



# BURGER KING UK MODERN SLAVERY STATEMENT 2024

## Foreword

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 our 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.






As part of our Burger King for Good charter, this approach is fundamental to the way we do business and the statement sets out how we deliver on our responsibilities and commitments in a focused and salient way to protect those who are most vulnerable to modern slavery. Modern slavery is wide scale and often hidden in nature which means that collaboration is vital. So, we will continue to work with suppliers, our colleagues, industry partners and expert organisations to address all aspects of modern slavery with the aim of improving the lives of people both in the UK and internationally.

This is our fifth 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<sup>st</sup> December 2024 and is approved by the Board of Directors.

Alasdair Murdoch  
Chief Executive Officer, Burger King UK  
28 May 2025

## OUR BUSINESS

Royale TopCo Limited and its subsidiaries (“Burger King UK” or “BKUK”) operate and are headquartered in the UK. Since 2017, a subsidiary of Burger King UK, BKUK Group Limited, entered into a Master Franchise and Development Agreement (‘MFDA’) with Burger King Europe GMBH, allowing BKUK Group Limited to become the Master Franchisee for the United Kingdom of Great Britain and Northern Ireland. BKUK Group Limited is the main trading entity of Burger King UK 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 restaurants in the UK, with the remainder operated by Franchisees.

				
293	572	c.6200	32 million	74
BKUK Managed Restaurants	Total BK Restaurants in UK	Total BKUK Restaurant Employees	Meals sold in 2024	Direct Suppliers



## **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 6,200 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. These standards along with our own employee practices and processes are set out in Burger King UK's Business Ethics and Code of Conduct Policy.

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
- Complete payroll checks every fortnight for duplicate bank details
- Conduct Right to Work compliance checks
- Train managers on Right to Work procedures via an online training hub. To date, 86% of managers have received this

Burger King UK does not use agency workers within our own operations which minimises the risk of exploitation through third-party employment providers.

Further to this recruitment stage, our loss prevention specialists also review restaurants on an on-going basis on site management processes regarding:

- Right to Work documents
- National Insurance numbers
- Employee I.D.s

These checks form part of Burger King UK's Business Risk Audit procedures which also ensure that employee working hours comply with legislation and industry directives and contracts are signed and are kept 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.

### **Franchisees**

All Franchisees must adhere to the requirements of their Franchise Agreement. With specific reference to modern slavery and the requirements of the UK's Modern Slavery Act 2015, the agreement stipulates that if any Franchisee significantly breaches the law and Franchise Agreement requirements and is unable to demonstrate corrective action, then Burger King UK has the right to terminate the Franchise Agreement with immediate effect. Our People team are continuing to develop further policy development and training support for Franchisees, including harassment, discrimination and whistleblowing issues.

### **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.

Supply base policies linked below:

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

## **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, which 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, in Burger King UK's Support Centre and on our employee intranet. Both the Employee Assistance Programme and the hotline are operated via Hospitality Action, the benevolent charity supported by the hospitality industry. Further to this, we also guide employees directly to the UK Modern Slavery Helpline and Unseen online reporting tool on our intranet in the case that they have a suspicion of modern slavery in the workplace.

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 our 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 is responsible for the supply chain for all direct owned and Franchisee operations and therefore these policies apply to all Burger King operations in the UK.

Burger King UK recognises complexity brings potential risks, which is why we prioritise creating long-term, collaborative relationships with our suppliers. This ensures that our trading relationships are conducted with the highest integrity. As Burger King UK does not

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:

TIER LEVEL	DEFINITION
Supplier Level	<ul style="list-style-type: none"> <li>• Supplier site or office</li> <li>• No production takes place here</li> <li>• Usually, the supplier is the entity that is contracted</li> </ul>
TIER 1	<ul style="list-style-type: none"> <li>• Direct production, manufacturing and warehousing</li> </ul>
TIER 2	<ul style="list-style-type: none"> <li>• Tier 1 subcontractors and ingredients suppliers</li> <li>• Includes slaughterhouses that are not the final stage in the production process</li> </ul>
TIER 3	<ul style="list-style-type: none"> <li>• Farm level</li> <li>• Raw material origin / extraction / cultivation</li> </ul>
TIER 4	<ul style="list-style-type: none"> <li>• Farm inputs such as feed and fertilizers</li> </ul>

This provides an action framework for us and our suppliers, where we can focus on sustainability priorities dependent on the risk present and our level of influence.

Burger King UK not only has a complex ‘Direct’ product 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.

Burger King UK procurement categories are as follows:

#### **Direct Procurement**

- Food and drink
- Branded food and drink
- Warehousing
- Packaging

#### **Indirect Procurement – Products**

- Furniture
- Uniform
- Cleaning equipment

#### **Indirect Procurement – Services**

- Contract window cleaning
- Waste collection
- Printing and signage

Many of our suppliers will be subject to modern slavery legal compliance in their own right. However, there are 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 practices and implement beyond audit work).

### Business Awareness Raising

Awareness and mitigation of the evolving risk landscape is driven by the Responsible Business team and monthly meetings are held with the Supply Chain and People teams to formally discuss changes to supply chains, policies and emerging risks.

### Supply Chain Mapping

The building blocks of any due diligence programme are 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 for both our Direct and Indirect suppliers. Our supply chain management database, Authenticate, provides the technology to engage with and manage suppliers across all tiers to build visibility, increase efficiency and mitigate a range of risks. It 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.

### Risk Mapping – Potential and Actual

A core tenet of our approach 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

- Desk-based assessment by STOP THE TRAFFIK on Burger King UK Direct suppliers
- Reviewed 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

- Desk based assessment on Burger King UK Direct products, commodities and sourcing regions
- Reviewed 6 global indices, including the Global Slavery Index, ITUC Global Rights Index and High-Risk Products Produced by Child Labour or Forced Labour

- We have used this work to understand the inherent risks of a particular country and their respective commodities. This has enabled us to develop targeted risk mitigation policies and procedures.



### 3. Double Materiality Assessment

- Review of Burger King UK ESG documents, strategies, policies and commitments, stakeholder interviews, surveys, competitor benchmarking, media review and academic paper review

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 five key pillars within Burger King for Good, ensuring that the most material issues are covered within this framework.

## Due Diligence Processes

### Supplier Selection and On-boarding

Burger King UK has a pre-qualification process that determines supplier selection for new tenders. The criteria for this process include:

- Sustainability credentials including independent certification and technical expertise, supported by timely and efficient engagement from suppliers
- Completion of Responsible Business critical questions assessment depending on the nature of the product, commodity or service

This process is led by Burger King UK's Supply Chain team with support from the Responsible Business team.

This process means that no new suppliers can be listed without Burger King UK understanding their commitment to responsible sourcing, suppliers providing evidence of compliance to our policies, and due diligence on the sustainability of any products they would supply, including independent verification where relevant.

Our due diligence systems for sustainability credentials, modern slavery and ethical sourcing policies are fully integrated into our contract management procedures. We are able to monitor compliance via our due diligence platform, Authenticate.

Supplier information submitted onto Authenticate is continually monitored by the Responsible Business team and bi-weekly meetings are held with the Supply Chain team to review supplier status and progress on the quality of due diligence evidence submitted.



## **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. If a Direct supplier is not a member of SEDEX, then the Responsible Business team will follow up with the supplier in consultation with the relevant Supply Chain manager to identify what the challenges may be, including knowledge of SEDEX and any cost concerns.

In any event, ethical trading due diligence of their supply chain must be evidenced by the supplier.

## **Reporting and Governance**

Burger King UK's Chief Financial Officer has overarching accountability for ensuring positive performance in all our ethical trading relationships with 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 Chief Supply Chain Officer, supported by the team of Supply Chain managers.

Our Chief People Officer has overarching accountability for Burger King UK employee policies which 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.



## OUR PROGRESS

WORKSTREAM	2024 KEY ACHIEVEMENTS	2025 KEY COMMITMENTS
Awareness Raising	<p><b>Digital Training</b> On-boarding training has been developed by STOP THE TRAFFIK for our head office employees and any new starter in our restaurant operations. This modern slavery training will be mandatory for any new starter within Burger King UK in 2025.</p>	<p><b>Digital Training</b> Roll out training to 100% of employees using our LMS platform, Thrive. Employee survey to be conducted to assess awareness and understand levels of engagement.</p> <p><b>In-person Training</b> Refresher training to be set up for the leadership team.</p>
Due Diligence	<p><b>Proactive Risk Mitigation</b> For new suppliers, an ESG critical questions assessment that includes ethical trading and modern slavery requirements is now integrated into tenders and renegotiations of contracts. This includes the requirement for Tier 1 sites to have an in-date SMETA report, where non-conformances are being proactively remediated.</p> <p>A factory observation checklist has been developed to be used by any Burger King UK employee visiting a supply chain facility. This will be accompanied by refresher training on spotting the signs of modern slavery.</p> <p>ESG action plans have also been developed with key departments using our third-party double materiality assessment and these are reviewed on a quarterly basis.</p> <p><b>Supply Base Mapping</b> A dedicated member of the Responsible Business team works with suppliers and Authenticate to ensure adequate due diligence is in place and any non-compliances are resolved.</p>	<p><b>Proactive Risk Mitigation</b> We will continue to follow up with suppliers on their responses to our ESG questions, focusing on those that are critical to the business in terms of category, geographic location, volume and spend. Any non-compliance or lack of response from suppliers will be escalated to the Supply Chain team.</p> <p>The supplier set up process will be applied across new tender processes and contract renegotiations in 2025. From June 2025, it will also mandate a set of minimum requirements to supply BKUK.</p> <p><b>Supply Base Mapping</b> We will continue to improve supply chain mapping visualisation beyond Tier 1 and across all supplier types including logistics partners to ensure traders are also captured in risk and due diligence assessments.</p> <p><b>Risk Mapping</b> Current risk mapping process will be updated to ensure any emerging risks are identified and mitigation activities are put into place. This will apply to product, country of origin and country of production.</p>



	<p>Our 2024 mapping statistics were as follows:</p> <ul style="list-style-type: none"> <li>• 100% of live suppliers have Tier 1 visibility</li> <li>• 54% suppliers fully completed sustainability SAQs</li> <li>• 32% suppliers partially completed sustainability SAQs</li> <li>• 14% suppliers (branded) did not complete but provided company reports</li> </ul> <p><b>Recruitment and On-boarding Processes</b> Following reported cases of discovered modern slavery in other Franchise locations within the QSR sector, we conducted a full review of our recruitment, payroll and loss prevention processes to ascertain if they identify the classic flags of modern slavery according to Stronger Together, the GLAA and Anti-Slavery International. As per our Direct Operations Processes section, we knew our procedures already catered for common flags such as duplicate bank account details and illegitimate Right to Work documents, but this exercise has allowed us to identify builds to best practice that we will be adding in 2025.</p>	<p>Focus on all Tier 1 suppliers to provide ethical audit information on their supply chains including policies, governance and reporting and audit results.</p> <p><b>Recruitment and On-boarding Processes</b> In 2025, we will build on all current processes to include additional checks on behavioural signs and will strengthen the documenting process of current procedures.</p>
<b>Partnerships</b>	<p><b>Stop The Traffik &amp; UK Youth Prevention Campaign</b> We have developed a new collaboration between our partners Stop The Traffik and UK Youth on a project to address the county lines issue which is growing among children and young people. (see case study)</p> <p><b>Food Network for Ethical Trade (FNET)</b> In 2024, to build on our existing modern slavery work with STT, we decided to join the FNET and continue to elevate our responsible sourcing efforts. We look forward to</p>	<p><b>Stop The Traffik &amp; UK Youth Prevention Campaign</b> Using training videos developed by STT based on the campaign learnings, we will build knowledge and capabilities in our teams focused on:</p> <ul style="list-style-type: none"> <li>• The principles of youth work</li> <li>• Supporting young people who are new to working at BK</li> <li>• Unconscious bias and microaggression training</li> <li>• County Lines Campaign</li> </ul> <p><b>Food Network for Ethical Trade (FNET)</b> We will engage with at least 2 working groups to support better understanding of complex parts of the supply chain.</p>

	working with other industry leaders in 2025 to tackle ethical trade challenges, and advance sustainable sourcing. This membership reinforces our commitment to supply chain working conditions and the environment.	
<b>Supplier Engagement</b>	<p><b>Annual Data Collection</b> We have continually engaged with our Tier 1 suppliers throughout 2024 as part of our SAQ follow up and reviews.</p> <p><b>Supplier Visits</b> Responsible Business team carried out 5 supplier visits with the Supply Chain team including farms and factories.</p> <p>In line with our commitment to training and proactive risk mitigation, we will invest in building human rights and ethical trade capacity in our team by upskilling a team member on the Social Accountability Initiative (SAI) SA8000 course which covers the leading global ethical auditing standard for organisations and factories.</p>	<p><b>Modern Slavery Resources</b> After developing our supplier toolkit, we will roll it out in 2025 to not only our suppliers but to our Franchisees. The toolkit, developed by Stop The Traffik, can be used by suppliers for practical guidance on how they can prevent modern slavery in their own business operations and supply chains.</p> <p><b>Supplier Visits</b> We will continue to carry out joint supplier visits with the Supply Chain team focusing on ethical trading and the management of worker welfare. Our SA8000 trained team member will further develop our understanding of high-risk operations and corroborate audit findings during supplier visits.</p>
<b>Policy Management</b>	All modern slavery related policies have been reviewed to ensure they are fit for purpose and engage with upcoming legislation and best practice.	We will develop a formal escalation process that will be integrated into our governance structure. We believe in a victim centric approach to remediation, and will work with suppliers to redress issues in their supply base. However, we hold the right to ultimately delist a supplier who fails to engage with our remediation approach.
<b>Identifying and Managing Safeguarding Opportunities</b>		Safeguarding is defined by the Care Quality Commission (CQC) as: ‘... <i>protecting a person’s health, wellbeing, and human rights, and enabling them to live free from harm, abuse and neglect</i> ’. Everyone can be at risk of safeguarding issues either working in our restaurants or visiting as a customer, but some groups are particularly vulnerable such as children and young people. This could range from modern slavery and sexual harassment to domestic and/or physical violence.

		<p>QSRs can play a role in safeguarding vulnerable people by providing safe environments and proactively engaging in practices to protect the public. Through our project work with Stop the Traffik and UK Youth, we identified a potential role that BKUK can play in the safeguarding of vulnerable people who interact with our restaurants either through work or socially.</p> <p>We are committed to developing a safeguarding process in 2025 to ensure that staff can raise concerns about potential or actual harm on-going in our restaurants.</p>
<b>Monitoring, Evaluation and Learning</b>	<ul style="list-style-type: none"> <li>• 50% Tier 1 suppliers are in scope of UK Modern Slavery Act and of this, 84% have shared their statements with BKUK</li> <li>• 67% of Tier 1 suppliers are SEDEX members</li> <li>• Of this, 45% Tier 1 suppliers have shown evidence of SMETA audits and 20% have conducted valid ethical audits</li> <li>• 6 new suppliers onboarded in 2024. All have provided company ethical trading policies, 2 are in scope of UK Modern Slavery Act and have provided statements</li> <li>• 3 of those suppliers are SEDEX members and have provided SMETA audit reports</li> </ul>	<p><b>Key Performance Indicators</b></p> <ul style="list-style-type: none"> <li>• Working towards 100% Tier 1 suppliers are Sedex members</li> <li>• 100% Tier 1 suppliers providing due diligence on modern slavery including MSS, company policies and processes</li> <li>• 100% new suppliers providing due diligence on modern slavery</li> <li>• 100% key Head Office employees trained on modern slavery</li> </ul>

### 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 28 May 2025.



Alasdair Murdoch  
28 May 2025

## Case Study: Burger King UK County Lines Prevention Campaign 2024

### Context

"County Lines" refers to a form of criminal exploitation where gangs pressure young people into storing or transporting drugs, weapons, and money to suburban, market, or coastal areas (Home Office, 2018). This illegal practice is recognised as a form of child abuse and can occur anywhere in the UK.

- Forced criminality is now the third most common form of trafficking in the UK.
- Young people are the most common victims of County Lines with 82% under 18.
- The National Crime Agency (NCA) estimates around 600–1,000 active County Lines networks in the UK at any given time.

Research indicates that vulnerable young people are now being recruited not only with the promise of money but also with food. Quick Service Restaurants (QSRs) have become hotspots for this recruitment activity.

### Working with our Partners

We are proud to have collaborated with two of our key Responsible Business partners in developing campaign work that could impact many young people across the country:

- Stop The Traffik (STT): Burger King UK has worked with leading anti-slavery charity STT on several different initiatives relating to modern slavery and risk mapping.
- UK Youth (UKY): UKY is Burger King UK's corporate charity partner. They champion youth work in the UK and have a network of over 8,000 youth organisations.

### Aim

Our aim was to raise awareness and understanding of the county lines issue and to collaborate on a digital initiative to support young people working in our restaurants and customers who may face this issue but do not know what to do or where to go for help.

### The Campaign

In November 2024, a social media campaign was launched with people in specific locations across England being served targeted social media content that detailed County Lines and how to refer themselves to Stop The Traffik confidentially if they felt moved to do so.

### Campaign Evaluation

The campaign has proved to be a success achieving the following results:

- Over 380,000 young people in England were reached by this awareness raising
- 55% of people responded that the campaign made them realise that they, or someone they know, is at risk of being in an exploitative situation
- Over 3,100 viewers watched at least half of the campaign video
- 5% of those who viewed the post performed a unique click on the 'learn more' button

Rebekah Lisgarten, Stop the Traffik stated *"Fast food restaurants have a unique opportunity to prevent human trafficking given their popularity and frequent use within communities, especially by young people. We are delighted to see Burger King UK going beyond compliance and taking a proactive approach to keep the public safe from exploitation, with a specific focus right now on county lines, hugely prevalent in the UK."*

Kerry Reid, UK Youth Director of Income Generation and Strategic Communications said *"Spotlighting the voice of young people through our co-design process has been really important. We've been able to create a campaign that is for young people by young people, which is hugely empowering and critical in creating the impact that we need to see in keeping our young people safe."*