

Five Guys Modern Slavery Statement - Financial Year Ending 31 December 2024

This statement sets out the actions taken by Five Guys JV Limited (company number 08185191) to ensure that our supply chain is free from slavery and human trafficking.

This statement supports our absolute commitment to prevent slavery and human trafficking in our corporate activities.

Organisational structure and supply chain

1. Five Guys JV is a burger and fries restaurant operation with over 170 stores based in the UK with continued expansion plans. Our head office is based in West London. Five Guys JV owns all its stores in the UK and does not franchise any stores in the UK.
2. Five Guys JV has a pool of approximately 400 food and non-food approved suppliers (including distributors) through whom all purchases are made.

We have long standing relationships with our suppliers and most of them will either be BRC approved or GFSI approved. We do not audit suppliers individually since the BRC/GFSI accreditation is the highest food safety standard in the industry. This also means that they are audited regularly by external auditors in order to maintain this approval. Within this audit there will be a review of the working environment to ensure that it is safe, ultimately leading to the welfare of the staff.

In addition, we ask all of our suppliers to sign up to the Five Guys Supplier Code of Conduct (the “**Code of Conduct**”).

In our restaurants:

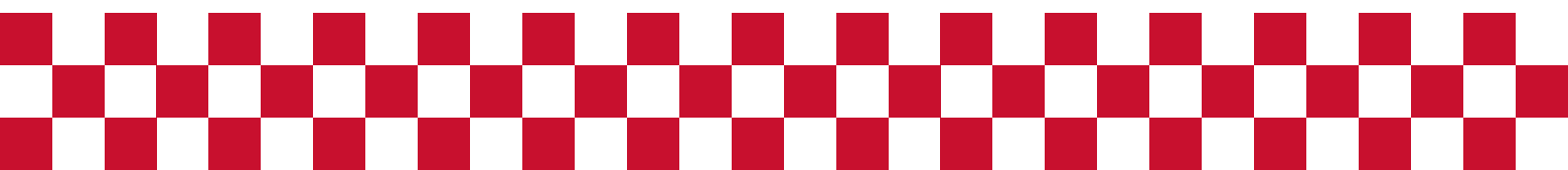
We lease and manage all of our venues ourselves and directly employ all of our restaurant staff therefore we have full oversight and control over how our own operations are managed.

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

1. 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 promote a safe and healthy working environment. We are strongly committed to paying the National Minimum Wage and use a clock-in clock-out technology to accurately track worked hours.

2. Our anti-bullying and harassment, grievance, diversity equality and inclusion policies (as well as our soon to launch sexual harassment policy) make clear to employees the actions and behaviour expected of them when representing Five Guys. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating and managing our supply chain.

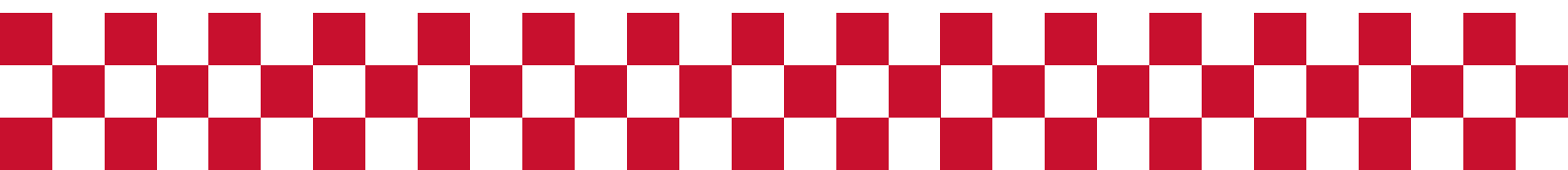
Suppliers

For those of our suppliers that have not signed our Code of Conduct we ensure that they are committed to complying with equivalent, not less favourable, ethical standards.

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.

In addition, having carried out an internal gap analysis, we are also implementing an internal modern slavery toolkit to enable the procurement team to carry out appropriate checks on the those suppliers which are more likely to hire unqualified staff or staff who do not speak English (this includes site visits and annual business review questionnaires covering recruitment process and right to work checks).



Due diligence

In selecting our suppliers, we will always evaluate any modern slavery and human trafficking risks based on a variety of factors which may include their geographical location, size, reputation and professional accreditations.
As part of our onboarding process, we require all of our “Category A” and “Category B” (core menu items, critical to brand) suppliers to sign up to the Code of Conduct. We actively seek their signature and keep their written confirmation of their adherence to it. This is tracked on Trustwell, a global platform which we use to manage our food safety and suppliers.

Awareness

The Five Guys supply chain team are aware of the implications and issues of modern slavery and human trafficking. This is achieved with new joiner briefings and regular conversations within the procurement team.

We are also working on improving general awareness of staff through training.

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: 30.05.2025

