

BURGER KING UK MODERN SLAVERY STATEMENT 2023

As a responsible food company, doing what is right extends to how we treat our employees, our customers and everyone who works in our supply chains. As our business grows, we are committed to ensuring that our approach to this is transparent, consistent and fair.

We recognise that we have a responsibility to ensure we conduct business in an ethical way and this includes understanding and addressing any risks, however small, of slavery and human trafficking in our own restaurant operations and in the wider supply chains. We are proud to uphold our duty to respect human rights and have a zero-tolerance to any form of slavery, forced labour and human trafficking anywhere in our business.

That is why in the last year, we have carried out training sessions for our Executive and Supply Chain teams and carried out a risk mapping assess-

ment of all our direct suppliers. This has enabled us to focus our resources on areas where most help and support is needed to protect our people and where there are exploitation risks. With the support of our strategic partner, STOP THE TRAFFIK Group, we have been able to continuously review our performance and review any lessons learned from our findings and experiences.

This is our fourth statement detailing our activities to prevent modern slavery in line with the provisions set out in the UK Modern Slavery Act 2015 and published in accordance with Section 54 of the Modern Slavery Act covering the year ending 31 December 2023 and is approved by the Board of Directors.

Alasdair Murdoch
Chief Executive Officer
16 February 2024

OUR BUSINESS

Royale TopCo Limited and its subsidiaries (“Burger King UK” or the “Group”) operates and is headquartered in the UK. Since 2017, a subsidiary of the Group, BKUK Group Limited, entered into a Master Franchise and Development Agreement with Burger King Europe GmbH, allowing BKUK Group Limited to become the Master Franchisee for England and Scotland. BKUK Group Limited is the main trading entity of the Group and maintains the relationships with suppliers as well as being the employing entity for all our team members. We own and manage over half of all the Burger King sites in the UK.



279

BKUK managed sites



551

Total BK Sites in UK



47

Direct Food and Beverage Suppliers



6,021

Total BKUK restaurant employees



45.5 million

Meals sold in 2023

Key Figures for 2023

OUR DIRECT RESTAURANT OPERATIONS

We recognise that all employees in our restaurants and offices must be safe and treated fairly with dignity and respect. We have approximately 6,000 employees directly employed by Burger King UK and as a responsible business, we adhere to minimum national standards and work towards industry best practice on working hours, pay and benefits.

We understand the risks of slavery and human trafficking within our own business operations, that are present at the recruitment and on-boarding stage of crew members; therefore, to combat this risk we:

- Carry out rigorous ID checks with a Trust ID checker system verification of employee identity,
- Perform Right to Work compliance checks and
- Ensure managers receive training on Right to Work procedures via an online training hub. To date, just over 90 % of managers have received this training.

Further to this recruitment stage, on an on-going basis our Loss Prevention and Business Risk department also reviews restaurants:

- Right to Work checks,
- Employee I.D.s and
- Visa checks.

These checks form part of Burger King UK's Business Risk Audit procedures. Aside from some of these modern slavery flags, they also ensure that employee working hours comply with legislation and industry directives and contracts are signed and up to date.

OUR POLICIES

As a business we have a suite of internal and external policies that cover our position on modern slavery and human rights.

Suppliers

Our suppliers are required to comply with all relevant legislation, regulations and industry best practice standards, as well as Burger King UK's Master Terms and Conditions which adopts a zero-tolerance approach to any bribery and corruption relating to any suppliers and sub-contractors we work with. We have reinforced this with an updated Supplier Code of Conduct that sets out our expectations for suppliers on business ethics and integrity, health and safety, environment, and labour rights, and specifically highlights labour practices.

Examples of policies are:

- [🔗 Human Rights Policy](#)
- [🔗 Responsible Sourcing Policy](#)

Franchisees

Our franchisees are required to comply with all legislation, regulations and industry best practice standards as part of our Franchise Agreement.

Restaurants and Offices

The wellbeing of our employees is paramount, and we provide an Employee Assistance Programme that offers 24/7 independent support to all employees. We also operate a free and confidential worker hotline, both via Hospitality Action, the benevolent

charity supported by the hospitality industry. This hotline allows our employees to raise any suspicions about worker exploitation or modern slavery. Details on how to use the hotline are displayed on restaurant notice boards or in Burger King UK's Support Centre and on our employee intranet.

We encourage our employees to raise any concerns or potential breaches of these policies and/or incidents anonymously and we recognise that the law protects any employee that makes public interest disclosures. This applies to any of the following:

- A criminal offence
- A miscarriage of justice
- An act creating risk to health and safety
- An act causing damage to the environment
- A breach of another legal obligation
- Concealment by us of any of the above

Examples of employee policies are:

- Employee Handbook
- Anti-bribery and Corruption Policy
- Grievance and Whistleblowing Policy
- Equality and Diversity Policy

OUR SUPPLY CHAIN

As a major food company, we have diverse and extensive supply chains. These include the sourcing and provision of food, drink and packaging products, point of sale materials, uniforms and restaurant equipment.

Burger King UK recognises that with complexity comes potential risks, which is why we prioritise creating long-term, collaborative relationships with our suppliers. This ensures that our trading relationships with our suppliers are conducted with the highest integrity. As Burger King UK don't own any of its own factories, having close relationships with our suppliers is integral to understanding the changing landscape of risk within our supply base.

To further manage the complexity of our supply chains, we have categorised our suppliers into tier levels as below:

Supplier Level

- Supplier office
- No production or processing takes place here
- Contracted by BK GmbH or Burger King UK

Tier 1

- Contracted by the supplier
- Direct production, manufacturing or warehousing

Tier 2

- Tier 1 subcontractors and ingredients suppliers

Tier 3

- Raw material extraction/origin level

Tier 4

- Farm level inputs

This categorisation helps provide a framework of action for us and our suppliers, where we can focus on different sustainability priorities dependent on the risk present and our level of influence.

A business like Burger King UK does not only have a complex product (or Direct) supply chain but also procures a number of Indirect products and services. Our Indirect Procurement team oversee the engagement with these organisations and work closely with our Responsible Business function to develop responsible sourcing practices and tender processes for these vendors.

Examples of Burger King UK Procurement Categories:

Direct Procurement

- Food
- Branded food and drink
- Warehousing

Indirect Procurement – Products

- Furniture
- Uniform
- Cleaning equipment

Indirect Procurement – Services

- Contract window cleaning
- Waste collection
- Printing and signage

Many of our suppliers will themselves be subject to modern slavery legal compliance in their own right. However, we recognise that there will be a number of suppliers who, whilst not legally required to comply with the UK Modern Slavery Act, are required by Burger King UK to demonstrate their own due diligence on ethical standards in order to supply the relevant goods and services to us.

OUR BURGER KING FOR GOOD CHARTER

Our responsible business strategy, Burger King for Good sets out how we deliver on this trust ensuring that we hold ourselves to account with our sustainability goals and commitments. These are aligned with the UN Sustainable Development Goals (SDGs) which aim to end poverty, protect our planet and increase prosperity for all.

Our approach to modern slavery and human rights due diligence covers several themes: awareness raising, supply chain visibility, risk mapping, reactive risk resolution (from audit findings) and proactive risk mitigation (using risk mapping to strengthen sourcing practises and implement beyond audit work).

Business Awareness Raising

Working in partnership with STOP THE TRAFFIK Group, we have hosted awareness raising sessions with our Executive and Supply Chain teams on spotting the signs of modern slavery in the procurement process. This training also broke down the potential exposure to risk by commodity and region.

Awareness of the evolving risk landscape is then maintained through the Responsible Business teams and Supply Chain Teams meeting monthly to formally discuss changes to supply bases and emerging risks.

Supply Chain Mapping

The building blocks of any due diligence programme is transparency and visibility. Businesses are not able to identify potential human rights breaches of modern slavery hot spots if they are not aware of where their supply chain is.

Mapping beyond Tier 1 is a key focus of the business going forward, for both our Direct and Indirect suppliers. We will continue to build on the robust work we have already done, using our supply chain management database, Authenticate. This platform provides the technology to engage with and manage suppliers across all tiers to build full visibility, increase efficiency and mitigate a range of risks. The Authenticate platform gives Burger King UK the tools to map finished and raw products back to source and monitors suppliers to ensure compliance and measure environmental, social and governance risk, virtually.

Risk Mapping – Potential and Actual

A core tenet of our approach to responsible business, is identifying present and potential impacts of our operations. Burger King UK have taken a three-pronged approach to understanding our risk as a business:



1. Supplier Risk Mapping

- Assessed by STOP THE TRAFFIK
- Desk based assessment on Burger King UK Direct suppliers
- Reviewed transparency of policies such as code of conduct, third party certifications, modern slavery statements where applicable, governance and training
- We have used this work to prioritise suppliers based on their capacity to formally manage risk



2. Material Risk Mapping

- In-house assessment
- Desk based assessment on Burger King UK Direct products, commodities and sourcing regions
- Reviewed 6 global indices such as the Global Slavery Index and ITUC Global Rights Index and High-Risk Products Produced by Child Labour or Forced Labour
- Understanding these risks along with the inherent risks of a particular country and their respective commodities set out below has enabled us to develop targeted risk mitigation policies and procedures



3. Double Materiality Assessment

- Assessed by Deloitte
- A review of Burger King UK ESG documents, strategies, policies and commitments, stakeholder interviews, surveys, competitor benchmarking, media review and academic paper review
- A total of 19 topics were assessed relative to one another and to their impact / financial materiality to Burger King UK including human rights, labour rights and responsible sourcing

The topics identified as the most material by stakeholders as they significantly impact and are impacted by Burger King UK are:

- Animal welfare
- Food safety and food quality
- Single-use plastics and packaging waste
- Responsible sourcing
- Labour practices
- Business ethics and governance
- Health, safety and wellbeing

The outputs from the double materiality assessment have been used to review the Group's five key pillars within Burger King for Good, ensuring that the most material issues are covered within this framework.

Due Diligence Processes

Supplier on-boarding

Our due diligence systems for sustainability credentials, modern slavery and ethical sourcing policies are now integrated into our contract management procedures. We are able to monitor compliance via our due diligence platform, Authenticate and our Supply Chain team ensure that these checks are part of supplier tenders and contracts.

This process means that no new suppliers can be listed without Burger King UK understanding their commitment to responsible sourcing, suppliers signing our policies and providing supporting evidence and independent verification of the sustainability of any products they would supply. Supplier information submitted onto Authenticate is continually monitored by our Responsible Business team and monthly meetings are held with the Supply Chain

to review supplier status and progress on the quality of due diligence evidence submitted. Authenticate is continually monitored by our Responsible Business and Supply Chain teams.

A series of modern slavery questions has recently been introduced to new tenders to ensure that supply chain partners are aware of their own risks and are able to mitigate and remediate effectively.

Manufacturing Facility Ethical Audit Programme

Burger King UK is a member of the Supplier Ethical Data Exchange (SEDEX) which is the platform that gives us improved visibility of our supply chain beyond Tier 1 suppliers and shows us information on ethical processes and practices at manufacturing site level.

All our direct suppliers are required to be SEDEX members so that we are able to review their SMETA (Sedex Members Ethical Trading Audit) results and follow up with the most appropriate action. In addition, Burger King UK carries out supplier assessments via Authenticate which includes requirements for suppliers to show evidence of their policies and practices on ethical trading within their own supply chains and businesses.

Reporting and Governance

Burger King UK's Chief Financial Officer has overarching accountability for ensuring positive performance in all our ethical trading relationships within our supply chains as well as our own relationships with our employees.

Accountability for measuring, mitigating and remediating modern slavery risks and ensuring policy compliance is owned by the Director of

Commercial Planning and ESG supported by the Head of Responsible Business.

Accountability and responsibility for managing Burger King UK's suppliers in delivering the responsible sourcing programme, responding to any risks and addressing policy non-compliances is led by the Director of Supply Chain Management supported by the team of Supply Chain Managers

Burger King UK's People Director has overarching accountability for ensuring that the right policies are in place to mitigate and remediate any risks within our own organisation.

Accountability for policy compliance and ensuring the safety and wellbeing of our employees and guests in our restaurants lies with our Chief Operating Officer. Day to day management is the responsibility of our Regional Operations Managers and Area Coaches and at site level by our restaurant managers.

Workstream	2023 Key Achievements	2024 Key Commitments
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Awareness Raising

- STOP THE TRAFFIK hosted awareness raising sessions with our Executive and Supply Chain teams on spotting the signs of modern slavery in the procurement process. This training also broke down the potential exposure to risk by commodity and region.
- In 2023, we adopted a “Learn at 11” session which is part of our internal communications programme throughout the year and open to employees who wish to learn more about a particular topic in which Burger King UK is involved. Positive feedback was received on raising awareness of the signs of modern slavery and examples of these in the hospitality sector together with providing information on how employees should respond to any potential risk or incident.

- On-boarding training will be developed by STOP THE TRAFFIK for our head office employees and any new starter in our restaurant operations. This modern slavery training will become a mandatory part of any new starter within Burger King UK.



Due Diligence

Risk Mapping

- Conducted a double materiality assessment with a third-party consultancy, to understand the importance of key issues such as human rights, labour practices and responsible sourcing with our stakeholders as well as how they impact on our business.
- Conducted an actual risk mapping of suppliers with the results informing our approach to a deeper supplier mapping beyond Tier 1 and the development of risk mitigation processes.
- Conducted an in-house material risk assessment to identify current high-risk commodities and regions. This was shared with the Supply Chain team to help support in future sourcing conversations.

Risk Mapping

- Work with all key departments on their action plans that have come from the double materiality assessment including rolling our modern slavery risk questionnaires to 100% of new tenders including Indirect services and products.
- We also commit to developing a process to identify when and how risk mapping needs to be updated, as we are aware that risks evolve and move over time.

Supply Base Mapping

- We continue to be committed to supply chain visibility lower down the Tiers by working with our partner suppliers.

Workstream	2023 Key Achievements	2024 Key Commitments
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Due Diligence
(continued)

Supply Base Mapping

- In 2023 we collaborated with Authenticate to map our product supply chains as far down the tier levels as we could. After developing our Tier level framework and consulting our risk mapping work, we have decided to take a more strategic approach to mapping for 2024, based on risk and leverage.

Risk Resolution

- We became SEDEX members in 2023, to support in identifying risks in our supply chain. We are versed on the limitations of audits though, and will continue to ensure that they are just one method, in a toolbox of approaches to risk discovery.

Proactive Risk Mitigation

- Developed a more robust supplier set up process, which includes modern slavery assessment questions developed by STOP THE TRAFFIK. This was rolled out in an Indirect procurement tender of uniforms, where a scorecard approach to ESG was taken and formed a third of the overall decision making for supplier selection.

Risk Resolution

- We will develop a Factory Observation Checklist for any Burger King UK employee that visits a supply chain facility. This will be accompanied by refresher training on spotting the signs of modern slavery.
- In 2024, we will continue to work on our audit coverage to ensure that we have visibility of 100% Tier 1 audits, and will recruit an additional team member to the Responsible Business team who will be responsible for working with suppliers to close off open non-compliances.

Proactive Risk Mitigation

- The supplier set up process will be rolled out across new tender processes in 2024.
- We will work with STOP THE TRAFFIK on identifying “beyond audit” work, in areas where we know we have risk vulnerabilities.

Partnerships

- We have set up a partnership with STOP THE TRAFFIK Group who will act as a ‘critical friend’ and provide us with independent advice on modern slavery related risks.
- In 2023, we kicked off activities with STOP THE TRAFFIK by undergoing policy development; reviewing the full suite of our policies and developing a modern slavery toolkit for suppliers. STOP THE TRAFFIK also reviewed all our current policies and contracts to ensure that they are forward thinking and colleague centred.

- STOP THE TRAFFIK, will continue to provide support related to our supply chain including horizon scanning of emerging issues, reviewing supplier assessments and developing corrective action plans where needed.
- As part of our on-going due diligence, we also commit to working with STOP THE TRAFFIK on project work that tackles a high-risk region and setting for modern slavery in our business.

Workstream	2023 Key Achievements	2024 Key Commitments
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Supplier Engagement

- Developed a supplier toolkit to be used by suppliers to provide them with practical guidance on how they can prevent modern slavery in their own business operations and supply chains.

- Roll out toolkit to 100% of Tier 1 suppliers and make the toolkit available for lower tiers. We also commit to rolling out this toolkit to a cohort of our franchise partners.
- 100% of current suppliers to complete an annual Self-Assessment Questionnaire which includes modern slavery indication questions developed by STOP THE TRAFFIK.

Policy

- Developed a Human Rights policy that lays out our commitments to protecting and respecting human rights in our business and supply chain.

- Annually review all policies to ensure that they are fit for purpose and engage with upcoming legislation and best practice.

Monitoring, Evaluation and Learning

- In 2023, we created the building blocks of a robust due diligence programme and in 2024 we commit to be able to report and evidence outcomes of this work through developing Key Performance Indicators.

We will set the following Key Performance Indicators on the following areas of due diligence to ensure we can evidence outcomes of our policies and procedures:

- Decrease in supplier risk level as per our actual risk mapping work. Based on desk-reviewed modern slavery risk (country and sector of operations) and engagement with STOP THE TRAFFIK to address issues identified with our policies and processes.
- 100% of new suppliers complete human rights due diligence process and are scored on their performance with the expectation to improve annually.
- A KPI on engagement of modern slavery training in head office and for employees in restaurant. This will be created by measuring the engagement with training modules and its effectiveness in raising awareness and educating on modern slavery issues.

STOP THE TRAFFIK's Director of
Commercial Marketing, Chris Jones states:

“Burger King UK has taken huge strides this year, acting on the increased transparency they have created in their previous year’s work. They are taking actions which promote human rights within the organisation and the communities in which they operate in. They are demonstrating a commitment to both responsible business and a world without trafficking and exploitation.”

BOARD APPROVAL

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes BKUK Group Ltd and its franchisees’ slavery and human trafficking statement for the current financial year. This statement was approved by the board of BKUK Group Ltd on 16 February 2024



Alasdair Murdoch
16 February 2024