

## Wendy's Restaurants of U.K. Ltd. Modern Slavery Statement 2023

This statement is published pursuant to section 54 of the Modern Slavery Act 2015 and constitutes The Wendy's Company and its UK subsidiary's ("Wendy's," "we" or "us") modern slavery and human trafficking statement for the financial year ending 31st December 2023.

### Our Business

Wendy's is primarily engaged in the business of operating, developing and franchising a system of distinctive quick-service restaurants serving high quality food. The Wendy's Company, headquartered in the United States, is a global company with restaurants in 32 foreign countries and U.S. territories, of which 403 out of 6,030 U.S. restaurants are operated by Wendy's, while the remainder are operated by franchisees. Wendy's Restaurants of U.K. Ltd. ("WRUK") is a wholly owned subsidiary of The Wendy's Company. As of December 2023, WRUK employed 380 employees and operated 12 restaurants in the UK. As of that date, 24 additional restaurants were operated in the UK by franchisees, independent business owners/operators that are not part of the Wendy's corporate organization. To support our restaurant operations, the international Wendy's supply chain team contracts for food, proprietary paper, operating supplies and equipment for the U.K., encouraging our suppliers to uphold high standards of conduct and ethical behavior. Wendy's does not enter into business with any organization, which knowingly supports or is found to involve itself in slavery, servitude, and compulsory labour.

### Policies and training

Respect, equity and fair treatment are central to what we do. Our founder, Dave Thomas, believed the impact we make on others and our communities is just as important as the food we serve. We strive to bring the values Dave established—including Do the Right Thing, Treat People with Respect and Give Something Back ("Dave's Values")—to life with our team members, customers and in the communities where we do business.

Wendy's commitment to human rights and ethical behavior underlies Wendy's Code of Business Conduct and Ethics. Our employees<sup>1</sup> and directors must demonstrate Dave's Values and comply with all applicable laws, rules and regulations as well as our policies. Dave's Values are woven into Wendy's culture through training materials and other resources. Certain Wendy's employees are required to complete (or test out of) a mandatory e-learning training on the Wendy's Code of Business Conduct and Ethics and certify their acceptance of such Code annually. Violation of these training and certification requirements may lead to disciplinary action, up to and including termination.

Wendy's Speak Out Program is an available resource for our employees with a toll free hotline to call (anonymously or named) and report policy violations, unsafe working conditions, and other issues as detailed in the program. Wendy's will investigate, address and respond to the concerns received, and will take appropriate corrective action.

Wendy's also maintains a separate Ethics Helpline where employees and others can raise ethics concerns or report misconduct through a toll-free hotline or online portal. Wendy's prohibits retaliation against any employee that raises an ethics concern.

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<sup>1</sup> Where Wendy's is mentioned as an employer, the reference is to The Wendy's Company and employees in our Company-operated restaurants, field support roles and corporate staff.

## **Due diligence**

WRUK's supplier form agreement contractually reserves the right to inspect and audit suppliers production and facilities (on its own or by a third party) with or without notice and contractually requires suppliers to comply with Wendy's standards and policies. The form agreement also requires suppliers to agree and acknowledge Wendy's Supplier Code of Conduct or represent and warrant that their own code of conduct meets or exceeds all of the requirements and standards laid out in the Wendy's Supplier Code of Conduct.

The Wendy's Quality Assurance team monitors media and conducts audits of plants, facilities and other relevant locations of our food and beverage suppliers.

During these visits, our Wendy's Quality Assurance team members observe operational conditions of our suppliers. Suppliers are also encouraged to conduct and document their own audits and inspections to ensure compliance. Noncompliance by a supplier or contractor with our Quality Assurance standards or other standards under the Supplier Code of Conduct can have direct consequences to the supplier's relationship with Wendy's. This has also precluded suppliers who do not meet our standards from entering the Wendy's system.

## **Performance Indicators**

As a condition of doing business with Wendy's, each of our Suppliers is expected to comply with Wendy's approved supplier requirements and all applicable laws, rules and regulations. Suppliers are encouraged to require similar standards of doing business from their suppliers and contractors, as applicable. The absence of reports from employees, suppliers, media, the public or law enforcement agencies regarding modern slavery issues will highlight the effectiveness to keep modern slavery out of our business or supply chain.

## **Statement approval**

This modern slavery statement was approved by the Board of Directors of Wendy's Restaurants of U.K., Ltd. on June 28, 2024.

Michael Clarke  
Managing Director, WRUK