassment and Retaliation.

Alongside the global reporting mechanisms, the Company has additional reporting mechanisms and channels in the UK. These are:

- Directly to our People Services Helpdesk who are available via phone, email or live chat.
- Via an anonymous reporting form which is received by the People Services Helpdesk.
- Via the Red Flag live chat option which is shared with the People Services Helpdesk.
- Via a restaurant Business Manager, People Manager, reporting manager or Department Head.

In addition, in order to support both Company and franchisee employees who feel uncomfortable or unable to communicate in English, our Red Flag chat option enables employees to raise concerns in their chosen language, which can then be translated via the system and escalated to the People Services Helpdesk team to be addressed.

Our Modern Slavery training directs people to the People Services Helpdesk as a point of contact for reporting concerns. The Helpdesk team has received bespoke training and guidance to identify signs of exploitation and to respond appropriately, including escalation procedures.

All modern slavery related concerns raised through these channels are escalated internally to our newly established Modern Slavery Response Team ("MSR"), made up of colleagues with expertise in areas such as employment compliance and law. The MSR team reviews each case and, where appropriate, carries out investigations. They provide guidance and direction on the necessary steps to support potential victims, in line with the escalation and remediation process introduced in 2024, which outlines how modern slavery cases are to be managed based on their specific circumstances. Where necessary, we will inform the relevant authorities with details of the case. We engage with relevant expert partners, such as Unseen UK, to seek guidance on the more complex cases, and we ensure senior colleagues are made aware of incidents and the appropriate actions being taken.

Through our escalation and remediation process, we are committed to working with potential victims to address and remediate issues that may have affected them. This could include making referrals to support networks to ensure the victim receives expert support and is protected from further exploitation moving forward.





Employee engagement

We use a variety of internal communication tools - including employee policies, the Employee Handbook, posters in Company restaurants and internal online platforms - to raise awareness among employees about modern slavery, the potential indicators and reporting channels available to them.

In 2024, we launched Modern Slavery awareness posters in addition to posters highlighting our commitment to creating a Safe, Respectful and Inclusive workplace. The new Modern Slavery posters call out how people can raise concerns regarding modern slavery, and our partnership with Unseen. In addition to this, we created and launched new online platform engagement tools which highlight key indicators of modern slavery risk for employees to look out for, and how to raise concerns with us.

The Company also has a number of employee policies setting out how we expect our people to behave and which support and signpost the reporting mechanisms. These policies aim to create a safe, respectful and inclusive workplace, ensuring employees understand their responsibilities and what they can expect when raising an issue or concern.

We conduct reviews of people practices across both Company and franchised owned restaurants to confirm that employees are receiving information about reporting mechanisms. This includes checking the availability of relevant policies and posters, as well as assessing employees' awareness and understanding of these policies and reporting channels.

McDonald's Corporation continues to work with external stakeholders to keep under review our approach to global policies related to protecting human rights. This gives us greater transparency and clarity on our commitments and ensures they remain aligned with internationally recognised standards.


Assessing and Mitigating Risk in our Supply Chain

Our requirements

McDonald's [Supplier Code of Conduct](#) (the "Code") outlines clear expectations to mitigate the risk of modern slavery across our supply chain. Our Code is aligned with internationally recognised standards such as the UN Guiding Principles - it applies to our suppliers and expects our suppliers to hold their own supply chains accountable to the same standards. Key requirements include:

- **No forced or prison labour:** Suppliers must not use any form of forced, bonded, indentured, or prison labour. This includes work-release programs. They must not engage in human trafficking or exploitation.
- **Voluntary employment:** Employment must be voluntary, with freedom of movement for all workers.



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- **Legal status:** Suppliers must employ workers who are legally authorised to work and verify their eligibility through appropriate documentation.
 - **Responsible recruitment:** Workers should not pay any form of recruitment fees to labour brokers/ employment agent or employers. Workers must not pay for any materials required to do their job safely including personal protective equipment and uniforms.
 - **Fees:** Suppliers must reimburse any fees paid by workers to obtain or maintain employment.
 - **No withholding documents:** Suppliers cannot keep workers' identification documents or other collateral. Migrant workers must retain possession and control of their personal documents and be provided with individual secure storage, to which only the worker has access, for identity and other legal documents.
 - **Written contracts:** Workers must receive written contracts in a language they understand at the point of recruitment. Terms of employment outlined at the time of recruitment will not differ in any way from what is provided at the Supplier, including type or work stated. Workers can terminate their contracts without penalties, including financial.
 - **Maximum working hours:** Workers must not work more than 80 hours per week, which includes a maximum of 12 hours of overtime. With our transition over 2024 to a new audit programme provided by SMETA (described below), this has now been reduced to a maximum of 60 hours per week.
 - **Minimum age requirement:** Suppliers must not employ workers who are under 14 years of age. With the new audit programme, this has now been increased to 15 years of age. If underage labour is detected, suppliers must take immediate remedial action in partnership with a specialist underage labour prevention and remediation service provider.
 - **Wages and benefits:** Workers must have control over their own bank accounts. Wages are not allowed to be withheld.

We require suppliers to establish internal grievance mechanisms and provide their workers with their own robust internal procedures to raise issues. Guided by the UNGPs, our supplier-facing Supplier Workplace Standards and Guidance Document (“SWSGD”) provides a step-by-step best practice process to help suppliers establish an effective grievance mechanism.

Suppliers must adhere to these standards at a minimum, irrespective of any less stringent local requirements. We assess compliance with our Code through Sedex / SMETA (described below). Where local laws impose stricter obligations, suppliers are expected to comply fully with those laws while maintaining alignment with our guidelines.


How we ensure compliance

In the UK, in 2024, the Company was supplied by 135 companies. When onboarding prospective suppliers, they must complete a verification process to show they meet our expectations. This includes completion of a rigorous annual self-assessment questionnaire (as outlined under McDonald’s Corporation’s Supply Chain Human Rights (“SCHR”)) to appraise their current systems and practices – producing a report indicating areas for improvement.

McDonald’s Corporation’s SCHR programme (in which the Company participates) requires suppliers to:

- As part of the verification process to show they meet our expectations, complete a rigorous annual self-assessment questionnaire to appraise their current systems and practices.



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- Face consequences: if wrongdoing is found, we will take action including terminating the relationship with the supplier.

McDonald's reserves the right to audit any suppliers in our supply chain. However, McDonald's audit approach focuses on Tier 1 (direct suppliers) and select Tier 2 suppliers (e.g. butcher, abattoir etc). Where issues arise associated with McDonald's supply chain beyond Tier 1 or 2, McDonald's Corporation or the Company (as applicable) will investigate and remediate where appropriate in partnership with our suppliers.

Auditing

McDonald's Corporation engages with several compliance auditing firms around the world to conduct these on-site audits of facilities, worker housing and cafeterias. These audits investigate such concerns as recruitment fees, discrimination, wrongful confiscation of personal documents and other human rights considerations that McDonald's seeks to eliminate from its supply chain.

Transition from SWA to SMETA

Over the course of 2024, McDonald's Corporation transitioned from its own proprietary audit programme, the Supply Workplace Accountability Programme ("SWA"), to the Sedex Members Ethical Trade Audit ("SMETA"), managed by the Supplier Ethical Data Exchange ("Sedex"). In the UK, the Company also participates in this programme. This meant that, during 2024, suppliers may have been subject to either the SMETA or SWA Programme.

Sedex Members Ethical Trade Audit (SMETA)


Sedex is a global membership organisation that provides a platform for companies to share information about their ethical practices, including labour rights, health and safety, the environment and business integrity.

The aim in moving to this audit protocol, which closely aligns with our Supplier Code of Conduct, is to help facilitate better collaboration across brands on issues we can't solve alone – such as forced labour and child labour. It will also help us to reallocate our internal resources to focus on our highest areas of risk and support better remediation and continuous improvement.

Supply Workplace Accountability Programme (SWA)

The SWA Programme engaged several social compliance auditing firms around the world who conduct on-site audits of facilities, worker housing and cafeterias. These assessments occurred annually and could be followed up by third-party audits if any issues were identified. These assessments investigated concerns such as recruitment fees, discrimination, wrongful confiscation of personal documents and other human rights violations that McDonald's seeks to eliminate from its supply chain.





Further, the audits scrutinised supplier compliance with each aspect of the Code, such as verifying that all workers are of legal age to work. If an underage person were hired, for example, suppliers must support remedial solutions that serve the child's best interests.

Modern slavery risks were addressed specifically as part of the audit, including a review of ethical recruitment practices to verify that workers are employed under voluntary conditions and have freedom of movement. This included verification that: workers are not charged illegal fees as a condition of employment; worker contracts are in local language and signed by the worker; and suppliers do not retain workers' government-issued identification, passports or work permits.

As part of its continued effort to prevent forced labour worldwide, McDonald's Corporation updated the SWSGD to address forced labour risks by strengthening its requirements around reimbursement of recruitment fees. The SWA global team engaged with the Company as needed, to develop compliance roadmaps and ensure there is full compliance with reimbursement requirements.


Understanding and managing risk

To assess and prioritise human rights impacts, McDonald's Corporation conducts human rights assessments, monitors media and third-party reporting and carries out internal and external stakeholder engagement. Internal routine accountability mechanisms are also critical for our ongoing due diligence across operations and supply chain. The SWA programme was a prime example of this and is complemented by ad hoc deep dives and heightened human rights due diligence on an as-needed basis.

Additionally, in 2018 McDonald's Corporation engaged an external provider to conduct a human rights impact assessment ("HRIA") at the farm level. The assessment enabled us to identify that, of the commodities we source, palm oil, tea, coffee and timber present the greatest risk of exposure to human rights concerns, with occupational health and safety, migrant workers, and decent working time identified as the highest risk areas. In addition to the farm-level commodity assessment, the HRIA also included a stakeholder consultation with key non-governmental organisations to understand how industry experts view the human rights risks associated with the production of the various commodities, as well as their observations on how the risks can best be mitigated.

Assessment findings, and the corresponding recommendations, help us strengthen human rights management frameworks to better identify, assess, prevent, mitigate and remediate salient human rights issues. For example, as McDonald's Corporation updates its sustainable sourcing policies for specific commodities, it considers these recommendations in informing the human rights due diligence requirements for suppliers. McDonald's Corporation also uses human rights assessment findings to raise awareness of human rights risks among our supply chain staff who procure products for the McDonald's system and have taken steps to strengthen risk management procedures and improvement plans.





By identifying the most salient human rights issues within these supply chains, McDonald's aims to strengthen its risk management procedures, develop appropriate improvement plans, and increase awareness of these issues within our business.

The SWA programme was complemented by additional mechanisms to enable collaboration on a risk-based approach toward high-risk sourcing regions or commodities. This includes sourcing our largest food and packaging volumes through internationally recognised third-party certification schemes that respect human rights and communities, alongside environmental standards in their certification process. McDonald's Corporation has strict sustainable sourcing policies in place that specify requirements to source via established schemes, such as the Roundtable on Sustainable Palm Oil (RSPO), Rainforest Alliance, Fairtrade International, Forest Stewardship Council® (FSC®) and the Programme for the Endorsement of Forest Certification ("PEFCTM").

Effective action

Since launching its supplier audit programme, McDonald's Corporation has engaged with thousands of suppliers and facilities on respecting human rights and mitigating risk. McDonald's is proud that our suppliers take their commitments seriously and, in some cases, have their own equally robust compliance and reporting programmes that have been evaluated and approved as equivalent to McDonald's SWA programme.

Where non-compliance is identified through an on-site audit, suppliers work with a third-party audit firm to complete a corrective and preventative action plan to address the non-compliance. The plan must provide specific time frames within which corrective action will be taken, root causes analysed and policies and procedures updated. In addition, the plan must be designed to avoid recurrence of the non-compliance and establish specific accountability. In instances of significant non-compliance, suppliers are subject to a follow-up audit to ensure that the non-compliance has been properly addressed.

McDonald's SWA programme (and now the SMETA programme) was designed to support suppliers in meeting our standards. We prioritise continuous improvement, capacity building and corrective actions. However, in certain circumstances, such as instances of significant non-compliance with the Code, McDonald's may remove a supplier from the supply chain.

In addition to training, auditing and other aspects of the SWA and SMETA programmes, we require suppliers to establish internal grievance mechanisms and provide their workers with their own robust internal procedures to raise issues. The Business Integrity Line and an email channel to reach the Supply Chain Human Rights team (formerly the SWA Global Management team) are open to suppliers and their employees, if they suspect or become aware of any alleged breaches of our Code. Our Code explicitly requires that the supplier's reporting programme must protect the worker's confidentiality and must prohibit retaliation in response to reporting issues.

Training on Modern Slavery and Human Rights





McDonald's Corporation

To help employees of McDonald's Corporation and its majority owned subsidiaries understand human rights, training on its Human Rights Policy is available to its employees in 13 languages. The training includes a section on forced labour that identifies particularly vulnerable groups and outlines McDonald's Corporation's commitments surrounding ethical recruitment. McDonald's employees are also trained regularly on the Standards of Business Conduct and are required to certify annually their understanding of and commitment to upholding the standards.

Given their important role in working with suppliers, supply chain procurement employees undergo in-person and online training on human rights issues in global supply chains in order to support suppliers in meeting their expectations under the Supplier Code of Conduct and the SWA programme (and now the SMETA programme). Global training modules focused on: health and safety, involuntary labour (including recruitment and fee reimbursement) and underage labour.

The Company

In the UK, we also rolled out a comprehensive series of mandatory training webinars across 2024, delivered in collaboration with our charity partners Unseen UK, for key employees across the business including those in corporate HR, Talent and Legal roles, for key Operations employees involved in recruitment and management of employees, and for our franchisees. The attendance rate across these training sessions was over 95% of corporate and operations employees and franchisees.


Training consisted of explaining and understanding what modern slavery is, types and scale of modern slavery in the UK, how to identify modern slavery, how to support potential victims and how to utilise our new escalation and remediation process so that, as a business, we can address modern slavery concerns.

We will continue to educate our workforce, and support our franchisees in educating theirs, with an "always on" model for training on preventing modern slavery. We deliver this with bespoke in-person training sessions and globally led e-learning modules, complemented by videos designed to help raise awareness about modern slavery. The Company aims to ensure that all its employees are aware of the risk of modern slavery and the part they can play in preventing it.

Supply Chain

For suppliers, the global SWA programme and SMETA programme include an online training platform where they can access materials that provide guidance on preventing modern slavery. Training modules include: Ensuring Eligibility to Work, Protecting the Rights of Migrant Labour and Implementing Grievance Mechanisms. For example, the Migrant Labour training aims to educate suppliers on the risks related to modern slavery when sourcing





migrant labour and some key actions they can take to ensure they are protecting the rights of migrant workers in their facilities.

Additionally, McDonald's Corporation's Supplier Workplace Standards and Guidance Document (referenced earlier) is shared with all suppliers and provides detailed guidance on each aspect of the Supplier Code of Conduct and how suppliers and their supply chains can meet our expectations.

McDonald's Corporation also offers optional live training sessions for suppliers with external human rights and supply chain experts. McDonald's Corporation has partnered with other brands and external consultancies across the industry to develop and train suppliers. For instance, McDonald's teamed up with AIM-Progress to train suppliers on the importance of responsible sourcing. Through this coalition, suppliers around the world received training on critical human rights issues.

Partnerships and Collaboration

McDonald's Corporation engages with relevant internal and external stakeholders to inform its approach to human rights.


McDonald's engages with stakeholders in a variety of ways. For example, Company employees provide feedback through multiple reporting mechanisms, including via people managers, human resources and participation in surveys. Within the McDonald's supply chain, external monitoring firms conduct on-site audits of supplier facilities through the SWA programme including on-site interviews and at farms through the McCafé Sustainability Improvement Platform ("SIP").

Partnerships are an important way for us to learn from others and help create change in the broader community. McDonald's Corporation engages in two multi-sectoral initiatives that focus on human rights and forced labour prevention: the [Leadership Group for Responsible Recruitment](#) (an initiative of the Institute for Human Rights and Business) and the [Centre for Sport and Human Rights](#). It also engages with the Business for Social Responsibility's Human Rights Working Group, which supports implementation of the UN Guiding Principles on Business and Human Rights in a shared-learning forum of more than 55 companies. To ensure our supplier programme addresses emerging human rights issues and risks, McDonald's Corporation also participates in initiatives such as AIM-Progress.

Notably, during 2024 the Company entered into partnership with leading anti-slavery charity, [Unseen UK](#), to develop and implement initiatives to prevent and detect modern slavery across our business and supply chain. Providing us with insights and guidance on the lived experiences of victims of modern slavery, they have enhanced our understanding of how we can spot the signs and how we can respond effectively to concerns and how we support victims.

Looking forward





We know that there is no single solution to the challenges of modern slavery and human trafficking and we must therefore continue to learn and understand the associated risks and warning signs. By working across all elements of our business and supply chain, we can continue to build our knowledge of these issues and take steps to evolve our collective awareness.

As we move ahead in 2025, we will continue to implement our action plan to ensure we continue to raise awareness of modern slavery within our business and help mitigate the possible risks it poses in our restaurants.

We will continue to educate our workforce and support our franchisees to do the same, through an “always on” model for training on modern slavery. We will deliver our largest ever training rollout across the Company, aiming to have key employees within Company owned and franchised restaurants complete comprehensive, in-person training on modern slavery. We will also introduce an e-learning module to ensure employees at all levels of our business have had training on modern slavery.

In addition to this, we’ll be focusing on how we can continue to raise awareness amongst all Company’s employees and how to ensure this is delivered in a way that is relevant to McDonald’s. We are creating bespoke awareness raising videos for our people and running campaigns linked with Anti-Slavery Day to ensure all our people are aware of the risk of modern slavery in McDonald’s and the part they can play in tackling it.

We are aiming to implement bespoke worker wellbeing visits to be conducted in Company owned and operated restaurants in the UK, and we will monitor and measure the effectiveness of all our initiatives in increasing awareness and providing employees with the means, support and confidence to raise concerns. We will build into our existing people engagement surveys measurement and assessment of the effectiveness of the work we’ve done so far, to ensure we can build on the successes and opportunities as we continue to work to tackle the risks of modern slavery.

Statement approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st December 2024. Mike Guerin, Franchisee Owner of Caspian Networks Ltd t/a McDonald’s approved this statement on 18th May 2026.

