

Five Guys Modern Slavery Statement – Financial Year Ending 31st December 2018

Introduction

This statement sets out Five Guys JV Limited's (company number 08185191) actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business or our supply chains.

As part of the Hospitality sector, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

We are absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of Five Guys JV:

- Five Guys JV is a Burgers & Fries restaurant operation with over 90 stores based in the UK with continued expansion plans. Our Head Office is based in West London. Five Guys JV's owns all its stores in the UK and does not franchise any stores in the UK.
- Five Guys JV has a pool of approximately 60 food and non-food approved suppliers (including distributors) through whom all purchases are made.

We currently operate in the following countries:

- UK, France, Spain & Germany

We have reviewed our internal practices and supply chain provider's practices in regard to risks of potential exposure to modern slavery. Five Guys JV is fully committed to promoting ethical supply chain business practices for all products and services provided to Five Guys JV by approved suppliers and vendors.

We have long standing relationships with our suppliers and most of them will be either BRC approved, GFSI approved or visited by Five Guys JV representatives, and this is tracked via FoodLogIQ. We don't audit suppliers individually as BRC/GFSI accreditation is sufficient. The Supply Chain Team do visit our supplier's production facilities but there isn't a formalised process for this. This means that they are audited regularly by external auditors to keep this approval and within this audit will be a review of the environment to ensure that it is safe, ultimately leading to the welfare of the staff.

We expect our suppliers to adhere to anti-slavery and human trafficking policies and procedures and expect them to have sufficient due diligence to ensure that they do not breach these policies and procedures.

All of our suppliers have signed the Five Guys JV Supplier Code of Conduct and this is tracked on FoodlogiQ, which is a global platform which we use to manage our suppliers.

Relevant policies

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

- **Dignity At Work** – Our Dignity At Work Policy makes clear to employees the actions and behaviour expected of them when representing the Five Guys JV. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.
- **Code of conduct** – We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve, where applicable, their worker's working conditions. Serious violations of our supplier code of conduct will lead to the termination of the business relationship.

Due Diligence

We undertake due diligence when considering taking on new suppliers, and regularly reviews our existing suppliers. Our due diligence and reviews include:

- mapping the supply chain broadly to assess a product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through the BRC or GFSI approval

Performance indicators

We have reviewed our key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. Thus, the organisation will ensure the People Team, Supply Chain Team and Directors are briefed on the subject.

Training

Five Guys supply chain team are aware of the implications and issues of modern slavery and human trafficking. Training and awareness will be given appropriate to the role of the employee.

Board approval

This statement has been approved by our board of directors, who will review and update it annually.

Director's signature:

Director's name: John Eckbert

Date: January 2019