



MODERN SLAVERY STATEMENT OCT 2016

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Greene King plc and other relevant group companies to prevent modern slavery and human trafficking in its business and supply chains.

Introduction

Slavery and human trafficking are abuses of a person's freedoms and rights. They are however a growing issue across the world, in every region and every economy. We recognise that we have a responsibility to prevent modern slavery and human trafficking both within our business and our supply chain. We are committed to making a positive contribution to society by developing and implementing business practices that allow us to deliver financial success whilst conducting our business strategy and operations in a responsible manner.

Our business

Greene King was founded in 1799 and is headquartered in Bury St. Edmunds, Suffolk. We currently employ around 44,000 people across our main trading businesses; Pub Company, Pub Partners and Brewing & Brands, all of which operate within the UK.

At our most recent financial year end in May 2016, we operated 3,035 pubs, restaurants and hotels across England, Wales and Scotland, of which 1,823 were retail pubs, restaurants and hotels, and 1,212 were tenanted, leased and franchised pubs. Our leading retail brands and formats include Hungry Horse, Farmhouse Inns, Chef & Brewer, Flaming Grill and the Greene King Local Pubs estate.

We also brew quality ale brands from our Bury St. Edmunds and Dunbar breweries, and we are the UK's leading cask ale brewer and premium ale brewer. Our industry leading portfolio includes Greene King IPA, Old Speckled Hen, Abbot Ale and Belhaven Best.

Our policies

We have adopted a code of conduct which sets out a number of principles with which we comply and that we expect our suppliers to comply with. These include statements that all employees shall be free to choose their employment and shall not be forced to work against their will, and that there shall be no forced, bonded or involuntary prison labour or human trafficking.

For our employees, failure to comply with the provisions of the Code may result in disciplinary action which could result in their immediate suspension or the termination of their employment.

We also operate a whistle blowing policy, aimed at our employees, which encourages staff to report any wrongdoing, including human rights violations such as modern slavery or human trafficking. Any reports of this nature will be fully investigated and appropriate remedial actions taken.

In relation to our suppliers, we believe that transparency is vital to a successful business relationship. We are committed to building long-term relationships with suppliers and value open and honest communication with them. In the event of non-compliance with our Code of conduct, we expect our suppliers to be committed and engaged in remedying the issue within a time-frame set out in a corrective action plan to be agreed with the supplier. We reserve the right to terminate any agreements should a supplier decide that compliance with the Code is impossible or where a supplier shows repeated disregard for the provisions of the Code.

Our supply chain

Our supply chain includes over 5,000 suppliers covering food and drink suppliers for our pubs, raw materials for our beers, as well as goods and services not for resale such as equipment used in our pubs, point of sale materials, IT equipment, utilities and waste services, contractors building, repairing or cleaning our pubs, marketing, advertising, recruitment and training.

Our suppliers vary enormously in terms of their size and expertise and many of those will themselves be reliant on their own supply chain, potentially across many countries, in order to be able to supply relevant goods or services to

Current and proposed due diligence processes for modern slavery and human trafficking

We have started work on establishing a range of due diligence processes to enable us to identify and assess potential risk areas in our business and our supply chain.

By running many of our pubs as managed houses we have optimum control of the work environment, including labour scheduling and pay rates, thus reducing the risks within our own business. Nevertheless, training will be developed and delivered to appropriate individuals across the business to ensure that they are aware of the issues and able to assess the risks in their area of responsibility.

We expect all major suppliers to have suitable anti-slavery and human trafficking policies and processes in place. Significant suppliers and those in businesses perceived to be most at risk have been asked to confirm their compliance with our code of conduct or to confirm that they have their own equivalent arrangements. This will be rolled out to our other smaller suppliers over time. As set out above, we reserve the right to terminate any agreement should a supplier decide that compliance is impossible or where a supplier shows repeated disregard for our code's provisions.

We also propose to update our supplier terms and conditions to require compliance with the Modern Slavery Act and to permit periodic and targeted audits of suppliers in this regard using a risk-based approach.

Our effectiveness in combating slavery and human trafficking

We understand that the risks of modern slavery and human trafficking are growing, and we will continue our approach to mitigating this risk in the year ahead.

This statement was approved by the board of Greene King plc and covers the following subsidiary entities:

Greene King Brewing and Retailing Limited

Greene King Retailing Limited

Greene King Pubs Limited

K.Holdings No. 1 Limited

Greene King Retail Services Limited

Greene King Services Limited

Greene King Investments Limited

Greene King Retailing Parent Limited

Premium Dining Restaurants and Pubs Limited

Spirit Financial Holdings Limited

Spirit Group Equity Limited

Spirit Group Holdings Limited

Spirit Group Parent Limited

Spirit Intermediate Holdings Limited Spirit Managed Holdings Limited Spirit Parent Limited Spirit Pub Company Limited Spirit Pub Company (Holdco) Limited Spirit Pub Company (Leased) Limited Spirit Pub Company (Managed) Limited Spirit Pub Company (SGE) Limited Spirit Pub Company (Services) Limited Spirit Pub Company (Supply) Limited Spirit Pub Company (Trent) Limited Spirit Pubs Debenture Holdings Limited Spirit Pubs Parent Limited Rooney Anand Chief executive officer October 2016 **PUBS, RESTAURANTS & HOTELS OUR BEERS WORK WITH US OUR COMPANY INVESTOR CENTRE NEWSROOM ENJOY RESPONSIBLY CONTACT US CUSTOMER FEEDBACK** SEARCH **USE OF COOKIES ACCESSIBILITY MODERN SLAVERY STATEMENT GREAT BRITISH SUMMER SOCIAL**



Greene King plc Westgate Brewery Bury St Edmunds Suffolk IP33 IQT







TIME WELL SPENT

Greene King is the country's leading pub retailer and brewer, running over 2,900 pubs, restaurants and hotels in towns, villages and citycentre high streets across England, Wales and Scotland. With a rich heritage of over 200 years, we brew award-winning beers and operate managed, tenanted, leased and franchised pubs from our headquarters in Bury St. Edmunds.