

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2024

27 March 2025

There is a risk within the UK that people can be exploited, employment rights denied and paid below the minimum wage, or not paid at all. Challenging economic conditions only increase the risk of this happening. The risk increases in many overseas countries, particularly in developing nations where there may be less protection for workers' rights and less enforcement.

Marston's recognises its responsibility to ensure that all individuals working for the business, as an employee or agency worker, are employed in accordance with UK law, that pay is set above the National Minimum Wage and that no employment rights are suppressed.

In addition, we recognise the importance of knowing how the goods we receive, often originating from abroad, are produced and how the services provided to us are delivered. This includes an understanding of the practices of our suppliers, their ethical position and their efforts to prevent the exploitation of vulnerable people within their own organisation and their wider supply chain.

Each year Marston's publishes a Modern Slavery Statement outlining the actions taken to combat the risk of modern slavery. We have a diverse, global supply chain which poses a challenge to fully understand the operations of our suppliers and, in turn, their suppliers. We are committed to seek practical ways to continuously improve this understanding.

The Modern Slavery Act 2015 recognises the role that large organisations can play in reducing the exploitation of people around the world. The economic benefit of a global supply chain comes with a responsibility to consider how those goods are produced and services provided, to explain what steps are taken to identify those people at risk of exploitation and to support the efforts of organisations to eradicate it.

Marston's is committed to comply with the legislation and is keen to play its part in protecting the human rights of all workers whether our own employees, agency workers, or those within our supply chain.

Our Business

Marston's is a UK based pub company operating approximately 1,300 pubs and lodges with c10,000 employees and c750 Pub Partners.

Vision: To be the UK's leading local pub company.

Purpose: Shared Good Times.

Strategy: To create a high-margin, highly cash-generative local pub company based on differentiated formats and a brand portfolio that is naturally balanced to appeal across a range of consumer segments.

Key Enablers: Our strategy and business model are underpinned by three core enablers which support and help drive our strategic priorities and reflect Marston's unique culture and how we operate responsibly and ethically:

(1) Powerful supplier partnerships

Products and services sourced to a high standard and sustainably in line with our Food Supplier Charter which sets out our sourcing practices and expectations.

(2) Performance driven team

Supporting our People to develop. We are focused upon developing our performance-based reward system which rewards, incentivises and recognises our employees and our Pub Partners for achieving goals and objectives.

(3) Safely and sustainably operating the business

Dedicated to best-in-class health and safety standards through training, support and reward which recognises the achievement of key safety KPIs.

Our sustainable and ethical approach aims to identify, assess and manage our environmental and social impacts. Further information can be found in our Impact Report at <https://www.marstonpubs.co.uk/>

Our Supply Chain Structure

Marston's purchases goods almost exclusively from the UK, or from European companies, albeit many of these goods and products originate from other areas across the world.

Our supply chain includes large multi-national companies, medium size UK businesses and, at a local level, smaller businesses such as maintenance contractors.

The main drinks distributor to our business is Carlsberg Britvic.

We have 80 food suppliers all of whom deliver into A F Blakemore & Son Ltd who store and deliver to order, to our pubs. 78 of those produce a modern slavery statement, of whom 74 have uploaded it to our food information system ("Smart Supplier").

Our pubs are reliant upon a wide range of supplies and services, including:

- food (chilled, frozen and ambient);
- drink brands (wines, spirits, beers, soft drinks, hot beverages);
- consumables;
- building materials and furnishings;
- equipment;
- services (IT network / maintenance / security / gardening);
- utilities.

We recognise that given our diverse supply chain, human rights issues could potentially arise either within the UK or overseas.

Excluding meat and some fresh produce, the food we receive mainly originates from either the UK or the EU. Workers' rights are legally protected within Europe and, therefore, we have a reasonable level of expectation that people employed in these countries are protected from exploitation.

Marston's does source food and goods from outside Europe, including some fish, frozen chicken, beef, cooking oil and uniforms. Although these products are often sourced from outside Europe they are purchased through either a UK or European based company. We insist that all our food suppliers, wherever they are based, comply with our Food Supplier Charter, and we arrange audits where appropriate.

Marston's Approach to Modern Slavery

We mitigate against the risk of people working in our pubs and elsewhere in our business, from any form of exploitation.

Marston's is fully compliant with all aspects of UK employment law, including those which protect individuals from exploitation.

These are some of the controls Marston's employs to mitigate human rights risks:

- 'right to work' identity checks for all new employees;
- retain copies of documentation as proof of identity;
- audit our payroll process.

In recent years we have used the SEDEX online portal to collect information from our suppliers on the employment terms and conditions of their workers. This information is collected via a Self-Assessment Questionnaire that the supplier submits, and from ethical audit reports which the supplier has uploaded. For further information see www.sedex.com.

Supplying Staff to our Premises

Agencies

We expect all the agencies that we use to comply with UK employment law/practices.

The agencies we use operate within UK employment law when supplying people to work on our premises which, in the past year, has included door staff at our pubs, as well as kitchen workers and cleaners.

We continue to form long-term relationships with these agencies so we can improve our understanding of their businesses to identify and mitigate modern slavery risks. We understand the value in furthering our understanding about how agencies recruit their staff, including any practices they may have for recruiting people from overseas to work in the UK.

Our expectation is that the agencies we use are bound by our terms and conditions. We expect our suppliers to be in effect an extension of ourselves, displaying our values and behaviours.

Any complaints by agency employees of employment abuses, to our team members, would be investigated thoroughly. This would include any reports made through our whistleblowing hotline "Speak Up". Awareness of the hotline is promoted via communications to our Pub Teams, through the induction process and through periodic campaigns, including posters in our pubs.

Our Expectations of Suppliers

Marston's builds and maintains long-term relationships with its suppliers, and these relationships facilitate a greater opportunity to understand their business, collect information and, if necessary, to follow processes that test their compliance to UK employment law.

During the tendering of our suppliers for higher risk categories, we carry out due diligence to understand how their employees are treated, and how they source services and resources. We also communicate to them how we expect workers to be treated. Marston's follows the Corporate Code of Ethics published by CIPS (Chartered Institute of Procurement & Supply) <https://www.cips.org/en/who-we-are/governance/cips-code-of-conduct/>.

Our food information system (Smart Supplier – see below) asks all food suppliers to indicate whether they work to a Code of Ethics, with the option to upload their own Code to our system.

The Corporate Code of Ethics published by CIPS, sets out the values, business culture and practices which all organisations should adopt. The Code requires a commitment to the eradication of unethical business practices, including bribery, fraud, corruption and human rights abuses, such as modern slavery and child labour.

Our Food Supplier Charter includes the following statement on labour (page 27):

Forced Labour

All work must be conducted on a voluntary basis and free from the imposition of any penalties or sanctions. We absolutely do not agree to purchase any products from any supplier produced through forced, bonded or involuntary labour. We will not tolerate slavery and human trafficking by any of our suppliers for Marston's, or any other purpose, and fully expect our suppliers to take active steps in ensuring the same. The SAQ on Smart Supplier requires a copy of the supplier's modern slavery statement to be uploaded.

Suppliers must allow their employees the right to leave after giving reasonable notice. Workers must not be required to lodge deposits or I.D. papers unless it is a legal requirement to do so. In all circumstances these must be returned promptly upon cessation of employment.

Responsibility for the due diligence over modern slavery belongs to the individual contract owner within the business. Our Procurement team manages overall compliance to our Procurement Policy, which includes instructions on the conduct of tendering and the gathering of information on suppliers.

We review the Modern Slavery Statements of our food suppliers and our drinks distributor, Carlsberg Britvic. We contact our suppliers where necessary with more specific questions, if not answered in their statements. We contact suppliers if we consider their Modern Slavery Statement content is significantly below the expectation of the Modern Slavery Act in terms of detail, or if the statement is not compliant with the Act.

SEDEX

Our aim is to use the SEDEX portal to gain an expanding insight into our suppliers' employment practices, going beyond what they might publish in their own Modern Slavery Statement. SEDEX also provides access to a network of international auditors to conduct thorough site inspections. By collecting in the SEDEX membership details of our suppliers within our food information system (Smart Supplier) we have increased the number of supplier sites sharing their ethical data from less than 20 four years ago to now over 110.

Our goal is ultimately to encourage all our suppliers in sectors deemed to be at higher risk to provide information through SEDEX. During 2025, we will continue to extend the invitation to our suppliers to engage with us through SEDEX.

Marston's Food Supplier Charter

<https://www.marstonpubs.co.uk/docs/responsibility/food-supplier-charter-2023.pdf>

Our current Food Supplier Charter (the "Charter") (published in October 2023) communicates the high standards and ethical business practices that must be adhered to by our food suppliers and includes sections on employment practices and modern slavery. The Charter forms part of the trading terms between Marston's and the companies supplying food to our pubs.

Supplier Auditing

We follow an audit programme which is based upon risk and includes site visits to our key food suppliers.

Our food suppliers are audited by an independent consultant (currently Food Alert). The audit is primarily for food safety purposes; however, the audit programme also includes ethical enquiries, including the risks of modern slavery in the supplier's extended supply chain.

Food Alert conduct audits on our behalf at suppliers' premises. The new audit scope went live in February 2024 and includes the consideration of whether the standards in the Charter are being met, and additional questions on modern slavery. This year we are aiming for the audits to be carried out at each of the supplier's sites servicing our business rather than just one. For some foreign supplier sites there can be a delay between the start of a contract and when a site audit can be arranged through a local auditor. We endeavour to minimise this delay so that the level of compliance to our Charter can be measured as soon as reasonably possible.

Smart Supplier

Four years ago we implemented a food information system, Smart Supplier. As well as storing detailed information on the products we buy, the system also holds information collected from our suppliers on their ethical approach. The supplier completes an SAQ which includes questions concerning SEDEX and their own modern slavery statement. They are asked to upload their statement for review by our managers.

Recently we have turned our attention to our drinks suppliers so that we can collect, via Smart Supplier, knowledge about ingredients that will inform allergen information. The drinks suppliers are asked for their SEDEX membership status and to upload their Modern Slavery Statement.

Our Policies

The way we address modern slavery is through a number of policies:

- Food Supplier Charter
<https://www.marstonpubs.co.uk/docs/responsibility/food-supplier-charter-2023.pdf>
- Human Rights Policy
<https://www.marstonpubs.co.uk/docs/policies/human-rights-policy.pdf>
- Procurement Policy
Marston's Procurement Policy is applicable to all purchases by our employees, managers, senior management and directors, regardless of value, and includes a statement of our ethical approach. Our Procurement team are responsible for ensuring compliance to this policy. We expect our suppliers to operate in compliance with the CIPS Corporate Code of Ethics (see above).
- Whistleblowing Policy:
<https://www.marstonpubs.co.uk/docs/policies/whistleblowing-policy-june2023.pdf>
Employees are encouraged to report any wrongdoing, which falls short of these business principles

Training

The purpose of the Modern Slavery Statement is explained to our Board, our Executive Committee, the members of our Senior Leadership Team responsible for ESG, and the Risk Committee.

Marston's has focussed on building capacity to combat modern slavery, embedding a robust approach and raising awareness. We treat this as a continuous exercise, to involve new employees as appropriate.

The Modern Slavery Act has been explained to the managers responsible for our key purchase streams, who have in turn considered the risks of modern slavery in our supply chain, and the appropriate wording of this statement.

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 28 September 2024.

Justin Platt (Chief Executive Officer)

MARSTON'S PLC

Marston's Trading Limited

Marston's Operating Limited

Marston's Pubs Limited

Marston's Estates Limited