

## Responsible Sourcing – Modern Slavery Policy

### Overview

Here at Greggs, it is our duty to stand for more than just profit. We've always been committed to doing the right thing and having a positive impact on people's lives and in 2021, we launched The Greggs Pledge which is all about how we can do more to help people, protect the planet, and work together with our partners to change the world for the better.

We believe we have a responsibility to ensure that our business makes a positive contribution to those affected by our activities and that we take proactive steps to address circumstances where this is not the case.

Our values, commit us to being enthusiastic, open, honest and treating people with consideration and respect and we live these through all of our people and operations.

It is one of our core values that all of our employees deserve the right to live and work with dignity and respect and we believe this ethos should equally apply to the employees of our suppliers, business partners and wider supply chain. We recognise that it is our responsibility to encourage this kind of working environment and that we should take steps to ensure that sound social and ethical practices are upheld, not only within our own operations, but also within our supply chain and by our business partners.

### Scope

**Slavery** means the status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised. This includes practices such as forced labour, debt bondage, the sale or exploitation of children and descent-based slavery.

**Forced labour** means all work or service which is exacted from any person under the menace of any penalty for which that person has not offered themselves voluntarily. A penalty could be a physical constraint or it could take the form of other abuse such as threats of deportation, passport confiscation or wage non-payment that binds a worker to the employer.

**Human trafficking** involves the movement of a person, either across international borders or within the boundaries of a single country, by means of threat, deception or abuse of vulnerability, for the purpose of exploitation.

### Key Principles

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Greggs does not tolerate any form of slavery, forced labour or human trafficking, whether directly within our own business or within the operations and activities of our suppliers, business partners and wider supply chain, whether within the UK or Overseas.

We are committed to ensuring that slavery, forced labour and human trafficking does not take place within our supply chain or other parts of our business.

We will verify, evaluate and assess the risk of slavery, forced labour and human trafficking occurring within our supply chain and we expect our suppliers and business partners to co-operate and collaborate with us to achieve this. We also expect our suppliers and business partners to take their own proactive steps to eliminate these abuses within their own supply chains.

Where we have suspicions that any supplier or business partner is engaging or implicated in any incident of slavery, forced labour or human trafficking, we will undertake investigations and take appropriate action. This may take the form of providing our support to ensure improvements are made, making reports to the relevant legal authorities and if necessary, terminating our business relationships where issues are not resolved to our satisfaction.

We will encourage all of our employees, suppliers, business partners, competitors, customers, the general public and other interested parties to raise any genuine concerns or suspicions that they may have about our procurement practices, in complete confidence.

Whilst we appreciate that this process will be a long term and on-going project which will take time to complete in collaboration with a number of stakeholders, we undertake to always be open, honest and transparent as to the findings of our supplier audits and investigations and we urge our commercial contacts to do the same without fear of business interruption subject to appropriate remedial action being implemented.

### **Governance**

These principles are included within all of our relevant internal processes.

We will review the principles and adherence to them on an annual basis.



**Signatory**

<b>Name:</b>	Malcolm Copland
<b>Title:</b>	Commercial Director
<b>Date:</b>	21.02.2022

<b>Name:</b>	Jonathan Jowett
<b>Title:</b>	Company Secretary
<b>Date:</b>	21.02.2022

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## Appendix – Implementation

- appoint an appropriate member of our Operational Board to take ultimate responsibility for ensuring the implementation of this policy;
- require all of our suppliers to provide an annual self-certification confirming that they are not aware of any incidents of slavery, forced labour or human trafficking occurring within their business and own supply chain;
- encourage all of our suppliers, where possible, to become members of the Supplier Ethical Data Exchange (SEDEX);
- undertake regular reviews of our supply chain and allocate risk profiles to each of our suppliers based on the information available to us;
- where appropriate, undertake scheduled supplier site audits in order to validate suppliers' self-certification and anti-slavery prevention practices;
- where suppliers fall short of our expectations, require a remediation plan be prepared, implemented and reviewed to address any shortcomings highlighted;
- provide relevant employees with training to recognise the any signs of slavery, forced labour or human trafficking within our supply chain and encourage practices to mitigate the risk of this occurring;
- put in place whistleblowing facilities to enable employees, suppliers, business partners, competitors, customers the general public and other interested parties to raise genuine concerns in confidence;
- publish the results of any audits and investigations undertaken as part of our annual Anti- Slavery and Human Trafficking Statement.