

COMPTOIR GROUP

MODERN SLAVERY ACT 2015 - STATEMENT

Our Business

Comptoir Group PLC is the holding company for a group of brands that provide dining experiences within casual dining and QSR hospitality sectors. Comptoir Group PLC employs over 550 people and operates 23 restaurants and one manufacturing facility in England. Franchise partners operate a further six restaurants in England, Netherlands, Qatar, and Dubai. Turnover for the group was 30m in 2023.

This statement outlines the measures that Comptoir Group PLC has taken to date and is continuing to take to ensure no slavery or human trafficking occurs in our business or in our supply chains.

Our Supply Chain

Our supply chain includes the key product categories of Ambient, Frozen & Chilled Food, Fresh Produce, Dairy, Fresh Meat, Beer, Wine and Spirits, Equipment & Disposables. We aim to amalgamate all suppliers into a single set of group-wide suppliers to minimise the risk of non-compliance with the Modern Slavery Act 2015 (the 'Act').

Most of our tier 1 suppliers are UK-based, which reflects a priority across the Group to source fresh, locally, and seasonally wherever possible.

However, we also have several important products sourced from the EU and the rest of the world. We are committed to ensuring that there is no slavery or human trafficking in our supply chain or in any part of our business. Our Modern Slavery policy (publicly available on the company website and available to employees on the company intranet) reflects our commitment to acting ethically and with integrity in all our business relationships. We are committed to working with those suppliers and partners who share our values and who will also work to eradicate human trafficking and modern slavery from their supply chains.

We incorporated due diligence relating to modern slavery in all new supply tenders and contracts in 2023. We will extend this to the full supply base during 2024.

Plans Going Forward

Within our business

Our current processes and procedures have led us to assess the level of risk of modern slavery and exploitation within our operations to be low, but this does not mean that we should ever be complacent given that the food industry is identified to be elevated risk.

To date, no modern slavery has been identified in our internal operations nor are we aware from our audit and verification processes of any in our supply chains. We will continue to monitor the effectiveness of our existing controls internally, and review annually what improvements may be made to strengthen our auditing and verification procedures.

Registered Address: 6th Floor Winchester House 259-269 Old Marylebone Road London NW1 5RA

Telephone 020 7486 1111 **Website** www.comptoirgroup.com

VAT No. 191247896 **Company Registration Number:** 07741283

COMPTOIR GROUP

Employees and agency workers

We have zero tolerance in relation to all our employees regarding slavery and human trafficking which also applies to our dealings with staff agency companies. Comptoir Group PLC has strict HR policies and procedures which support the Act to protect against modern slavery and human trafficking. These include carrying out pre-employment face to face interviews and checks of identification and right to work documentation using government listed partner, TrustID.

It is also a requirement that all employees are able to speak and understand the English language, so we can be confident employees will understand our policies and procedures, internal communications and will be able to ask for help should they require it. The business also insists that all employees have their own bank account for the payment of wages. We provide various routes for employees to communicate with the business should bad practice be taking place and to allow people a confidential route to whistle blow.

Effectiveness and Tracking

Comptoir Group PLC has introduced the following KPI's to measure the performance of our anti-slavery actions as a requirement for all our team members:

KPI's	Measure	What we have achieved	What's Next	Timeline
1.	All employees will receive Modern Slavery Training each year		ALL Comptoir teams to be enrolled on the MS Training in Q1 of 2024 for completion	Ongoing
2.	All new employees complete Modern Slavery Training is part of Onboarding		Continue to monitor good engagement of Training	Ongoing
3.	All suppliers will be required to share their Modern Slavery Policy	In 2023 we incorporated due diligence relating to modern slavery in all new supply tenders and contracts.	We will only work with suppliers who share our commitment to ensuring that Modern Slavery and unfair practices are eradicated throughout our supply chain.	Ongoing
4.	Confidential whistleblowing hotline available for all employees and agency workers	EAP Hotline available for all employees.	Raised awareness of the initiative and resources available.	Ongoing

Training

Comptoir Group PLC recognises modern slavery is a crime and can take many forms, such as forced labour, servitude, compulsory labour, and human trafficking. We remain committed to improving our practices to combat slavery and human trafficking.

Related HR policies, elaborated in employee handbook

- Eligibility to Work in the UK
- Whistleblowing Policy
- Grievance Policy

Registered Address: 6th Floor Winchester House 259-269 Old Marylebone Road London NW1 5RA

Telephone 020 7486 1111 **Website** www.comptoirgroup.com

VAT No. 191247896 **Company Registration Number:** 07741283

COMPTOIR GROUP

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved by the Comptoir Group PLC Board.



Nick Ayerst
CEO
Comptoir Group PLC
Date: 29th April 2024