

## **Wingstop Uk Modern Slavery Statement for the Financial Year Ending 31st December 2024**

This Modern Slavery Statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and sets out the steps Wingstop UK has taken to ensure that slavery and human trafficking are not taking place in our business or supply chains.

### **1. Introduction**

Wingstop UK is committed to acting ethically and with integrity in all our business dealings. We have a zero-tolerance approach to modern slavery and are dedicated to ensuring transparency in our practices and in combating slavery and human trafficking in any form.

### **2. Our Business**

Wingstop UK is a chicken wings and fries restaurant operation with over 55 stores based in the UK with continued expansion plans. We employ circa 2500 employees and operate in England, Scotland and Wales.

Our Head office is based in Central London with a regional location opening in Manchester in January 2025.

### **3. Standards**

We operate within the following policies and principles that describe our approach to the identification of modern slavery risks and the steps taken to prevent slavery and human trafficking in our operations:

#### **Employees**

We promote the respect for workers' rights and compliance with labour standards by adopting sustainable, responsible and inclusive workplace practices. We are committed to not using any form of forced or compulsory or child labour, discrimination in respect of employment and occupation.

We have implemented the following policies to prevent modern slavery and human trafficking:

- **Modern Slavery Policy:** Sets out our expectations for employees, suppliers, and contractors.
- **Code of Conduct:** Guides ethical behaviour throughout our organisation.
- **Whistleblowing Policy:** Encourages employees and other stakeholders to report concerns about modern slavery or unethical practices without fear of retaliation.

#### **Our Suppliers**

Our supply chain is global, sourcing a wide range of raw materials from various regions around the world. We take a proactive approach to ensure that modern slavery, forced labour, and discrimination have no place at any level of our supply chain. To achieve this, we work closely with all our suppliers, reinforcing our zero-tolerance stance towards exploitation and unethical labour practices.

All our food suppliers are BRC accredited and undergo annual audits against the BRC framework. This ensures they meet rigorous requirements for food safety, quality, and ethical sourcing practices. By working with BRC accredited suppliers, we gain full traceability of our supply chain, allowing us to track the movement of products and ingredients from source to final delivery. This level of transparency enables us to identify potential risks, such as modern slavery or unethical labour practices, at any stage of the supply chain and take immediate corrective action if necessary.

Through these measures, we strive to maintain a transparent, accountable, and responsible supply chain that reflects our unwavering commitment to eradicating modern slavery and promoting fair labour practices across all levels of our operations.

As a result, we require our suppliers to meet, respect and promote human rights and labour standards (including employee health and safety), and in particular:

- to respect and support human rights as set out in the United Nations Supplier Code of Conduct;
- to adhere to the minimum age limited defined by laws;
- to comply with relevant International Labour Organisation (ILO) standards;
- to support and promote equal opportunities in the workplace;
- to work to eliminate any form of illegal discrimination in their workplace;
- to uphold international standards and national labour law work to continually improve their workplace and employment standards;
- not to use child labour;
- to treat all employees with dignity and respect;
- to have a proactive employee health and safety program;
- to comply with all applicable wage and hour laws and regulations;
- to not discriminate in hiring and employment practices on the basis of race, religion, age, nationality, social or ethnic origin, gender, sexual orientation, political opinion or disability; and
- to adopt a zero-tolerance position in relation to modern slavery.

#### **4. Due Diligence Processes**

We have established robust due diligence processes to identify and mitigate risks related to modern slavery:

- Risk assessments of suppliers and contractors.
- Pre-screening and ongoing audits of high-risk suppliers.
- Contractual clauses requiring compliance with modern slavery laws.

#### **5. Risk Assessment and Management**

We conduct periodic risk assessments to:

- Identify potential hotspots for modern slavery within our supply chains.
- Evaluate the effectiveness of our policies and interventions.

## **6. Training and Awareness**

We provide regular training to employees, suppliers, and partners to ensure they understand:

- The signs of modern slavery and human trafficking.
- Reporting mechanisms and their roles in preventing exploitation.

## **7. Measuring Effectiveness**

We evaluate the effectiveness of our actions by:

Monitoring the number of supplier audits completed.

Tracking reports of suspected modern slavery and their resolutions.

Reviewing feedback from stakeholders on the adequacy of our measures.

### **9. Future Commitments**

We are committed to continuous improvement and will:

Strengthen our supplier monitoring processes.

Collaborate with industry partners and initiatives to address systemic risks.

Enhance training programs to cover emerging threats and trends.

## **8. Approval**

This statement was approved by the Board of Directors on 23.12.24 and signed on behalf of Wingstop Uk / Lemon Pepper Holdings by:

A handwritten signature in black ink, appearing to be a stylized 'W' or 'L' with a large loop, written on a light background.