



human trafficking and slavery statement

1. summary

the united kingdom modern slavery act 2015 requires certain businesses to provide disclosure concerning their efforts, if any, to ensure there is no modern slavery or trafficking in their organisation or supply chain

the following is the statutory statement by wagamama made pursuant to section 54 of the modern slavery act 2015 (“msa”)

2. coverage of this statement

wagamama is a chain of branded restaurants that are operated within a group of companies. this statement applies to all companies within the group as listed below |

company	role of company
mabel topco limited	ultimate parent of the wagamama group of companies. this company does not trade
mabel midco limited	intermediate financing company. this company does not trade
mabel mezzco limited	intermediate holding company. this company does not trade
mabel bidco limited	intermediate financing company. this company does not trade
wagamama group limited	intermediate holding company. this company is expected to trade with the same policies within the next twelve months
wagamama limited	core trading company in the uk
wagamama cpu limited	a company the centrally produces certain ingredients to the trading companies
wagamama international franchising limited	a company that operates franchise agreements on behalf of the group
wagamama newco limited	a dormant company
ramen usa limited	the intermediate parent of the companies in the usa
wagamama usa holdings inc.	usa company acting as the parent of the usa companies
wagamama inc	usa company trading in boston

3. description of business and supply chain

3.1 description of business

wagamama is an international food retailer specialising in pan-asian cuisine. it has a high number of [directly owned] retail outlets in the uk and franchise operations in eighteen other countries around the world. wagamama ltd operates the restaurants in great britain + the usa. international locations (excluding usa) are operated by independent franchisee's (including northern ireland)

a number of retail outlets, while not owned by wagamama, operate under franchise, under licence of the wagamama brand and know-how. wagamama requires franchisees to operate their restaurants to our standards and as per our operation manuals and guidelines we provide, we do share our values with our franchisee's, however these cannot be imposed

business ethics are at the heart of the wagamama business model. 'kaizen' is a japanese principle, meaning 'good change', which sits right at the heart of everything we do and inspires us to make changes every day. this philosophy also sits at the heart of our employment policies and our supply chain management. we aim to bring a 'good change' to the communities in which we serve. we also take extremely seriously our legal and compliance obligations in our business conduct and strive to observe these fully. this includes our duties under the msa

wagamama adopts a zero-tolerance stance in relation to modern slavery. wagamama is extending its existing policies to set out our comprehensive and uncompromising values in relation to these issues. the intention is to create a clear and concrete declaration of principles which leaves no doubt in relation to our position on these matters

3.2 description of wagamama group structure

the wagamama group consists of trading entities in the uk and usa, owned and controlled by holding companies with the ultimate parent company being mabel topco limited. in the uk, wagamama restaurants operate through wagamama limited with a kitchen operation working through its subsidiary, wagamama cpu limited. our international franchise business operates through wagamama international (franchising) limited; a further subsidiary of wagamama limited

our usa company-owned restaurants operate through wagamama inc. and its subsidiary wagamama usa 2015 llc

3.3 description of our supply chain

members of our supply chain include sellers of direct ingredients and wholesalers from the uk and the rest of the world, as well as suppliers of business inputs such as physical office premises, information technology and office suppliers. we require high standards of our supply chain

4. details of checks and due diligence to be conducted on members of the supply chain

our responsible sourcing policy confirms our zero-tolerance approach to modern slavery in our supply chain. this policy is based on the ethical trading initiative base code for labour

practise and sets out our expectation for each supplier to thoroughly assess and ensure that all aspects of their supply chain are compliant. our policy includes, among other things, the prohibition of slavery and human trafficking, safe and hygienic working conditions and payment of a fair wage. all direct suppliers are required to show compliance with this policy and to provide evidence of continuous improvement in worker welfare

we require all our suppliers to have their own modern slavery-related policies and monitoring systems and many are also required by law to make their own modern slavery statements

new suppliers

we have a rigorous process for assessing new suppliers on their technical capabilities and ethical credentials. we do not collaborate with business partners, including suppliers, who do not meet our high standards

key members of our procurement team have been trained to identify the risk indicators of modern slavery and human trafficking in our supply chains

supplier ethical data exchange (sedex) and ethical audits

all suppliers to the wagamama business are required to register with and complete assessments within sedex. following a review of the outcomes of these assessments, ethical audits may be carried out. it is our policy that any suppliers who are deemed high risk, as identified by the sedex risk assessment score, undertake an audit within three months of being identified high risk. no suppliers were identified as high risk during 2019. we currently have 77 suppliers registered and linked within the sedex platform who supply to our business

due diligence on suppliers is not always limited to questionnaires or audits. wagamama holds face to face meetings with key suppliers + commercial visits to manufacturing premises on a regular basis with discussions taking place to understand the steps they have taken and are taking in order to ensure there is no slavery or human trafficking in their organisation or their own supply chain

5. our people

all our employees are paid by bank transfer and we don't allow payment to be made into third party bank accounts thus minimising the risk of forced or compulsory labour

we pay the national living wage (nlw), regardless of age, and have a clear progression route to support career development and internal promotion. our talent acquisition policy is equality impact assessed to avoid direct or indirect discrimination and we welcome people from all backgrounds into wagamama. candidates coming for interviews participate in a 'discovery session' and are given a voucher for their time. the session lasts no longer than two hours and involves observing and trying food during the selection process to give candidates a true reflection of the job they have applied for. line managers are responsible for the recruitment and selection of their team in accordance with the talent acquisition policy and equal opportunities policy

we collect sensitive people information to understand the demographics of our workforce, this information is stored securely and only used to understand the make-up of our workforce and determine our approach to diversity, inclusion and equality

un-paid work experience and un-paid labour is not prohibited within wagamama. those who are employed by wagamama have chosen to be in paid employment with the right to resign with notice at any time. all employees are bound by the company's dignity at work policy with wagamama taking a zero-tolerance approach to bullying and any form of harassment

senior members of wagamama's supply management team have taken detailed advice in relation to the issues of modern slavery and human trafficking. wagamama intend to reinforce this as and when personnel change in the following departments | people, procurement + supply chain management and the qa team. all training carried out will be either face-to-face or electronic and wagamama intend to test employees' knowledge at the end of the training. the level of training needed is proportionate to the role of the team member concerned and the likelihood of their becoming exposed to instances of modern slavery or human trafficking in carrying out their everyday duties

governance

the relevant heads of each business area such as brand managing directors and the heads of the procurement, legal, property, finance and i.t. teams have responsibility for their department's compliance with our responsible sourcing policy. all policies are approved by the board and are reviewed annually 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 new suppliers and business activities. we believe in continuous improvement in the prevention of modern slavery and we will continue to review our ethical trading programme annually to ensure it reflects best practice

6. employment

in the context of our own organisation, we are committed to the principle that those who work for us must have chosen their work freely and must be treated with dignity. wagamama is committed to paying its team members no less than the applicable minimum wage. in relation to restaurant team members, 100% of tips they receive from customers are added to their remuneration

7. violations

7.1 violations by employees

wagamama will take very seriously any instance of suppliers being involved directly or indirectly in modern slavery or human trafficking. wagamama's response to any such discovery will depend upon a number of factors, including the number of victims involved, the gravity of the human rights violations concerned, whether the supplier was involved directly or indirectly and whether or not the supplier has previously been involved in such conduct previously. wagamama will not tolerate any of its officers or employees being involved in modern slavery or human trafficking. any such employee can expect to find themselves the subject of serious disciplinary actions in accordance with our employment manual and contract of employment

employees can raise any suspicions they may have from time to time that modern slavery or human trafficking may be taking place in wagamama's organisation or supply chain. employees are reassured that where suspicions are reported in good faith, they will receive no sanction if these ultimately turn out to be unfounded.

8. risk assessment

assessment of effectiveness in preventing modern slavery

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wagamama has identified that its procurement and supply chain management are the areas of most risk for the business

furthermore, wagamama has identified as areas of elevated risk | the supply of food ingredients. we are aware of very serious occurrences of modern slavery and human trafficking abuses by producers of agricultural produce and seafood. for these reasons, suppliers in these categories are an important (but not the sole) area of our due diligence and audit efforts

we also apply close scrutiny to those suppliers who are known to operate, directly or indirectly, in areas of the world where the global slavery index (gsi) has found there to be a higher level of risk

this said, we believe that any risk assessment must be reviewed regularly to take account of any new information regarding modern slavery and human trafficking

9. effectiveness of policies

in general, we will keep our slavery and human trafficking policies and due diligence processes under review to ensure their effectiveness in achieving the desired results |

we are applying the following kpis as metrics to determine whether wagamama's policies and procedures are producing the desired effect |

1. audits completed on all suppliers on a timely basis with a pre-determined schedule that could be within more than one financial year
2. the audit process not having given grounds for any concerns regarding modern slavery or human trafficking and wagamama not having otherwise received reports of suppliers being complicit in such practices
3. the completion of training for all key procurement and supply management personnel as well as others and the completion of follow-up questionnaires by attendees, which we expect to demonstrate a high level of understanding of the subject matter
4. incorporation of a set of values into the manual with which franchisees are required to comply

any questions or queries in relation to this statement should be directed to | www.wagamama.com/contact-us

signed:



company secretary

Date: 02 september 2020