



## TRG Concessions and Barburrito Modern Slavery Statement 2026

*This document has been published in accordance with the Modern Slavery Act 2015 and constitutes the Modern Slavery Statement for The Restaurant Group Limited and relevant subsidiaries during the reporting year including TRG (Holdings) Limited, TRG Concessions Limited and Barburrito Group Limited for the financial year ended 28 December 2025.*

### Introduction

As an employer and provider of goods and services we have a key role to play in the fight against slavery, servitude, forced labour and human trafficking (“Modern Slavery”). TRG Concessions & Barburrito, one of the three business divisions that comprise The Restaurant Group (“TRG”), has a zero-tolerance approach to Modern Slavery of any kind in both our operations and our supply chain. We have a responsibility to prevent and detect exploitation and to influence and work together with suppliers and business partners to raise labour standards in our industry. Although our operations and employees are currently all based in the UK, and our key supply chain partners are UK companies, some of the ingredients and food products we buy are produced in other parts of the world, and it is our responsibility to promote high standards of ethical behaviour throughout our supply chain.

### Our business

TRG Concessions trades principally at UK airports, managing food and drink sites that include bespoke concepts and franchised third-party brands, while Barburrito focuses on serving fast, fresh and healthy Mexican food. Together, we employ approximately 2,400 colleagues, including those employed as part of TRG’s central head office operations. As a responsible business, we recognise our obligation to ensure that our activities are guided by ethical principles and managed in the interests of all our stakeholders. For this reason, Concessions & Barburrito has established processes that protect workers within our restaurants and supply chains. Concessions & Barburrito adheres to TRG’s corporate policies, which are all published on the TRG website [here](#).

### Our policies

TRG corporate policies include a Human Rights Policy, affirming our commitment to preventing or mitigating human rights impacts both in our own operations and within our supply chain, and policies on Whistleblowing and Equality & Diversity. TRG’s Ethical Sourcing Policy provides further details in respect of human rights in its supply chain and confirms its zero-tolerance approach to Modern Slavery. This policy is based on the Ethical Trading Initiative (“ETI”) Base Code for labour practice and the UN Guiding Principles on Business and Human Rights, and sets out TRG’s expectation for every supplier to each of its business divisions to thoroughly assess and ensure that all aspects of their supply chain are compliant.

The Ethical Sourcing Policy explicitly prohibits suppliers, among other things, from: using any forced, bonded or indentured labour; employing child labour; charging workers fees or requiring them to lodge identity papers with employers; relying on workers who have been trafficked or transported for

the purposes of exploitation; and imposing any form of harsh or inhumane treatment. Suppliers are also required to ensure they provide a safe and hygienic working environment, abide by national employment laws, and pay a fair wage. All suppliers are required to show compliance with this policy and to have their own policies and monitoring systems in place, as well as maintaining appropriate records.

## **Our people**

All Concessions & Barburrito employees undertake right-to-work checks and are required to provide a National Insurance number and their own bank account details. Wages and salaries are paid by bank transfer, and we do not allow payment to be made into third-party bank accounts. All prospective employees participate in a comprehensive interview process. A number of mental health first aiders are trained across the business to support anyone who may need help and also to help identify symptoms when something may be impacting an individual's ability to perform at work or their well-being outside of work. We also have an employee assistance programme. We encourage colleagues to speak up and inform their line manager or the People team if they are a victim of Modern Slavery, in which case appropriate action will be taken and supportive measures put in place. Whistleblowing arrangements are in place at TRG level.

Concessions pays all team members the National Living Wage, while Barburrito pays the National Minimum or Living Wage depending on age. All tips are paid directly, with no deductions for any administration or processing charges. During peak season we employ a number of temporary staff to help support the operations, all of whom are vetted based on our Company criteria, and we ensure the same principles apply in terms of applicable policies, equal pay, payment methods and ensuring they are protected under the Modern Slavery Act.

Employees can raise any suspicions they may have from time to time that Modern Slavery or human trafficking may be taking place within the business or its supply chain and will be protected under TRG's Whistleblowing Policy.

## **Supply chain purchasing model**

In terms of potential Modern Slavery within our supply chain, we consider food and beverage purchases a key risk area, given known issues in the agriculture and food production sectors. We operate a centralised procurement model across our brands and divisions for food and beverage supplies as well as for other products such as uniforms and equipment and certain services provided to our sites, which is managed by the TRG purchasing team, amounting to around £45 million of annual spend. We have established strong relationships with our suppliers, and TRG sets minimum standards to be adhered to across its divisions, including Concessions & Barburrito. TRG requires all its direct suppliers to work closely with their own suppliers, distributors, agents and producers to promote best practice and transparency within the supply chain. Around one fifth of the sites run by Concessions are franchises managed on behalf of other brands, who in some cases require us to source from their suppliers. Where this is the case, we undertake reviews of supplier policies in order to assess alignment with our own standards and require them to provide confirmation that all products meet TRG's responsible sourcing, environmental and Modern Slavery policies.

## **New suppliers**

TRG has a rigorous process for assessing new suppliers on their technical capabilities and ethical credentials. We do not engage with business partners, including suppliers, who do not meet our high standards. New suppliers in the managed supply chain are required to complete a declaration on

Responsible Sourcing and Modern Slavery as part of their onboarding. Procurement contract templates include explicit clauses under which suppliers confirm their compliance and that of their own suppliers with the requirements of the Modern Slavery Act. In addition, under the contract, when a supplier sub-contracts, they are required to conduct a third-party audit of that sub-contractor's Modern Slavery compliance.

Members of the TRG procurement team have been trained to identify the risk indicators of Modern Slavery in supply chains and receive annual refresher training on the Modern Slavery Act 2015, with emphasis on Section 54 (Transparency of Supply Chains).

We are committed to staying up to date with any relevant changes and amendments to the legislation and will ensure that the key members of our procurement team complete all the necessary refresher training as required.

### **Supplier Ethical Data Exchange (SEDEX) and ethical audits**

Suppliers managed by the TRG procurement team are also required to register with SEDEX, which is one of the main platforms through which companies can manage and improve working conditions in their global supply chains and complete the supplier assessment questionnaire within the SEDEX system.

In 2025, eight supplier facilities were identified as a potential risk based on their SEDEX score (as calculated from questionnaire responses and inherent country/site activity risk). These suppliers have been required to complete SMETA audits (SEDEX Members Ethical Trade Audit), the outcomes of which are shared with us via the platform. Other suppliers may also complete audits, either of their own accord or because of a request from another customer – a total of 42 supplier facilities have completed audits in the last two years, with the outcomes again being shared with us.

SMETA audits provide information on labour standards, health and safety issues, environmental performance and ethical matters, and are designed to help protect workers from unsafe conditions, overwork, discrimination, low pay and forced labour. Suppliers may be provided with a corrective action plan to help improve performance and resolve any issues identified by the audit findings.

TRG is in the process of ensuring that any suppliers who are not in the SEDEX system or whose membership has expired are onboarded or renew their membership in a timely manner. We have 155 suppliers registered and linked within the SEDEX platform who supply to TRG Concessions & Barburrito.

### **Other suppliers**

For those suppliers not managed through central TRG procurement (for example certain non-food suppliers, including property services and IT providers), different procedures apply. Site maintenance suppliers, for example, are managed through an external facilities management platform, with its own onboarding process. For the Concessions business, we also actively vet contractors and request their policies relating to the Modern Slavery Act and employment abuse as part of the rigorous airport security pass vetting process. TRGC remain committed to working collaboratively with all of our airport business partners to increase awareness, detection and prevention of modern slavery and human trafficking, and to promote responsibility on this issue and ensure that we are transparent in our actions to tackle modern slavery.

## Potential breaches and reporting

If any breaches of our processes or potential cases of Modern Slavery are identified – whether through internal audit, whistleblowing or any other route – these should be reported to the Concessions & Barburrito CEO, as well as the TRG General Counsel and the TRG People Director (if involving staff) or the TRG Procurement Director (if supply chain related). If, following consideration, it appears that the case involves possible criminal offences under the Modern Slavery Act (or any other law), the matter should be referred up to the TRG CFO and CEO and the police informed.

## Governance

Heads of each relevant business area or function, including brand and divisional managing directors, and the heads of the procurement, legal, property, finance and IT teams have responsibility for their department's compliance with relevant policies. All key TRG and Concessions & Barburrito policies are approved at the relevant Board or senior executive level and are reviewed regularly to assess their effectiveness for the future.

## Assessment of effectiveness in preventing Modern Slavery

We will continue to keep under review new risks as they emerge and carefully monitor both existing and new suppliers and business activities. The TRG procurement team have a robust verification programme in place to confirm suppliers' compliance with the Modern Slavery Act and TRG policies, based on SEDEX registration (where appropriate), regular supplier visits, ongoing communication, and supplier reviews and audits. We believe in continuous improvement in the prevention of Modern Slavery and we will continue to review our processes annually to ensure they reflect best practice – for example, we are looking to ensure improved onboarding, review and audit procedures are in place for all suppliers not managed through central procurement, and at expanding the scope of our Modern Slavery training programmes. From 2026 we are also requesting key food and drink suppliers to complete the food supply chain sustainability framework self-assessment tool developed by the IGD, which covers human rights.

This statement was approved by the Board of The Restaurant Group Ltd on 21 May 2026 on behalf of all Group entities during the 2025 reporting year.

Signed by

Andy Hornby

**Chief Executive Officer**

The Restaurant Group Limited

1 June 2026