



WHITBREAD

Whitbread's Corporate Modern Slavery Statement 2020/21

Whitbread Modern Slavery Statement 2020/21

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.

With the world in the grip of the COVID-19 pandemic, this year has been unlike any we have experienced. This has had a significant impact on the hospitality industry and Whitbread is no exception. The pandemic has impacted our business, our teams and our supply chains across the globe. However, our strong commitment to remaining a Force for Good has underpinned our response to these challenges through 2020 and into 2021.

We have closely monitored the risks and impact our global and national supply chains have faced in light of the pandemic and we have been working to mitigate these risks in collaboration with our suppliers.

Our responsible sourcing programme has continued throughout this challenging period. Where physical visits to supplier sites have been restricted, we have developed and innovated our monitoring tools to ensure continued communication and maintenance of standards, largely through the introduction of new, remote tools. We have continued to risk assess 100% of our suppliers against our responsible sourcing policy and have updated our policy to reflect the unique labour challenges that we know COVID-19 can bring. Finally, we've begun mapping our supply chain beyond our Tier 1 direct suppliers.

This year we have implemented a new, more stringent risk assessment process for our International Sourcing Department. This was particularly important when we needed to secure the supply of PPE for our own team members across our estate, whilst upholding our high standards for sourcing, even in times when a rapid response was crucial.

As ever, 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, where suppliers demonstrate a persistent disregard for our standards, we will cease to work with them.

Even with a large proportion of our estate closed during 2020 and 2021, we have continued to ensure 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. This helps us ensure the well-being of our guests and our teams, and do our part as a global citizen in tackling the issue of modern slavery.

As we move forward into 2021, we will take the learnings from this extraordinary year and continue to develop our programme. We are committed to retaining robust processes and maintaining our high standards to ensure that human rights are respected across our business and supply chains.

This statement covers the period 27th February 2020 – 25th February 2021. This Modern Slavery Statement was approved by our Executive Committee and by the Whitbread PLC Board on 22nd April 2021.



Alison Brittain

CEO 22nd April 2021

Introduction

Following our third statement published at the end of Whitbread's 2019-20 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. This statement covers the entirety of Whitbread Group PLC owned businesses.

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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 ten hotels in the Middle East (through a joint venture) and 30 operational hotels in Germany.

Supplier Network and Supply Chain Structure

We purchase our goods and services from over 2,600 direct suppliers. Most of our suppliers are manufacturers of finished products (e.g. beds, furniture), food processors, construction contractors and providers of services (e.g. technology and laundry). The majority of our Tier 1 supplier network is 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 Operations Function, led by our Group Operations Director. Our Group Sustainability team work incredibly closely with the Group Operations and Procurement team to ensure our policies and processes related to modern slavery are adhered to and implemented effectively across our supply chain. This year, we have aligned our working more closely by ensuring a sustainability representative is present at each bi-weekly procurement and supply chain leadership call. As well as this, we update objectives and KPIs annually across the functions to align and embed our responsible sourcing policy and processes.

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"> The 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 Group Operations Director, supported by the Procurement & Supply Chain Director. 	<ul style="list-style-type: none"> The 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 MD. 	<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 business unit MDs and at site level, by all team members.

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 as outlined in sections: Team members, Supply Chain and our Guests.

2.1. Team members

We have approximately 29,000 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 is what allows us to continue delivering high standards for our customers every day – and this is at the heart of our strategy. Last year, as part of our sustainability strategy Force for Good, we updated our commitment areas and goals for enabling our people to live and work well to include listening to our teams and supporting their physical and mental wellbeing.

2.1.1 Team members: Policies

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. We recognise that certain roles have higher levels of modern slavery risk, such as housekeeping, which is why we have ensured that team members in these roles are employed directly by Whitbread. However, we still ensure that we do all we can to mitigate that risk through our clear policies and processes.

A list of these policies and an outline of their purpose can be found in all previous reports here:

 [Whitbread 2019/20 Modern Slavery Statement](#).

2.1.2 Team members: Due Diligence

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. All team members working across our hotel and restaurant sites undertake mandatory 'Modern Slavery' e-learning training. This is 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 roles.

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.

2.2. 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, is crucial to our responsible sourcing programme.

Following last year's work to update our high-risk supplier list, we have continued to focus our efforts on working closely with these high-risk suppliers to address and mitigate our risk by working through our 'Human Rights in the Supply Chain' due diligence process (figure 2).

2.2.1. Supply chain: Policy

We have continued to strengthen our Responsible Sourcing programme over the past 12 months despite the turbulent global and national situation. We recognise that more than ever it is vital that we retain our high-level due diligence process.

Our programme is underpinned by our Responsible Sourcing Policy, outlining the minimum standards we require all suppliers, across all locations, 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, supporting evidence and verification. Ethical sourcing, sustainability credentials and modern slavery are fully integrated into our core contract management framework platform (Trade Interchange).

This process means that any new suppliers cannot be introduced without Whitbread understanding their approach and commitment to responsible sourcing. The platform is continually monitored by our procurement and sustainability teams and compliance with the process is embedded within KPIs and objectives.




Ian Douglas

Head of Procurement – Goods For Resale

“Within Food & Drink procurement at Whitbread, our Responsible Sourcing programme now sits at the heart of our relationship with our suppliers, enabling us to manage and mitigate risks throughout our end to end supply chain. Today it forms a key part in our supplier selection process, with suppliers having to clearly demonstrate their commitment to our policies before any relationship can commence and is maintained through regular reviews with suppliers as part of our SRM (Supplier Relationship Management) programme.”

COVID-19 Responsible Sourcing Policy update

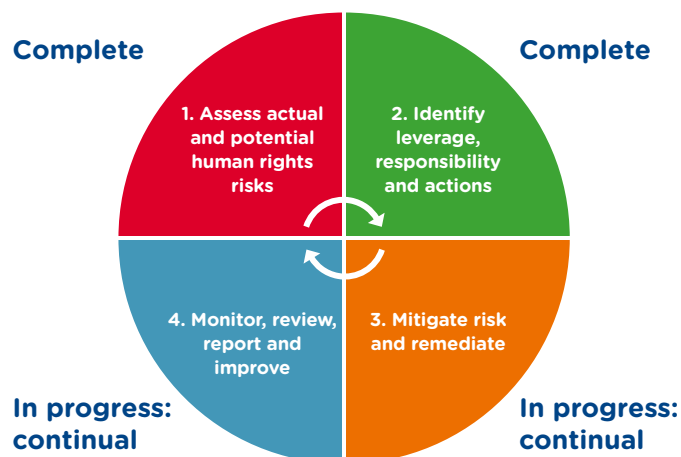
When the COVID-19 pandemic swept across the globe in 2020, we recognised the need to ensure workers' rights across our global and national supply chain were protected in relation to COVID-19 specific risks. In order to do this, we undertook several measures:

- A high level COVID-19 risk assessment was distributed to Whitbread's critical suppliers to understand the impact of the pandemic on their sites. This focused on impact to worker roles and any excessive demand fluctuations that impacted recruitment.
- From these responses we engaged with those suppliers that needed support in reinforcing clear standards on health, safety and hygiene, as well as clear employee recruitment standards when extra workers might be required during peak periods.
- We then updated the Responsible Sourcing Policy to include COVID-19 specific clauses that focus on the need to safeguard employees' safety through social distancing measures and mandatory PPE (in line with national laws). This policy can be found here:  [Whitbread Responsible Sourcing Policy](#)

2.2.2. Supply chain: Due Diligence

Since the beginning of our Responsible Sourcing programme, we have conducted due diligence process across every Tier 1 supplier.

[Figure 1 - Human Rights in the supply chain due diligence process]



This is a continual cycle we move through in partnership with our suppliers. Within these categories we can then identify any risk areas that require further engagement or remediation.

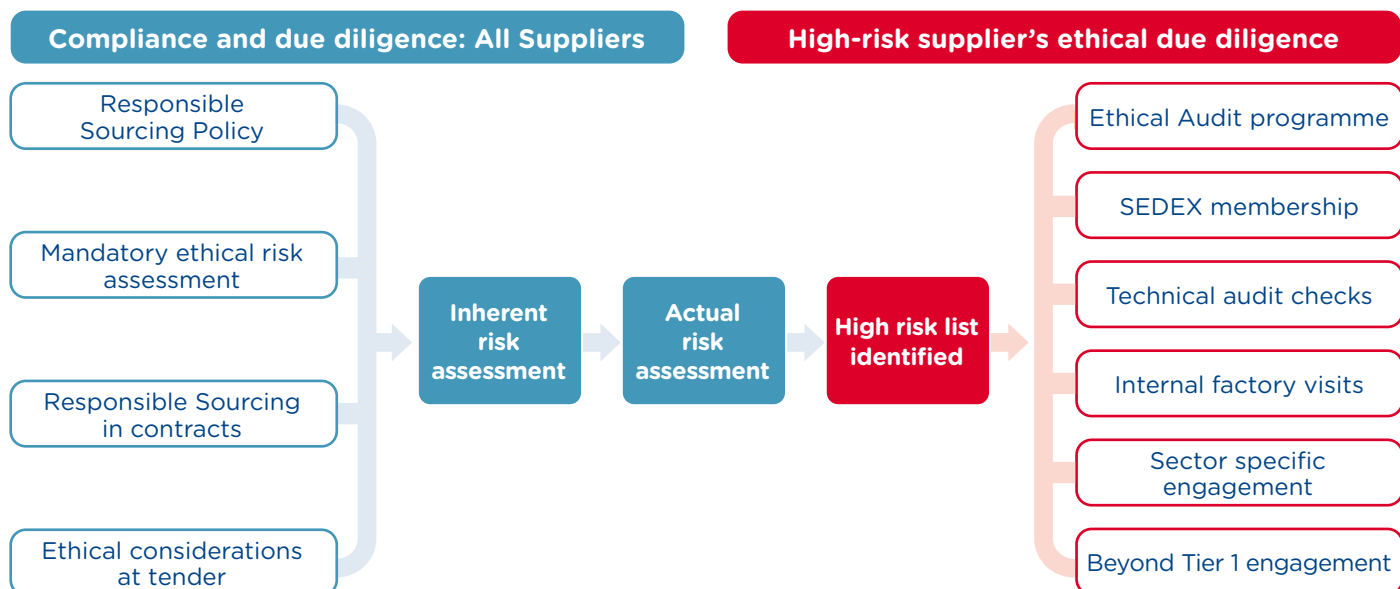


Olivia Murphy Sustainability Manager

"It's been a real step change over the last two years for Whitbread to move beyond audit into supplier engagement. Each supplier or sector that we identify as high risk is supported through our process in a collaborative way with myself and the procurement team working together from identification of risk through to remediation. This has strengthened our supplier relationships, allowing us to undertake root cause analysis and to really understand what's causing the risk to manifest in the first place. This has driven some really interesting and transformative conversations internally, that have helped to develop and drive the whole programme forward."

The illustration below outlines the standard due diligence processes we take across our supply base and further engagement taken with our high-risk suppliers:

[Figure 2 - Due diligence actions taken for Whitbread Suppliers]



Supply chain risk assessment

Last year, we outlined the process we had taken to update our supply chain risk assessment in partnership with STOP THE TRAFFIK. This risk assessment is comprised of two key stages: Inherent risk assessment and Actual Risk assessment. The purpose is to identify key sectors and locations in our supply chain with inherent high risk in order to prioritise action, layering this with actual risk assessments in relation to the material impact on our business.

The key sectors identified in our business with inherent ethical risk are:

[Figure 3 - High inherent risk sectors in Whitbread supply chains]

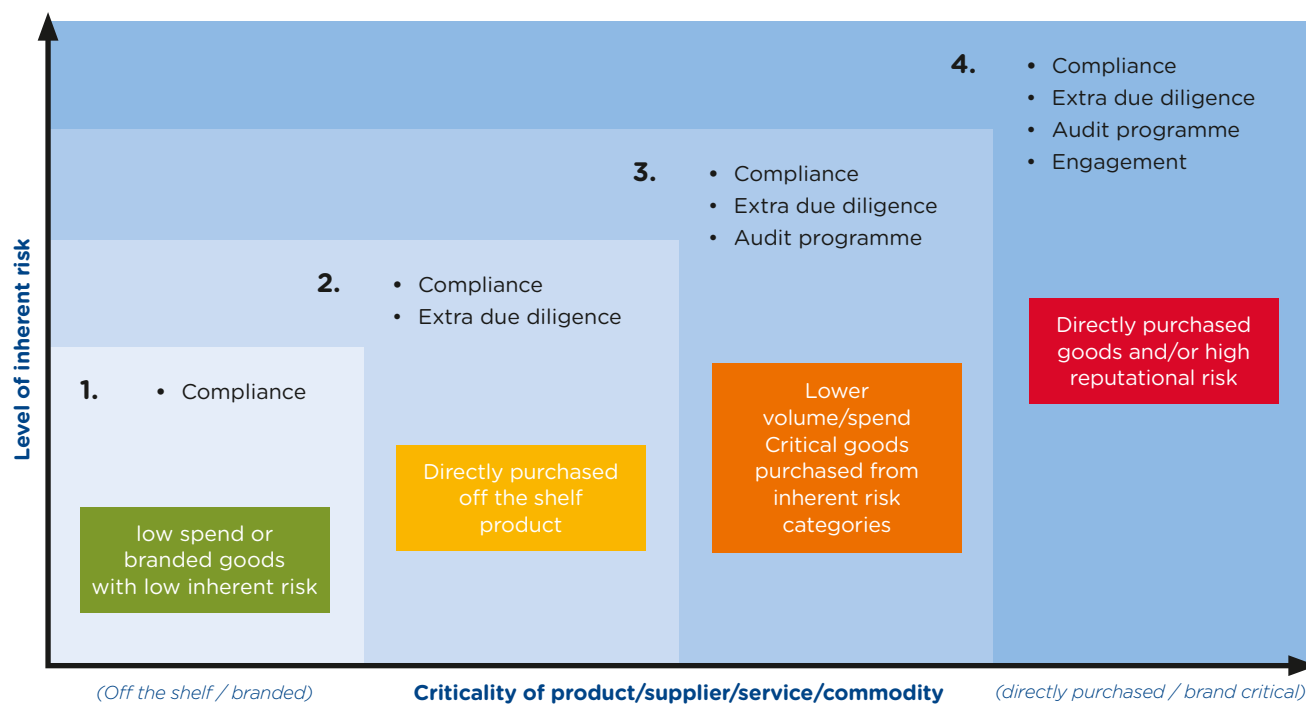
Services	Food and Beverage	Non-Food
Housekeeping and contract cleaning	Meat and poultry suppliers	Case goods suppliers
Construction	Food manufacturing	Manufactured furniture
Laundry Services		Consumable items
Logistics and waste management		Cotton products

From this inherent list, we assign each supplier with an 'actual risk' rating according to our relationship, leverage and partnership status. This initially resulted in 109 suppliers across our supply chain which were deemed to be actual high risk.

This year, we recognised that our annual risk assessments don't allow for supply chain changes between annual review. Therefore, we developed the process to embed it as a standard, ongoing, internal practice for any supply chain changes or additions that fall in an inherent risk area. The number of suppliers categorised as high risk is now more dynamic, reflecting real-time assessment and mitigation. It may flex during the year as new high-risk suppliers are added or contracts end.

The below diagram highlights our ongoing risk assessment process for new suppliers, commodities or services and the associated actions taken for each perceived risk level.

[Figure 4 - Ongoing risk assessment process for new suppliers, products and services]



At the time of reporting, our high-risk supplier list is comprised of **82 suppliers, operating over 152 sites:**

Furthermore, in 2020/21 we embedded ethical risk into wider risk assessment and review processes undertaken by the Procurement and Supply chain function. The ethical high-risk list also forms part of a holistic risk assessment of suppliers that also includes any other business risks that could exacerbate one another. For example, during analysis of the pandemic's impact on our suppliers, we identified that financial challenges a factory faced could exacerbate ethical risk. In response to this, we now monitor each risk category on a monthly basis across the procurement function to identify any overlapping risks.

Ethical audit programme

Working with an independent, third-party partner, we have conducted SMETA (Sedex Members Ethical Trade Audit) audits for suppliers who we recognise as high risk for over 4 years now.

These audits assess compliance against our Responsible Sourcing Policy using the SMETA guidelines for best practice. An overview of this programme and the SMETA audits can be found in our previous statement here: [Whitbread Responsible Sourcing Policy](#)



Griffiths Family Farms

Whitbread Egg Supplier

"We were one of the first suppliers to go through Whitbread's responsible sourcing and audit programme and we approached it with total transparency. There were a number of areas that needed addressing, but rather than issue ultimatums and demand immediate corrections, the Whitbread team worked with us, really got to understand our business and have provided great support across a number of levels over the last three years. We have made major investment in new personnel and operational changes throughout our business, resulting in a cultural step change and significantly higher levels of staff engagement. This process has had a very positive impact across our business and Whitbread has played a major supporting role."

Impact of COVID-19 on our Supply Chain due-diligence

Undoubtedly COVID-19 has impacted both our operations and our supply chain. In some cases where our operations have been closed it has caused a reduction in demand and therefore a subsequent reduction in the supply of goods and services to our business. In other categories (such as PPE) we saw an increased demand. Regardless of the impact to our procurement team, our basic compliance and due diligence as listed on figure 2 remained consistent. However, further due diligence such as the ability to physically audit sites both for SMETA and through technical teams has reduced, particularly for our UK suppliers during national lockdowns.

To counter any risk that these restrictions might pose on our standards, where possible and suitable, we have worked with our third-party partner to deliver remote audits to continue checks against our Responsible Sourcing Policy. Where remote audits are not feasible, we have allowed a maximum of 24 month extensions from February 2020 for suppliers to book in audits, from our usual annual audit expectation. Alongside this, if no audit has been carried out in 2020/21 we have maintained regular communication and engagement with our high-risk suppliers, ensuring we understand any impact of the COVID-19 pandemic on their business that may increase ethical risks and how this is being managed. 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.

Technical team

As outlined in past reports, we continue to provide ethical performance and due diligence checks to our food and beverage technical team to enable them to embed a high level 'temperature check' of our suppliers' ethical performance in their regular supplier visits and technical audits.

Supplier Ethical Data Exchange (SEDEX)

We are members of the Supplier Ethical Data Exchange (SEDEX) giving us improved visibility of the supply chain beyond our directly contracted suppliers and providing us with better information on the employment processes and practices at manufacturing sites.

In 2020/21 we achieved connection with every high-risk food and beverage supplier on the SEDEX platform as well as many of their own Tier 1 and 2 suppliers, providing us with more detailed information to conduct due diligence and monitor improvements along the supply chain.

We were incredibly proud to be the first large hotel business to become members of SEDEX as well as introducing many of our suppliers to the tool and encouraging them to use it. It has enabled us to better understand our supply chain through connecting direct and indirect suppliers, initiating and monitoring audits and, crucially, managing and remediating issues that might be uncovered.

2.2.3. 2020/21 Progress and Highlights

International Sourcing Process update

We know sourcing in China comes with an inherent level of ethical risk. Sourcing products through our international sourcing team, who have direct relationships with the production factories, allows us to work much closer with our supply chain partners, providing opportunities to understand their businesses better, with greater leverage and control to influence positive change and ensure human rights are respected.

This year we have worked closely with our international sourcing team, based in China, to create a more robust process for ethical due diligence than we had previously. Following the training we delivered to our International Sourcing colleagues on ethical trade, human rights and responsible sourcing last year, we have now gone one step further to improve our responsible sourcing processes.

The new process follows all our high-risk due diligence steps as outlined in figure 2, with the addition of factory visit reports. We have implemented a simple yet robust visit report that our Whitbread colleagues in China populate and send to the UK team for assessment each time they visit a factory.

This visit report is aimed to highlight any hidden, or obvious breaches, against our Responsible Sourcing Policy.

Without the presence or formality of an audit, visit reports provide a more transparent and informal opportunity to facilitate conversations on ethical standards with suppliers. This also allows flexibility for us to review supplier sites at short notice. An example of where this has worked well this year was during the procurement of PPE for our team members. This was a new product, required at short notice and we needed to verify that these products were sourced with integrity and in line with our robust processes.

This process has been rolled out in China for any existing supplier commercial visits, as well as any new suppliers being brought on board. It provides an additional touchpoint for engaging with our suppliers, reiterating our minimum expectations and supports us in building a relationship that can provide a basis for continuous improvement.

[Figure 5: Sign off process for PPE Procurement]



Collin Tang
Senior Sourcing Manager

“It was incredibly important when setting up a team and a sourcing office in China that CSR and ethical risk was front and centre. Our new team undertook clear training on labour and ethical risk and have gone further to embed this into checks at factory visits. The training has provided my team with the required skills and confidence to support our efforts in responsibility sourcing great products that enhance our guests experience.”



Dogie Knight

International Head of Supply Chain

"Engaging in the Responsible Sourcing Programme has been critical to our International Sourcing function. Through training and a clear process of engaging with suppliers we recognise we have an opportunity to influence positive mitigation for human rights and modern slavery risk at supplier sites. The team have been upskilled on spotting signs of modern slavery and now have a template by which they can review these signs when we visit. Open, transparent and honest relationships with suppliers are the key to ensuring we uphold our responsibility to respect the human rights of workers across our supply chain and I look forward to strengthening our work as we move into the next year."

Supply Chain Mapping Beyond Tier 1: Premier Inn Bedroom

As well as a robust process in place for our direct Tier 1 suppliers, we have also worked hard this year to focus on suppliers deeper within our supply chain for key, brand critical products. We have undertaken this work with our long-standing partner STOP THE TRAFFIK.

A material part of our business and a critical part of our global value chain is the team of suppliers who provide us with the products and services we need to deliver a Premier Inn Bedroom. This year we have embarked on the challenging task of mapping the supply chain for these selected items back to the point of manufacture. This has provided greater transparency and a more comprehensive understanding of our global supply chain and associated risk and, now that the mapping is complete, we are beginning to conduct audit reports for our Tier 2 supply chain and beyond across all categories in the coming year.

This 'Bedroom' pilot is the first step in understanding how we review our wider supply chain and prioritise action, allowing us to refine our risk mitigation strategy for our Tier 2 supply chain and beyond across all categories in the coming year.

Global Forced Labour Risk Assessment

We have also conducted an independent assessment of global forced labour exploitation to provide a more in-depth understanding of the issue itself and more specifically, our supply chain risk.

Through our work with STOP THE TRAFFIK's Centre for Intelligence Led-Prevention, we have identified and mapped forced labour and exploitation hotspots in detail. This information will enable us to ensure we are engaging with any factories close to these hotspots and this will inform responsible procurement decisions. In the next year, we will be focusing on mitigating this risk further as we engage with the relevant suppliers.

2.3. Guests

2.3.1. Guests: Policy

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.

2.3.2. Guests: Due Diligence

During the calendar year to end of December 2020, 8,789 team members have completed our E-Learning module on the issue of Child Sexual Exploitation (CSE). To date 99.7% of all Premier Inn team members have completed training on 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 at the end of last year was that National Guidance would be ready for launch by August 2020. Due to the pandemic, this was halted and restarted at the end of 2020. A draft of this document has been commented on and we are awaiting a second draft.

3. 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 to strengthen our partnership with STOP THE TRAFFIK who provide specialist knowledge and expertise on modern slavery to us. This year, we've worked closely on our supply chain mapping beyond Tier 1 suppliers. We look forward to continuing this relationship as we delve deeper into our supply chains in the coming year.

Working collaboratively with our supplier network allows us to develop a deep understanding of how compliance with our Policy works in practice. We are continually improving and developing our strategy as we learn from our compliance and remediation actions and will continue to build on our strong supplier relationships to drive meaningful change.

3.1 Partner Testimonials



Jason Nunn

Director of Business Engagement at STOP THE TRAFFIK

"STOP THE TRAFFIK are proud to continue our ongoing partnership with Whitbread which was launched in 2016. They continue to innovate and develop their approach to mitigating modern slavery risk, including through using innovative mapping techniques to identify forced labour hotspots. By risk-mapping beyond Tier 1, they have brought additional transparency to their supply chain, allowing for more effective due diligence and are leading in this critical area of corporate, social responsibility."







Intertek

"Together Whitbread and Intertek have collaborated to build a due diligence programme that supports Whitbread in making informed decisions about their global supply chain. With SMETA social audits as a core deliverable, we have adapted to address new and unique challenges that Whitbread has faced - including tailored supply chain audits for the service and construction sectors, implementing a whistle-blowing process for reporting and investigation of workers' concerns, and adopting a remote audit approach to maintain supply chain integrity during the COVID-19 pandemic. We continue to partner with Whitbread to evolve this programme as we look to address new frontiers in the changing face of modern slavery and ethical operations in global supply chains"

4. Performance Indicators

Last year, we outlined the following new KPIs we would be reporting our performance against. You can find our updates for 2020/21 below:

	Example metrics	Update
Increasing Awareness 	Events and activities within our business Events and activities in our supply chain	Due to COVID-19 we've been unable to host specific events. However, we rolled out COVID-19 risk assessments to our critical suppliers and ensured continued engagement virtually.
Pieces of intelligence shared 	Information sharing (received or reported) Corrective Action Plans shared and agreed with suppliers	We have conducted audits on over 70% of all of our high-risk supplier list which we share with our suppliers and agree a corrective action plan for improvement. 100% of Tier 1 suppliers are risk assessed through our contract management system and are required to sign our Responsible Sourcing Policy.
Partnerships and Collaboration 	Participation in industry events Collaborative activities with NGOs and other organisations Improvement programmes with suppliers (where appropriate)	We work with STOP THE TRAFFIK to continually move from compliance to engagement and improvement. This year, we've deepened our understanding of supply chains in Tier 2 and beyond. We have also worked with Intertek to create a bespoke Whitbread workbook for audits to ensure we have clear lines of communication for workers alongside trialling remote audits.
Due diligence in our supply chain 	Annual assessment of risk Action plans created, audits and investigations completed	We have now integrated our risk assessment process into wider procurement strategy to ensure we see a holistic view of 'risk' across our business. Over 70% of our high-risk suppliers have audits in place and action plans created for each audit to ensure follow-up for improvement.