

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 the 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.
Wagamama USA 2015 LLC	USA company trading in New York.
Boston One LLC	USA company and holder of liquor licenses 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 (ex USA) are operated by Independent Franchisee's (inc. N.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 per Operation Manuals and Guidelines we provide, we do share our values with our franchisee's, however these cannot 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 pushes us to find better ways in everything we do. 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

In order to protect the high levels of quality associated with our brand and to continually improve these further, it has been our longstanding practice to audit new and on-going members of our supply chain either in person by qualified QA Managers or by requiring them to answer detailed questionnaires relating to their own business plans and processes.

wagamama requires all new & ongoing suppliers to submit to these verification processes on a regular basis; annually, two yearly or three yearly depending on how long they've been supplying & the risks concerning the product they supply or the results of their previous audit.

Suppliers must disclose to wagamama information about their compliance with legislative obligations and sustainability within their business. We have a dedicated supply chain management team & quality assurance managers who scrutinise the replies they receive. In the past, wagamama has been prepared to terminate its relationship with suppliers where they cannot provide satisfactory self-assessments or indeed fail to pass an audit.

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. Training

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 & when personnel change in the following departments; people, procurement & supply chain management & 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.

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

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.

wagamama also recognises that its people team could also be at risk of exposure to slavery and trafficking. Whilst wagamama's recruitment and retention policies are legally robust, wagamama recognises the need to be vigilant when recruiting team members that have been engaged through agencies, who may not necessarily adopt the same values or care as much as wagamama in their engagement or referral of team members. To address this risk, wagamama conduct an audit of the practices of the agencies it uses. It also provides tailored training for members of its people team.

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:

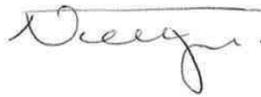
We are applying the following KPIs as metrics to determine whether wagamama's policies and procedures are producing the desired effect:

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



Director

Date 5/4/19