Declaration — Board Sign-off	*Stonegate Group*

Under Regulation 43 of the Pubs Code etc. Regulations 2016, a pub-owning business must ensure that the Compliance Officer submits its annual compliance report to the Pubs Code Adjudicator within 4 months of the end of each reporting year.

In accordance with Regulation 43 of the Pubs Code etc. Regulations 2016. This is a declaration that the statutory requirements in Regulations 43(5), (7), (8) & (9) have been complied with.

	Audit Committee Statement
Please describe the process by which this report has been approved including which 'other reports' you have used and wider arrangements to ensure that the person or committee referenced in regulation 43(7) has an understanding of your business's compliance with these Regulations as required under regulation 43(7)(a).	**The Annual Compliance Report is prepared by the Code Compliance Officer (CCO) and their team, who gather, review and analyse information from the business's key Pubs Code compliance processes, including onboarding, rent proposals, rent assessments, MRO activity, training records, tenant feedback, compliance monitoring and any complaints or alleged breaches identified during the reporting period. The report is supported by a range of management information and compliance reports that provide assurance regarding the business's compliance with the Pubs Code. These "other reports" include compliance monitoring reports, operational performance data, audits of Code-related processes, records of tenant queries and complaints, training and awareness reporting, and management information generated from the onboarding and rent review systems. Once drafted, the Annual Compliance Report is reviewed by the senior leadership team, who consider both the report and the supporting compliance data, challenge findings where appropriate, and confirm that any identified issues and remedial actions have been accurately reflected. The report then receives final approval and sign-off from the Board, which reviews the Annual Compliance Report together with the supporting information to ensure it has a sufficient understanding of the business's compliance with the Regulations. In addition to the annual reporting cycle, the CCO provides periodic compliance updates and management information to senior leadership and the Board throughout the year. These reports highlight compliance trends, emerging risks, complaints, potential breaches, corrective actions and training activity, ensuring that the Board maintains an ongoing understanding of the business's compliance with the Pubs Code and enabling it to exercise effective oversight in accordance with Regulation 43(7).**

Please confirm, if you have an annual report, that a summary of the annual compliance report will be included as per regulation 43(8):	***Yes***
Approved by (name): ***This should be the Chair of the Audit Committee, or where such a committee does not exist, the non-executive director responsible for functions normally associated with an Audit Committee or, in the absence of such a post, by your Chief Executive Officer, Managing Director or equivalent.***	***David McDowall***
Job title of approver:	***Chief Executive Officer***
Date of approval:	***20/07/2026***
Submitted by (Code Compliance Officer):	***Donna Gracey***

Section A — Estate Data & Renewals (Input) — *Stonegate Group*

#	*Question / Metric*	*E&W Total*	*England*	*Wales*	
	Number of Code Pubs at End of Period (31 March 2026)	*E&W Total*	*England*	*Wales*	
1	Total number of Pubs Code Agreements at the end of this reporting period	3288	3152	136	**Only numerical question where England & Wales are separate; total is calculated**
2	- of which Tenanted	2537			
3	- of which Leased	751			
4	Agreements protected under the Landlord and Tenant Act 1954	688			
5	Agreements where tenant has contractual right to renew as described in reg 26(3)	4			
6	Short agreements as defined in regulation 2, including tenancies at will, where regulation 54 exemption applies	547			
7	Short agreements (including tenancies at will) where tenant has acquired full Code rights	64			Cases where a tenant has acquired full Code rights by entering into more than one short agreement (including a Tenancy At Will) that together total more 12 months or more
8	Agreements which fall under regulation 55 (Franchises)	0			
	Total Estate at the end of this reporting period (England & Wales)	4053			Calculated - sum of A9, A10, A11 and 'Turnover or profit share' sub-total
9	Tied Tenancies & Leases excluding Turnover or Profit share arrangements	2643			Exclude arrangements which are included in answers A12, A13 or A14, to eliminate double-counting
10	Free of Tie (excluding Turnover or Profit share arrangements)	333			Exclude arrangements which are included in answers A12, A13 or A14, to eliminate double-counting
11	Managed (excluding Turnover or Profit share arrangements)	422			Exclude arrangements which are included in answers A12, A13 or A14, to eliminate double-counting
	Turnover or profit share arrangements	655			Calculated - sum of the figures A12, A13 and A14 below
12	- of which: Franchises under regulation 55	0			
13	- of which: other turnover or profit share agreement covered by the Code	645			
14	- of which: other turnover or profit share agreement not covered by the Code	10			Not covered in the opinion of the POB
	Extended Protection				
15	Disposals where there was a publican in situ who is entitled to Extended Protection	0			Under SBEE Act 2015 69(4)
	Free of Tie outside MRO				
16	Number of free of tie tenancies agreed with existing tied tenants outside of the Pubs Code procedures.	4			
	Qualifying Investments				
17	Number of new Qualifying Investments made under Regulation 56 during this period	2			Regulation 56
	Surrenders, Forfeitures, Assignments & Abandonments				
18	Number of legal surrenders.	239			Only include those surrenders where the publican left the property.
19	Number of forfeitures.	47			Legal repossession by the Landlord
20	Number of assignments.	16			Legally assigned by Tenant to new Tenant, under terms of agreement
21	Number of abandonments.	27			Abandonment by Tenant before end of Tenancy, typically without notification to Landlord
	Contractual Arrangements				
22	Please list your all your contractual arrangements and briefly describe their key features where the name is not self-explanatory	Tenancy at Will (Pubs Code Short Agreement) Craft Union TAW (Pubs Code Short Agreement, profit share) Short Term Tenancy (Pubs Code Short Agreement) Craft Short Tenancy (Pubs Code Short Agreement, profit share) Retail Partnership Tenancy (Pubs Code) Fixed Term Tenancy (Pubs Code) Turnover Tenancy (Pubs Code) Craft Union Tenancy Agreement (Pubs Code, profit share) Partnership Incentive Lease (Pubs Code) Partnership Investment Lease (Pubs Code with Investment Exception under reg 56) Commercial Lease (Free of tie) There are no different agreement types or policies in place for pubs in Wales			This question ensures the PCA has a complete view of the types of contracts being offered in the market including innovative ones. Please highlight any new types of contract and existing contracts where terms have been amended during the reporting period Please indicate whether you have different agreement types or policies in place for pubs in Wales and if so, explain any differences.
	Landlord and Tenant Act 1954: Section 25 and 26 Notices				
	Total number of LTA 1954 S.25 notices issued in this reporting period	2			Landlord seeking to end Tenancy; total calculated from summing 'opposing' (25) & 'proposing variation' (26)
23	• Of which, those served at any time after receipt of an MRO notice.	0			Note: not used to calculate total above
24	• Of which, those served within an MRO procedure.	0			Note: not used to calculate total above
25	• Of which, those opposing a new tenancy without proposing a variation of terms.	1			LTA Section 25(7)
26	• Of which, those opposing renewal and proposing a variation of the terms.	1			LTA Section 25(8)
27	**Number of LTA 1954 S.26 notices received in this reporting period**	8			Tenant requesting renewal of Tenancy; enter total manually as 'Tenant withdrew s.26 notice' case not covered
28	• Of which, you opposed a new tenancy without proposing a variation of terms.	8			...of s.26 total (A27)
29	• Of which, those you opposed at any time after receipt of an MRO notice.	8			...of 'opposed without proposing a variation' (A28)
30	• Of which, those you opposed within an MRO procedure.	0			...of 'opposed without proposing a variation' (A28)

31	• Of which, you opposed by proposing a variation of terms.	0					…of s.26 total (A27)
	Landlord and Tenant Act 1954: Use of Section 30(1)(g)						
32	Number of new instances within the period of landlord opposing renewal in whole or in part in reliance on LTA 1954 S.30(1)(g).	0					This could be proactive issue of LTA S25 notice or response to LTA S26 notice from tenant
	Number of LTA 1954 court proceedings where the POB relied in whole or in part on an intention to take the pub back into occupation.	0					Calculated from the three answers immediately below (A33, A34, A35)
33	• Of which, the number of objections to a new tenancy that were upheld.	0					
34	• Of which, the number of objections to a new tenancy that were dismissed.	0					
35	• Of which, are still ongoing.	0					
36	Number of new instances when LTA S.30(1)(g) was relied upon to oppose a tenancy renewal and a hybrid, operator, manchise or profit / turnover share agreement was proposed for the pub's continued operation	0					New question in 2025-26 template
	New Tenants and Agreements						
37	Number of new substantive agreements that fall under the Code in this reporting period (in respect of which regulation 11 duty applied)	1044					Do not include tenancies where the tenant has, or has had, a previous agreement (other than a short agreement) for that pub.
38	Number of new Short Agreements under regulation 2 that fall under the Code in this reporting period (in respect of which regulation 14 duty applied)	1027					
39	Number of new agreements in this reporting period which have LTA 1954 rights	0					
40	Number of new unprotected tied tenancies with tenants previously having 1954 Act protected tenancies	0					
	Rent Proposals						
	Number of rent proposals provided in this reporting period.	1122					Calculated
41	• Of which, those under regulation 15(2-5).	4					Requests and notices under Sections 25 and 26 of the Landlord and Tenant Act 1954
42	• Of which, those under regulation 15(6).	0					Change in amount of rent other than periodic indexation pre-agreed in tenancy or licence
43	• Of which, those under regulation 15(7).	1118					POB notifies tenant of intention to negotiate new agreement with the tenant
	Rent Assessment Proposals and Requests (RAP)						
44	Number of rent assessment proposals provided under regulation 19(1)(a)	66					Regulation 19(1)(a) - a rent review required under the terms of a tenancy or licence of a tied pub.
	Number of rent assessment **requests**:	**Requests where RAP Provided**	**Requests where RAP Rejected**	**Requests where RAP Pending**	**Total RAP Requests**		
45	under regulation 19(2)(a) - 5 years	0	2	0	2		Under Regulation 19(2)(a) - 5 years elapsed
46	under regulation 19(2)(b) - significant increase in price	0	0	0	0		Under Regulation 19(2)(b) - Significant Increase In Price of Product or Service
47	under regulation 19(2)(c) - trigger event	0	1	0	1		Under Regulation 19(2)(c) - Trigger Event
	Total	0	3	0	3		Sum calculated from three figures above
	Number of MRO Notices and Events 1 April 2025 - 31 March 2026	**MRO Events**	**MRO Notices Received**	**MRO Notices Accepted**	**MRO Notices Rejected**	**MRO Notices Withdrawn**	**Completely reworked section**
	Number of 23(1)(a) MRO Notices during the period [SIPP or Trigger event]	n/a	2	0	2	0	Calculated from the two figures below in each case
48	- of which due to Significant Increase in Price of Product or Service	n/a	0	0	0	0	24 (SIPP) - include all products and service subcategories (R3 - R6)
49	- of which due to Trigger Events	n/a	2	0	2	0	25 Include all Trigger Events you are notified of under R7
	SIPP / Trigger Event MRO Validity as Percentage of SIPP / Trigger Event MRO Notices			0%	100%	0%	Calculated - what percent of notices result in different 'statuses' (accepted, rejected, withdrawn)?
	Number of 23(1)(b) MRO Events & Notices during the period [RAP and Renewal]	77	28	24	4	0	Regulation 26 Renewal & 27 Rent assessment, where Investment Exception Regulation 56 does not apply
	- of which due to tenancy **Renewal**	11	10	9	1	0	Calculated: sum of Statutory plus Contractual Renewals
50	- which is statutory renewal of a protected tenancy under LTA	11	10	9	1	0	Regulation 26(2) - LTA S.25 Notice issued by Landlord or S.26 notice issued by Tenant
51	- which is contractual under the terms of the tenancy (not under LTA)	0	0	0	0	0	Regulation 26(3)
52	- of which due to you issuing a **Rent Assessment Proposal**	66	18	15	3	0	Regulation 27 - Rent assessment proposal is sent by the pub-owning business under regulation 20(1)
	RAP/ Renewal MRO Notices as Percentage of RAP / Renewal MRO Events	36%					Calculated - what percent of events result in an MRO notice?
	RAP/ Renewal MRO Validity as Percentage of MRO Notices at RAP/Renewal			86%	14%	0%	Calculated - what percent of notices result in different 'statuses' (accepted, rejected, withdrawn)?
	Outcome of Accepted MRO Notices						
	Where an MRO Notice has been accepted; those that resulted in:						
	Free-of-tie arrangements that are:	8					Calculated from next two lines
53	• New agreement - including short term agreements.	5					
54	• Deed of variation.	3					
	New tied arrangements that are:	8					Calculated from next two lines
55	• Agreed by new lease or tenancy	2					
56	• Other new tied arrangements (rent or other terms).	6					
57	Tied tenant departure from the pub	0					
58	Other outcomes	2					

59	Ongoing – yet to be concluded	23					

	Length of MRO tenancies	**Minimum Length (in months)**	**Maximum Length (in months)**	**Average Length (in months)**			**ref High Court requirement that they should be 'reasonable' in [2020] EWHC 714 (Ch)** **Average should be 'mean' (not mode or median)**
60	Length initially offered	19	120	65			Initial offers demonstrate POB standard practice
61	Length agreed	49	240	128			

	Independent Assessors (IAs)						
62	Number of IA appointments.	4					
63	● Of which, those jointly agreed with the tenant.	4					
64	Number of cases where rent was determined by the Independent Assessor	3					
	Please list for each case - the MRO rent requested by the Tenant, the MRO rent proposed by the POB and the MRO rent set by the Independent Assessor	**Requested by Tenant**	**Proposed by POB**	**Set by Assessor**			
65	**MRO rent:**	45,500 36,500 41,500	71,500 58,650 70,000	58,375 41,250 56,000			

	Premises Insurance						
66	Number of tenants requesting to price match their building insurance during this reporting period by providing notification of a tenant's alternative policy	10					Request under Regulation 46(3)(c)
67	● Number of unsuccessful price match requests.	8					
68	● Number of occasions when you have agreed in writing that any difference is not payable by the tenant under regulation 46(5).	2					
69	● Number of occasions when you have purchased the tenant's alternative policy.	0					
70	Whether you receive commission or rebate from insurers and, if so, what percentage.	Yes	20%				

	Sale of freehold or long leasehold						
71	Number of notifications under regulation 49(2).	0					When holder of the freehold, or superior landlord has taken any steps to advertise or sell the property…
72	On how many occasions has your POB relied upon the exemption in regulation 49(3)?	0					… unless part of a Sale & Leaseback, or would breach another statutory obligation

Section B — Code Compliance (Input)		Stonegate Group
#	Question	

Statistory Requirements and Principles

Pubs Code 43(6): The annual compliance report must include a detailed and accurate account of:
(a) the pub-owning business's compliance with these Regulations in the period to which the report relates
(d) any steps taken during the period to which the report relates to ensure compliance with these Regulations, including details of training and guidance offered to employees in connection with the Regulations.

The Regulatory Compliance Handbook (statutory advice under Section 60 of the SBEE Act 2015): lists "the minimum standards of behaviours that the ... PCA expects pub-owning businesses ... to adopt"

Core Principles
1. Fair and lawful dealing by pub-owning businesses in relation to their tied pub tenants;
2. That tied tenants should not be worse off than they would be if they were not subject to any product or service tie.

The definition of 'tied pub tenant' in Section 70(1) of the SBEE Act 2015 includes prospective tenants. Your answers in this section should therefore, where appropriate, include how you are complying with your duties towards prospective tenants under the Pubs Code

Statutory Guidance on clarity in the MRO procedure issued by the PCA on 17 March 2023

Each answer in this section of the report should comply with the statutory requirements above and reflect that references to 'arrangements' in a question includes (but is not limited to) things designed to ensure and verify compliance with each Regulation (including meeting statutory deadlines) such as:
- ***IT systems and AI***
- ***steps, processes and workflows***
- ***custom and practice***
- ***data capture and verification***
- ***how you gather feedback***
- ***training***
- ***assurance, governance and risk management***
- ***KPIs or other measurements (e.g. of the effectiveness of processes and success of training) and***
- ***how and when these arrangements are reviewed***

Please clearly state what new arrangements, changes or improvements, if any, have been made during the reporting period to improve Code-related outcomes

Entering into an Agreement

	Pub Entry Training - Regulation 9	
1	Please describe your arrangements for complying with regulation 9 regarding Pub Entry Training. Your description should detail, for example: - any information you gather on whether Tenants are successfully completing the training whether this be delivered under regulation 9, 12 or 14 - how you assure & improve the quality of your training through e.g. gathering & use of feedback	We ensure that all new tenants are advised to undertake pre-entry training and asked to complete BII Pre-Entry Awareness Training (PEAT) course unless exempt under regulation 9(3). Our onboarding system ensures all applicants taking new pubs code agreements are required to upload a copy of their PEAT training certificate or approved exemption.
	Sustainable Business Plan - Regulation 10	
2	Please describe your arrangements for complying with regulation 10 for ensuring that a tenant's business plan is sustainable. Your description should detail, for example how you: - confirm they have taken necessary professional advice - approve their sensitivity analysis - arrive at your opinion that financial forecasts are reasonable & realistic	We require all prospective tenants to submit a sustainable business plan as part of the application process. Applicants are strongly encouraged to obtain independent professional advice and are provided with pre-entry interim BII membership, giving access to accredited advisers, including qualified accountants. Business plans, financial forecasts and any sensitivity analysis are reviewed by the Operations team and approved by the Regional Manager, drawing on their knowledge of the pub and trading potential. In assessing whether forecasts are reasonable and realistic, we consider the assumptions used, comparable trading data, expected costs and revenues, and the business's ability to remain viable under different trading scenarios. Applications are only approved where we are satisfied that the proposed business is sustainable and financially robust.
	Information Provision - Schedule 1 - Regulation 11	

3	Please describe your arrangements for complying with regulation 11. Your description should detail, for example, how you: - assure you have met your information obligations and ensure tenants receive all the Schedule 1 information - ensure that the information is accessible and useful and has been referred to by the tenant - verify this happens before the tenant seeks independent professional advice - how you comply with the information requirements in respect of the premises and their maintenance and repair	Schedule 1 information is prepared with input from the Regional Manager, Property Team and relevant support functions and is provided to all prospective tenants through our onboarding platform before they are asked to seek independent professional advice. The onboarding system is used to manage compliance with our information obligations, ensuring that all required Schedule 1 documents, including information relating to the premises and any maintenance and repair responsibilities, are issued in full and in a format that is accessible and easy to review. Prospective tenants must confirm receipt and understanding of the information before they can progress to the business planning stage, providing assurance that the information has been referred to and considered. The system records completion of each stage and prevents the letting process from progressing until all required information has been provided and acknowledged, ensuring compliance with Regulation 11.
	Assignments - Regulation 12	
4	Please describe your arrangements for complying with regulation 12. Your description should detail, for example how you: - assure you have met your information obligations under 12(2) and 12(9) - verify you have met your obligations under 12(4)(a)-(c) - ensure tenants are advised to seek professional advice	Detailed assignor and assignee information packs are provided to both parties when a request for a licence to assign is received, ensuring all information required under Regulation 12 is supplied at the appropriate stage of the process. These packs include details of the proposed assignment, relevant tenancy information, and clear guidance advising both assignors and assignees to seek independent professional advice, including legal, financial and property advice, before proceeding. Compliance with our information obligations is managed by our Agreements Team who record the issue and acknowledgement of all required documentation and tracks completion of each stage of the assignment process. Compliance is verified through individual file reviews prior to completion of the assignment, ensuring that all requirements under Regulation 12 have been met. Any instances of non-compliance identified during the review process are addressed and rectified before the assignment is allowed to proceed.
	Premises - Regulation 13	
5	Please describe your arrangements for complying with regulation 13 regarding the premises. Your description should detail, for example: - creating, updating and using Schedules of Condition - assessing and resolving Dilapidations in a timely fashion - how you encourage and support a tenant to undertake a thorough inspection of the premises and obtain the advice of a suitably qualified surveyor	We comply with Regulation 13 through a structured property assessment and onboarding process designed to ensure prospective tenants fully understand the condition of the premises and their repairing obligations before entering into a tied pub tenancy. A Schedule of Condition is prepared by our Property Team and/or their nominated contractors, together with a Schedule of Works detailing any agreed repairs or improvements. These documents form part of the tenancy documentation and are issued to applicants through our onboarding system, which prevents the process from progressing until the relevant property information has been provided and reviewed. Dilapidations are managed through an established process using independent chartered surveyors. A terminal dilapidations schedule is prepared no later than six months before the end of the tenancy and sets out any items requiring repair, reinstatement or replacement, together with the associated costs. This provides tenants with early visibility of potential liabilities, enabling them to plan and address issues in a timely manner. Any dilapidations matters are assessed and progressed promptly to achieve a fair and efficient resolution. To support informed decision-making, prospective tenants are required to undertake a thorough inspection of the premises before committing to an agreement. They are strongly encouraged to obtain independent professional advice from a suitably qualified surveyor and are provided with pre-entry interim BII membership, which gives access to accredited professional advisers. Regional Managers also discuss the condition of the premises and the relevant property documentation with applicants to ensure they understand the property's condition, any planned works, and their ongoing repair and maintenance responsibilities.
	Short agreements - Regulation 14 & Voluntary Minimum Standards	
6	Please describe your arrangements for complying with regulation 14 and the voluntary Minimum Standards on Short Agreements agreed in March 2025. Your description should detail, for example: - how you assure you have met your information obligations under this regulation - how you are implementing the Minimum Standards and ensuring all staff are aware of the agreed obligations	We comply with Regulation 14 and the voluntary Minimum Standards on Short Agreements through the same controlled onboarding processes used for Regulations 9 and 11. All required information is provided to prospective tenants through our onboarding platform, with system controls in place to ensure the relevant documentation is issued, reviewed and acknowledged before an application can progress. Compliance is monitored through mandatory workflow stages, preventing progression until the required information obligations have been satisfied and recorded. The voluntary Minimum Standards are embedded within our onboarding procedures, documentation and operational guidance. Relevant staff, including Regional Managers and support teams, are made aware of the requirements through internal policies, training and process guidance, ensuring that short agreement applicants receive the appropriate information and protections. Compliance is supported by the governance and approval controls within the onboarding system, together with management oversight to ensure the agreed standards are applied consistently across all short agreement.
Ending a Tenancy		
	Forfeitures - Section 146 notice	

7	Please describe your processes and procedures before and after issue of a section 146 notice under the LPA 1925. Your description should detail, for example: - how you ensure you are treating tenants fairly and lawfully and learning from business failure	Prior to issuing Section 146 notice the following steps are taken: • Discussion between tied pub tenant and Regional Manager • Escalated to Legal Services - account review and advice note issued detailing legal options • Relevant approvals sought including from the Operations Director for service of notice • Written correspondence prior to formal notice if appropriate • Opportunity for the Tied Pub Tenant to remedy the breach. • If the breach is not remedied and/or should a rent breach arise (whichever is the sooner) possession proceedings will be commenced via the courts. Following service of S146 notice: • Regional Manager remains engaged throughout notice period • Legal Services follow up on or near to expiry to manage next steps (Regional Manager to arrange peaceable re-entry / instruct solicitors to issue forfeiture proceedings) • If forfeiture proceedings are issued the tied pub tenants account is suspended and all further correspondence is dealt with via solicitors.
Rent		
	Rent Proposals - Regulations 15-18	
8	Please describe your arrangements for complying with regulations 15-18 regarding the rent proposal. Your description should detail, for example: - the production and capture of a rent proposal, its contents, when it is provided and how requests for further information under reg 18 are captured, handled and complied with. - how you assure you have met your information obligations under Schedule 2 - How you ensure forecasts are reasonable, evidenced and prepared in accordance with RICS guidance.	Our rent proposal process is managed through our onboarding system, which controls the preparation, issue and retention of rent proposals and associated information. Rent proposals are provided to prospective new tenants as part of the onboarding process and to existing tenants where required, including in circumstances such as deeds of variation to extend the term, which goes beyond the minimum requirements of the Code. The contents of the rent proposal are regularly reviewed to ensure compliance with Regulations 15–18 and Schedule 2 information requirements. All rent proposals are reviewed and approved by the Valuation Manager, both of whom are Fellows of the Royal Institution of Chartered Surveyors (RICS). This ensures that forecasts, assumptions and rental assessments are prepared in accordance with recognised RICS guidance and industry best practice. Financial projections included within the proposal are supported by relevant trading information, property-specific data and market evidence, with assumptions tested to ensure they are reasonable, realistic and appropriately evidenced. Compliance with Schedule 2 information obligations is assured through the onboarding system, which tracks the provision of all required documentation and prevents progression until the necessary information has been issued. Any requests for further information under Regulation 18 are recorded and managed through the Regional Manager, who coordinates responses with the relevant valuation, operational or support teams to ensure requests are handled promptly and comprehensively. Governance controls within the onboarding process provide oversight and assurance that all information obligations have been met before agreements are concluded.
	Rent Assessment Proposals - Regulations 19-22	
9	Please describe your arrangements for complying with regulations 19-22 regarding the rent assessment proposal. Your description should detail, for example: - the production and capture of a rent assessment proposal, its contents, when it is provided and how requests for further information under reg 21 are captured, handled and complied with. - how you assure you have met your information obligations under Schedule 2 - How you ensure forecasts are reasonable, evidenced and prepared in accordance with RICS guidance. - Confirmation that you comply with the Code in respect of all duties to conduct a rent assessment, including all contractual rent reviews to which the tenant is entitled under the terms of their agreement. - how a rent assessment is conducted	We comply with Regulations 19–22 through a structured rent review process supported by our Rent Review system, which tracks key review dates and prompts the preparation and issue of rent assessment proposals at least six months before the contractual rent review date. The contents of the rent assessment proposal are regularly reviewed to ensure compliance with the Code and Schedule 2 information requirements. As part of the rent assessment process, the Regional Manager visits the pub to gather relevant trading and property information to inform the assessment. Internal controls require confirmation that this visit has taken place within the three months preceding the issue of the rent assessment proposal. All rent assessment proposals are reviewed and signed off by the Valuation Manager, both of whom are Fellows of the Royal Institution of Chartered Surveyors (RICS), ensuring that forecasts, assumptions and rental assessments are prepared in accordance with RICS guidance, supported by appropriate market evidence, trading information and property-specific data. Compliance with Schedule 2 information obligations is managed through the Rent Review system and verified through individual file reviews and senior management sign-off before the proposal is issued. Any requests for further information under Regulation 21 are recorded and coordinated through the relevant Regional Manager, who works with valuation and support teams to provide a timely and comprehensive response. We comply with all Code requirements relating to rent assessments, including conducting all contractual rent reviews to which a tenant is entitled under the terms of their agreement. Following issue of the rent assessment proposal, we actively engage with the tenant to discuss the proposed assessment and seek agreement where possible. Where agreement cannot be reached, the matter may be progressed to PIRRS or arbitration (unless an MRO process is underway). Once agreed, revised rents are formally documented through a rent review memorandum or deed of variation, signed by both parties and retained within our electronic and hard-copy records. Compliance is monitored through system controls, management oversight and file audits, with any identified instances of non-compliance addressed and rectified before completion of the rent assessment process.
Market Rent Only (MRO)		
	MRO Notice - Regulations 23-27	

10	Please describe your arrangements for handling MRO notices under regulation 23. Your description should detail, for example: - receiving, logging and checking validity of the notice - which teams are engaged - tracking of statutory deadlines	The MRO administration process is managed by the Agreements team through our MRO Claims system, who ensure that the deadlines and timescales are met as prescribed in the Code. The MRO system tracks and diarises statutory deadlines. Any areas of non-compliance are referred to the internal Pubs Code inbox and Code Compliance Officer who would assess the impact on the tenant and address as appropriate. Any query over the MRO event type/validity would be escalated to the Code Compliance Officer. If we think that an MRO notice is unclear, we will revert to the tenant to ask them to clarify. We do not reject MRO notices where the tenant has made an obvious typographical error.
	MRO Procedure - Regulations 28-33	
11.1	Please describe your arrangements for complying with regulations 28 - 31. Your description should detail, for example: - not exercising any right to recover rent or change product or service ties (regulation 28) - issuing acknowledgements under regulation 29(2) - issuing all full responses under regulations 29(3)(4) or 29(3)(4) or updated, required or revised responses - ensuring all proposed MRO tenancies are MRO-compliant (regulation 30) including not being unreasonable (regulation 43(4)) - ensuring terms and conditions of each proposed MRO tenancy are not unreasonable (regulation 31) - tracking and meeting all statutory deadlines	Our MRO administration process is managed by the Agreements Team, supported by the Valuation, Operations and Compliance teams, with dedicated systems and controls in place to ensure all statutory deadlines and procedural requirements prescribed by the Code are met. Key dates, milestones and responses are tracked throughout the MRO process, with management oversight to ensure timely compliance. We do not exercise any right to recover rent or introduce changes to product or service ties where prohibited by Regulation 28. Internal policies and system controls are designed to ensure that no action is taken that could prejudice the tenant's rights during an MRO process. Acknowledgements required under Regulation 29(2) are issued within the prescribed timescales, and all full responses, updated responses, revised responses and supporting information required under Regulations 29 and 30 are prepared and issued through a controlled process. Any requests, correspondence or challenges received from tenants are logged, monitored and progressed by the Agreements Team to ensure that all obligations are met and appropriate records are maintained. All proposed MRO tenancy agreements are prepared in accordance with our MRO Proposal Policy, which is subject to regular review and updating in light of Pubs Code Adjudicator guidance, arbitration awards, legal developments and operational experience. Proposed MRO agreements are reviewed to ensure they are MRO-compliant, reflect the requirements of the Code and do not contain terms that would be unreasonable in the circumstances. The commercial terms and conditions of each proposed MRO tenancy are assessed on a case-by-case basis to ensure compliance with Regulations 30 and 31 and with the overarching requirement to act reasonably under the Code. Any actual or potential areas of non-compliance identified during the process are referred to the internal Pubs Code compliance function and the Code Compliance Officer, who assess the circumstances, consider any impact on the tenant and ensure that appropriate remedial action is taken. Compliance is supported through regular process reviews, management oversight and governance controls designed to ensure that MRO rights are administered fairly, consistently and in accordance with the requirements of the Code.
11.2	Please describe your arrangements for complying with regulation 32. Your description should detail, for example: - handling procedural or event disputes during the MRO process - tracking and meeting all statutory deadlines - seeking to agree a tenancy during the resolution period - updated, revised and required full responses - referrals to the Adjudicator	Our arrangements for complying with Regulation 32 are designed to ensure that MRO procedures are managed fairly, efficiently and within the statutory timescales prescribed by the Code. The Agreements Team is responsible for tracking all MRO deadlines and key milestones through dedicated case management processes, with oversight from the Compliance function to ensure that all statutory requirements are met. Where procedural or event disputes arise during the MRO process, the appointed Leasing Development Manager (LDM) will seek to engage constructively with the tied pub tenant and their advisers to resolve the matter through discussion and negotiation wherever possible, with the aim of avoiding unnecessary formal dispute proceedings. Tenants are made aware of their rights under the Code, including their right to refer a dispute to the Pubs Code Adjudicator where appropriate. During the resolution period, we actively seek to reach agreement on the terms of an MRO tenancy and will continue to engage with the tenant in good faith to progress discussions. As part of this process, we routinely include a proposed market rent within the MRO offer and consider any representations or evidence submitted by the tenant. Where required, updated full responses are prepared and issued in accordance with our MRO Proposal Policy, taking into account ongoing negotiations, additional information provided by the tenant, guidance issued by the Pubs Code Adjudicator and any directions or determinations arising from arbitration proceedings. All correspondence, responses and revisions are recorded and monitored to ensure compliance with the Code. Where a matter is referred to the Adjudicator, we cooperate fully with the process, comply with any relevant directions or awards, and implement any required changes to the MRO proposal or tenancy documentation promptly. Compliance is supported through management oversight, documented procedures and ongoing review of MRO cases to ensure that tenants' rights are respected throughout the process and that all regulatory obligations are met.
	MRO Independent Assessor - Regulations 36-38	

12	Please describe your arrangements for complying with regulations 36 - 38. Your description should detail, for example: - seeking agreement as to the Independent Assessor - compliance with any statutory deadlines - referrals to the Adjudicator - provision of Schedule 3 information to the Independent Assessor - provision (to both the Assessor and the tenant) of any other relevant information and information requested by the Assessor	Our arrangements for complying with Regulations 36–38 are managed by the Leasing Development Manager (LDM), Valuation Team and Compliance function, ensuring that all statutory requirements, deadlines and information obligations are met throughout the Independent Assessment process. Where an Independent Assessor (IA) is required, the appointed LDM works collaboratively with the tenant to seek agreement on the appointment of a suitably qualified IA in accordance with the requirements of the Code. Once appointed, the aligned Valuation Manager is instructed to manage the assessment process on behalf of the business and act as the principal point of contact for valuation matters. The Valuation Manager works closely with the IA and complies with all procedural directions and timescales issued during the assessment process. All submissions are prepared in accordance with the RICS Professional Statement Surveyors Acting as Advocates and are supported by relevant valuation evidence and market information. Compliance with statutory deadlines is monitored through internal case management processes and management oversight. Schedule 3 information is prepared and coordinated by the Valuation Manager, both current Valuation Managers being Fellows of the Royal Institution of Chartered Surveyors (RICS). Where appropriate, elements of the valuation work may be supported by independent external experts. The business ensures that all Schedule 3 information is provided to the IA within the required timescales and that any additional relevant information, or information requested by the IA, is supplied promptly to both the IA and the tenant as required by the Code. Where issues arise that may require referral to the Pubs Code Adjudicator, these are considered carefully by the Valuation Manager and Compliance function. Any decision to challenge or refer an IA determination to the Adjudicator must be approved by the Code Compliance Officer, ensuring appropriate oversight and consideration of the merits of the case before any referral is made.
	MRO End of Procedure - Regulations 39 and 40	
13	Please describe your arrangements for complying with regulations 39 and 40. Your description should detail, for example: - the duty to enter into an agreed tenancy or licence as soon as reasonably practicable, - your communications with the tenant at the end of the MRO procedure, - compliance with any statutory deadlines	Our arrangements for complying with Regulations 39 and 40 are managed by the Agreements Team, which oversees the conclusion of the MRO process and the completion of any agreed Market Rent Only tenancy or licence. The team monitors all statutory deadlines and key milestones through the MRO Claims system to ensure compliance with the requirements of the Code. Once the MRO procedure has concluded, the tenant is notified in writing of the outcome and provided with confirmation that the process has come to an end. We actively seek to enter into the agreed MRO tenancy or licence as soon as reasonably practicable, working directly with the tenant and, where appropriate, through appointed solicitors to progress the necessary legal documentation and complete the agreement without unnecessary delay. Throughout the final stages of the process, we maintain clear communication with the tenant regarding the next steps, expected timescales and any actions required to facilitate completion. Feedback on the process is also invited as part of our commitment to continuous improvement. Any concerns, delays or issues arising in connection with the completion of an MRO agreement are escalated to the Code Compliance Officer for review and investigation. Compliance is supported through documented procedures, management oversight and internal controls designed to ensure that agreed MRO tenancies are completed promptly and in accordance with all applicable statutory requirements.
Business Development Managers (BDM) - Regulation 41		
14.1	Please describe your arrangements for complying with regulation 41(1)-(3) & (5). Your description should detail, for example: - BDM onboarding, training and annual refresher training, including on the conduct of rent assessments - updating BDMs with advice, guidance and other publications issued from time-to-time by the PCA - how you ensure BDMs deal with tenants in a fair and lawful manner - provision to tenants of information on the role of the BDM	We comply with Regulation 41 through a structured programme of onboarding, training, monitoring and ongoing support for all Business Development Managers (BDMs). All BDMs receive dedicated induction training covering the requirements of the Pubs Code, their responsibilities when dealing with tied pub tenants, and the standards of conduct expected of them. This includes specific training on rent assessment procedures, tenant communications and Code compliance obligations. Refresher training is delivered annually, with additional updates provided whenever there are significant developments in the Code, PCA advice, guidance, arbitration awards or other relevant publications. BDMs are regularly updated on advice, guidance and other materials issued by the Pubs Code Adjudicator through internal communications, training sessions and compliance briefings. This helps ensure that their knowledge remains current and that regulatory developments are consistently reflected in day-to-day operations. We seek to ensure that BDMs deal with tenants in a fair, lawful and professional manner through documented policies, training, management oversight and compliance monitoring. Information regarding the role of the BDM is provided to tenants as part of the onboarding process and through ongoing communications. In addition, BDM Continuing Professional Development (CPD) declarations are published on our website, providing transparency regarding training and professional standards. These arrangements ensure that tenants understand the role of their BDM and that BDMs are equipped to fulfil their responsibilities in accordance with the requirements of the Pubs Code.
14.2	Please describe your arrangements for complying with regulation 41(4) with respect to both tenants and prospective tenants. Your description should detail, for example: - ensuring accurate, contemporaneous notes are made of all relevant meetings and discussions between BDM and tenants - meeting all statutory timescales for provision and agreement of meeting notes with notes being agreed in real time during the visit wherever possible	We comply with Regulation 41(4) through the use of dedicated systems for recording interactions with both tenants and prospective tenants. BDM activity with existing tenants is supported by our Publican Meeting Minutes system, while interactions with prospective tenants are recorded through our Onboarding system. These systems are designed to ensure that accurate and contemporaneous notes are made of all relevant meetings and discussions, providing a clear record of matters discussed, actions agreed and any follow-up requirements. Following the meeting, notes are issued within the statutory timescales required by the Code, with processes in place to capture any comments, amendments or agreement from the tenant. System controls and management oversight help ensure that deadlines are monitored and met consistently. The Publican Meeting Minutes and Onboarding systems provide visibility of interactions across the business, enabling compliance monitoring, the identification of potential issues and timely intervention where necessary. Any concerns relating to the quality, accuracy or timeliness of meeting notes are escalated to the Compliance team for review and appropriate action, ensuring ongoing compliance with the requirements of Regulation 41(4).

Code Compliance Officers (CCO) - Regulation 42		
15	Please describe your arrangements for complying with regulation 42. Your description should detail, for example: - appointment, training & annual refresher training - access to resources - reporting line - arrangements to ensure operational independence from the BDMs - how CCOs make themselves available to deal with tenant Code enquiries - that they have the entitlements listed in the regulation - the arrangements for keeping BDM training records - how they discharge their role to verify the pub-owning business's compliance with the Code	We comply with Regulation 42 through the appointment of a dedicated Code Compliance Officer (CCO) who is responsible for overseeing compliance with the Pubs Code across the business. The CCO receives appropriate induction training on the requirements of the Code and undertakes regular refresher training to ensure their knowledge remains current. They are supported by a Compliance team and have access to the resources, systems, management information and specialist expertise necessary to discharge their duties effectively. The CCO operates independently of the Business Development Manager (BDM) function and has a separate reporting line to senior leadership and the Board. This structure helps ensure that the CCO can assess compliance matters objectively and without operational influence from those responsible for managing tenant relationships. In accordance with our governance arrangements, the CCO provides regular compliance reporting to senior management and the Board, enabling effective oversight of the business's compliance with the Code. The CCO is accessible to tied pub tenants and prospective tenants wishing to raise Code-related enquiries. Contact details for the Compliance function are communicated through relevant tenant documentation and correspondence, enabling tenants to seek guidance or raise concerns directly where appropriate. The CCO is afforded all of the rights, entitlements and access required under Regulation 42 to fulfil their role effectively. This includes access to the information, systems, records and personnel necessary to investigate compliance matters, monitor adherence to the Code and recommend corrective actions where required. Records of BDM induction, annual refresher training and continuing professional development are maintained centrally and are subject to monitoring by the Compliance and People teams. These records are used to verify that training requirements have been completed and to identify any additional training needs. The CCO discharges their role through ongoing compliance monitoring, review of operational processes, oversight of Code-related activities, analysis of complaints and tenant feedback, review of management information and investigation of any actual or potential breaches. The CCO also oversees the preparation of the Annual Compliance Report and provides regular updates to senior leadership and the Board on compliance performance, emerging risks, training activity and any remedial actions required. These arrangements provide assurance that the business is operating in accordance with the Pubs Code and that any compliance issues are identified and addressed promptly.
Annual Compliance Report - Regulation 43(6)(d) - Employee Training		
16	Please describe your arrangements for complying with regulation 43(6)(d) in respect of training and guidance for your employees. Your description should detail, for example: - induction training and annual refresher training for all employees who deal with tied pub tenants [Regulatory Compliance handbook 2.1] - training and guidance to other employees	We comply with Regulation 43(6)(d) through a comprehensive programme of training, guidance and ongoing awareness activities designed to ensure employees understand their responsibilities under the Pubs Code and are equipped to apply its requirements in their day-to-day roles. All employees who deal directly with tied pub tenants receive dedicated Pubs Code induction training as part of their onboarding process. This training covers the key requirements of the Code, tenant rights, relevant internal procedures and the standards of conduct expected when interacting with tenants. Refresher training is provided annually to ensure knowledge remains current and to reinforce understanding of regulatory obligations. In addition to formal training, employees are provided with ongoing guidance through internal policies, process documentation, compliance briefings and updates issued in response to developments in the Pubs Code, guidance published by the Pubs Code Adjudicator, arbitration awards and changes to internal procedures. Relevant employees receive targeted training where regulatory developments impact specific operational activities. Training and guidance are also provided to employees who do not deal directly with tied pub tenants but whose roles support Code-related activities, including colleagues within Property, Finance, Legal, People and other support functions. This helps ensure that all areas of the business understand their responsibilities and contribute to maintaining compliance with the Code. Records of induction training, annual refresher training and any additional Code-related training are maintained centrally and monitored by the Compliance and People teams. Completion rates are reviewed regularly, and any identified training requirements are addressed through additional training or support. These arrangements help ensure that employees remain informed of their obligations and that the business maintains a strong culture of compliance with the Pubs Code.
Insurance - Regulation 46		

17	Please describe your arrangements for complying with regulation 46. Your description should detail, for example: - informing the tenant that the insurance charge proposed is higher than the premiums [regulation 46(2)(a)] - whether you, or any related group undertaking, receives, or expects to receive, any commission or rebate in connection with that policy [regulation 46(2)(b)] - how statutory deadlines in regulation 46(4) are met and - how assessment is made whether the tenant's suggested insurance policy is suitable and comparable [regulation 46(3)]	We comply with Regulation 46 through established insurance arrangements and processes designed to ensure transparency, fairness and compliance with the requirements of the Pubs Code. Stonegate purchases a number of corporate insurance policies, the principal policy being property insurance arranged for tied pubs in accordance with the obligations set out within the tenancy agreement. The policy is placed on a block basis with a reputable, independent insurer and the methodology for allocating premiums to individual properties is agreed with insurers. These arrangements are reviewed annually to ensure they continue to deliver appropriate cover, comprehensive policy benefits, minimal exclusions and an effective claims service in a cost-effective manner for tenants. Stonegate administers tenants' insurance arrangements on behalf of an agent of AJ Gallagher in accordance with FCA requirements for commercial insurance. Insurance documentation is issued to tenants, although the insurance contract remains between the insurer and the tenant, with the tenant identified as the policyholder. Where required by the Code, we provide tenants with information regarding the insurance charge, including whether the charge exceeds the underlying premium and whether Stonegate, or any related group undertaking, receives or expects to receive any commission, rebate or other financial benefit in connection with the policy. The commission received in relation to the placement and administration of insurance is disclosed to tied pub tenants as part of the annual insurance renewal communication process. Requests from tenants to insure through an alternative provider are managed through a documented review process. Any proposed alternative policy is assessed to determine whether it provides a level of cover that is suitable and comparable to the insurance required under the tenancy agreement, taking into account factors such as sums insured, policy limits, exclusions, excesses, cover extensions, insurer financial standing and claims service provisions. The assessment is undertaken by appropriately qualified colleagues and, where necessary, with support from our insurance advisers. Statutory deadlines relating to insurance disclosures, responses and assessments are monitored through internal procedures and administration controls to ensure that any requests from tenants are handled promptly and within the timescales prescribed by the Code. Any issues regarding compliance are escalated to the Compliance function for review and resolution where appropriate.
Miscellaneous		
	Extended Protections - Regulation 45A	
18	Please describe your arrangements for complying with regulation 45A and confirm that your Extended Protection reports to the PCA have been accurate and timely in accordance with policy. Please set out and explain any discrepancies.	We comply with Regulation 45A through established processes for identifying, recording, monitoring and reporting all Extended Protection cases. Responsibility for oversight of Extended Protection sits with the Compliance function, working alongside the Estates Team to ensure that eligible tenants receive the protections required by the Code and that all reporting obligations are met. We confirm that Extended Protection reports submitted to the PCA during the reporting period have been prepared and submitted in accordance with our reporting procedures and have been accurate and submitted within the required timescales.
	Gaming Machines - Regulation 47	
19.1	Please confirm that no new - or renewed - tenancies or licences require a tied pub tenant to rent or purchase a gaming machine	Yes
19.2	Please confirm whether (where a tied tenant chooses to have gaming machines), they may obtain them on the open market, or whether they are required to obtain them from you or your nominated supplier	Yes
	Sale of Freehold / Long Leasehold - Regulation 49	
20	Please describe your arrangements for complying with regulation 49. Your description should detail, for example: - details of how you ensure the required information is provided to the tenant as soon as reasonably practicable	The Estates and Commercial property team manage the disposal process and issue notification to the tenant in writing once a pub is approved for disposal. Following approval for disposal of a property, a letter advising of our intention to sell the property is issued to the current tied pub tenant, as soon as reasonably practicable and in line with Pubs Code requirements.
	Detriment - Regulation 50	
21	Please describe your arrangements for ensuring continuing compliance with regulation 50 to ensure that your tenants do not suffer detriment for exercising, or attempting to exercise, their rights under the Code regulations. This should include, where necessary, arrangements for the taking of contemporaneous notes evidencing the basis of any decision to oppose a lease renewal	Our Pubs Code training supports this regulation. Any disputes would be referred to the Code Compliance Officer.
	Flow Monitoring Devices - Regulation 51	

22	Please describe your arrangements for complying with regulation 51 on the use of Flow Monitoring Devices	Stonegate operates flow monitoring devices in most of our tied pubs to monitor for potential breaches of the purchasing obligations. Whilst the output of the flow monitoring devices is used in this process, we do not raise any charges to tenants without additional, corroboratory evidence relating to the alleged breach including but not limited to, photographic or documentary evidence of proof of purchases outside of the tie, financial accounting information and ordering patterns inconsistent with the observed sale of products. All proposed charges are discussed, with tenants before any charges are confirmed.
	Exemptions - Regulations 54-56	
23.1	Please describe your arrangements for complying with regulation 54 on Short Agreements. Your description should detail, for example, how you ensure you can identify when a tenant who has been on a short agreement or tenancy at will becomes entitled to full Code rights.	The pre-entry requirements in relation to short agreements are managed by the Agreements team. Pubs on a short agreement are notified in writing that Pubs Code rights apply if and when their agreement goes over 12 months in duration.
23.2	Please describe your arrangements for complying with regulation 55 on Pub Franchise Agreements	Stonegate do not have any pub franchise agreements as defined under the Regulations.
23.3	Please describe your arrangements for complying with regulation 56 on the Investment Exception	All conditions of regulation 56 are met and documented in the investment agreement or deed. We have diarised the expiry of the investment period in each case and will inform the tenant of that expiry at the time.
	Void or unenforceable terms of a tenancy or licence - Regulation 57	
24	Please confirm that your agreements do not contain void or unenforceable terms within the meaning given in regulation 57 and describe your arrangements to ensure this remains the case	Yes

Section C — Breaches & Complaints (Input)	Stonegate Group

Statutory Requirements and Other Policy

Pubs Code 43(6): The annual compliance report must include a detailed and accurate account of:
(b) any instances where a breach or alleged breach of these Regulations has been identified by a tied pub tenant
(c) the steps taken in relation to any such breach, or alleged breach

PCA Breach Reporting Policy https://www.pubscodeadjudicator.org.uk/media/395

Instructions on completing this Section

List breaches which started, ended, which you became aware of or were reported to the PCA during this reporting period.
All references to 'breach' include 'alleged breach' where relevant.
All breaches, including alleged breaches, must be reported promptly.
Your notes in Column K should include the following :
- the specific regulation and paragraph number breached or alleged to have been breached
- the extent of the breach
- Identification of any actual or potential detriment to tenants and how this is being mitigated
- actions taken to prevent the breach reoccurring

In addition, ***if the breach or alleged breach has not been reported to the PCA under the breach reporting policy please explain why*** .

If there were no breaches started, ended, alleged or reported during the period, please select this option on the first line

Line No.	Regulation Number (Select from drop down)	Description of breach or alleged breach	Status (Select from drop down)	Breach Notification Source	Date CCO Aware of Breach	Date Reported to PCA	Start date of breach	End date of breach	Number of Tenants affected	POB Notes and actions as per instructions above
1	Regulation 11 — Schedule 1 information	The TPT alleged a breach of Regulation 11, citing dissatisfaction with the information provided prior to entering into the agreement and concerns regarding the condition of the pub	Rejected	Tenant	24/04/25					The alleged breach was not upheld and was therefore not reported to the PCA. Following investigation by the CCO, it was confirmed that all required pre-tenancy information had been provided prior to the commencement of the tenancy.
2	Regulation 12 — Assignments	TPT alleged breach of regulation 12 citing dissatisfaction of AGA requirement/privity release fee.	Rejected	Tenant	22/05/25					The alleged breach was not upheld and was therefore not reported to the PCA. Following review, the matter was not considered a breach as the relevant lease contained privity provisions
3	Regulation 13 — Premises	TPT alleged breach of regulation 13(7) due to dilapidations survey not served at least 6 months before the end of the tenancy	Rejected	Tenant	26/08/25					The alleged breach was not upheld and was therefore not reported to the PCA. Following investigation by the CCO, the dilapidations survey was found to have been served within the timescales required under the Code
4	Regulation 12 — Assignments	TPT alleged breach of regulation 12 citing dissatisfaction with progess of assignment	Rejected	Tenant	01/07/25					The alleged breach was not upheld and was therefore not reported to the PCA. The assignment process was progressed within the timescales required under the lease, and completion could not proceed as the lease had been forfeited.
5	Regulation 11 — Schedule 1 information	The TPT alleged a breach of Regulation 11 in relation to a failure to provide the required training and information prior to the commencement of the tenancy	Rejected	Tenant	08/05/25					The alleged breach was not upheld and was therefore not reported to the PCA. Following investigation by the CCO, it was confirmed that all required pre-tenancy information had been provided and that Pre-Entry Awareness Training had been completed prior to the commencement of the tenancy.
6	Other Pubs Code complaints	The ex-TPT raised an alleged breach of the Pubs Code, citing concerns that their deposit had been withheld upon termination of the tenancy	Rejected	Tenant	20/11/25					The alleged breach was not upheld and was therefore not reported to the PCA. Following investigation by the CCO, it was determined that the deposit had been retained due to outstanding liabilities under the tenancy agreement.
7	Regulation 41 — Business Development Managers	The TPT raised an alleged breach of the Pubs Code, citing concerns that meeting minutes were issued for a meeting that did not occur.	Rejected	Tenant	03/12/25					The alleged breach was not upheld and was therefore not reported to the PCA. Following investigation by the CCO, it was established that the meeting record in question related to a standard communication that had been issued by email and subsequently recorded on the meeting minutes system for completeness. The record did not indicate the TPT as having attended a meeting.
8	Regulation 41 — Business Development Managers	Alleged breach of Regulation 41(4)(b): the TPT contended that meeting minutes were not supplied as required	Rejected	Tenant	14/01/26					The alleged breach was not upheld and was therefore not reported to the PCA. Following investigation by the CCO, it was confirmed that the meeting minutes in question had been provided to the TPT within 48 hours of the meeting
9	Regulation 10 — Sustainable business plan	The TPT alleged a breach of Regulation 10 in relation to the timing of the price review notification and the completion of the business plan.	Rejected	Tenant	05/01/26					The alleged breach was not upheld and was therefore not reported to the PCA. Following investigation by the CCO, it was determined that no breach of the Code had occurred, as the tied pub tenant was notified of the outcome of the price review as soon as the results became available.
10	Regulation 11 — Schedule 1 information	The TPT alleged a breach of Regulation 11 on the basis that a Schedule of Condition was not provided as part of the Schedule 1 information	Rejected	Tenant	26/01/26					The alleged breach was not upheld and was therefore not reported to the PCA. Following investigation by the CCO, it was confirmed that the Schedule of Condition had been provided as part of the Schedule 1 information, and no breach of the Code was identified.

11	Regulation 41 — Business Development Managers	Breach of Regulation 41(4) relating to the provision of meeting minutes within the timescales prescribed by the Code.	Confirmed	Tenant	10/11/25	21/11/25	24/01/25	24/01/25	1	The TPT was made aware of the Code requirements regarding the right to receive meeting minutes and, during a face-to-face meeting, confirmed that no detriment had been suffered as a result of the breach. Following identification of the breach, the CCO conducted an audit to determine whether any further breaches had occurred. The audit concluded that no additional breaches had been committed.
12	Regulations 28–33 — MRO (procedure)	The TPT alleged a breach of Regulation 29 as a full response was not provided to an MRO request which claimed that a trigger event had occured.	Rejected	Tenant	11/12/25					The alleged breach was not upheld and was therefore not reported to the PCA. Following investigation by the CCO, it was determined that a full response had been provided to the MRO request. The CCO confirmed that the matter did not constitute a valid trigger event under Regulation 29, and as such, no further response was required under the MRO procedure.