



MODERN SLAVERY STATEMENT

FINANCIAL YEAR ENDING 2 JANUARY 2021

Purpose

This statement has been published in accordance with section 54 of the Modern Slavery Act 2015. It provides an update on the steps that Greggs plc ("Greggs") has taken during its financial year ending on 2 January 2021 to further our commitment to prevent modern slavery and human trafficking within its business operations and supply chains. It also outlines Greggs' ongoing pledge to mitigate the risk of modern slavery in its supply chain over the coming years, although we still expect a degree of disruption to progress in 2021 as we recover from the Covid-19 pandemic which closed our shops, supply sites and furloughed most of our people for a significant part of 2020.

Our Commitment

We do 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 build our business on the basis of seven core values; enthusiastic, supportive, open and honest, appreciative, fairness, consideration and respect. These core values shape everything that we do as a business and how we interact with our stakeholders.

As such, we are committed to taking steps to ensure that slavery, forced labour and human trafficking does not take place within our business operations or our supply chain.

Our Structure, Business and Supply Chains

The structure of our business has not changed since the previous financial year. We are one of the leading food-on-the-go retailers and brands in the UK, selling a range of traditional bakery products, sandwiches, hot drinks, sweet treats and other food-on-the-go products. We stand for great tasting, freshly prepared food that our customers can trust, at affordable prices.

We own and operate a vertically integrated supply chain, responsible for the sourcing, production and distribution of our products up to the point of sale in our shops. We trade from a growing estate of retail outlets which, at the end of 2020, totalled 2,078 shops; 1,750 of which are directly operated by us) located throughout the UK. Our retail outlets are supported by a network of regional production facilities and distribution centres, a fleet of our own delivery vehicles and a directly employed workforce of approximately 21,500 people; serving millions of customers each week.

The Greggs brand is also represented by a number of franchise partners, operating from 328 retail outlets across the UK and under a frozen food wholesale arrangement with Iceland Food Limited.

For the financial year ending 2 January 2021, we announced an annual turnover of £811.3 million and a pre-tax loss of £13.7 million.



Our Policies and Procedures

We first implemented our Anti-Slavery and Human Trafficking Policy in 2017, shortly before the publication of our first modern slavery statement. We are committed to continually reviewing our approach to preventing Modern Slavery by ensuring we engage with relevant third parties who can share their expertise in how to develop robust processes, enabling us to refine our policy as modern slavery issues and practices develop.

In addition to refining our Anti-Slavery and Human Trafficking Policy and our Modern Slavery Policy, we have a number of minimum standards both for our colleagues working in the Procurement of goods and services, and for our suppliers in relation to their own due diligence procedures and the steps that they must take to eliminate modern slavery within their business operations.

- Procurement Code of Conduct; all Procurement colleagues have completed an online learning module on the Code of Conduct and this will be repeated annually to ensure this is embedded. This is also published on our website.
- Supplier Code of Conduct (contained within our Responsible Sourcing Policy).

We also have a number of general policies and procedures throughout the different areas of our business that support our Anti-Slavery and Human Trafficking Policy, including the following:

- Recruitment Policy;
- Equal Opportunities and Dignity at Work Policy;
- Whistleblowing Policy;
- Anti-bribery and Corruption Policy;
- Business Conduct Policy; and
- Employee Handbook.

We have set up a modern slavery reporting mechanism, whereby our employees, suppliers, business partners, customers and other interested parties are able to raise any genuine concerns or suspicions that they may have about our procurement, recruitment or working practices, in complete confidence. We intend to publicise this mechanism fully during the year.

Our Workforce

All of the people working within our company operated shops and central office support functions are directly employed by Greggs plc. Occasionally, for special projects, we contract work from consultants or short-term contractors.

Our supply chain workforce, (including those working within our production, distribution and logistics teams) is mostly made up of colleagues directly employed by Greggs plc, although a small number, around 10%, come from third party agencies.

We recognise and work with the Bakers, Food and Allied Workers Union (BAFW), the Union of Shop, Distributive and Allied Workers (USDAW) and the United Road Transport Union (URTU), who represent our employees working in our retail outlets, production and distribution centres and our logistics teams.



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Given the nature of our vertically integrated supply chain, which includes nine production and distribution facilities, we have identified that this area of our business represents a potential risk of modern slavery occurring, because:

- it involves labour for volume food production;
- a proportion of this workforce is comprised of migrant workers; and
- a proportion of this workforce is comprised of temporary agency works.

Across our supply chain sites, we work with a number of agencies supplying temporary workers, whether for delivery driver roles or as bakery operatives. These agency workers support our core directly employed workforce during seasonal periods of peak production or to cover short term labour shortages. The agencies that we work with are all reputable national or international organisations and we rely on them undertake adequate checks to ensure that the labour provided does not pose a risk of modern slavery.

To put in place additional safeguards, we continue to design an awareness training programme which will be delivered via our “G-Learning” internal development portal. We intend to roll out this training to the management teams at each of our production and distribution facilities. This training is intended to help our site production managers and supply chain people managers, who interact with our production workforce on a daily basis, to:

- identify some of the basic physical signs of modern slavery;
- assess whether these signs give rise to a suspicion of any of our agency workforce being exposed to a risk of modern slavery; and
- deal with any suspicions in an appropriate way, whether by reporting this internally or via the relevant authorities, such as the Modern Slavery Helpline or the local police force.

Procurement and Supply Chain

Our Procurement team is split into areas of spend and our purchasing managers are responsible for sourcing aspects of supply within their category, in addition to ensuring the performance of suppliers is of a satisfactory standard.

We procure our raw ingredients, finished products, equipment and other goods not for re-sale and services from third party suppliers. Parts of our logistics and manufacturing operations are outsourced to third parties and we also outsource some routine services, such as contract cleaning and private refuse collection.

As at 2 January 2021 of the 1,823 approved businesses listed in our procurement system and holding an active trading relationship status, approximately 1,498 have fully completed the previous version of our ‘Modern Slavery’ questions within our Supplier Registration Questionnaire. This represents a 82% completion rate as against a 75% completion rate reported in our 2019 statement.

We analysed the responses to our ‘Modern Slavery’ questions for the 1,498 approved businesses that we are actively trading with, which showed the following responses (please refer to **Appendix 1** which details these specific questions):



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Yes to Question	Q7.3	Q7.4	Q7.5	Q7.6	Q7.8	Q7.9	Q7.10	Q7.11
No. Suppliers	664	220	136	115	1483	1490	1456	1488

All suppliers that answered “Yes” to Q7.3 were asked to place themselves into various sub-categories, depending on the product or service that they supply or the industry that they operate in. Although there are some limitations with this approach (suppliers may have differing interpretations as to which sub-category they fall within), the following types of suppliers were identified as falling within the industries regarded as representing an increased risk of modern slavery occurring:

- Food and beverage;
- Farming and fishing;
- Apparel;
- Industrial cleaning services;
- Building and construction;
- Industrial production and manufacturing services;
- Transportation and storage services; and
- Management and business professionals and administrative services (this category includes temporary worker agencies).

Given the nature of our business, operating within the food industry, the above list of supplier types is not unexpected.

From July 2020, all new suppliers and all existing suppliers that update their responses to our registration questionnaire (regardless of the industry operated in or of the country of origin) will be asked two additional questions:

- does your company have a Modern Slavery Policy; and
- please provide us with the web link to where we are able to view your Modern Slavery Policy.

All suppliers who have not agreed to the statements provided relating to employment checks, audits and preventing modern slavery are contacted as to the reasons for their refusal to respond and informed that we will collaborate with them to help them to address areas for development.

Two of the obvious commodities we still regard as representing a higher risk on the basis of the use of an agricultural workforce and the locations that they are sourced from are coffee and tea.

Coffee

We source coffee from Columbia, the “Central Basket” (which includes Peru, Honduras and Guatemala) and Vietnam via an intermediary trader, who is required to adhere to the “Fairtrade Trader Standard”. Coffee traders are required to be aware of the applicable labour laws in the countries they trade in and of the fundamental International Labour Organisation (ILO) conventions. Relevant ILO conventions related to modern slavery covered by Fairtrade include: Forced Labour



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Convention, 1930 (No. 29); Abolition of Forced Labour Convention, 1957 (No. 105); Minimum Age Convention, 1973 (No. 138) and Worst Forms of Child Labour Convention, 1999 (No. 182).

By working in partnership with Fairtrade, our intermediate supplier is aware that coffee communities continue to be marginalised and be made up of vulnerable people, living in poverty and having a low income. These are all factors that are known to increase the risk of forced or child labour. According to labour rights organisation Verite, there is a risk that coffee is produced with child labour in Columbia and Vietnam. The Responsible Sourcing Tool¹ shows that in Peru, workers in agricultural sector are at risk of being exploited in forced labour.

Due to this risk of forced or child labour in the coffee supply chain in the countries we source from, our supplier is working in partnership with Fairtrade to mitigate the risks of violations against ILO conventions 1930, 1957, 1973 and 1999 related to forced and child labour.

For example, compliance with Fairtrade standards (and through the Fairtrade Small Producer Standard and Trader Standard relevant ILO conventions) is monitored closely by FLOCert, an independent company accredited for Fairtrade certification by the International Organization for Standardization (ISO). Coffee producer groups are supported on the ground by Fairtrade Producer Networks in addressing any issues arising in real time, with mechanisms in place to investigate and act on allegations of breaches. Any alleged breaches can be safely reported to Fairtrade or to FLOCert, who can then take appropriate action.

In addition, by working in partnership with Fairtrade, our supplier is seeking to address the underlying issues which can be drivers of human rights abuses. Coffee farmers receive at least a Fairtrade minimum price, which aims to cover the average costs of sustainable production, or the market price, whichever is higher. In addition, producers receive a Fairtrade premium, which they can invest in their own development, according to their needs. Both the minimum price and premium help to alleviate poverty and increase the incomes of coffee farmers and their families, which in turn helps to reduce the risks of forced and child labour occurring in these communities.

Tea

Following a re-tender of our supply of tea in 2017, during which our tender process involved a detailed list of questions (in addition to our basic pre-qualification questionnaire), our supplier has been able to demonstrate the following policies and procedures:

- it has in place a "Stronger Together" initiative, which includes its own internal policies on preventing hidden labour exploitation, training of staff, awareness posters and undertaking third party agency audits. It also insists that the agencies it uses sign up to its "Stronger Together" Recruiter Compliance Principles;
- it has contacted other parties in its supply chain to make them aware of the requirement to ensure compliance with its own Ethical Trading initiative;

¹ The Responsible Sourcing Tool is the result of the collaboration of four institutions committed to fighting human trafficking: The State Department's Office to Monitor and Combat Trafficking in Persons, Verite, Made in a Free World and the Aspen Institute.



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- it works with external organisations, including Fairtrade (as required by Greggs);
- in respect of its agency recruiters, it undertakes audits every six months and regularly carry out unannounced worker interviews;
- Bureau de Veritas (SEDEX – SMETA 2 Pillar) and SAI Global undertake unannounced audits of its site operations every year. The tea it purchases is required to be 100% Fairtrade, so all suppliers are audited by FLOcert regularly. It ensures any tea purchased is Fairtrade certified by regularly monitoring certification status; and
- SMETA Ethical audits of its UK site are completed by Bureau de Veritas on an unannounced yearly basis. In turn, its own tea suppliers are audited by FLOCert on a yearly basis.

Developing Our Approach to Supplier Due Diligence

Building on our experience, in December 2020 we upgraded our Supplier Portal, making improvements to our Supplier Registration process and Supplier Due Diligence Questionnaires in order to help us better understand the risks in our supply chain.

Moving away from the 11 Anti-Slavery and Human Trafficking questions previously included in our registration questionnaire (that every supplier must answer), we have re-structured the questionnaire; with all suppliers required to provide information as to what they are doing to help identify and prevent Modern Slavery within their Supply Chain. By selecting the industries they operate within from a dropdown menu, the supplier is asked further relevant questions, which will assist us in identifying whether products themselves (or their components), ingredients or commodities come from a list of pre-defined high-risk countries (as set by the Global Slavery Index). We have also introduced an additional question requesting that the supplier directs us to a copy of their latest modern slavery statement.

Over the course of 2021, all existing suppliers and all new suppliers to Greggs will be required to complete these new questionnaires and this information will be required to be kept up to date annually (as a minimum). The information provided by suppliers will allow our colleagues to perform a risk assessment based on numerous factors, including potential Modern Slavery risks, and will be used to support the management of our suppliers.

We will also be formalising our Supplier Management Framework which will set out how we segment and manage our wide range of suppliers and the risk. One of the inputs required to segment suppliers will be the risk of Modern Slavery occurring with the supply chain each category of Supplier having a different management approach depending on the risks identified.

This categorisation will assist us in prioritising the engagement and monitoring of higher risk suppliers and allow us to allocate our resource effectively.

As part of our Supplier Registration process, we also ask all suppliers if they are members of SEDEX and willing to share data they have input to SEDEX by partnering with Greggs within the SEDEX portal. This partnership is initiated by Greggs and enables us access to any Ethical data within the portal should we require further information on our Suppliers.

Buying Fairtrade



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Having worked with Fairtrade for over 15 years, Greggs are strongly committed to the partnership. We have continued to increase our Fairtrade commitments over time, which now include; coffee beans, apple juice, orange juice, sugar sticks, sugar syrup, hot chocolate, black tea, mint tea, green tea and bananas. We have recently converted our chocolate couverture to Fairtrade and by the end of 2021 we aim for all our direct chocolate purchasing to become Fairtrade. Our exploration of additional conversion opportunities is ongoing.

At Greggs, we believe that our collaboration with Fairtrade supports the delivery of our pledge to mitigate the risk of modern slavery in our supply chain. Key benefits of working with Fairtrade include:

Fairtrade standards

The Fairtrade Standards combine a range of economic, environmental and social criteria that are designed to support farming communities to strengthen their economic position and address imbalances of power in conventional trade. Fairtrade's main focus is to reduce economic precarity at the farm level, but it also has interventions to mitigate unfair trading practices, abuse of labour, and environmental damages throughout supply chains.

Credible assurance

Fairtrade operates with a single certifier model. Fairtrade's independent certification body, FLOCERT, follows rigorous practices in verifying whether a producer or supply chain actor fulfils the Fairtrade Standards. This ensures a clear focus on credibility and quality of both virtual and in person data collection and audits.

Tailored risk analysis

Fairtrade provides analysis on specific commodities, countries and supply chains that empowers each supply chain member as well as its commercial partners to decide on the appropriate activities to enable them to act ahead of regulation that may impact them.

Producer Networks (in Asia, Africa and Latin America)

Through Fairtrade Producer Networks, who hold 50% of voting rights at Fairtrade, Fairtrade is present in Africa, Asia and Latin America and engages closely with farmers, workers and relevant stakeholders. The producer networks support the set-up of new farmer organisations. They work with farmer organisations to develop the premium development plans (see below). Furthermore, the producer networks provide training and implementation of programmes. Having the producer networks enables Fairtrade to manage risks in real-time, which helps to drive impact and secure supply.

Fairtrade minimum price and premium payments

The respect of human rights is inherent to the work of Fairtrade, as it changes the way trade works through better prices, decent working conditions and a fairer deal for farmers and workers around the globe.

Fairtrade is unique in that it sets a minimum price for each commodity, which producers are paid when selling their products through Fairtrade. This minimum price aims to cover the average costs of



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sustainably producing a crop and acts as a safety net when market prices drop. In addition, producers receive a Fairtrade Premium, which they invest in their own communities and businesses². In the last 16 years, £5.1 million of Fairtrade Premium was generated across six Fairtrade ingredients and 10 Greggs' products. Both the minimum price and premium help to improve the incomes of coffee farmers and their families, which contributes to a decent standard of living.

The Fairtrade standards promote behaviours that both reduce economic precarity and mitigate unfair trading practices; principles at the core of tackling modern slavery. Our continued partnership with Fairtrade demonstrates our commitment to reducing modern slavery within all of our supply chains.

Educating our Colleagues

In December 2020, all colleagues within the Procurement Team responsible for sourcing products achieved their CIPS Ethics Certificate, enabling Greggs to obtain the CIPS Corporate Ethics accreditation.

This demonstrates our commitment to ethical procurement and sustainable supply chains.

Operating Board Statement

This statement covers the financial year ending on 2 January 2021 and has been approved by the Board of Greggs plc.

Roger Whiteside

Chief Executive

18th June 2021

² To become Fairtrade certified, farmers must join up to form a farmer organisation. The latter develops a premium development plan with the help of the Fairtrade Producer Networks. The plan must get discussed and approved democratically at the co-operatives annual assembly, and it gets checked during audits.



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Appendix 1 – Modern Slavery Supplier Registration Questionnaire – 2020 version

7. Anti-Slavery and Human Trafficking

7.1 Does your company have a Modern Slavery Policy?

7.2 Please provide us with the web link to where we are able to view your Modern Slavery Policy.

7.3 What Country is the Organisation registered in?

7.4 Do you comply with the International Labour Organisation Covenants of the countries you operate in?

Yes - All countries	Yes - Some countries	No
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7.5 Does the Organisation operate within any of the following industries:

Agriculture or Farming	Electronics
Mining and Minerals	Food Processing
Garments or Textiles	Construction
Fishing or Seafood	Logistics

7.6 Does the Organisation operate within any of the following Countries, or, so far as the Organisation is aware, are any goods, products, services or a component part of them, sourced from any of the following Countries:

India	North Korea
China	Russia
Pakistan	Nigeria
Bangladesh	DR of Congo
Uzbekistan	Indonesia

7.7 Does the Organisation operate within any of the following Countries, or, so far as the Organisation is aware, are any goods, products, services or a component part of them, sourced from any of the following Countries:

Egypt	Thailand
Myanmar	Ethiopia
Iran	Iraq
Turkey	Philippines
Sudan	Mexico

7.8 Does the Organisation operate within any of the following Countries, or, so far as the Organisation is aware, are any goods, products, services or a component part of them, sourced from any of the following Countries:

Afghanistan	Syria	Nepal
Tanzania	Cambodia	Ukraine
Colombia	South Africa	Peru



Yemen	Algeria	Morocco
Japan	Uganda	South Korea

7.9 Please identify the relevant goods, products, services or component part that is sourced from the countries listed in the previous questions. Please ensure you reference which country they are sourced from and provide details of the supplier or sub-contractor supplying the relevant goods, products, services or component part.

7.10 Using the options provided please state that:

- (i) The Organisation has made reasonable enquiries and so far as it is aware, neither the Supplier nor any of its directors, officers and employees:
 - a. been convicted of any offence involving slavery, forced labour or human trafficking whether in the United Kingdom or any other jurisdiction;
 - b. been or is the subject of any investigation, inquiry or enforcement proceedings by any governmental, administrative or regulatory body regarding any offence or alleged offence of or in connection with slavery, forced labour and human trafficking, whether in the United Kingdom or any other jurisdiction.

Agree	Disagree
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7.11 Using the options provided please state that the Organisation has implemented appropriate and proportionate due diligence procedures and checks for its own suppliers, sub-contractors and other participants in its supply chain and to the best of its knowledge and belief, is not aware of any incidents of slavery, forced labour or human trafficking taking place in its supply chain in respect of any goods, products, services or component part supplied to Greggs.

Agree	Disagree
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7.12 Using the options provided please state that the Organisation maintains a complete set of records to trace the supply chain for all goods, products, services or component part supplied to Greggs and shall make such records available for inspection by Greggs upon request.

Agree	Disagree
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7.13 Using the options provided please state that the Organisation undertakes to:



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- (i) notify Greggs as soon as it becomes aware of any actual or suspected slavery, forced labour or human trafficking in its supply chain in respect of any goods, products, services or component part supplied to Greggs;

- (ii) fully co-operate with Greggs in respect of any investigation, audit or site inspection arising from any actual or suspected incidents of slavery, forced labour or human trafficking in any supply chains in respect of any goods, products, services or component part supplied to Greggs.

Agree	Disagree
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Appendix 2 – Modern Slavery Supplier Registration Questionnaire – 2021 version

Section 7 is to be completed by all Suppliers, regardless off the type of goods or services they provide to Greggs.

7. Ethical - Modern Slavery

7.1 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. For more information about how we are working to tackle Modern Slavery within Supply Chains, our Modern Slavery Statement and Modern Slavery policy can be accessed via the Greggs Corporate Website.

7.2 Is the company required by section 54 of the Modern Slavery Act to produce an annual statement setting out the steps that have been taken to ensure your company and supply chains are slavery?

7.3 Does the company have a policy on modern slavery and human trafficking (this may form part of your company’s wider CSR policy)?

7.4 Does the company carry out documented risk assessments of its business and supply chain to ensure continuous compliance with relevant statutory requirements?

The following further questions are asked of suppliers providing specific goods or services that are classified as high risk as per the Global Slavery Index.

Coffee	All countries
Tea	All countries
Nuts	Boliva, Peru
Sugarcane	Boliva, Brazil, Dominican Republic, Myanmar, Pakistan
Cattle	Boliva, Brazil, Niger, Paraguay , South Sudan
Rice	India, Mali, Myanmar
Cocoa	Ivory Coast, Nigeria, Ghana
Fish	China , Ghana , Indonesia, Japan , Russia, Korea, Republic of South Korea, Taiwan, Thailand
Electronics	China, Malaysia
Garments	Argentina, Brazil, China, India, Malaysia, Thailand, Vietnam

1.1 Do you currently have a program to assure that human trafficking and slavery do not exist in your operations and supply chain?

1.2 Describe your program to assure that human trafficking and slavery do not exist in your operations and supply chain?



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- 1.3 Do you currently work with a third party to identify the overall risks of slavery and human trafficking in your supply chain? This may include mapping your actual supply chain and looking into what countries you source from and what products or services you buy and the risks related with sourcing from those countries or sourcing a specific product.
- 1.4 Confirm the third party you work with and provide an explanation about how you work with them to identify the overall risks of slavery and human trafficking in your supply chain?
- 1.5 Do you currently conduct independent audits of your operations and suppliers?
- 1.6 Explain including description of audit frequency and selection process, e.g. are audits random or risk based? If risk based, how is high risk identified?
- 1.7 Does your audit programme include auditing personnel recruitment sources, including overseas labour brokers or overseas employment agencies providing imported labour?
- 1.8 Explain how your audit programme includes auditing personnel recruitment sources, including overseas labour brokers or overseas employment agencies providing imported labour.
- 1.9 Are your audits based on company standards for suppliers that include clauses on slavery and human trafficking?
- 1.10 Are any of the audits the company performs unannounced audits?
- 1.11 Have you set out consequences for supplier non-compliance with said standards?
- 1.12 Confirm the consequences supplier non-compliance with said standards?
- 1.13 In the event that non-compliance by your suppliers is discovered, do you have a programme to remediate such infractions?
- 1.14 Explain your programme to remediate infractions identified.
- 1.15 Do you require your direct suppliers to certify that all materials incorporated into your final product were sourced, processed and manufactured in compliance with the human trafficking and slavery laws of the country or countries in which they operate?
- 1.16 Explain how you ensure direct suppliers certify that all materials incorporated into your final product were sourced, processed and manufactured in compliance with the human trafficking and slavery laws of the country or countries in which they operate.
- 1.17 Do you have company standards on human trafficking and slavery for your employees and contractors?



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- 1.18 Provide information on your standards and the relevant sections relating to company standards on human trafficking and slavery for your employees and contractors.
- 1.19 Do you have internal accountability standards and procedures in place to hold your employees and contractors accountable for non-compliance with your standards on slavery and human trafficking?
- 1.20 Have you established consequences for non-compliance of employees and contractors with said standards?
- 1.21 Explain your process in managing employees' and contractors' non-compliance and what consequences are imposed.
- 1.22 Have your management employees, particularly those in charge of supply chain management, been trained to understand what slavery and human trafficking are and how to mitigate the risk of them in their respective supply chains?
- 1.23 Provide details of the training provided to management employees, particularly those in charge of supply chain management, to understand what slavery and human trafficking are and how to mitigate the risk of them in their respective supply chains.