

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FY2025

Marston's recognises that modern slavery, human trafficking and the exploitation of vulnerable people remain significant risks both within the UK and internationally. Economic pressures increase these risks, particularly in countries where legal protections for workers' rights are limited and poorly enforced.

We are committed to ensuring that all individuals working for Marston's – whether employees or agency workers -are engaged in accordance with UK law, paid fairly, and protected from the suppression of employment rights. We also recognise our responsibility to understand how the goods and services we procure are produced and delivered, and to ensure our suppliers uphold high ethical standards within their own operations and supply chains.

Each year, Marston's publishes a Modern Slavery Statement outlining our ongoing actions to prevent modern slavery. Our supply chain is diverse and global, and we continue to seek practical ways to deepen our understanding of suppliers' operations and strengthen our ability to identify and mitigate risk.

The Modern Slavery Act 2015 highlights the crucial role organisations play in reducing exploitation across global supply chains. We take this responsibility seriously and remain committed to protecting the human rights of all those who work for us or with us.

Our Business

Marston's is a UK based pub company operating approximately 1,300 pubs and lodges, employing around 9,000 employees and working with approximately 800 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 is underpinned by three core enablers that help drive our strategic priorities, reflect Marston's unique culture and support our responsible and ethical approach:

(1) Powerful supplier partnerships

Goods and services sourced to high standards and in line with our Food Supplier Charter which sets out our sourcing practices and expectations.

(2) Performance driven team

Supporting our People with development opportunities and a performance-based reward system that recognises and incentivises achievement of goals and objectives across employees and Pub Partners.

(3) Safely and sustainably operating the business

Dedication to best-in-class health and safety standards, supported through training, active monitoring and recognition of key safety KPIs.

Our sustainable and ethical approach includes assessing and managing our environmental and social impacts. Further details are available in our Impact Report at www.marstonpubs.co.uk

Our Supply Chain Structure

Marston's sources goods almost exclusively from UK and European businesses, although some products originate globally. Our supply base includes multi-national organisations, medium-sized UK companies, and, at a local level, smaller businesses across various service categories.

- Our main drinks distributor to our business is Carlsberg Britvic.
- We have 84 food suppliers, 82 of whom produce a Modern Slavery Statement, with 81 uploaded to our food information system, *Smart Supplier*.

Our pubs rely on a broad range of goods 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 networks, maintenance, security, gardening)
- Utilities

We acknowledge that modern slavery risks may arise both domestically and internationally. While most of our food products originate from the UK or EU – regions with strong worker-protection frameworks - we also source certain items (including fish, frozen chicken, beef, cooking oil and uniforms) from outside Europe via UK- or EU-based suppliers. All suppliers, regardless of location, must comply with our Food Supplier Charter, and we conduct audits where appropriate to ensure these standards are upheld.

Our Approach to Modern Slavery

We aim to ensure that no one working in our business or on our premises is subject to any form of exploitation. Marston's complies fully with UK employment law, including protections designed to prevent forced labour and other forms of abuse.

Key controls:

- 'Right to Work' checks for all new employees
- Retention of copies of identity documentation
- Audits of payroll processes
- Supplier due diligence via SEDEX, including Self-Assessment Questionnaires and ethical audit reports Further information is available from www.sedex.com.

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 Smart Supplier we have increased the number of supplier sites sharing their ethical data from less than 20 five years ago to more than 110.

Our goal is ultimately to encourage all our suppliers in sectors deemed to be at higher risk to provide information through SEDEX. During FY2026, we will continue to extend the invitation to our suppliers to engage with us through SEDEX.

Supplied and Agency Staff

We expect all agencies supplying staff to operate fully within UK employment law. In the past year, these agencies have supplied door staff at our pubs, kitchen workers and cleaners.

We build and maintain long-term relationships with our agencies to improve our understanding of their recruitment and employment practices including those used when sourcing workers from overseas.

Our expectations are reflected in our contractual terms, and we expect agencies to align with Marston's values and behaviours. Any concerns raised by agency workers – including through our "Speak Up" whistleblowing portal – are investigated thoroughly. Awareness of the portal is promoted through pub communications, inductions and periodic campaigns.

Expectations of Suppliers

We build long-term relationships to enhance visibility of supplier practices and ensure compliance with UK employment standards and broader ethical expectations. For higher-risk categories, our tender processes include due diligence on employment practices and sourcing arrangements. We also follow 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/>, 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.

Corporate Code of Ethics published by CIPS (Chartered Institute of Procurement & Supply)

"Promote the eradication of unethical business practices, by:

- *Fostering awareness of human rights, fraud and corruption issues in all my business relationships.*
- *Responsibly managing any business relationships where unethical practices may come to light and taking appropriate action to report and remedy them.*
- *Undertaking due diligence on appropriate supplier relationships in relation to forced labour (modern slavery) and other human rights abuses, fraud and corruption.*
- *Continually developing my knowledge of forced labour (modern slavery), human rights, fraud and corruption issues, and applying this in my professional life."*

Smart Supplier captures whether food suppliers follow a Code of Ethics and allows them to upload their own Code to our system.

Responsibility for supplier due diligence lies with individual contract owners, supported by our Procurement team, who oversee compliance with our Procurement Policy. We review Modern Slavery Statements from food suppliers and our drinks distributors, following up on omissions, lack of detail or non-compliance with legal requirements.

Smart Supplier

Five 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.

More recently we 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.

Marston's Food Supplier Charter

[Link to be updated]

Our Food Supplier Charter (the "Charter") (published in 2025) sets out the standards and ethical business practices that must be adhered to by our food suppliers, including requirements relating to employment practices and modern slavery. The Charter forms part of our trading terms.

Our Charter includes the following statement on labour (page 29):

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 that are 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.

Supplier Auditing

We operate a risk-based audit programme, involving site visits to key food suppliers conducted by an independent consultant (currently Food Alert). Although focused primarily on food safety the audit scope includes ethical considerations and modern slavery risks within extended supply chains.

The enhanced audit programme, introduced in February 2024, includes additional modern slavery questions and assessment of compliance with our Charter. We aim for audits to cover all sites servicing Marston's where possible. For overseas sites, we work to minimise delays in arranging local audits.

Policies

Our approach to modern slavery is supported by several key policies, including:

- Food Supplier Charter
[Food Supplier Charter](#)
- Human Rights Policy

[Human Rights Policy](#)

- Procurement Policy
Applies to all purchasing activity and includes the requirement for suppliers to comply with the CIPS Corporate Code of Ethics (see above).
- Whistleblowing Policy:
[Whistleblowing Policy](#)
Encourages employees to report wrongdoing or behaviour falling short of our standards.

Training and Awareness

The purpose and requirements of the Modern Slavery Act are communicated to the Board, Executive Committee, Senior Leadership Team members with ESG responsibilities, and the Risk Committee.

We continue to build internal capability to identify and manage risks of modern slavery, treating awareness-raising as an ongoing priority. Managers responsible for key purchasing streams receive guidance on assessing risk and informing this statement.

Statement of Compliance

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Marston's slavery and human trafficking statement for the financial year ending 27 September 2025.

Justin Platt (Chief Executive Officer)

MARSTON'S PLC

Marston's Trading Limited

Marston's Operating Limited

Marston's Pubs Limited

Marston's Estates Limited