

JD WETHERSPOON ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT 2016 / 2017

Introduction from John Hutson – Chief Executive Officer

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

We have updated our company policies and procedures to specifically address these issues and have bolstered our current systems to reinforce our zero-tolerance company stance against modern day slavery and human trafficking.

In the past year, we have informed our suppliers of our expectations of them to monitor their supply chains. We have delivered training to employees at our head office and pubs so they can identify and report suspected cases of slavery and human trafficking.

John Hutson



Organisation's structure

JD Wetherspoon Plc is an operator of managed public houses and hotels in the United Kingdom and Ireland, with headquarters situated in Watford, Hertfordshire, England. As at August 2017, we had approximately 37,000 employees and 895 pubs, including 53 hotels. The company has an annual turnover of approximately £1.6 billion.

Our supply chain

JD Wetherspoon Plc's supply chain includes approximately 200 food, drink and non-consumable suppliers and 400 property suppliers. We also source products from a number of micro-breweries and local suppliers. Whilst a substantial proportion of our suppliers are based in the UK and Ireland, we also have a range of suppliers from around the world, who vary considerably both in terms of size and our annual spend with them.

Our new suppliers are subject to a stringent internal approvals process and are required to adhere to our Supplier Charter and the [Responsible Supplier Principles](#) contained in it before they are permitted to work with us.

Many of our suppliers hold international quality standards and accreditations and are regularly audited by the issuing authorities to ensure adherence to these requirements. We also audit a selection of our suppliers to check compliance with our company's quality standards. Our suppliers all conform to accredited assurance schemes that are relevant to their geographical location and product supplied. These assurance schemes must also comply with all EU legislation.

In addition, we have numerous other service providers and property contractors who are subject to an initial due-diligence process managed by a third party, Acoura, on our behalf. We have issued our [Responsible Supplier Principles](#) to our suppliers as a step to ensure compliance with these requirements in all areas of our organisation.

October 2017

JD WETHERSPOON ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT 2016 / 2017

This year we joined Sedex, a collaborative platform for sharing responsible sourcing data on supply chains. This will enable us to manage our suppliers' performance and monitor our supply chains more closely. Over the next twelve months we will start to map out our supply chain starting with food and drink suppliers before moving on to the providers of non-consumable items and services.

Having undertaken an extensive review of our supply chain, we have selected direct-to-pub suppliers as an area of focus for this financial year. We have written to these suppliers to advise of our requirements and expectations and conducted audit activity to check compliance.

Our policies on slavery 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 and [Responsible Supplier Principles](#) reflect our commitment to conducting business ethically and with integrity with effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business.

When compiling the [Responsible Supplier Principles](#) we made extensive reference to the UN International Labour Convention codes of practice, the Ethical Trading Initiative Base Code, the Global Social Compliance Programme Reference Code and the Modern Slavery Act 2015.

As part of sourcing products from many different countries, it would be impossible for JD Wetherspoon to monitor all elements of our suppliers' supply chains or every individual who is involved with sourcing our products. We therefore set agreed standards with our suppliers and expect suppliers to conform within their own operations. These minimum standards apply to all our suppliers across all countries and different jurisdictions where our products are sourced from. We expect our suppliers to be fully responsible for implementing these principles and accountable for any non-compliance.

The Responsible Supplier Principles must be applied at all times and, whilst we will work with suppliers to assist with compliance, if required changes are not made, we will impose strict sanctions on any supplier which refuses to comply with these standards and principles and may ultimately cease to trade with that supplier.

Supplier adherence to our [Responsible Supplier Principles](#)

To ensure all suppliers and contractors comply with our values and ethics we have in place a robust supply chain compliance programme. This consists of:

- Maintaining a risk register to identify and rank commercial suppliers in terms of risk;
- Conducting audits on a 12 – 18 month rotation, including detailed walk-arounds of suppliers' premises and welfare facilities (where applicable);
- Reviewing suppliers' policy statements on ethical matters including slavery and human trafficking;
- Speaking to staff employed by suppliers to investigate working practices;
- Developing action plans to deal with suppliers who have not responded to our request to adhere to the Supplier Charter.

We have a cross-functional compliance team which consists of senior personnel from the following departments: Legal, Commercial, Audit and Personnel.

October 2017

JD WETHERSPOON ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT 2016 / 2017

Training

This year we developed and delivered Modern Slavery and Human Trafficking awareness training to all of our employees at our head office and those performing a management role in our pubs. We will continue to review the training annually.

We also delivered specific training to our purchasing and audit teams and those whose roles are directly involved with our supply chain.

Training will continue to be reviewed on an annual basis.

Further steps

We will periodically review the effectiveness of the steps we have taken to ensure 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 slavery and human trafficking statement for the financial year ending 30 July 2017.

.....

SIGNATURE DIRECTOR

JD WETHERSPOON PLC

Date: 21 September 2017

October 2017