ETHICAL SOURCING POLICY

1. ABOUT THIS POLICY

The Restaurant Group has developed this Ethical Sourcing Policy to ensure our suppliers meet the ethical trading standards we require. We have a responsibility to ensure our own business and supply chains follow sound ethical, environmental, and social practices and we will continue to work with our suppliers to maintain this.

This policy sets out the baseline standards for suppliers to TRG's UK and Ireland operations. Individual divisions or brands within the Group may choose to adopt further policies and procedures, or implement additional requirements, provided they are not inconsistent with this policy. Franchise partner suppliers are managed by our franchise partners and are subject to their separate due diligence process.

All employees involved in the manufacture of goods or provision of services to TRG deserve to be treated with respect and be able to work in a safe environment where they are valued and paid fairly. In this way companies will benefit from more productive and committed employees.

TRG have set out these principles to run alongside all applicable laws. This policy is a minimum standard of ethical supply expected from all suppliers working with us and exceeding any of these principles is welcomed.

The scope of this policy covers all direct suppliers of products and services to TRG and it is expected that these principles are applied throughout the supply chain

The principles defined in the policy are TRG's minimum standards that we require from all suppliers, based on the Ethical Trading Initiative (ETI) base code and the UN Guiding Principles on Business and Human Rights.

2. MODERN SLAVERY ACT

2.1. Please refer to the TRG Modern Slavery Statement for each of our divisions: wagamama, Barburrito (previously TRG Concessions and Barburrito), Brunning & Price, which can be found on the relevant websites.

3. EMPLOYMENT

3.1. There is no forced, bonded, indentured or involuntary prison labour.

2.2. Suppliers are not permitted to charge workers fees to obtain work, or lodge 'deposits' or their identity papers with their employer.

2.3. All workers within the supply chain are free to leave their employer after reasonable notice.

2.4. There are no individuals working in any part of the supply chain who have been trafficked, transported for the purposes of exploitation.

4. RESPECTING FREEDOM OF ASSOCIATION

4.1. Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

4.2. The employer adopts an open attitude towards the activities of trade unions and work organisations.

4.3. Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.

4.4. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

5. WORKING CONDITIONS

5.1. A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry, any specific hazards and legal requirements in line with internationally recognised certification and standards.

5.2. Suppliers must minimise the causes of hazards inherent in the working environment and take adequate steps to prevent accidents and injury to employee health associated with work or occurring during the course of work.

5.3. Employees shall receive regular and recorded health and safety training which is repeated for any reassigned or new workers.

5.4. Suppliers must provide clean toilet facilities, potable water, and sanitary food storage for all employees.

5.5. If accommodation is provided it must be clean, safe, and meet the basic needs of workers.

5.6. Responsibility for health and safety must be assigned to a senior management representative within the company.

6. CHILD LABOUR

6.1. Child labour is not permitted in our supply chains. A child is any person under the age of 15 (or 14 in ILO exempt countries).

6.2. Formal documentation that verifies the age of each worker must be held by the supplier.

6.3. Employees under the age of 18 shall not be employed at night or in hazardous conditions.

7. WAGES AND BENEFITS

7.1. Wages and benefits paid for standard working hours must meet the national legal standards, or industry benchmark standards if higher and should always be enough to meet basic needs and provide further discretionary income.

7.2. Suppliers must provide written and understandable information to employees about their wages before they enter employment. They must also provide employees with wage slips each time they are paid including the particulars of their wages for the pay period concerned.

7.3. Suppliers must not deduct wages as a disciplinary measure and they shall not make deductions from employees' wages not provided for by national law without the expressed permission of the worker concerned.

7.4. Workers should receive payment directly from the supplier in the form of cash, cheque or a nominated bank account transfer.

8. HOURS OF WORK

8.1. Working hours must comply as a minimum to national laws.

8.2. Total working hours, not including overtime, shall not exceed 48 hours per week.

8.3. Overtime should be voluntary and not more than 12 hours per week on average. It should not be used to replace regular employment and must always be compensated at a premium rate. Workers can refuse to work overtime without any disciplinary action.

8.4. The total hours worked in any 7-day period shall not exceed 60 hours, except where it's allowed by national law, it's a collective agreement, appropriate safeguards are in place and the supplier can demonstrate exceptional circumstances apply e.g. production peaks.

8.5. Employees are permitted at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

9. DISCRIMINATION

9.1. Suppliers must not discriminate when hiring, providing compensation or access to training. Promotion, termination or retirement must not be based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

10. REGULAR EMPLOYMENT

10.1. Work performed must be on the basis of a recognised employment relationship established through national law and practice.

10.2. Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

11. HARSH OR IMHUMANE TREATMENT

11.1. Physical and verbal abuse, the threat of physical abuse, sexual harassment or other forms of intimidation are prohibited.

11.2. When disciplinary actions are carried out they must be fair, compliant with local laws, and proportionate to the act. Disciplinary actions must be recorded.

11.3. There must be a whistle-blowing policy in place for employees.

12. ACCOMODATION

12.1. Where provided all accommodation must comply with local laws regarding health, sanitation, electrical, mechanical, fire and structural safety.

12.2. Any charges made for food or rent must be reasonable and in line with local cost and wages.

12.3. Employees must be allowed to enter and leave freely during their free time, with restrictions only imposed for safety reasons.

12.4. The accommodation must:

12.4.1. Have been designed for human habitation

12.4.2. Have adequate lighting

12.4.3. Have access to potable water

12.4.4. Have hygienic and well-maintained toilet and showering facilities, separated by gender

12.4.5. Have adequate lockable storage space

12.4.6. Have adequate recreational facilities

12.4.7. Have individual sleeping beds or mats for each employee

12.4.8. Have separate sleeping areas for each gender

12.4.9. Have appropriate space and sleeping arrangements for legally married couples

12.4.10. Have an evacuation plan prominently displayed

12.4.11. Be away from the factory or areas of production

13. ENVIRONMENT

13.1. An environmental risk assessment must be conducted of the production site or facility.

13.2. Suppliers must have environmental policies and management systems in place to ensure compliance with local and national legal requirements. These must show plans for continuous improvement.

14. CORPORATE PRACTICE

14.1. Suppliers must comply with the UK Bribery Act and any equivalent and applicable legislation. Any breaches of this must be reported to TRG

14.2. Fraud, bribery, corruption, improper payments or gifts, money laundering, insider trading are not tolerated in the supply chain

15. IMPLEMENTATION AND ONGOING COMMITMENT

TRG are committed to working collaboratively with our suppliers to achieve high ethical, environmental and social standards of supply as laid out in the above principles.

We have the right to cease trading with any suppliers who do not follow these principles, or who do not show willing to achieve them. We will however consider the full impact of cessation of trading with these suppliers on their employees and the community.

Within our own business we will:

- Where appropriate, use SEDEX, or equivalent, to manage our suppliers' ethical and responsible business practices
- Make relevant employees aware of the Ethical Sourcing Policy
- Provide relevant training to employees tasked with implementing this policy, as required.
- Protect confidential information of suppliers
- Comply with UK Bribery Act and any equivalent and applicable legislation
- Record and monitor supplier level of compliance to the policy
- Review our policy annually as a minimum

With our suppliers we will:

- Work to mutually agreed terms
- Make payments for services and products in full and on time
- Recognise other responsible sourcing standards where applicable
- Communicate our policy and obtain written acceptance of the intention to implement within suppliers' business

As a supplier to TRG you are expected to:

- Create a management system to deliver policy compliance within your operation and supply chain, maintaining records to show compliance. This may include policies, training records and verification systems. Senior management should be given responsibility to lead this.

- If requested, sign up and maintain certification to SEDEX or equivalent accreditation as agreed with TRG
- Comply with all applicable laws in countries in which you operate including ILO conventions, UN Guiding Principles on Business and Human Rights and the UK Bribery Act. If standards offer conflicting information, apply the standard which offers the greater degree of protection to workers
- Report any serious breaches of this policy to TRG

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