

BURGER KING UK MODERN SLAVERY STATEMENT 2025

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.

Our policy of zero-tolerance means that any infringement will result in a penalty and mandatory correction. In some cases, the penalty will be the severing of the Burger King UK business relationship with the responsible entity, although we do not operate a blanket “cut and run” approach to breaches of policy. We understand in some cases it is more responsible to continue the business relationship to oversee the correction of issues and remediation of victims.

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 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 sixth 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 31st December 2025 and is approved by the Board of Directors.

Alasdair Murdoch
Chief Executive Officer, Burger King UK
1st June 2026

SCOPE

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 under the parent company Restaurant Brands International (RBI).

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.

OUR BUSINESS



286

BKUK Managed
Restaurants



574

Total BK
Restaurants in UK



c.6000

Total BKUK
Restaurant
Employees



33 million

Meals sold in 2024



65

Direct Food &
Beverage
Suppliers

STATEMENT STRUCTURE

For transparency and ease of access, our modern slavery statement has the below formation. We have chosen to base the structure generally on the Food Network for Ethical Trade's (FNET) Human Rights Due Diligence (HRDD) framework, as it is considered best practice in the sector and ensures consistency across various reports.

The statement has the below sections:

1. Risk assessment and analysis
2. Policy commitments, governance and training
3. Mapping supply chains and business relationships
4. Mitigating risks and taking action
5. Remediation processes and complaints mechanisms
6. Continuous improvements and commitments

1 RISK ASSESSMENT AND ANALYSIS

BKUK uses multiple tools to assess actual and potential adverse impacts on people in its operations, franchises and supply chains.

A core part of our approach is identifying actual and potential modern slavery risks across our operations. Burger King UK uses multiple tools to assess risk:

1. Expert External Assessments and Reports

Stop The Traffik (STT) Risk Assessment

- STT completed a desk-based assessment of BKUK Direct Food & Beverage suppliers.
- It reviewed supplier policies, certifications, statements, governance and training materials.
- We use the findings to prioritise suppliers by their ability to manage risk.

Sedex and use of SMETA Audits

- BKUK has been a Sedex member since 2023 and require Direct suppliers to share audits for manufacturing and warehousing sites.
- Sedex and SMETA audits support our internal risk categorisation, and we may shadow audits to strengthen site visibility.

Double Materiality Assessment

- Deloitte reviewed BKUK's ESG documents, commitments, stakeholder input, benchmarking, media and academic sources.
- The most material topics identified were:
 - animal welfare, food safety and quality, packaging waste, responsible sourcing, labour practices, business ethics and governance, and health, safety and wellbeing
- These findings informed a review of the five Burger King for Good pillars to ensure they reflect our most material issues.

County Lines Campaign - Rapid Evidence Review – UK Youth and Stop the Traffik

- An evidence review by UK Youth and Stop the Traffik found county lines exploitation is a risk for young people in and around restaurant locations.
- Fast-food venues including chicken shops and other leisure spaces can be used by traffickers to recruit and groom young people.

The BKUK Responsible Business team then collates the results from all the above risk assessments to focus activity and policy in those areas. The BK For Good charter therefore uses these risk assessments to identify four categories of People impacted by our business operations:

1. BKUK Directly Employed Staff
2. Customers and Community
3. BKUK Franchise Staff
4. Workers in the Supply Chain

Our approach to anti-slavery work must cover all 4 categories to be impactful.

2 POLICY, GOVERNANCE AND TRAINING

BKUK makes public commitments to human rights, has clear accountability mechanisms and offers a range of training and awareness raising to staff

Governance

- Burger King UK's Chief Financial Officer has overall accountability for ethical trading across our supply chains and workforce.
- Responsibility for measuring, mitigating and remediating modern slavery risks, and for policy compliance, sits with the Director of Commercial Planning and ESG, supported by the Head of Responsible Business.
- The Chief Supply Chain Officer, supported by the Supply Chain team, leads supplier oversight, responsible sourcing and responses to policy breaches.
- The Chief People Officer is accountable for employee policies that help prevent and address risks within our own operations.
- The Chief Operating Officer oversees policy compliance and the safety and wellbeing of employees and guests, with day-to-day responsibility held by Regional Operations Managers, Area Coaches and restaurant managers.

DIRECT OPERATIONS

Policy

Employee wellbeing is supported through a 24/7 Employee Assistance Programme and a free, confidential worker hotline run by Hospitality Action. Guidance is also available through our intranet, including signposting to the UK Modern Slavery Helpline and Unseen's reporting tool.

Key employee policies include:

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

We are committed to treating employees fairly and safely. Around 6000 people are directly employed by BKUK, and our employment practices are set out in the BKUK Code of Business Ethics and Conduct.

We recognise recruitment and onboarding as key risk points for modern slavery and human trafficking. To reduce this risk, we:

- Carry out ID and Right to Work checks, supported by manager training
- Run payroll checks for duplicate bank details and do not use agency workers in our own operations

Loss prevention specialists also review restaurant processes to ensure key employment checks are in place, including:

- Employee identity and Right to Work documents are checked and kept valid
- Right to Work documents are collated and are valid
- Pay records are matched to hours worked

These checks form part of our Business Risk Audit procedures, which also cover working hours and contract compliance.

Training

In 2025, Stop the Traffik developed two mandatory digital training modules for Restaurant Managers covering modern slavery indicators and county lines exploitation.

CUSTOMERS

Policy

BKUK is committed to protecting the health, safety and welfare of employees and guests by maintaining safe restaurants and offices, high food safety standards and reduced environmental impact. BKUK's management is responsible for applying safe systems of work, supported by internal and external advisers, and our Health and Safety Policy is reviewed annually.

Training (Awareness Raising)

We have delivered a county lines awareness campaign targeting young people in high-risk locations.

FRANCHISES

Policy

Franchisees must comply with their Franchise Agreement. Where serious breaches are not corrected, BKUK may terminate the relationship immediately. Our People team is continuing to develop policy and training support for Franchisees and share best practice where relevant. Many Franchisees fall within the scope of the Modern Slavery Act in their own right.

Training

We share a free Stop the Traffik SME toolkit with franchise partners to help them identify risk indicators in their operations and recruitment.

SUPPLY CHAIN

Policy

As a major food business, we manage complex supply chains covering food, drink, packaging, point-of-sale materials, uniforms and equipment across both company-owned and franchised operations in the UK. This complexity creates risk, we prioritise long-term, collaborative supplier relationships to strengthen oversight and maintain high standards of integrity.



Suppliers must comply with relevant laws, regulations, industry standards, BKUK’s Master Terms and Conditions, and RBI’s Supplier Code of Conduct, including requirements on labour rights, ethics, health and safety and the environment. Relevant supply chain policies are published on our Burger King for Good webpages, including a Human Rights and Responsible Sourcing Policy.

Training

We provide suppliers with a freely accessible Stop the Traffik SME toolkit to help identify risk indicators in their operations and recruitment processes. Many suppliers are subject to modern slavery legislation in their own right. Those outside scope are still required by BKUK to demonstrate appropriate ethical due diligence.

3 MAPPING SUPPLY CHAINS AND BUSINESS RELATIONSHIPS

BKUK is committed to transparency and visibility as the foundation for any robust due diligence programme

The building blocks of any due diligence programme are transparency and visibility. Businesses cannot 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, Foods Connected, provides the technology to engage with and manage suppliers across all tiers to build visibility, increase efficiency and mitigate risk. It gives BKUK the tools to map finished and raw products back to source and monitors suppliers to ensure compliance and measure environmental, social and governance risk.

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

TIER LEVEL	DEFINITION
Supplier Level	• Supplier site or office • No production takes place here • Usually, the supplier is the entity that is contracted
TIER 1	• Direct production, manufacturing and warehousing
TIER 2	• Tier 1 subcontractors and ingredients suppliers • Includes slaughterhouses that are not the final stage in the production process
TIER 3	• Farm level • Raw material origin/ extraction/ cultivation
TIER 4	• Farm inputs such as feed and fertilizers

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 procurement categories are as follows:

Direct Procurement

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

Indirect Procurement - Product Examples

- Furniture
- Uniform
- Cleaning equipment

Indirect Procurement - Service Examples

- Contract window cleaning
- Waste collection
- Printing and signage

4 MITIGATING RISKS AND TAKING ACTION

Review of modern slavery flags present in recruitment process

BKUK has action plans based on our risk assessments and collaborates with others to prevent and mitigate risks

In 2025, we reviewed our current recruitment processes for the common flags of modern slavery and human trafficking (e.g. bank account numbers) to engage our internal teams on these flags and ensure a consistent approach to highlighting any areas of concern. This process led to some additional reporting measures being initiated for 2026 to continue to strengthen mitigating actions in our on-boarding procedures.

Tier 1 Ethical Audit Programme

BKUK is a Sedex member and, in 2025, began requiring SMETA audits for Tier 1 sites of Direct suppliers providing BKUK-branded products or operating in high-risk areas.

New Tier 1 sites must have a valid SMETA audit less than one year old and no critical non-compliances before supplying BKUK. Audit frequency increases with risk, and BKUK uses an internal scoring system to prioritise follow-up and track remediation. BKUK works with several branded suppliers for products such as drinks, coffee, tea and sugar and in these cases BKUK may accept equivalent in-house social audit programmes where appropriate to avoid duplication and audit fatigue.

We recognise audits are only a snapshot in time of factory conditions and must sit within a wider due diligence approach. However, they provide a basis for engagement, and we work with suppliers to address root causes and drive improvement. We know that audits alone are not enough, so we combine audits with BKUK own visits, risk assessments and targeted action on risks.

External Collaboration

We strongly believe that collaboration is vital and no single company can solve this alone. We have learnt first-hand the effectiveness of industry-wide networks and collaboration with anti-slavery organisations such as Stop the Traffik who have supported on training and development.

In 2024, we also began looking for a space to cooperate with like-minded businesses in the human rights and supply chain space. BKUK are the first Quick Service Restaurant (QSR) to join the Food Network for Ethical Trade and are collaborating with UK food retailers and suppliers who have a wealth of on-the-ground experience to learn from. Being members of the FNET enables us to work alongside at least 80 suppliers and retailers to use our collective leverage to bring about positive change in global food supply chain working conditions by providing guidance, resources, training, and opportunities for collaboration. BKUK participated in two working groups which support advancing our implementation of responsible business practices.

Internal Collaboration

Embedding mitigating actions into our core business operations means that our approach is cross-functional. This includes our People, Supply Chain, Property, Marketing and Responsible Business teams. Each team is clear on their own specific responsibilities towards addressing modern slavery and this is hugely important in the hospitality sector where supply chains are complex and outsourcing to third party agencies is commonplace for services, such as contract cleaning. Stop The Traffik developed bespoke actions for each of these teams and delivered these actions during Executive Committee training in 2025.

We also continue to see tangible benefits in enhanced due diligence management through joint supplier visits between Responsible Business and Supply Chain teams, as well as regular formal meetings between the Responsible Business team and other functions.

CASE STUDY: COUNTY LINES PREVENTION CAMPAIGN

Context

County lines is a form of criminal exploitation in which gangs coerce young people to move drugs, weapons or money. It is recognised as child abuse and can occur anywhere in the UK.

Statistics

- Young people are the main victims, with 82% under 18.
- The National Crime Agency estimates 600–1,000 active county lines in the UK at any time.

Our research found that food and fast-food venues can be used to recruit vulnerable young people, making this a relevant risk for BKUK.

Working with our Partners

We developed the campaign with Stop the Traffik and UK Youth.

- Stop the Traffik – anti-slavery partner.
- UK Youth – youth sector partner.

Aim

Our aim was to raise awareness of county lines and signpost young people to support.

The Campaign

In November 2024, we launched a targeted social media campaign in selected locations in England, highlighting county lines risks and directing people to confidential support from Stop the Traffik.

Campaign Evaluation

The campaign results included:

- Reach of over 380,000 young people in England
- 55% of respondents said it helped them recognise exploitation risk
- Award-winning campaign recognised for impact and youth co-design

5 REMEDIATION PROCESSES AND COMPLAINTS MECHANISMS

BKUK has established grievance mechanisms and response plans developed to deal with adverse issues

Direct Operations

Worker Voice

We see worker voice as comprising of multiple elements that allow our staff avenues to raise grievances, concerns, complaints or even suggestions freely and without fear of reprisal. One channel is our Speak Up hotline, provided by Hospitality Action, which allows concerns to be raised anonymously. Identities are only discussed if needed for an investigation, and BKUK does not tolerate retaliation against anyone reporting concerns in good faith.

A second channel is our formal Employee Relations grievance process, which gives employees a clear way to raise concerns and managers a consistent framework to resolve them. We also run a twice-yearly employee listening survey. In 2025, responses contributed to BKUK being recognised as one of the World's Happiest Workplaces, ranked in the global top 100 for hospitality, and accredited by The Sunday Times Best Places to Work.

Supply Chain

In the supply chain, worker voice refers to the ability of workers to raise concerns, share views and influence workplace conditions. No single model suits every business; we expect a range of accessible channels to be available to workers.

As such, in 2025 we initiated a piece of research in our supply base to understand what grievance mechanisms and worker voice channels are available to our Tier 1 supply chain workers. Our goal is for 100% our Tier 1 sites to have multiple robust channels for employees to speak up to and will continue this work into 2026.

We assess supplier grievance mechanisms using four levels:

Level 1: Informal grievance process

Examples include open-door policies and suggestion boxes.

Level 2: Digital worker voice mechanisms

These provide a more formal, anonymous route for concerns through tools such as surveys, apps or hotlines run by the supplier or brand.

Level 3: Worker forum

A functioning worker forum gives employees representative channels to raise concerns, supported by a formal feedback and response process. This level could also include support from external worker voice mechanisms such as NGO hosted hotlines and apps.

Level 4: Recognised trade union

A recognised trade union represents workers' concerns. Where unions are not independent, an equivalent channel, such as a worker forum, should be in place.

We expect all Tier 1 suppliers to have appropriate grievance mechanisms so workers can raise concerns safely, confidentially and without retaliation. This work will continue in 2026.

6 CONTINUOUS IMPROVEMENTS AND COMMITMENTS

BKUK works to continually develop its understanding of risks, communicates this externally and internally and makes commitments to improvements

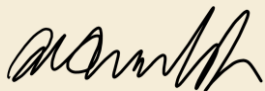
WORKSTREAM	2025 KEY ACHIEVEMENTS	2026 COMMITMENTS
1. Risk assessment and analysis	Risk Mapping: As set out in Section 1, BKUK uses a broad mix of internal and external tools to assess and prioritise human rights and modern slavery risks.	Risk Mapping: We will keep our risk register live, monitor emerging risks, stay active in industry groups, complete an internal saliency assessment, and review onboarding risks linked to indirect suppliers in 2026. Further to this, in 2026 we commit to a full review of our onboarding process to assess risk posed by Indirect suppliers.
2. Training and Awareness Raising	Direct Operations - Digital Training: In 2025, we launched bespoke modern slavery and county lines training modules, with the modern slavery module mandatory for restaurant managers on Thrive.	Direct Operations - Digital Training: In 2026, modern slavery and county lines training will become mandatory annually for regional operations managers and support office staff.
2. Training and Awareness Raising	Direct Operations - In-person Training: In December 2025, Stop the Traffik delivered refresher training to the Executive leadership team, with tailored actions for each department to take forward in 2026.	Direct Operations - In-person Training: In 2026, we will deliver in-person human rights training for the Responsible Business team through FNET, and specialist training for Supply Chain and Talent teams on on-farm risks and recruitment indicators. This will build on existing digital training and strengthen practical, real-world capability.
2. Training and Awareness Raising	Supplier and Franchise Training: In 2025, we shared Stop the Traffik's free modern slavery toolkit with suppliers and franchisees to support practical risk prevention in their operations and supply chains. The Responsible Business and Supply Chain teams also carried out joint visits focused on ethical trading and worker welfare.	Supplier Training: In 2026, we will launch a project called "Farm-to-Flames" with Whopper suppliers to strengthen due diligence across our hero product supply chain. Participating suppliers will complete the FNET Human Rights Due Diligence tool so we can better understand risks and support improvement where needed. Franchise Training: In 2026, we aim to share our bespoke Stop the Traffik digital training with franchise restaurant managers through BK University.

WORKSTREAM	2025 KEY ACHIEVEMENTS	2026 COMMITMENTS
3. Mapping Supply Chains and Business Relationships	Supply chain mapping: In 2025, we implemented a new end-to-end supply chain platform covering food safety, compliance, procurement and ESG, which now holds our supplier and Tier 1 data.	Supply chain mapping: In 2026, through Farm-to-Flames, we will prioritise mapping Whopper ingredients to farm level.
4. Mitigating Risks and Taking Action	Proactive Risk Mitigation: In 2025, we applied supplier onboarding controls across tenders and contract renewals, including mandatory critical questions for new suppliers and new product proposals.	Proactive Risk Mitigation: In 2026, we will continue targeted follow-up on SAQ responses, focusing on higher-risk suppliers by category, geography, volume and spend, with issues escalated to Supply Chain.
4. Mitigating Risks and Taking Action	Food Network Ethical Trade: BKUK remains the only Quick Service Restaurant member of FNET and uses two working groups to strengthen understanding of complex supply chain risks. – The Due Diligence Working Group developed risk assessment and remediation principles that we are integrating into our approach. – The Climate Change and Human Rights Working Group built our understanding of risks such as extreme heat and water stress in sourcing regions. – Regular calls and member meetings help us track emerging issues, collaborate with peers and share learning.	Food Network Ethical Trade: In 2026, we will stay active in our current FNET groups and join the Raw Materials and Services group to strengthen our understanding of high-risk commodities and indirect services.
4. Mitigating Risks and Taking Action	–	Modern Slavery Intelligence Network (MSIN): We will join MSIN to complement Tier 1 audits by improving visibility of lower-tier risks and supporting collaborative remediation where issues are identified.
4. Mitigating Risks and Taking Action	–	Restaurant Support Visits In 2026, the Responsible Business team and Stop the Traffik will carry out support visits and systems review to assess recruitment risks and how controls work in practice, including worker interviews, with potential future rollout to franchise restaurants.

WORKSTREAM	2025 KEY ACHIEVEMENTS	2026 COMMITMENTS
4. Mitigating Risks and Taking Action	County Lines Prevention Campaign - Phase One: See case study for full detail. In 2025, our County Lines Prevention Campaign won the “Disruption of Recruitment” award at Stop the Traffik’s Data to Disrupt Anti-Trafficking Awards. The prize was presented by Eleanor Lyons, the UK’s Independent Slavery Commissioner, and was celebrated for its broad impact and the use of youth voice in the campaign’s co-design.	County Lines Prevention Campaign Phase Two: Following Phase One, BKUK will explore a second phase and continued partnership with Stop the Traffik.
5. Remediation process and complaints mechanism	Crisis Management and Risk Escalation Procedure: In 2025, we introduced a business-wide crisis management procedure, led by H&S, that includes modern slavery as a Severity 1 risk and was developed and stress tested with an expert partner.	Remediation Process: We will work with an expert third party to develop a remediation process for people adversely affected by issues under BKUK’s control, aligned with the UN Guiding Principles and relevant legal guidance.
5. Remediation process and complaints mechanism	Have Your Say Worker Survey: We survey employees twice a year, achieving an 86% completion rate in 2025.	Worker Voice: We will review worker voice across Direct Operations and our supply base, first mapping current channels and then identifying improvements based on effectiveness.
6. Continuous Improvement and Commitments	KPIS for 2025: We track internal KPIs to keep our Responsible Business work focused and effective, including: – SAQ completion rate – Major and critical site ratings, and reductions – Projects addressing regional modern slavery risks – Tier 1 sites with valid SMETA audits – Number of restaurant managers trained	KPIS Targets for 2026: We will continue refining KPIs to reflect emerging risks, report them internally and to the Board, and add enhanced Whopper supplier KPIs through Farm-to-Flames in 2026.

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 in 2026.



Alasdair Murdoch 28
1st June 2026