



**Urban Pubs and Bars Limited**  
**Modern Slavery and Human Trafficking Statement**  
**Financial Year Ending April 2026**

**Introduction and Commitment**

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Urban Pubs and Bars Limited (“UPB”, “the Company”, or “the Group”) has taken and continues to take to ensure that modern slavery and human trafficking are not taking place within our business or supply chains.

Urban Pubs and Bars is committed to acting ethically and with integrity in all our business dealings and relationships. We take a zero-tolerance approach to modern slavery and are committed to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere within the Group or within our supply chains.

**About Our Business**

Urban Pubs and Bars Limited is a London-based pub and restaurant group operating approximately 66 venues across London and the South East of England. The Group does not operate outside the United Kingdom. The Group encompasses several distinct brands and operating divisions, including Urban Pubs & Bars, Salt Yard Group, Bat & Ball, Albion & East, and associated restaurant concepts.

*Key business facts:*

- Group turnover: Approximately £92 million per annum (FY2025/26 year-to-date run rate), significantly exceeding the £36 million threshold under the Modern Slavery Act 2015
- Sites: Approximately 66 venues comprising pubs, bars, restaurants, and premium dining establishments
- Employees: Approximately 90 head office staff and an estimated 1,500–2,000 total employees, including site-based team members across all venues
- Headquarters: London, United Kingdom
- Operating model: The Group operates managed venues (not franchised) with direct employment of all staff, ensuring oversight of working conditions and employment practices

Our operations span the hospitality sector, which is recognised as carrying inherent modern slavery risks due to the prevalence of low-wage work, high staff turnover, reliance on migrant labour, and complex food and drink supply chains.

**Our Supply Chains**

Our supply chains are principally focused on the procurement of food, beverages (both alcoholic and non-alcoholic), and third-party services necessary to operate our venues.

Our supply chains include:

- Food and drink procurement
- Operational services including:
  - waste management
  - security
  - cleaning
  - maintenance
  - IT services
  - professional services
- Capital and refurbishment projects

Most of our suppliers are UK-based, reflecting the fact that the Group operates solely within the United Kingdom, and we aim to work with reputable partners who share our commitment to ethical business practices. We seek to build long-term supplier relationships and maintain open communication about our values and expectations in relation to modern slavery. All suppliers and agencies we work with are expected to comply with the Modern Slavery Act 2015 and align with recognised industry standards.

### **Risk Assessment**

We recognise that certain areas of the hospitality sector can present a higher risk of modern slavery and labour exploitation. As part of our ongoing review processes, we consider potential risks across both our operations and supply chain.

#### **The areas identified as presenting the highest potential risk include:**

- outsourced cleaning and security services
- temporary labour and agency workers
- construction and refurbishment contractors
- parts of the food supply chain involving imported goods or multi-tier sourcing

We believe these risks are mitigated through our managed operating model, direct employment practices, supplier oversight, right to work checks, and ongoing operational supervision across our venues.

We continue to review our supply chain and operational practices to identify opportunities to strengthen safeguards and reduce risk further.

### **Policies and Procedures**

To support our commitment, we maintain policies and procedures relating to:

- recruitment and right to work checks
- whistleblowing and confidential reporting
- employee conduct and workplace standards

- supplier onboarding and approval processes

All employees are required to demonstrate their right to work in the UK prior to employment commencing. Right to work and identity verification checks are conducted using TrustID, a certified Identity Service Provider, together with manual checks where required in line with Home Office guidance.

We do not retain employee passports or identity documents and all employees are paid directly into personal bank accounts.

### **Recruitment and Employment Practices**

All recruitment is conducted through our centralised HR and operational Management teams, We do not use gangmasters or informal labour providers.

Where temporary agency staff are used, we only work with reputable UK-based recruitment agencies and labour providers that comply with the Modern Slavery Act 2015. We work closely with these agencies to ensure that all labour supplied is paid at or above the National Minimum Wage and that appropriate employment and right to work checks are carried out.

We are committed to ensuring:

- fair pay and compliance with National Minimum Wage requirements
- safe working conditions
- reasonable working hours
- fair and respectful treatment of all employees

### **Supply Chain Due Diligence**

Before engaging with new suppliers or agencies, we undertake appropriate due diligence checks to ensure that they operate responsibly and have appropriate modern slavery and ethical trading policies in place. We also review these requirements at supplier renewal stages where appropriate.

We expect suppliers to:

- comply with applicable employment and modern slavery legislation
- maintain fair labour practices
- undertake appropriate checks within their own supply chains
- notify us of any significant breaches relating to modern slavery or labour exploitation

Any breach of our expectations relating to modern slavery may result in Urban Pubs & Bars Limited ceasing its relationship with the relevant supplier, contractor, or agency. Where breaches involve employees or internal matters, these will be addressed in accordance with the Company's disciplinary procedures.

We pay particular attention to higher-risk categories such as outsourced cleaning, security, and construction-related services.

## Training and Awareness

Relevant senior operational and people teams are made aware of modern slavery risks and the indicators of potential exploitation as part of our wider people and compliance processes.

We continue to review appropriate ways to strengthen awareness of modern slavery risks across the business.


## Looking Ahead

During the next financial year, we intend to continue developing our approach by:

- reviewing supplier onboarding procedures
- strengthening supplier compliance expectations
- improving awareness of modern slavery risks across operational teams
- continuing to review higher-risk areas of the supply chain

## Approval

This statement has been approved by the Board of Directors of Urban Pubs and Bars Limited and constitutes the Group's modern slavery and human trafficking statement for the financial year ending April 2026.

Name: **Jim Pickworth**  
Position: **Chief Financial Officer**  
Signature: 

Jim Pickworth (May 28, 2026 09:53:12 GMT+1)

Name: **Chris Hill**  
Position: **Managing Director**  
Signature: 

Chris Hill (May 27, 2026 13:36:05 GMT+1)

Date: 30<sup>th</sup> April 2026

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