

AFA Restaurants Ltd Modern Slavery Statement 2026

Introduction

This statement sets out AFA Restaurants Ltd (“**Company**”) actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities of the Company (as a franchisee of the McDonald’s group) during the financial year 1st January 2025-31st December 2025 and is published in accordance with the UK Modern Slavery Act.

As part of the hospitality industry, the Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Company is absolutely committed to preventing slavery and human trafficking in its activities, and to ensuring that its supply chains are free from slavery and human trafficking.

The Company will continue to build its knowledge of the risks of modern slavery and the areas of its business that could face some of these challenges. The Company will continue working across its business to implement appropriate practices to prevent and respond to any potential risks.

Organisational structure, supply chains and employment practices

Organisation structure

The Company is a private limited company and operates 18 unlicensed restaurants across Essex, Cambridgeshire and Suffolk. The company started in 2013 and now employs in excess of 1750 employees across the 18 sites (data as of 31/12/2025).

The Company is a franchisee of McDonald’s Restaurants Ltd, which is the McDonald’s UK operating entity.

McDonald’s is the world’s leading global food service retailer, serving 63 million people every day. McDonald’s states that it works tirelessly to ensure that all three elements of their business—the McDonald’s group companies, the franchisees, and their supplier partners—feed and foster their respective communities. McDonald’s approach to modern slavery and ensuring human rights are underpinned by this same commitment.

Supply chains

McDonald’s has a complex global supply chain with thousands of direct suppliers who employ over a million people in more than 100 countries. Suppliers are a critical component of McDonald’s business. Accordingly, McDonald’s has built long-term relationships with its supplier partners, many of which have worked with McDonald’s for decades. These long-term relationships enable McDonald’s to have open and honest conversations and to share best practices.

McDonald’s knows that a large part of the success of the McDonald’s system lies in their trusted relationships with their supplier partners. In the contracts underpinning these relationships, they ask them to comply with their Supplier Code of Conduct and associated guidance, which include respect for human rights and following practices that protect their employees’ health and safety.

All the ingredients on their menu are sourced from approved supplier partners who have to adhere to their high-quality standards, which are independently audited. Where possible, their 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 their supply chains are vertically integrated, meaning that their supplier partners will often have control and oversight of every step of the supply chain.

As a franchisee, the Company is bound to use McDonald's supply chains and therefore, and as well as relying on McDonald's own efforts, is itself subject to measures McDonald's puts in place to assess risk and mitigate against incidents of modern slavery and human trafficking. Accordingly, please refer to McDonald's UK Modern Slavery Statement for further information about how McDonald's assesses risk in its supply chains and the steps it takes to mitigate such risks.

Employment practices

The Company is committed to preventing forced labour and upholding responsible and ethical recruitment standards.

The Company hires employees directly on a permanent basis. It does not offer seasonal employment contracts for migrant workers, which are a known area of vulnerability for modern slavery and human trafficking. In a similar vein, the Company does not use any employment agencies or employment businesses to provide it with labour indirectly.

The Company does recognise however that a significant proportion of its employees are originally from Europe or are International Students and a significant proportion are under the age of 18 therefore are considered to be at greater risk. Regular HIG (How's it Going) chats take place with all employees.

The Company uses a third party, Trust ID, to check the validity of right to work documents as well as keeping all appropriate and required immigration records. Employees are not able to start work for the Company unless these are confirmed.

Human Rights

In 2018, McDonald's Corporation published a global Human Rights Policy, which reinforces McDonald's commitment to respect and promote human rights. The Policy was developed with input from expert third parties and is guided by the UN Guiding Principles on Business and Human Rights, the International Bill of Human Rights, and the principles set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. This Policy not only applies to McDonald's but is followed by its franchisees. This policy was updated and relaunched in 2024. There is a further commitment to respect human rights set out in McDonald's Standards of Business Conduct, which applies to all employees of the Company.

We strive to foster safe, inclusive, and respectful workplaces wherever we do business and respect the fundamental rights of our employees. Our staff are trained annually on the Standards of Business Conduct and are required to certify their understanding of and commitment to upholding the Standards.

Employees may raise human rights issues, or report potential or actual human rights issues through a number of reporting channels, including contacting McDonald's Human Resources or the Global Compliance Office. Any alleged violations of the Standards of Business Conduct or other McDonald's policies by Company staff are reviewed and addressed as appropriate.

McDonald's have established clear processes to record and escalate all modern slavery related allegations received to their 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 McDonald's people agenda and explore contextual safeguarding within the business.

Alongside existing reporting mechanisms such as the anonymous global Business Integrity Line, McDonald's have also 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 external audits are conducted to ensure employees were informed about the available reporting mechanisms.

Relevant Policies

The Company supports the goals of the Modern Slavery Act and takes its responsibility to act with due diligence to avoid infringing on the human rights of others and address any impact on human rights if they occur.

The Company has chosen to adopt policies put in place by McDonald's Restaurants Ltd around Anti-Bullying & Harassment, Diversity & Inclusion, Modern Slavery Policy, Respect in the Workplace, Responsible and Ethical Recruitment Policy, Whistleblowing and Workplace Violence Prevention.

Anti-Bullying & Harassment Policy The Company provides guidance on how to report behaviours such as bullying, harassment and/or victimisation at work. The policy outlines a zero tolerance approach and a promise to investigate whether the complaint comes from a leaver, supplier, customer or employee and whether it occurred inside or outside of the workplace.

Diversity & Inclusion Policy The Company outlines its commitment to promoting equality and preventing discrimination in this policy. The Company strives to achieve an inclusive environment where everyone can achieve their full potential.

Modern Slavery Policy This policy sets out the meaning of modern slavery and our commitment to preventing modern slavery practices within our workforce and supply chains. This policy also details the expectation that we have of all individuals that engage in business dealings with us, to maintain the same commitment to preventing modern slavery practices, globally.

Respect in the Workplace Policy This policy sets out expectations for employees' behaviour towards one another and also includes customers, suppliers and couriers.

Responsible and Ethical Recruitment Policy This policy provides guidance on ensuring all recruitment practices within the Company are carried out both responsibly and ethically for those individuals being recruited into the AFA system. The policy outlines our expectations for ensuring no employee gains employment within the Company at a detriment to themselves via either financial or social means.

Whistleblowing Policy The Company encourages all its employees, customers and other business partners to report any concerns related to whether the activities of the organisation are being conducted in a lawful manner. This would include any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

Workplace Violence Prevention Policy The Company is committed to providing a working environment that is safe and free of physical threats or violence of any type. The Company will investigate any complaint that is brought to its attention.

Employees may raise human rights issues, or report potential or actual human rights issues through a number of reporting channels, including externally by contacting McDonald's UK and the McDonald's Business Integrity Line (a global resource). Reports received by McDonald's or the Company are reviewed and addressed as appropriate.

These policies are reviewed by McDonald's and by the Company on a regular basis and are shared with employees through McDConnect, an internal communication platform powered by Blink, and discussed as part of their onboarding, with paper copies available on request. In 2025 these policies

were transferred across to McDConnect so that employees can access them after Workplace by Meta was retired.

Due Diligence

The Company understands that McDonald's human rights due diligence is incorporated into their Supplier Workplace Accountability programme. As part of this McDonald's assesses the potential human rights risks of their supply chains, including modern slavery risks, using desk-based research, supply chain mapping, and stakeholder engagement.

The Company understands that McDonald's undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. As a franchisee of McDonald's, the Company will only use McDonald's approved suppliers. The Company understands that McDonald's due diligence and reviews include:

- evaluating the modern slavery and human trafficking risks of each new supplier;
- conducting supplier audits or assessments through the organisation's own staff/third party auditors, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans;
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate McDonald's supplier code of conduct, including the termination of the business relationship.

Performance Indicators

The Company has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- taking advantage of training schemes offered by local councils and organisations such as Cambridge BID Partnership who offer related training through NTES and Braintree District Council on the 'Spot It Stop It' scheme which provides information to spot the signs of exploitation and how to report it;
- reviewing weekly working hours of all employees to ensure they remain within working time regulations;
- tracking and reviewing complaints resolved via a grievance mechanism, whether dealt with formally or informally;
- reaching out to employees through 'How's it Going' chats, 'Love to Listen' Meet Ups, 'Love to Listen' employee surveys and promoting its 'Open Door Policy'.

Training

The Company requires all employees to complete related training around 'Creating Belonging', 'Building a Safe, Respectful and Inclusive Working Environment' and 'Workplace Violence Prevention'. The training around 'Building a Safe, Respectful and Inclusive Workplace' is repeated annually.

In addition to this there are a number of relevant training modules provided by McDonald's and available through Campus including:

- Responsible and Ethical Recruitment Principles

New and updated e-learning modules were introduced in 2025 by McDonald's, including a specific module around modern day slavery: 'SRIW: Is It a Trap? – Modern Slavery' and the manager version 'SRIW: Unseen Victim – Modern Slavery'.

Awareness-raising programme

As well as training employees, the organisation has committed to raising awareness of modern slavery issues by displaying posters across the organisation's premises. The Modern Slavery reporting poster is in display in all toilets/changing rooms.

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 2025. The Director of the Company approved this statement on the 22nd May 2026.

A handwritten signature in black ink, consisting of a stylized 'A' followed by a series of connected loops and a horizontal line at the end.

Ahmet Mustafa

Company Director, AFA Restaurants Ltd

