

Whitbread Modern Slavery Statement 2019/20

As part of our company wide Force for Good sustainability programme, which is focused on enabling people to live and work well, we recognise our responsibility as the UK's largest hospitality company to respect the human rights of every worker supplying goods or services to us, every team member helping us deliver great service to our customers, and the guests that we serve every day.

This has been yet another year of progress and development and a great amount of learning. We understand our risks in more detail, and this year has been about continuing to manage and mitigate that risk and also starting to think about innovative ways we can address it to try and tackle root causes.

In some cases, this involved taking a deep dive look at accepted practices, asking questions of ourselves and our suppliers – and committing to make changes for the better, together.

We have undertaken a new, comprehensive risk assessment of our supply chain this year, increasing the scope of our mitigation programme which we look forward to sharing progress on in this in subsequent reports. We remain committed to working collaboratively with our suppliers and our stakeholder network, learning from our experiences and continually developing and improving our programme where we know there may be risk. However, as we continue to develop our Responsible Sourcing Policy, we will cease working with suppliers who demonstrate a disregard for our standards.

As we did last year, we've also been working hard to increase the awareness of important issues related to modern slavery across our operations. We continue to ensure that our team members across the Premier Inn and Restaurants estate have the knowledge and tools to recognise and report a suspected case of modern slavery in our sites, helping us ensure the wellbeing of our guests.

This statement covers the period 2nd March 2019 – 27th February 2020. Of course, since the year-end, the world has been in the grip of the COVID-19 pandemic and this has had a significant impact on the hospitality industry and Whitbread is no exception to that. However, being a Force for Good is not a principle that we leave behind when we face challenges, it is a central part of our ethos. Through the COVID-19 crisis we have been contributing our skills, experience and facilities to support our own people, our communities across the country and our supply chains. As we continue to manage through the COVID-19 crisis we will also monitor any potential impact this has on our Responsible Sourcing programme. We will ensure that we are engaging with our suppliers as we always do, to maintain our high standards and ensure human rights are respected across our supply chains.

This Modern Slavery Statement was approved by our Executive Committee and by the Whitbread PLC Board on 18th May 2020.



Alison Brittain
CEO
19th May 2020

Introduction

Following our third statement published at the end of Whitbread's 2018-19 financial year, this document provides an update on our work over the past 12 months to mitigate the risks of modern slavery across our business and supply chain.

We have focused on managing the risks we identified last year, re-assessing and reviewing our processes for identifying and mitigating modern slavery risks and setting the direction for our responsible sourcing programme in 2019-20.

The report is split into the following sections:

1. Business and supply chain structure
2. Risks of modern slavery across the business
3. Key risk areas:
 - Supply chain
 - Team members
 - Guests
4. Partnerships and Collaboration
5. Performance Indicators

1. Business and supply chain structure

Whitbread PLC is the UK's largest hospitality company and owns the country's favourite hotel business, Premier Inn. Premier Inn is the leading value-for-money brand with the largest network in the UK and has over 800 hotels and more than 78,000 rooms.

All hotels and restaurants are operated by us and we have a hot food offer in almost every location. Our unique joint site model means that more than half of our UK hotels are located alongside our own restaurant brands (Bar & Block, Beefeater, Brewers Fayre, Table Table and Cookhouse & Pub).

We also have eight hotels in the Middle East (through a joint venture) and six hotels open in Germany.

1.1. Supplier Network and Supply Chain Structure

We purchase our goods and services from over 2,400 direct suppliers. Most of our suppliers are manufacturers of finished product (e.g. beds, furniture), food processors, construction contractors and providers of service (e.g. technology and laundry). The majority of our tier 1 supplier network are largely based in the UK, supported by a global supply chain.

Of these tier 1 suppliers, we have 28 critical suppliers. For Whitbread, a critical supplier is one that has both high strategic impact and operational criticality, and whose product or service is central to our core brand offerings.

The core procurement team in the UK is positioned in the Group Transformation Function, led by our Group Transformation Director. We have worked hard to ensure this team works closely with our Group sustainability team to ensure our policies and processes related to modern slavery are adhered to and implemented effectively across our supply chain. In order to achieve this, we ensure objectives and KPI's are aligned and embedded across both functions with regards to our responsible sourcing policy and processes.

2. Risks of modern slavery across the business

We continue to formally recognise that there are a number of ways in which our business could be affected by modern slavery. How we assess and mitigate that risk is dependent on the type of risk, our leverage and ability to manage it, and where accountability for doing that sits within the business or supply chain.

The fundamental areas of risk and the accountabilities for managing them remain unchanged from last year's report.

2.1. Accountability for modern slavery risk management

CEO and members of the Executive Committee have overarching accountability for the standards of our supply chain, the treatment of our team members and the safety of our guests		
1 - Supply Chain	2- Team members	3- Guests
<ul style="list-style-type: none">• Group General Counsel has overarching accountability for setting the right policies to enable ethical performance of our supply chain.• Accountability for measuring, monitoring and making recommendations for mitigating and remediating risk in the supply chain lies with the Head of Sustainability, supported by the Sustainability Manager in our Legal function.• Accountability for managing supplier participation in the responsible sourcing programme and responding to any risk sits with our procurement function, led by the Transformation Director, supported by the Procurement & Supply Chain Director.	<ul style="list-style-type: none">• Group HR Director has overarching accountability for ensuring that the right policies are in place to ensure that the risks are being managed.• Day to day management of policy compliance is managed by the business unit MDs and COOs.	<ul style="list-style-type: none">• The Business MDs and Director of Safety & Security (S&S) and S&S Team support the CEO and Executive Committee members with the management of safety across the business• Day to day management of safety and security is the responsibility of the business unit MDs and COOs and at site level, by all team members.

3. Key risk areas

3.1. Team members

We have approximately 37,000 team members working across the Whitbread brands, directly employed by Whitbread. As a hospitality business, we recognise that ensuring people are treated fairly, are empowered to develop their skills and fulfil their potential as future leaders is what allows us to continue delivering high standards for our customers every day – and this is at the heart of our strategy. This year, as part of our sustainability strategy 'Force for Good' we have updated our commitment areas and goals for enabling our people to live and work well. This includes listening to our teams and supporting their physical and mental wellbeing.

Having direct control over how the people working in our hotels and restaurants are employed, reduces the risk that someone working for our business might be a victim of modern slavery. However, we still ensure that we do all we can to mitigate that risk.

Human Trafficking Policy – This has been communicated to all employees. The following Policies are embedded throughout our organisation and support the mitigation of any risk that a team member may be subject to modern slavery.

Speaking Out Policy - Outlines the process we follow when our employees raise a concern about wrongdoing, danger or breach of the Code of Conduct, or criminal activity such as human trafficking. The policy ensures that concerns raised are dealt with without fear of reprisal, can be raised anonymously and will be investigated in line with a robust and transparent procedure. Any such concern may be raised internally, or through our independent and confidential Speaking Out line, which is run through Hospitality Action, our employee assistance provider.

Grievance Policy - Supports and provides guidance to employees and managers regarding any concerns raised by an employee, in relation to their work. This process encourages concerns to be raised informally in the first instance in order to encourage an open and honest culture, however it also outlines the formal process in the event that concerns raised cannot be resolved through the informal route or in more serious cases where it is appropriate to deal with matters formally at the outset. As such, the grievance policy provides clear guidelines on how individuals can raise their concerns, along with what will happen at that point, and the potential outcomes of any investigation into the issues raised. Individuals are also welcome to have union representation during any grievance process.

Equal Opportunities Policy – Outlines our active commitment to provide equal opportunities and embrace diversity throughout employment. This policy also clearly explains what individuals can do in the event they do not feel they are being treated fairly or equally, and as such, refers to the Grievance Policy.

Right to Work - This policy reflects Whitbread's commitment to recruit talented people, balance our Global People Principles and ensure legal compliance. Whitbread will not employ anyone who cannot demonstrate their legal right to work in the UK. At the start of 2019 we implemented a new process utilising to enhance the quality and consistency of document checks. All candidates progressing to an interview are required to upload evidence of their right to work in the UK directly to a secure, online platform, where they are checked by a specialist third party organisation. Through automating the checks in this way, we have an even greater level of confidence that the legislative requirements are applied consistently and in a non-discriminatory fashion. The new process also provides an improved ability to track document expiration dates and to proactively take the required actions. In addition, Managers also have access to the Employee Relations helpdesk for further support and guidance.

Code of Conduct - This document outlines the way we do things at Whitbread and is provided to all employees upon joining. All employees are required to read the code and confirm annually that they are familiar with its contents. It signposts to useful and relevant policies including Speaking Out, Grievance and Equal Opportunities, ensuring our employees have an ongoing awareness of the policies Whitbread has in place to support them. It also explains our Global People Principles which

set out through our values, how we intend to do business everywhere. This includes working responsibly and ethically to be a positive part within the communities that we operate within.

Implementation tools - Performance of Right to Work checks are formally reported as part of our internal operational performance management and auditing processes. Our Speaking Out and Grievance Policies are supported by internal processes for confidential reporting which are reported to our General Counsel. Our Code of Conduct is embedded through training.

3.1.1. Our progress during FY 2019-20

Modern Slavery training

Recognising the risk that our hotels could be used as locations for trafficked individuals to be harboured or exploited, we have taken steps to empower our team members to respond in the right way if they suspect that something is not quite right. Over the last two years we have trained all of the team members working across our hotel and restaurant sites, ensuring the e-learning element of training is mandatory for all team members joining the business and we have undertaken similar training with all of our Human Resources (HR) teams including shared services, resourcing, operations, employee relations and leadership.

All our bespoke training focuses on raising awareness of human trafficking and modern slavery issues, empowering our teams to identify indications of human trafficking abuse in our sites and provide them with the tools to report it quickly and effectively.

This year we have also undertaken specific sector training with high risk areas of our supply chain where our programme has highlighted a particular risk. Please see following section 'highlights' within supply chain 3.2.5 for more detail.

3.2. Supply Chain

As reported In our earlier statements, based on a risk assessment undertaken in partnership with Stop the Traffik our analysis identified that the majority of risk lies in the lower tiers of our supply chain – often a number of tiers away from our direct control – meaning a collaborative approach, working with our suppliers to manage the risk, would be crucial.

Following last year's work, we have continued to focus our efforts on working closely with our high-risk suppliers and to address our risk by working through our 'Human Rights in the Supply Chain' due diligence process.

However, we have also undertaken a new comprehensive risk assessment to identify an up to date high risk supplier list, reflective of our business today as a focused hotel and restaurant company. Details of this can be found in section 3.2.1.

How we manage risk

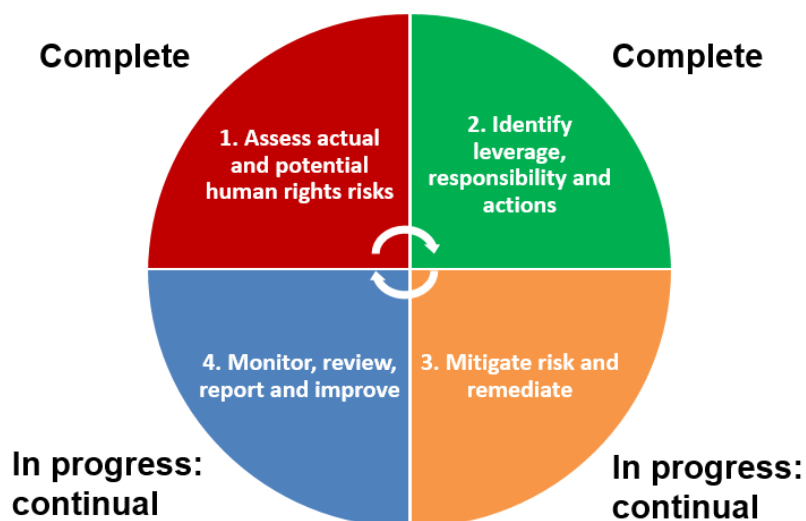
We have continued to strengthen our ethical trade programme over the past 12 months still retaining our high-level due diligence process. However, we have undertaken a new comprehensive risk assessment of our supply base resulting in a representative and current 'High Risk' list.

We conduct due diligence processes across all suppliers to:

1. Assess actual and potential human rights risks
2. Identify leverage, responsibility and actions
3. Mitigate risk and remediate
4. Monitor, review, report and improve

The success of this due diligence process relies on a number of tools and procedures centred around our core Responsible Sourcing Policy and the Principles of Implementations it lays out below:

'Human Rights in the Supply Chain' due diligence process



3.2.1. Assess actual potential human rights risks

Inherent High-Risk Assessment

We recognise that with business changes, come supply chain changes; the sale of Costa Coffee to the Coca Cola business, the increase in our German portfolio and the opening of a China International sourcing office meant it was vital to ensure our material risks were still accurate and our 'high risk' supplier list reflected our current supply base. Therefore, we conducted a renewed comprehensive risk assessment of our supply base.

To do this, we worked with Stop the Traffik to undertake a robust inherent risk assessment process. In the 2019 risk assessment we included a larger number of suppliers, as well as an updated methodology to better understand our inherent risk and ensure it remains accurate in an ever-changing environment. The enhanced methodology combines a range of human rights rights datasets with Stop the Traffik's Centre for Intelligence-Led Prevention in order to objectively rank the modern slavery risk for all countries and economic sectors. The process identifies the key inherent risks present in a business' supply chain, addressing sub-sectors and source countries of interest and prioritising major suppliers within them. STT's new methodology ranks suppliers not just on the product or service they provide the business with, but the broader economic sphere they operate in.

This process identified a list of 469 suppliers that had inherent high risk in our business that we went on to identify leverage, responsibility and actions with, in order to understand the *actual* high-risk suppliers in our business.

3.2.2. Identify leverage, responsibility and actions

Actual High-Risk Assessment

Working through each supplier identified with having Inherent high risk, internally, we conducted an in-depth analysis based on:

- **The origin of risk** – what component of the product or service provided caused to be on the high-risk list?
- **The position of this risk** – how deep in the value chain is it?
- **Our responsibility** - how responsible would we be for the manifestation of that risk occurring? (For this analysis, we used the UN Guiding Principles 'cause, contribute or linked to' principle).
- **Our leverage** – what is our leverage to do something about this risk?

- **Supplier performance** – through our internal due diligence programme we already have a rich amount of data relating to our suppliers' own programmes to protect against modern slavery, their employment practices and labour standards across the sites where our products and services are manufactured. Reviewing this information allowed us to gauge how effectively the risks identified might already be being managed.

This year we have conducted the process above for the entirety of the inherent high-risk list and have assigned each of them with an actual risk rating accordingly. This has resulted in 109 suppliers across our supply chain which are deemed to be actual high risk.

3.2.3. Mitigate risk and remediate

In order to mitigate risk and remediate the risk found in our risk assessment process, we use several tools for suppliers:

➔ ***We conduct independent ethical audits:***

Working with an independent, third party partner, we have continued to conduct SMETA (Sedex Members Ethical Trade Audit) audits for suppliers who we recognise as high risk.

These audits assess compliance against our Responsible Sourcing Policy using the SMETA guidelines for best practice. They involve a full site visit, document, policy and employment practice review of each supplier and a representative sample of worker interviews. These interviews are always undertaken in confidence, in the workers' native language and provide a safe and confidential opportunity for workers to speak out about any malpractice or concerns they may have.

Whilst we recognise SMETA best practice guidelines, we understand that sometimes workers may feel unable to speak freely when they are in the workplace. In order to ensure we are truly providing the opportunity for honest feedback at all Whitbread PLC audits; we have created a whistleblowing line via our independent auditors who give interviewees a number they can call if they want to speak about anything at a later date.

Wherever issues are uncovered through these audits, we work closely with our suppliers to remediate areas of non-compliance to clearly defined and agreed timeframes. This remediation is then verified by a follow up, third party audit to ensure compliance. Where our suppliers demonstrate a persistent disregard for working with us to meet the standards outlined in our Policy, we reserve the right to cease working with them.

This year we completed all audits on the previous high-risk list. Once the new high-risk list was updated in December 2019, we have already completed audits for 60.5% of the 109 updated high-risk suppliers. This year, we will be working to hit 100% of these and ensure 100% of audits with outstanding NCs are followed up within 6 months.

Our audits typically identify some non-compliances against the SMETA guidelines. Most of these are minor, but we have identified issues such as insufficient health & safety practices, overtime premium pay, working hours, training on modern slavery and labour rights and contract clauses on overtime expectation.

We appreciate that meaningful change needs collective effort and consistent activity. Therefore, we work closely with our suppliers to address and remediate any issues that put workers at risk. However, we do state in our Responsible Sourcing Policy that we reserve the right to cease trading with suppliers who demonstrate a persistent disregard for our standards.

Last year, we have reviewed a number of supplier contracts based on their ethical performance, the actions they have taken and their willingness to improve. This information now forms part of the tender process for the relevant suppliers.

➔ ***We conduct technical team training:***

As outlined in the past three years' reports, we continue to provide ethical performance and due diligence training to our F&B technical team to enable them to embed a high level 'temperature check' of our suppliers' ethical performance in their regular supplier visits and audits.

This training has provided our technical teams with the tools they need to record basic observations relating to core labour principles during every site visit. These tools also provide an escalation procedure to our Head of Responsible Sourcing for anything that causes concern. We have found that this additional check & control process has increased collaboration between the two different teams and better understanding of our suppliers.

With the implementation of an international sourcing office in China this year, we have also trained our new International Sourcing team to spot the signs of Modern Slavery during supplier visits. In conjunction with our technical and procurement teams we have now created a process to ensure visits undertaken by internal teams to supplier's report against core principles of the SMETA standard. This gives us further due diligence across our supply chain, regardless of the level of risk.

3.2.4. Monitor, review, report and improve

Once a high-risk supplier is identified, we have outlined above the steps they must take in order to mitigate risks of modern slavery in our supply chains. However, we also retain a robust process for ongoing monitoring our entire supply chain, including new suppliers that join the business between our annual risk assessment process in the steps below:

➔ We have policies and procedures to continually govern our relationships:

Whitbread's Responsible Sourcing Policy outlines the minimum standards we require all suppliers, across all geographies, products and services, to comply with. Our Policy is aligned with the International Labour Organisation (ILO) convention and the UN Guiding Principles on Business and Human Rights. This policy is updated annually.

Specifically, with regard to modern slavery, it states that there will be no:

- Trafficked individuals working in any part of the supply chain
- Forced, bonded, indentured or involuntary prison labour
- Payment of recruitment fees on behalf of the worker

Our internal supplier data management system allows us to record our suppliers' commitment to work towards the standards outlined in this Policy and measure their performance against it through questionnaires and supporting evidence and verification.

As we reported in 2018/19, our due diligence systems for ethical sourcing, sustainability credentials and modern slavery are now fully integrated into our core contract management framework platforms (Trade Interchange). We are able to monitor compliance and give responsibility to our procurement team to ensure ethical due diligence is part of key supplier checks, tenders and contracts.

This process means that any new suppliers cannot be introduced without Whitbread understanding their approach and commitment to responsible sourcing, as well as making sure all new suppliers have signed our Policies and provided supporting evidence and verification for any claims relating to the sustainable accreditation of any products it supplies. The platform is continually monitored by our procurement and sustainability teams and the compliance embedded with KPI's and objectives.

➔ We are members of the Supplier Ethical Data Exchange:

We are members of the Supplier Ethical Data Exchange (SEDEX) and have linked with over 200 sites. The SEDEX platform gives us improved visibility of the supply chain beyond our directly contracted suppliers and provides us with better information on the employment processes and practices at manufacturing sites.

This year we have improved our use of the SEDEX platform by requiring all our suppliers identified as 'high actual risk' to link with us on SEDEX (where appropriate). Not only this, but the updated risk assessment and analytics tools on SEDEX allow us further information to conduct due diligence and monitor improvements with new and existing suppliers.

We were incredibly proud to be the first large hotel business to become members of SEDEX as well as encouraging many of our suppliers, whom had not previously used the tool also do so. It has enabled us to better understand our supply chain through connecting direct and indirect suppliers, monitor audits, initiate audits and crucially monitor and remediate issues.

3.2.5. Supply chain 2019/20- Highlights

Responsible Construction – Supplier Engagement

This year we have initiated an in-depth review of our construction activity for our hotels. We were aware through our risk assessment that the prevalence of contracted and agency labour, complex supply chains and regionalised activity, increases the risk of modern slavery in the construction sector, due to reduced visibility and control over workers and labour standards.

Having identified this risk, working in collaboration with our procurement, property and third-party ethical auditing team we conducted independent investigations and ethical audits focusing on labour standards, working conditions and crucially, responsible employment practices with our most material contractors.

Through our investigations, we found opportunity for non-compliances in our supply chain, however we found no material breach of policy. However, due to the complexity of the issue, we wanted to use the results of our audits to move beyond audit, into supplier engagement, to collaboratively understand and mitigate risks of modern slavery in both our own supply chains, as well as other sites that our contractors may be working on.

In order to do this, we have undertaken several steps:

➔ *Supplier engagement event*

- In September 2019, we held a 'Responsible Construction at Whitbread' event. The aim of this event was to bring together our main construction contractors to discuss, debate and collaborate on the issues we were finding. Over 40 participants attended, representing our key contractor base.
- This day was led by senior leaders at Whitbread (Director of Supply Chain) and attended by senior representatives from contractors across the UK, Expert NGO Stop the Traffik as well as Whitbread's external legal advisors who were able to inform the group on the current legislative landscape on Modern Slavery.
- Third Party NGO Stop the Traffik delivered specialised training for all contractors and Whitbread representatives that attended, covering the risks of modern slavery in the construction sector, examples of this, ways to spot signs and crucially, tangible steps that can be taken locally to mitigate this risk and identify and report any concerns quickly and effectively.
- The day also provided a confidential listening space that promoted and facilitated conversations between attendees to understand the complexities within our various supply chains. This allowed for collaborative discussions on tangible steps to mitigate risks going forward.

➔ *Internal Processes and procedures review: Whitbread*

- The outputs from the supplier engagement event allowed us to reflect on our own processes within our property, procurement and responsible sourcing programmes.
 - We have created a 'Responsible Construction' information pack that provides all contractors with our clear minimum standards, information on where they can gain training and accessible information for teams on site. This pack

- contains simple steps such as ensuring confidential reporting lines are available to all staff and information posters are translated to languages.
- Through collaboration with our independent health and safety audit provider Bernie Simms, we have upskilled the Bernie Simms team on the risks of modern slavery. Going forward, we have introduced due diligence questions in health and safety audits to gain further insight to standards on site for workers and provide another route to report any concerns.
 - We have also upskilled all internal Whitbread property teams on spotting signs of modern slavery and the clear reporting processes to ensure that when our own teams visit sites, they are equipped with tools to report any concerns.

➔ **Internal Processes and procedures review: Suppliers**

- Having undertaken ethical audits of our main contractors, this has prompted and encouraged our suppliers to proactively look at their own business and supply chains, beyond Whitbread sites. This is crucially important in order to maximise the impact we can have as a collective, on modern slavery in the construction industry.

Case Study: Gilbert Ash

One of our key contractors, Gilbert Ash, were involved from the beginning of our supplier engagement programme. We conducted independent audits on Gilbert Ash construction sites, and they were involved in our Engagement event. From this, they have led the way internally through updating their own policies and processes, upskilling their internal teams and spreading the messages through their own sub-contractor network. For their commitment, collaboration and support with our responsible sourcing programme, Gilbert Ash were awarded our 'Force for Good' award in our 2019 Supplier Conference.

“Following our preparation and participation in a SMETA 4 Pillar Audit through our partnership with Whitbread, we have reviewed and amended our processes whilst also delivering awareness/good practice sessions to our staff and supply chain members. We have added process checks to our internal auditing system and hope this along with our commitment to continued SMETA audits will assist in highlighting the impact responsible management can have in reducing modern slavery in construction.” Gilbert Ash

3.4. Guests

We take the potential issue of child or adult exploitation (sexual or otherwise) very seriously. We recognise that there is a risk in all hospitality companies that hotels might be used for the sexual exploitation of adults or children, or the harbouring / movement of adults and children for the use of forced labour. Whilst we recognise that this is a risk which we cannot always directly control, there are some actions we can take to make sure that our own team members are properly trained to spot the signs of exploitation and empowered to act on any suspicions quickly and effectively.

3.4.1. Our progress during FY 2019/20

During the calendar year to end of December 2019, 21,762 Team Members have completed our E-Learning module on the issue of Child Sexual Exploitation (CSE). Furthermore, Whitbread has worked closely with the National Business Crime Centre attached to the Metropolitan Police Force in establishing a sector wide working group with the aim of establishing National Guidance for Hotels regarding CSE. The expectation is that this National Guidance will be ready for launch by August 2020.

4. Partnerships and Collaboration

We recognise that managing risk of modern slavery is complex and we value the positive impact that collaboration and partnership can have in tackling these issues, both across our supply chain and with other stakeholder groups.

Throughout the year, we have continued our partnership with Stop the Traffik who continue to provide specialist knowledge and expertise supporting our team member training and specialist issue remediation wherever required. We look forward to continuing this partnership into the next year as we consider what other areas of our supply chain, we can be taking a more proactive and industry specific approach.

Working collaboratively with our supplier network allows us to develop a deep understanding of how compliance with our Policy works in practice. We review our Responsible Sourcing Policy on an annual basis and are continually improving and developing our strategy as we learn from our compliance and remediation actions.





4.1 Partner Testimonials

“STOP THE TRAFFIK are proud to have partnered with Whitbread since 2016. They have consistently demonstrated the drive to go beyond just compliance and are leading prevention best practice. By engaging with suppliers to support them in improving their processes and by evaluating and adapting internal procedures, Whitbread has demonstrated their commitment to preventing modern slavery.” Ruth Dearnley, CEO, Stop the Traffik

“Sedex is proud to have Whitbread PLC as part of the businesses that make up the Sedex community. Whitbread joined Sedex two years ago, to reduce audit fatigue amongst their suppliers and also show progress in their responsible sourcing programme and was the largest hotel group to first become a Sedex member. Using Sedex, Whitbread is able to monitor, manage and engage with suppliers, initiate and review audits and understand the intricate workings of their complex supply chain, enabling Whitbread to manage systemic issues affecting labour rights and working conditions”. Sedex, January 2020

5. Performance Indicators

Last year, we outlined the following new KPIs we would be reporting our performance against. You can find our updates below:

	<u>Metric</u>	<u>Update</u>
Increasing Awareness 	Events and activities within our business	<p>This year we hosted our first sector specific industry event. This was both for our internal teams and our external construction supply chain (find information on this in section 3.2.5. This involved upskilling our internal teams as well as our construction contractors and provide a space for collaboration on the topic of modern slavery in the construction industry.</p> <p>We also spoke to our tier 1 supplier network on the key sustainability focus for the upcoming year at our annual supplier conference held at Wembley arena.</p>
	Events and activities in our supply chain	
Pieces of intelligence shared 	Information sharing (received or reported)	<p>We have conducted audits on 60.5% all of our 2019/20 high risk supplier list which we share with our suppliers and agree a corrective action plan for improvement</p> <p>100% of tier one suppliers are risk assessed through our contract management system and are required to sign our Responsible Sourcing Policy.</p>
	Corrective Action Plans shared and agreed with suppliers	
Partnerships and Collaboration 	Participation in industry events	<p>We have collaborated with NGO and specialist Stop the Traffik for 4 years now. We work with STT to continually move from compliance to engagement and improvement, from an annual risk assessment to bespoke modern slavery training to supplier engagement events.</p>
	Collaborative activities with NGO's and other organisations	
	Improvement programmes with suppliers (where appropriate)	
Due diligence in our supply chain 	Annual assessment of risk	<p>This year we updated our risk assessment, assessing 1408 suppliers and identifying 374 of these with 'inherent' high risk and 109 with 'actual high risk'. For all Actual high-risk suppliers 60.5% have now been audited.</p>
	Action plans created, audits and investigations completed	
	<i>Number of non-compliances identified and remediated</i>	