



Modern Slavery & Human Trafficking Policy – UK

At Krispy Kreme we are committed to compliance with the Modern Slavery Act 2015 ("the Act") and recognise the importance of taking action to combat modern slavery, which can take many forms such as slavery, servitude, forced and compulsory labour and human trafficking. We strive to act ethically and with integrity and take a zero-tolerance approach to instances of modern slavery.

The Senior Leadership Team (SLT) and Board of Directors shall be responsible for the development, implementation and monitoring effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any contract of employment or other contract to provide services, and it may be amended at any time.

1.0 Within Krispy Kreme

1.1 Krispy Kreme has HR policies and standards in place to ensure compliance with relevant legislation and fundamental rights at work, including equal opportunities and working hours and breaks. These are provided to staff at their induction and are readily accessible via the Hub and Thrive.

1.2 All colleagues who work at Krispy Kreme are subject to a right to work check in accordance with UK legislation. Colleagues are unable to work at Krispy Kreme unless we are satisfied that they have the legal right to do so and this process is audited regularly.

1.3 Our employment policies state that no person below the minimum legal age shall be employed.

1.4 Where specific workplace conditions apply, such as night shift work, working with dangerous machinery and/or hazardous substances, no person under the age of 18 (Young Persons) will be employed.

1.5 Line managers of young person employees must complete a Young Persons Risk Assessment on their first day of employment. This must be reviewed annually until they reach the age of 18.

1.6 Krispy Kreme will occasionally use internally approved recruitment agencies, in which case the agency is expected to adhere to our Equal Opportunities and Modern Slavery policies.

2.0 In the supply chain

2.1 Krispy Kreme has a close working relationship with its key suppliers and no purchasing should be undertaken without a contract signed by a Director.

2.2 Suppliers are required to complete a questionnaire indicating their compliance with the Act and any indicators of non-compliance are followed up with a risk assessment and appropriate action, as defined below.

2.3 Procurement of key raw materials is to be carried out through the independent purchasing agent appointed to manage the Krispy Kreme supply chain. Standard terms and conditions, which include a statement of compliance with the Act, are to be used at all times with deviation only permitted with the authority of a Director.



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2.4 Suppliers which breach their obligations under the Act will face appropriate actions which could include being asked to remedy the breach, termination of contract or compensation for loss.

3.0 Your responsibilities and how to raise a concern

3.1 The prevention, detecting and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

3.2 Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect that a breach of this policy has occurred or that it may occur, you must report it in accordance with our Whistleblowing Policy.

3.3 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions constitutes any of the various forms of modern slavery, raise it with your manager or through the confidential helpline (please see the section on Speaking Up in our Whistleblowing Policy).

3.4 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

4.0 Breaches of this policy

4.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

4.2 We may terminate our relationship with other individuals and organisations on our behalf if they breach this policy.

Date	Changes	Version	Reviewed By
1 st January 2025	New Policy	1.0	Ashtons Law & KK HR