

J D Wetherspoon plc

Antislavery and human-trafficking statement 2021/2022

Introduction

J D Wetherspoon plc is committed to taking all necessary steps to ensure that our company policies and working practices help to combat the global issues of slavery and human-trafficking.

These policies and procedures address those issues specifically and reinforce our zero-tolerance company stance against modern slavery and human-trafficking.

In the past year, we have continued to work with our suppliers to ensure full compliance with our company policies and requisite standards, as stated in the company's supplier charter. We continue to focus on transparency within our supply chains and require all suppliers of food, drinks and non-consumables to become members of Sedex – a global organisation which enables companies to share information on responsible sourcing in their supply chains.

This statement is published in accordance with the Modern Slavery Act 2015. It outlines the approach which we take to prevent slavery and/or human-trafficking in our business and supply chains.

J D Wetherspoon plc published its first statement in September 2017. Each year since then, we have continued to develop policies and procedures which help to eliminate any risk of modern slavery and human-trafficking in our supply chains.

Our company

J D Wetherspoon plc is an operator of managed public houses and hotels in the United Kingdom and the Republic of Ireland, with headquarters in Watford, Hertfordshire, England. As at July 2021, we employed approximately 39,000 people, had 861 trading pubs (including 57 hotels) and reported an annual turnover of £773 million.

Our supply chain

J D Wetherspoon's supply chain includes approximately 200 suppliers of food, drinks and non-consumables and 400 property suppliers. We source products from microbreweries and local suppliers in the United Kingdom and the Republic of Ireland, as well as from several large international suppliers, varying considerably in terms of both size and our annual spend with them.

New suppliers are subject to a stringent approvals process which includes, as a prerequisite for food suppliers, a satisfactory audit. Our suppliers of food and drinks are required to adhere to the principles of our supplier charter, before they are permitted to work with us.

Many of our suppliers hold international quality standards and accreditations and are audited regularly by their issuing authorities to ensure adherence to these requirements. We also audit a selection of our suppliers, based on risk, to check compliance with our company's quality standards. Our suppliers all conform to those accredited assurance schemes relevant to their geographical location and products supplied, which must also meet our supplier charter's minimum standards.

In addition, we have numerous other service providers and property contractors – these are subject to a separate due-diligence process, managed on our behalf by a third party.

Our supplier charter is available on our website and includes those company policies applicable to our suppliers. These are:

- Antibribery and corruption
- Sourcing policies, practices and guidelines
- Distribution
- Food-product-labelling
- Product recall
- Traceability
- Supply chain audit
- Foreign object detection

It is our aim that all suppliers join Sedex to provide full transparency within our supply chain. As at October 2021, approximately 175 suppliers are members of Sedex.

Our policies on antislavery and human-trafficking

We are committed to ensuring that there is no slavery or human-trafficking in our supply chains or in any part of our business. Our supplier charter reflects our commitment to conducting business ethically and with integrity, with effective systems and controls to ensure that slavery and human-trafficking are not taking place anywhere across our business.

Because we source products from many countries, it would be impossible for us to monitor all elements of our suppliers' supply chains or every individual involved in producing our products. Therefore, we set agreed standards with our suppliers and expect them to conform within their own operations.

These minimum standards apply to all suppliers across all countries and the various jurisdictions from which our products are sourced. We expect our suppliers to be fully responsible for implementing these principles and be accountable for any non-compliance.

Our suppliers

To ensure that all suppliers and contractors comply with our values and ethics, we have a robust supply chain compliance programme. This comprises:

- maintaining a risk register to identify and rank commercial suppliers in terms of risk.
- conducting audits on a 12- to 24-month rotation, including a detailed walk-around of suppliers' premises and welfare facilities, where applicable. Owing to the pandemic and COVID-19 restrictions, we have been able to conduct only a small number of on-site supplier audits. Mostly, we have carried out desktop reviews, where possible, and plan to introduce more on-site audits in 2022.
- reviewing suppliers' policies on ethical matters, including antislavery and human-trafficking.
- speaking to staff employed by suppliers to investigate working practices.
- developing action plans to deal with those suppliers which have not responded to our request to adhere to the supplier charter.

We have a cross-functional compliance team, with senior personnel from the following departments: legal, commercial, audit and personnel.

Training

We provide training on modern slavery awareness to all new employees, both in our pubs and at head office, as well as annual refresher training to all employees. We have also reintroduced more targeted training for any employees whose roles are directly involved in procurement or with our supply chain.

Further steps

We will periodically review the effectiveness of the steps we have taken to ensure that there is no slavery or human-trafficking in our supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our antislavery and human-trafficking statement for the financial year ending 25 July 2021.

Approved on behalf of J D Wetherspoon's board of directors on 16 December 2021.



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