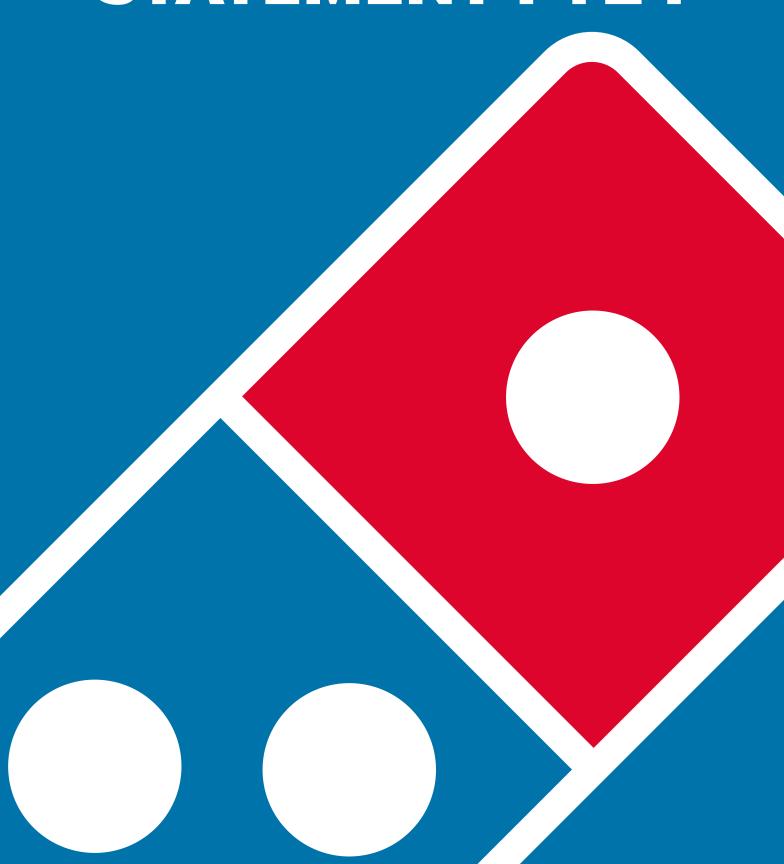
**DOMINO'S PIZZA ENTERPRISES LTD** 

# MODERN SLAVERY STATEMENT FY24



### **DISCLAIMER**

This Statement has been prepared on behalf of Domino's Pizza Enterprises Limited in accordance with the requirements of the Australian Modern Slavery Act 2018 (Cth) (the **Modern Slavery Act**). It explains the actions that have been taken by the reporting entity, including its owned and controlled entities, subsidiaries and joint ventures acknowledged in Appendix 1, to identify and mitigate the risk of slavery and human trafficking primarily in our Australian business operations and supply chains during the reporting period 3 July 2023 to 30 June 2024 (FY24).

Domino's Pizza Enterprises Limited (**Domino's**) is an Australian company (ABN 16 010 489 326) registered under the Australian Corporations Act 2001 (Cth) and publicly listed on the Australian Securities Exchange.

In this Statement a reference to 'Domino's, 'Domino's Pizza', the 'Domino's Group', the 'company', 'DPE' the 'organisation', 'we', 'us' and 'our' is to Domino's Pizza Enterprises Limited and its controlled entities, joint ventures, and subsidiaries collectively, except where the context otherwise requires. A list of Domino's subsidiaries covered under this Statement is included under Appendix 1. Refer to our Annual Report for further details on the Domino's Group structure.

This Statement may contain forward-looking statements referencing significant events occurring after 30 June 2024. Forward looking statements including those regarding the Company's intent, belief, goals, objectives, initiatives, commitments or current expectations are not statements of fact. Any forward-looking statements are based on the Domino's good-faith assumptions as to the financial, market, risk, regulatory and other relevant environments that will exist and affect the Company's business and operations in the future. Domino's does not give any assurance that the assumptions will prove to be correct.

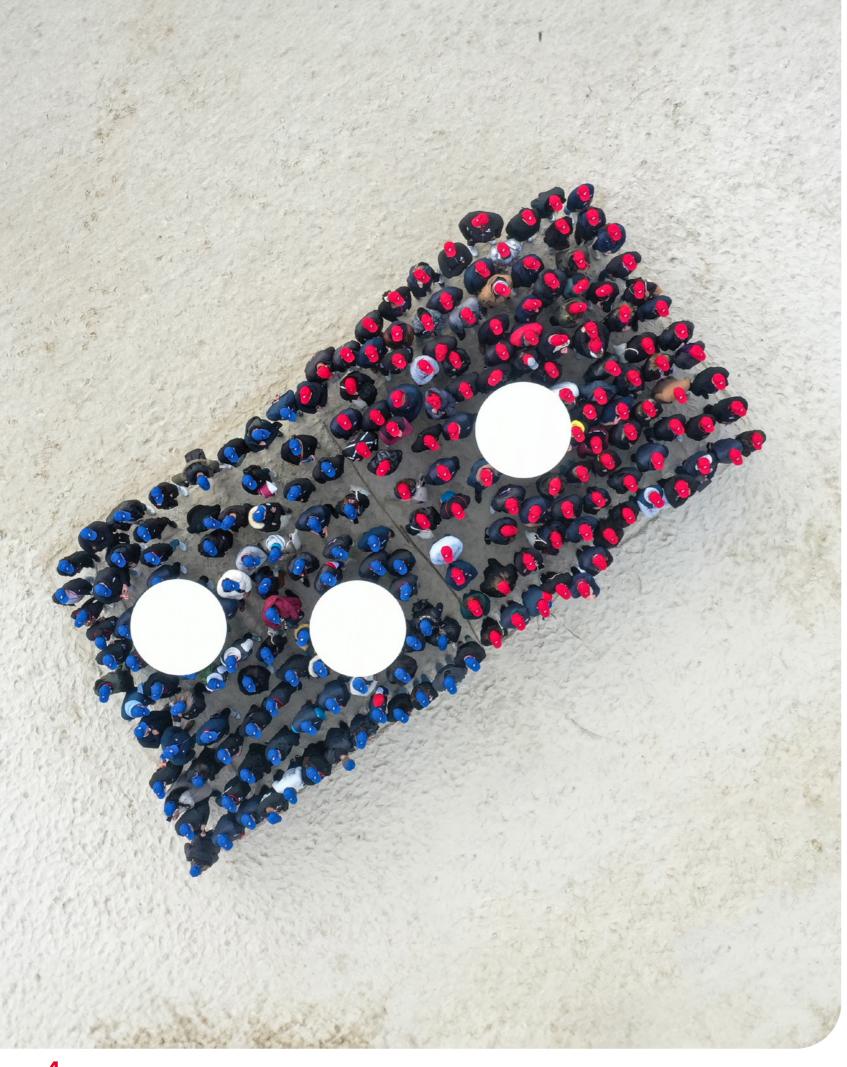
Forward-looking statements involve known and unknown risks, uncertainties and assumptions and other important factors, many of which are beyond the reasonable control of the Company, that could cause the actual results, performances or achievements of the Company to be materially different from the relevant statements.

Readers are cautioned not to place undue reliance on forward-looking statements, which speak only as at the date of issue. Except as required by applicable laws or regulations, Dominos' does not undertake any obligation to publicly update or revise any of the forward-looking statements or to advise of any change in assumptions on which any such statement is based. Past performance cannot be relied on as a guide to future performance.

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DOMINO'S PIZZA ENTERPRISES LTD I MODERN SLAVERY STATEMENT FY24



# **EXECUTIVE SUMMARY**

Domino's Pizza Enterprises (DPE) protect and promote human rights as set out in the United Nations Universal Declaration of Human Rights, including the principles contained within the International Bill of Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work. These underpin our commitments made in this Statement alongside our Human Rights and Responsible Sourcing Policies as well as our Business Partner Code of Conduct (Appendix 2).

To produce this Statement, we utilise the United Nations Guiding Principles on Business and Human Rights (UNGP) definitions of "cause", "contribute" and "directly linked" concepts as a guidance, to allows us to better assess our role in potential human rights risks and violations and implement targeted solutions. These concepts are defined as:

### **CAUSE**

When our activities directly result in an adverse human rights impact, such as forced labour within our operations. We are fully responsible for preventing and addressing any harms caused by our activities.

### CONTRIBUTE

When we may contribute to negative human rights impacts when our actions or decisions exacerbate an issue, even if we are not solely responsible. For instance, if we engage with business partners whose practices, combined with other factors, lead to exploitative labour conditions, we are contributing to that harm. In such cases, we are committed to taking proactive steps to mitigate risks and ensure compliance with ethical labour standards.

#### **DIRECTLY LINKED**

when we may not cause or contribute to an impact, but our business operations may be directly linked to human rights violations through our supply chain. For example, if a business partner engages in forced labour practices, while we are not directly causing the harm, we may still be directly linked to it through

the business relationship. In such cases, we engage with the business partner to remediate the issue and, if necessary, adjust our business practices to avoid further linkage to unethical practices.

Addressing modern slavery and respecting human rights is embedded in our values and culture, and we understand this process as continuous, led by our Board of directors. This continuous improvement approach to modern slavery has helped us raise our ethical standards and it is reflected in the following milestones achieved during FY24:

- Improved data collection from both our operations and supply chain
- Outlined our first-tier business partners for the Australian market
- Onboarded a new risk assessment platform to help identify, mitigate and manage any modern slavery risks within our supply chain
- Improved our due diligence and risk assessment frameworks

DPE acknowledges that modern slavery risks exist in every country in which we and our business partners operate so we are dedicated to managing these threats, whilst recognising that we can do better in some areas. That is why in FY25 we are committed to completing our assessment of all tier-one suppliers and starting the assessment of our tier-two suppliers (especially those operating in medium to high risk industries or countries), explore the implementation of targets and KPIs and consider further improvement of our disclosures of modern slavery and human rights through the full adoption of the UNGP framework as well refining the level of our grievance mechanisms.

EXECUTIVE SUMMARY

DOMINO'S PIZZA ENTERPRISES LTD I MODERN SLAVERY STATEMENT FY24

## CHAIRMAN & CEO MESSAGE

#### Dear valued stakeholders,

We are pleased to present Domino's Modern Slavery Statement for FY24. This year we are providing you with a new set of relevant information that is changing the way we do business. You will see how we improved our policies, enhanced our risk management approach and gathered more information from relevant sources both from supply chain and DPE teams. These efforts are translated into a significant advancement of our disclosures, we have matured in our capacity to manage modern slavery risks and its impacts, and we can proudly say that we have accomplished our main commitments made in our previous Modern Slavery Statement including:

- Improved reporting and data collection processes to assess modern slavery risks across both our supply chain and Domino's teams globally;
- Improved the integration of our Responsible Sourcing, Human Rights and Whistleblower Policies into daily operations;
- Enhanced our engagement with our supply chain and business partners;
- Made structural changes with a centralised approach to how we recruit, onboard, train, develop and engage with our people.

Beyond these achievements, we have also successfully undertaken other important significant accomplishments during the year, including:

### Data collection and partnerships:

- Taking further steps to ensure responsible business conduct with our Responsible Sourcing Policy, now signed by over 85% of our global food and packaging business partners. To reinforce this, we published several new key policies and statements.
- Further improving the traceability of our supply chain and capacity to address our ESG risks through partnering with ImpactBuying B.V. (IB).
   This platform helps to assess ESG risks within our supply chain through data collection and various

- questionnaires on key ESG topics with a specific focus on human rights and modern slavery.
- We gradually began the above process of collecting information from business partners and are now able to track and analyse key modern slavery related data points from many of them. As a result, this year for the first time we are reporting on our top 20 first-tier business partners, representing 65% of our total spend in the Australian market.

### Risk assessment and due diligence:

- In FY25, appointment of a Risk and Treasury
  Reporting Manager who has a key role to play
  in assessing sustainability-related threats, such
  as supply chain disruptions and unsafe working
  practices, whilst creating an environment in which
  leaders take a disciplined and focused approach
  to managing risk.
- Progressed in the development of our Risk Assessment framework underpinning our capacity to better report on how we approach modern slavery and human rights risks.
- Started to implement a more rigorous evaluation of our due diligence alerts as well as social compliance audit reports carried out to verify business partners' adherence to ethical labour standards.

### Our workforce:

Continued roll-out of our Global Learning
 Programme – Path to Excellence – Netherlands,
 Germany and Japan all gained access during
 FY24 and the remaining seven markets are expected to follow in the next 12 months.

The accumulation of these major accomplishments over the financial year is reflected in this Modern Slavery Statement marking a substantial advancement in our ongoing journey to enhance reporting and manage risks on our behalf.

The results from our due diligence survey (responses from 201 first-tier business partners in AU) show that there are no business partners

categorised as high risk whilst 50% are low risk, who report against modern slavery legislation and maintain strong internal policies. The remaining 49% were identified as medium risk. These findings are essential to design our strategy moving forward and focus on working collaboratively with those business partners who are facing potential challenges to identify pain points and proactively address and mitigate potential risks.

Although some of these results are reassuring, we recognise there is much work ahead of us to manage the risks of modern slavery not only with business partners but also within our operations. Our goal is to be able to make positive impacts on human rights, and this priority is embedded in our values to help people grow and prosper.

**Jack Cowin** 

To finalise, I would like to highlight some of the positive impacts we've made within our own operations including our Women in Domino's Initiative, which awarded AUD 50,000 grant to seven female store or regional managers across Australia and New Zealand to contribute towards their first own Domino's store. Additionally, as part of our regular review of remuneration metrics, in Australia, the median gender pay gap for base salary has decreased from 13.6% in FY23 to 0% in FY24.

Ultimately, we aim to achieve a better slice for everyone, from the farmers who grow our ingredients, to our franchise partners who make and deliver our meals, to our customers who enjoy our pizzas.

Thank you for being part of our mission to create a better slice for everyone.

Sincerely,

mer 3e

Mark van Dyck
CEO and Managing
Director

Jack Cowin Chairman

Mark van Dyck

DOMINO'S PIZZA ENTERPRISES LTD | MODERN :





The Domino's brand is owned by Domino's Pizza Inc., (DPI) a publicly listed company in the United States of America (US) and not the subject of this statement. We are the largest Domino's franchisee outside of the US, and we hold the exclusive master franchise rights for the Domino's brand in Australia, New Zealand, Belgium, France, the Netherlands, Japan, Germany, Luxembourg, Cambodia, Taiwan, Malaysia and Singapore.

Domino's Pizza Enterprises is a public company, listed on the Australian Securities Exchange as 'DMP'. The information set out in this statement covers Domino's and the entities it owns and controls. Across our markets of operation, the

Group fully or partially owned and controlled 34 subsidiaries as at 30 June 2024 –see the Appendix 1 for a full list.

Non-food services subsidiaries of note based in Australia include:

- Impressu Print Group Pty Ltd, a full-service printing company also offering warehousing and logistics solutions.
- Construction, Supply & Service Pty Ltd, which provides store fit-out services for Domino's and the restaurant industry more broadly.



### **IMPRESSU**

Impressu Print Group Pty Ltd (Impressu), has been a beacon of printing excellence since the eighties, earning the trust of national brands and local businesses alike. With a legacy of delivering high-quality, visually striking print and digital work, our printing company has cemented its reputation as a premier end-to-end print solutions provider.

With a workforce of 82 employees (76 permanent - 72 full-time and 4 part-time and 6 casual), Impressu fully adheres to DPE's policies, including those related to Human Resources and the Responsible

Sourcing Policy. As a result, both suppliers and employees are subject to DPE's established standards and procedures.

Paper and ink are the company's top two products by spend amongst their first-tier suppliers. Impressu maintains a long-standing relationship with its largest paper supplier, which has a Modern Slavery Statement in place as well as having completed the IB due diligence questionnaire as requested to all DPE's business partners. They source their FSC certified goods from Germany and South Korea and they provide Impressu with both recycled and virgin paper.







### Domino's Pizza Enterprises Ltd

Headquarters, Brisbane, Australia. Publicly traded on the Australian Securities Exchange as DMP.



Direct operations in Australia, Belgium, Cambodia, France, Japan, Germany, Luxembourg, Malaysia, Taiwan, New Zealand, Singapore and the Netherlands. 3,795 STORES

863 corporate stores and 2,932 franchised stores

### 12 MARKETS

More than 100,000 team members across our combined corporate franchised networks

### 46 million UNIQUE CUSTOMERS

represent nearly 11% of our markets' total population.

Our franchise partners are important business partners in managing modern slavery risks within our operations and while there are many similarities in these risks and how we manage these across all stores, there are some key differences arising from the franchising model, which are detailed later in this statement.

### **CONSULTATION PROCESS**

Domino's Australian subsidiaries, including Impressu Print Group Pty Ltd were involved in the modern slavery risk assessment process undertaken in preparation of this statement. These subsidiaries were consulted through meeting to discuss modern slavery risks within their operations and supply chains, and they provided procurement data and information which were incorporated within the risk assessments and IB questionnaire. These subsidiaries also report directly to Domino's Pizza Enterprises executives and are overseen by the Board. We are committed to working across our business and providing support to our subsidiaries to identify and manage modern slavery risk going forward.



### **GOVERNANCE FRAMEWORK**

The Domino's Board comprises our Group CEO & Managing Director and five non-executive Directors, of whom four are independent. The Board is responsible for guidance and oversight of ESG issues, identification of regulatory obligations and areas of significant business risk whilst ensuring robust mechanisms are in place to manage those risks. We place modern slavery and Human Rights topics under the "social" aspect of ESG.

The Board of Directors is assisted by specialised committees tasked with ensuring more effective monitoring of ESG matters and contributing to the decision-making process. The Nomination, Culture and Remuneration Committee (NCRC) and the Audit and Risk Committee (ARC) are comprised solely of independent non-executive directors.

The ARC is responsible for monitoring the culture and effectiveness of our risk and compliance activities, and internal controls and systems. It is also responsible for overseeing the accuracy and reliability of financial information, the appropriate application of accounting policies and whistleblowing matters. The ARC's responsibilities also include monitoring compliance with our Code of Conduct and due diligence approach, including how we identify, assess, manage and mitigate ESG risks across our value chain.

The ARC receives periodic reports containing information relating to concerns raised under the Anti-Bribery and Corruption Policy. Further information on our Board and other corporate

bodies can be found in our annual Corporate Governance Statement which is published on our corporate website here.

### **ESG STEERING COMMITTEE**

Our ESG Steering Committee meets on a quarterly basis. This governing body assumes the pivotal role of supervising the execution of our ESG strategy throughout our operations, oversees compliance with sustainability related regulation and frameworks, and provides counsel to the Board of Directors regarding the progress of our ESG approach.

The ESG Steering Committee is chaired by our Group CEO and Managing Director and made up of five senior executives with recognised competence and influence on our ESG-related work across our business. These members actively update their knowledge on ESG-related matters, including through direct engagement with recognised external experts.

### **ESG MANAGEMENT**

At the senior management level, Domino's Group Chief Sustainability Officer shapes and implements our Domino's for Good ESG strategy across our markets, assesses and manages impacts, and aligns our risks and material topics.

The Group Chief Sustainability Officer reports to our Group Chief Partnerships Officer. As a member of our ESG Steering Committee, the Sustainability Officer provides regular updates to this committee.



Additionally, our global Centres of Expertise (CoEs) help to execute our ESG strategy and lead key initiatives to achieve our global goals on the ground. They drive innovation and coordinate our activities across Sustainable Stores and Operations, Responsible Sourcing and Sustainable Product Innovation within DPE.

The responsible sourcing team is in direct contact with the procurement team to support managing human rights risks in our supply chain, whilst the buyers are responsible for engaging with our business partners in a manner that aligns with ethical sourcing and human rights risks in cooperation with key sustainability roles at Domino's.





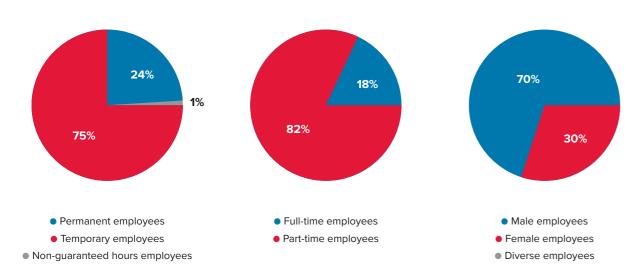
### **OUR WORKFORCE**

In FY24, Domino's employed approximately 100,000 members across 12 markets, of which 16,583 are the number of employees at support offices and company-owned stores (as per Table 1 below). Our people fill diverse roles such as making pizza, serving customers, delivery drivers, fitting out stores, managing corporate functions and operating technical printing services amongst others.

Employment types differ across roles, with most of our team members in stores in part-time or casual contracts and most of our corporate staff in full-time contracts. We take these differences in employment types and recruitment into account when considering the risk of modern slavery within our operations, as outlined later in this statement.

Countries	Total Corporate employees	Permanent employees	Temporary employees	Non-guaranteed hours employees	Full-time employees	Part-time employees	Male	Female	Diverse
Australia	1,690	1,004	21	665	477	1,213	1,191	496	3
Belgium & Luxembourg	18	16	2	-	17	1	8	10	-
Cambodia	105	54	-	51	54	51	61	44	-
France	560	560	-	-	241	319	448	112	-
Germany	700	336	6	358	140	560	562	138	-
Japan	7,784	582	-	7,202	582	7,202	5,439	2,345	-
Malaysia	3,488	918	1	2,569	919	2,569	2,309	1,179	-
Netherlands	991	209	53	729	218	773	768	223	-
New Zealand	82	13	-	69	13	69	67	15	-
Singapore	717	261	-	456	261	456	536	181	-
Taiwan	448	95	-	353	95	353	292	156	-
GLOBAL	16,583	4,048	83	12,452	3,017	13,566	11,681	4,899	3

Table 1: Support Offices and Corporate stores - Employee composition



Our aim is to attract, retain and engage with all our team members, so their experience at Domino's leaves them better than when they first joined us. Our pizza makers and delivery drivers have the opportunity to assume leadership roles in our organisation. We also recognise that some of our team members only stay with us temporarily, often to support themselves through school or university.



### **OUR SUPPLY CHAIN**

With a multi-tiered supply chain, Domino's works with about 330 business partners in the Australian market. We aim to source the majority of our food commodities locally to ensure the freshness of our products, support local farmers and improve the efficiency of our supply chain. We are transparent on the percentage of core product originating from Australian ingredients to support customers in making informed decisions. On average, our products are made in Australia with at least 79% Australian ingredients, see our website for more details.

Our supply chain composition and management are complex when considering the role of our franchisees since some of their supplies are procured through Domino's but others are managed by each individual franchise partner. Although these decisions are subject to business contracts and must adhere to our policies, they are out of our

direct control and therefore we acknowledge our limited capacity to report on them.

To simplify the analysis and given that our reporting and data gathering processes are ongoing and recently initiated, the scope of the following data is based on the corporate stores (including head office) for the Australian market only.

In FY24, the total spend with over 1,100 AU business partners was over AUD \$600 million. Measured by value, our top 20 first-tier suppliers accounted for 65% of our total expenditure. We classify them as "food" and "non-food" suppliers, where food includes all edible products to produce everything on our menus plus beverages and packaging, while non-food suppliers represent all services – such as marketing and logistics - and products like machinery amongst others.

Tier 1 Supplier	Product Group	Country of production	% of total spend		
Food suppliers					
Supplier 1	Cheese	USA	11%		
Supplier 2	Various dry products	Australia	5%		
Supplier 3	Meats	Australia	5%		
Supplier 4	Packaging	Australia	4%		
Supplier 5	Bread	Australia	4%		
Supplier 6	Meats	Australia	3%		
Supplier 7	Meats	Australia	3%		
Supplier 8	Beverages	Australia	3%		
Supplier 9	Dough ingredients	Australia	2%		
Supplier 10	Frozen products	Australia	1%		
Supplier 11	Sauces	Australia	1%		
Non-food suppliers					
Supplier 12	Logistics	Australia	8%		
Supplier 13	Printing services	Australia	3%		
Supplier 14	IT Services	Australia	3%		
Supplier 15	Insurance	Australia	2%		
Supplier 16	Marketing	Australia	2%		
Supplier 17	Logistics	Australia	2%		
Supplier 18	Marketing / IT Services	Australia	1%		
Supplier 19	Marketing	Australia	1%		
Supplier 20	IT Services	Australia	1%		
Total % of spend of the top 20 tier-1 suppliers FY24	Total % of spend of the top 20 tier-1 suppliers FY24				

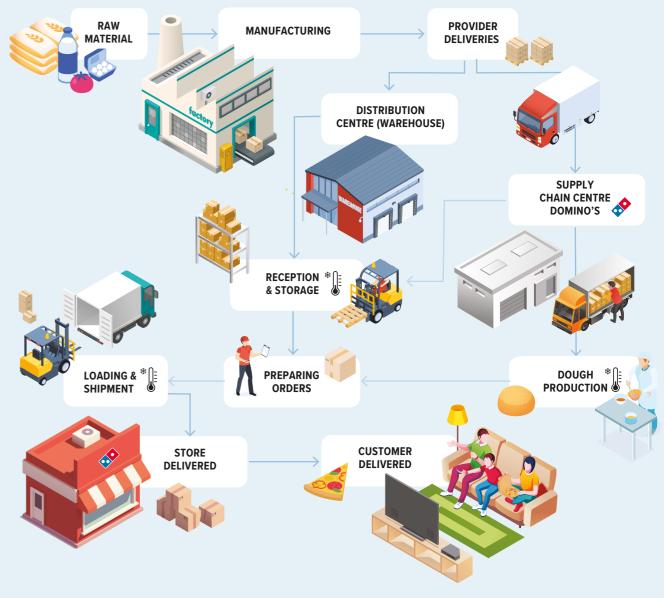
Table 2: Top 20 first-tier suppliers by spend

Of the top 20 first-tier suppliers, 16 produce their goods and services locally in Australia with the remaining 4 including our top 1 supplier of Cheese from the US and 3 large IT service vendors with global operations. According to the Global Slavery Index 2023 none of our top 20 tier-1 suppliers produce their products or services in a high-risk country. USA have a low level of prevalence (3.3 out of a 1,000 people) and 25% of vulnerability whilst Australia has a very low level of vulnerability (7%) and a 1.6 estimated prevalence of modern slavery per 1,000 people.

Beyond this top 20 first-tier suppliers in Australia, our chain includes goods sourced from Asia, the Americas and Europe as well as Australia. Key store supplies are distributed direct to our stores through local third-

party logistics partners in each state and territory. For us, responsible sourcing means that we obtain our products in a socially and ethically responsible as well as in an environmentally sustainable way while working with our suppliers to make sure that the workers involved in making the products we use are safe and treated fairly.

We view our suppliers as business partners, an observation that has led us to rename our Supply Chain department as our Partnerships department to strengthen the relationship and increase transparency. This department includes Procurement, Logistics, Supply Chain, Quality and Food Safety. We have also established dedicated local partnerships teams for each market we serve to support local sourcing and development more efficiently.





DOMINO'S PIZZA ENTERPRISES LTD | MODERN SLAVERY STATEMENT FY24

people work in a safe environment, are free from harm and paid fairly for the work they do. That is why we have zero tolerance to modern slavery within our own operations.

As a global employer, we acknowledge that there is an intrinsic risk of employing vulnerable workers in certain areas of our operations given the industry in which we operate. This risk stems from the nature of some roles, particularly at the store level, which often require minimal formal education or specialised skills. These roles tend to attract younger individuals (who meet working legal age), students (who require casual or flexible working hours), and people who recently migrated to some of the countries where we operate like Australia and see in us an opportunity to advance their careers, develop new skills and achieve their personal goals in the country.

To ensure our team members are not subject to any modern slavery practice or related to any violation of human rights, we have established recruitment procedures which require confirmation that workers have the rights to work in each of the countries where we operate and are of at least a minimum working legal age, but regardless of their location, all our workers have the benefit of our corporate policies (Appendix 2). Every team member joins our

workforce voluntarily and is free to resign whenever they wish to do so, and we paid in accordance with the relevant awards.

Moreover, we provide attractive career development opportunities for our people through easily accessible training programs – like Domino's University - and professional development workshops, amongst other benefits. Domino's offers employees casual and part time arrangements to enable employees the ability to obtain flexibility in their work, to meet the demand of study and other activities. Domino's is committed enabling employees to have longevity in their employment as well as career progression.

Based on the latest Global Slavery Index<sup>1</sup>, we assessed the level of vulnerability to modern slavery on the 12 countries where we operate<sup>2</sup>. This data helps us to better understand the risks of modern slavery whilst enabling us to target appropriate measures to mitigate them.

Countries	Level of vulnerability to modern slavery	Estimated prevalence of modern slavery (per 1,000 of population)	Corporate employees distribution per country
Cambodia	58%	5.0	0.6%
Malaysia	37%	6.3	21%
Singapore	24%	2.1	4.3%
Taiwan	21%	1.7	2.7%
France	13%	2.1	3.4%
Belgium	11%	1.0	0.1%
Germany	11%	0.6	4.2%
Japan	11%	1.1	46.9%
New Zealand	8%	1.6	0.5%
Australia	7%	1.6	10.2%
Netherlands	6%	0.6	6.0

Table 3: Level of vulnerability to modern slavery per country where we operate

Our biggest market in terms of corporate employees is Japan with 46.9% of our total workforce. The Global Slavery Index states that Japan has an estimated prevalence of modern slavery of 1.1 in 1,000 people, and 11 on a scale of 0 to 100 - with 100 being the maximum level of vulnerability to modern slavery. These figures are below average for the region.

The Netherlands, Australia and New Zealand have the lowest levels of vulnerability to modern slavery and 16.7% of our workforce is based in these countries. According to the Global Modern Slavery Index, Cambodia presents a high level of

vulnerability, while Malaysia, Singapore and Taiwan require a higher level of due diligence from us, as a total of 28.1% of our direct workforce is located there where risks of Modern Slavery vulnerability are significant.

### CASE STUDY

#### **ESG IN JAPAN**

Domino's Pizza Japan (DPJ) have made inspiring strides towards their ESG goals through diverse ESG initiatives in the last 12 months. Business partners have been engaged through collaborative workshops, fostering a shared commitment to sustainability across the supply chain. Employees and franchisees have experienced a more inclusive and supportive work environment, thanks to initiatives that integrate people with disabilities and promote diversity. Overall, these efforts in Japan have created a ripple effect, enhancing DPJ's reputation and contributing to a more sustainable future for all stakeholders involved.

A key initiative was a supplier workshop held in April to promote sustainable practices to majority of our business partners. This workshop focused on how business partners could reduce their carbon footprint, not just within their operations, but also as part of our supply chain, and how we could work together to meet our sustainability goals and comply with our Responsible Sourcing Policy requirements. The business partners also visited a store to get a more thorough understanding of our operations which they found very valuable.

In terms of social initiatives, we've provided positions for those with disabilities in cooperation with government agencies and local disability support centers. These employees perform essential tasks such as cleaning and maintenance, fostering a more inclusive and supportive work environment. The positive interactions between all employees have been encouraging and beneficial for our organizational culture.



<sup>&</sup>lt;sup>1</sup> Walk Free 2023, The Global Slavery Index 2023, Minderoo Foundation. Available from: https://walkfree.org/global-slavery-index (no 2024 version at the point of writing this statement).

 $<sup>^{2}\,</sup>$  The table only shows data for 11 countries given that there is no data available for Luxemburg



### **ABOUT OUR FRANCHISE PARTNERS**

We recognise that the same risks apply to our franchise partners. However, our level of visibility and control of human resources is different across these non-corporate stores. That is why in FY24, we brought together all people-related teams who used to report locally under one global people function. This resulted in a more consistent approach to how we recruit, onboard, train, develop and engage with our people. Safety became part of the Compliance team's responsibility.

As a result, a key focus was to create safer ways of working across all our markets. This centralised approach to human resources is helping us mitigate and manage any modern slavery and human rights risks within our operations. We aim to enhance our due diligence processes, paying particular attention to those countries with a higher level of modern slavery vulnerability.

Having a centralised people function has allowed us to better support our franchise partners and in the future we aim to have one centralised HR system to improve our ability to perform due diligence responsibilities whilst providing us with key HR information to be able to analyse, detect and manage any risks related to modern slavery within the operations of our franchise partners.

### MODERN SLAVERY RISKS IN OUR SUPPLY CHAINS

One of the greatest areas of exposure to modern slavery risks for our business is through our suppliers, particularly in the food industry, so we are focused on working with our business partners to effectively manage these risks. As part of this approach, to proactively identify, prevent, mitigate and address modern slavery risks in our supply chains, in FY24 we partnered with Impact Buying B.V. (IB), to enhance supply chain transparency through traceability technologies, leveraging their expertise in human rights and supply chain. They provided us with a platform designed to collect, verify and validate information about our business partners, their associated supply chains and the products they deliver. This platform helps to assess ESG risks within our supply chain through data collection from various

questionnaires, with a particular focus on modern slavery and human rights.

Although the roll-out of this platform has already begun, the collection of information from business partners will be gradual and ongoing, prioritising the urgency of legislation, the size of the supplier, the importance of the product/service, the risks associated with different countries of origin and / or the ESG risks of the different raw materials involved. For more details about our approach and commitments made in relation to the sustainable procurement processes and use of these different high-risk products please refer to Appendix 2 where our overarching policies are disclosed.

### DATA GATHERING AND RISK ANALYSIS IN OUR SUPPLY CHAIN DURING THE REPORTING PERIOD AND BEYOND FOR THE AUSTRALIAN MARKET

In order to perform a risk assessment of direct business partners we started collecting data related to the location, business partner type, and product group (i.e. food) from our own records. As part of this initial phase, our priority was to understand the modern slavery risks as well as the negative impacts observed in our supply chains including how well our first-tier business partners manage human rights risks in their own operations and supply network.

In specific supply chain areas, we went beyond first-tier to collect key datasets from second and third-tier suppliers down to the farm level, to better recognise the origin of our commodities. This process of gathering information is the first step to assessing our supply chain beyond first-tier with the aim of better identify and map risks throughout our supply chain. We expect to be able to report details of the findings in our next Modern Slavery Statement since we consider this a high priority within our ESG strategy.

If we detect incomplete information, we have followup procedures in place allowing us to evaluate all relevant criteria for our risk assessment process. This continuous engagement approach not only allows us to ensure that the level of transparency increases over time but also to apply a targeted method to risk management. Additionally, to ensure that data is complete, up-to-date, objective, and reliable, IB is responsible for onboarding business partners into the system, tracking the information to be provided, and verifying the data supplied.

We found this approach to risk assessment to be particularly relevant for suppliers of products like fish & seafood, vegetables, meat, cocoa, palm oil, soy (including soy and palm oil used as animal feed), eggs & egg derivatives, and coffee given that these industries are subject to higher risks of human rights abuses depending on the country of origin (see Appendix 3 for more details). The following table is a list of the different layers of considerations throughout the process:

Risk assessment task	Summary of the procedure
Country risk classification	Business partners located in countries classified as high-risk are required to undergo third-party social compliance audits.  IB uses the amfori BSCI country risk list, which is based on the World Bank's index to determine risk countries in terms of human rights violations. Although this does not allow for differentiating between various risks in advance, it largely aligns with specialized indices such as the Global Rights Index, the Global Slavery Index (utilized earlier in this report), the Global Child Labour Index, the Labour Rights Index, the ILAB list of goods - child and forced labour, and the Human Development Index that have been used too.
Risk product group	As the risks often do not lie with the direct business partner but in the upstream supply chain, the product groups served by the business partners are assessed according to already identified potential risks in the supply chain. For instance, countries of origin and production, as well as ingredients and components, are considered for this assessment.
Desk study for key high-risk products	Once those high-risk products are identified, they are cross-checked with the volume consumed by Domino's. This exercise allows us to create a list of product groups that are at high risk and high level of consumption. These products groups will require further investigation considering various factors such as the type of product, the raw materials used in production, the location and nature of the manufacturing process, and the sourcing volume and leverage with the business partner. Sources such as reliable newspaper articles, published studies, impact assessments, NGO reports, and university studies are consulted.  It is essential to perform product-specific research to minimise assumptions based on the general characteristics of the respective industry.

Table 4: Risk assessment tasks description

### **DUE DILIGENCE SURVEY**

A due diligence survey was shared with 334 of our first-tier business partners for the Australian market, to gain an understanding of how they are reporting and assessing ESG risks, with a focus on modern slavery and human rights. To help focus our efforts, we decided to include business partners with an annual spend of \$10,000 or more. The survey seeks to explore their risk management practices, policies and targets, implemented measures, supply chain visibility, training, and engagement with relevant stakeholders. We received 201 responses (60%), and all were analysed, with 10% undergoing further in-depth analysis to gather concrete insights into supply chain risks.

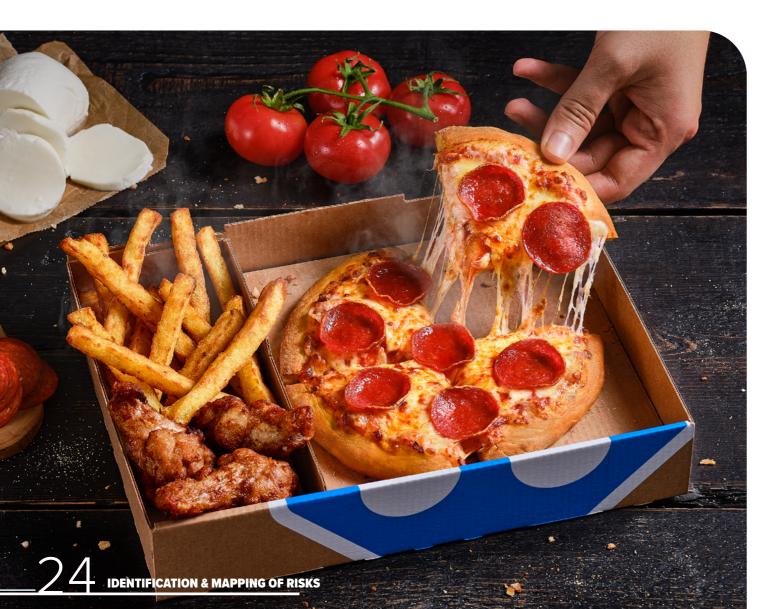
The purpose of this survey is to assign a risk score to first-tier business partners—classifying them as low, medium, or high risk. Each answer is reviewed and scored on a scale of 0-5, with higher scores indicating greater risk. A total score for the whole questionnaire ranging from 0-100 indicates low risk, 101-200 indicates medium risk, and 201-350 classifies a business partner as high risk.

This survey helps transform the abstract risk analysis into a more specific one, as the information provided by first-tier business partners is used to identify our supply chain risks and highlight hot spots to prioritise our actions.

Moreover, the due diligence survey allows us to identify 'due diligence alerts' which are red flags metrics pointing us to specific cases requiring further action or investigation. See Appendix 4 for an overview of these red flags, and their assigned risk level.

### **SOCIAL COMPLIANCE AUDIT REPORTS**

In 2024, we established the process for the collection of social compliance audit reports, such as ETI-SMETA, SA8000, or amfori BSCI, from first-tier and other tier business partners located in high-risk countries. These reports are collected and evaluated by IB as part of its risk analysis to identify specific risks for each business partner. More information on this can be found in the "Our Actions taken to Address Risks" section.



The evaluation of audit reports (e.g., the individual chapters of an amfori BSCI audit report) provides detailed insights into the risks related to specific human rights aspects, such as child labour and forced labour. Missing aspects required by the MSA are supplemented through the due diligence survey. Through the analysis of the third-party social compliance audit reports, we assess amongst others:

- Labour rights: Ensuring no child labour, forced labour, or exploitation.
- Working conditions: Safe and hygienic workplaces.
- Wages and benefits: Fair remuneration that meets or exceeds local minimum wage laws.
- Freedom of association: Protecting the right of workers to join trade unions and bargain collectively.

• **Ethical business practices:** Preventing corruption, bribery, and fraud.

While third-party audits do not directly fulfill the compliance requirements of the Modern Slavery Act, they are an essential part of our broader approach to managing risks in the supply chain. These audits help to:

- **Identify risks:** Uncovering labor rights violations and modern slavery risks.
- Support remediation: Providing valuable data that helps us work with suppliers to address and correct any identified issues.
- Enhance transparency: Increasing visibility over our suppliers' practices, contributing to our overall human rights due diligence framework.

## FIRST-TIER BUSINESS PARTNERS DUE DILIGENCE SURVEY RESULTS IN THE AUSTRALIAN MARKET

We conclude that all our top 20 first-tier business partners have established robust sustainability management systems. These include, for instance, human rights policies, sustainable sourcing practices, employee policy manuals, supply chain integrity statements, and supplier codes of conduct. Although some risks are identified (as specified below), these partners are classified as low-risk, as they are taking appropriate actions to prevent, mitigate, and reduce modern slavery risks.

These 20 first-tier business partners are primarily based in low-risk countries, with nearly all located in Australia and one in the United States (see table 2). Supply chain transparency data gathering has begun,

involving the mapping of other tier supply chain actors, demonstrating that so far all of these actors are also based in low-risk countries, such as Australia, the United States, Canada or Belgium.

The top 20 first-tier business partners operate primarily in food production, agriculture, logistics, and service provision—of which the first two sectors are known to carry inherent human rights risks, such as forced labour, child labour, and risks associated with low-skilled migrant workforce, especially in connection with some commodities that are relevant to us.

Key highlights of our due diligence survey responses and their own MSA statements include:



### **RISK CATEGORISATION**

LOW RISK

were categorised as low risk, with robust due diligence systems in place. These partners typically report under the MSA and maintain strong internal policies, risk assessments, action plans, and conduct regular audits to ensure compliance with modern slavery regulations.

**MEDIUM RISK** 

49% were identified as medium risk, particularly in industries such as food processing and agriculture.

**HIGH RISK** 

Zero

suppliers were identified as high risk.

### **DUE DILIGENCE MANAGEMENT SYSTEM**

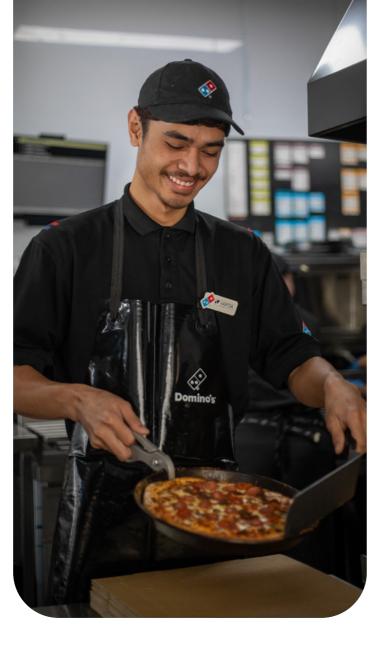
46% of our first-tier business partners have implemented a due diligence risk management system following the OECD Due Diligence risk cycle.

### **CODE OF CONDUCT COMPLIANCE**

62% request to their direct suppliers to sign a code of conduct, ensuring adherence to minimum human rights standards, such as the ILO core labour standards.

### **HUMAN RIGHTS TRAINING**

92% of our first-tier business partners train their entire workforce on human rights, 8% train up to 25% of their workforce.



### **VISIBILITY ACROSS SUPPLY CHAINS**

have high visibility, having mapped the entire supply chain for key products and services and identified critical suppliers at all levels.

have moderate visibility, with mapping completed for major first-tier business partners and partial mapping for other key areas.

28% are developing their visibility, currently having limited or no visibility below the first-tier level.



### **DEEP DIVE: TWO KEY BUSINESS PARTNERS**

We are proud to see most of our top first-tier business partners demonstrating strong human rights and due diligence practices within their own operations and supply chain. Particularly two suppliers, our main cheese/mozzarella supplier and dough ingredients one, representing over 13% of our spend. Despite them not being required to report under the Modern Slavery Act, both have opted to assess whether their business operations are causing, contributing to, or linked to adverse human rights impacts. They have also implemented supplier codes of conduct to mitigate risks, which prohibit for instance forced labour and child labour, and ensure compliance with international labour laws.

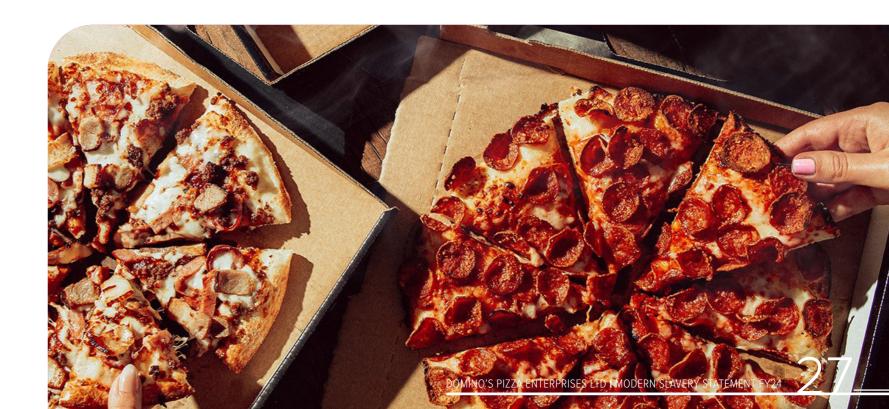
Our cheese supplier is a subsidiary firm of a global corporation, which is required to report under the Modern Slavery Act in the UK. This connection reinforces their commitment to transparency and due diligence. They also engage in responsible sourcing practices, adhering to ethical standards outlined in their supplier code of conduct and sustainability reports.

In terms or risk assessment both companies conduct regular evaluations to manage risks within their operations and supply chains. Our dough ingredients supplier has implemented a robust set of policies, including due diligence practices and policies on human rights, environmental risks, and governance.

Both business partners maintain moderate to high levels of visibility over their supply chains. For instance, the dough ingredients supplier has identified its major first-tier supply network and has partially mapped the supply chains for key products and services. On the other hand, our cheese suppleir has outlined their supply chain regarding their critical products and services and has identified key business partners at all levels of their supply chain, ensuring a comprehensive understanding of risks and opportunities.

Moreover, both companies provide annual training programs for all employees, including the topics of human rights, health & safety, anti-bribery, and anti-corruption governance amongt others. These programs are designed to ensure compliance with their ethical policies and reinforce standards across their operations and supply chains.

In terms of stakeholder engagement our dough ingredients supplier actively engages with key business partners and stakeholders to maintain high human rights standards and ensure alignment with their goals. They also participate in several global initiatives, such as SAI-SDP, the Global Dairy Platform, and the International Dairy Foods Association amongst others.





DPE and its subsidiaries are committed to preventing bribery and corruption, which is reflected in our Responsible Sourcing Policy. We operate within the laws of each jurisdiction in which we do business, in a way that complies with our Responsible Sourcing Policy and the expectations of our stakeholders. We also hope for the same standards from our business partners and their commitment to our Responsible Sourcing Policy. Our Anti-Bribery and Corruption Policy also sets out various standards for our Board of Directors and all our employees.

The ARC receives periodic reports containing summary information relating to concerns raised under the Anti-Bribery and Corruption Policy. There were no incidents reported in FY24.

Our values underline our commitment to ensuring fair and ethical standards throughout our value chain and day-to-day operations. We collaborate closely with our partners and build strong relationships based on mutual respect, transparency and trust. We have several policies that support our approach.

These policies and commitments ensure Domino's consistently exhibits and promotes ethical, transparent and responsible behaviour, engages with key stakeholders and communities and contributes to the growth and prosperity of franchise partners, team members and communities. They also stipulate due diligence processes around human rights and provide information about grievance mechanisms.

Ensuring our compliance with these policies is the responsibility of senior management and our Group CEO and Managing Director, Group Chief Financial Officer, Group General Counsel & Company Secretary, Group Chief Partnerships Officer, Group Chief People & Culture Officer and Group Chief Sustainability Officer at a group level. Senior management delegates these tasks to the market leadership teams to ensure the policies are implemented in accordance with local legislation.

We have provided several training sessions to key global personnel including the topics of Modern Slavery Act legislation, and due diligence process. The teams included, global ESG, Partnerships and ANZ wider Partnerships, legal and finance teams. We also carried our 121 meetings with IB to not only receive third party training, but also to ensure modern slavery and human rights topics are embedded in our global ESG strategy.



#### THE KEY ROLE OF PURCHASING

In 2022, our procurement, supply chain and quality department changed its name to the partnerships team. The keyword 'partnerships' better describes the essence of what the team does, shifting the focus from prioritising 'the lowest unit price' to building long term relationships with partners. This cultural change in the team played an important role in materialising the company's sustainability ambition into procurement practices, prioritising innovation and new ideas. The partnership team therefore works according to a well thought-out but simple model; 'three-legged stool' strategy.

All three 'legs' are equally important:

- 1. FAIR PRICE
- 2. INNOVATION
- 3. LONG-TERM RELATIONSHIPS

This 'three-legged stool' strategy is a foundational approach to buying acting as a mitigator of Modern Slavery and Human Rights risks. We believe that our business partners are less likely to breach contracts if they know we value our relationship in the long term, also if the cheapest price is not our priority, we are less likely to engage with vendors who carry a risk of modern slavery in their operations or supply chain to save costs.

#### **ABOUT OUR FRANCHISE PARTNERS**

When a new franchise partner joins us, they are required to read and understand our Sub-Franchise Agreement (SFA) contract which amongst other things, it contains modern slavery provisions. Franchisees are also required to participate in training, which will cover various topics relating to modern slavery as they enter their SFA for their store. We house all training materials in our Path to Excellence program which requires sign off before progression.

The following levels of governance and oversight apply to our franchised stores:

· Franchisee screening and onboarding procedures.

- SFA mandate compliance with labour legislation and standards.
- Centralised support including training and supply chain management services (the vast majority of franchise partners use our designated suppliers).
- Monitoring procedures, including auditing programs.

Below is an illustration of the way some of our key policies and procedures address priority areas in managing modern slavery risk. This includes our procurement functions, franchisee management and corporate store employment and grievance mechanisms. Some policies cover multiple areas.

### **GOVERNANCE APPROACH**

**Procurement** 

Franchise Management & Corporate Store Employment

Grievance Mechanisms



RESPONSIBLE SOURCING POLICY



EMPLOYMENT LAW COMPLIANCE POLICY



WHISTLEBLOWER
POLICY & INDEPENDENT
WHISTLEBLOWING
FUNCTION



BUSINESS PARTNER ONBOARDING AND SCREENING PROCEDURES



SUB-FRANCHISEE AGREEMENT



EMPLOYEE COMPLAINTS PROCESS



FRANCHISEE SCREENING AND ONBOARDING PROCEDURES



WORK HEALTH & SAFETY POLICY

Our commitment to ensuring fair and ethical standards throughout our value chain and day-to-day operations is closely aligned with our core values. These standards and requirements are the foundation of the relationships with our partners we choose to work with. Our Responsible Sourcing Policy, underpins these standards and ensures that DPE's entire value chain is always committed to responsible business conduct. We strive to continuously improve these

standards to make a positive contribution to the people, communities, animals and the environment impacted by our business. Since publishing the Responsible Sourcing policy in 2023, it has been signed by over 85% of our global food and packaging business partners. We aim to extend this policy to all business partners globally and look forward to reporting further progress in FY25.

We also acknowledge that there is a risk of our franchise partners not operating their franchise in accordance with the terms and conditions of their respective franchise agreements. If a franchise partner breaches our agreement, we will analyse what the breach is and its severity. For example, if there's a breach of the SFA, subject to law, DPE will either terminate immediately or terminate for an unremedied breach following a reasonable notice

period. The consequences of non-compliance may include damage to the brand, fines or other sanctions from regulators and/or a reduction in franchise fees received from the franchise partners. Domino's mitigates this risk by continually monitoring and evaluating the financial and operating performance of each franchise partner to assess compliance with franchise agreements as well as conducting random audits.

### **RISK MANAGEMENT IN OUR OPERATIONS**

Risk management is a key consideration in all our activities at Domino's and our approach to due diligence is as an ongoing process aiming to identify, prevent, mitigate and manage any adverse human rights impacts. It involves four steps:

### WORKFLOW FOR IMPLEMENTING CONTINUOUS IMPROVEMENT - FROM GROSS RISK TO NET RISK



\*Workflow stops here for low-risk business partners.

#### STEP 1 - RISK ANALYSIS AND ESCALATION

IB is responsible for reviewing audit reports and due diligence survey responses. Any nonconformities (i.e. business partner refuses to provide documentation) or risks identified are escalated to our Partnerships Team and the corresponding buyer responsible for overseeing the relationship with the business partner.

As part of this first step, besides our due diligence surveys, we have also commenced to request social compliance audit reports such as ETI-SMETA, SA8000, or amfori BSCI from business partners in high-risk countries. This approach adds a relevant layer of assessment in our risk management and due diligence process. We seek to ensure that those business partners operate according to global standards as a minimum requirement. Through the analysis of these third-party audit reports, DPE assesses the risks before moving to the next step.

#### **STEP 2 - EVIDENCE COLLECTION**

A cross-functional working group, including experts from our team, the buyer, and IB meets regularly to assess the identified non-conformities or due diligence alerts. Together, we develop a tailored solution and decide what corrective actions are going to take place. The buyer, who manages the relationship with the business partner, directly engages with them to provide guidance and support in resolving the specific cause of the escalation. We are committed to seeking collaboration from the business partner in order to resolve the issue and proceed to implement grievance mechanisms.

#### **STEP 3 - CORRECTIVE ACTION**

Once corrective actions are determined, our business partner is expected to implement these measures. For non-conformities identified in audit reports, we also have the option to request a closed Corrective Action Plan (CAP) report after a specific period to confirm that the non-conformity has been addressed. The auditing of the resolved non-conformity is again managed by the relevant standard criteria and the third-party certification bodies. This follow-up step ensures the effectiveness of the corrective actions, and further measures are taken if issues persist.

### **STEP 4 - FOLLOW-UP**

The process does not stop once corrective actions are in place. The next phase involves tracking the effectiveness of these actions for continuous improvement. This approach ensures that business partners are continuously reviewing their own practices, and the risk of human rights violations is minimised.

### DUE DILIGENCE QUESTIONNAIRE FINDINGS

This due diligence process has aready provided valuable insights regarding potential risks, leading to initial actions; however, the first round is not fully complete for all business partners.

The responses to the questionnaire allow us to identify risks and classify business partners as high, medium or low risk. The second layer or analysis includes the likelihood of occurrence and the severity of a potential breach. Moreover, the due diligence questionnaire serves as an initial preventative measure, helping to lower a business partner's risk status by reflecting good audit results, relevant actions already undertaken or proactive self-disclosure.

As the process matures, we will gather feedback on the effectiveness of corrective actions. Lessons from ongoing monitoring will guide refinements to the overall approach, ensuring the framework for assessing actions remains robust and adaptable to new challenges. By working collaboratively throughout this process, we ensure that all nonconformities and alerts are comprehensively addressed, while also supporting business partners in improving their practices. This not only drives compliance but also fosters long-term sustainability and ethical business practices across our supply chain. This continuous improvement loop strengthens the resilience of our operations and supply chain management whilst it reinforces our commitment to human rights and responsible sourcing.

Additionally, during FY24 we conducted training modules to explain the importance of human rights in the supply chain and why we request specific information, such as supply chain transparency, social compliance, and modern slavery due diligence. The IB business partner portal was also introduced to assist our suppliers in submitting data, filling out forms and navigate the portal as well as ensure they understand our expectations. This collaborative approach supports responsible sourcing and long-term partnership.

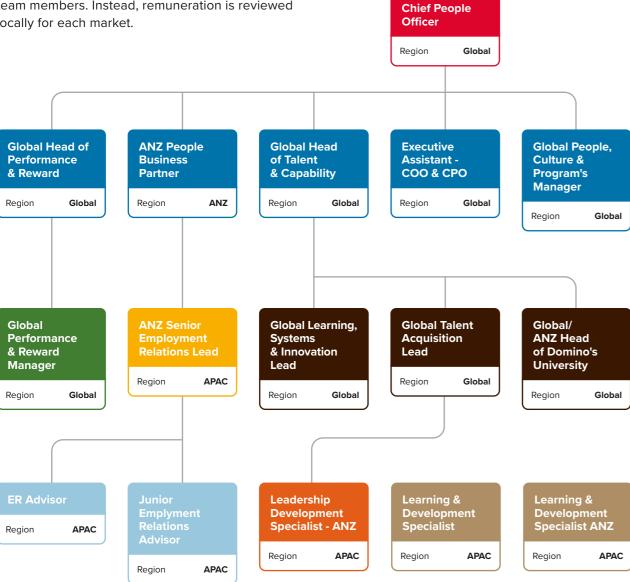


### IN OUR OWN OPERATIONS: AS AN EMPLOYER

#### **EMPLOYEE RIGHTS AND REMUNERATION**

Domino's reviews the remuneration for its Support Office and corporate store employees at least once a year and adheres to all local laws regarding remuneration and rewards. As DPE operates in 12 markets with varying local legal requirements, there is not a single remuneration policy that covers all team members. Instead, remuneration is reviewed locally for each market.

Our structural changes mean that we now have centralised approach to how we recruit, onboard, train, develop and engage with our people. This chart of our Global People Team represents the new structure:



This approach to Human Resources management helps us ensure that our labour standards are fair and equitable whilst complying with local laws, standards and regulations in the markets in which we operate. Inflation continues to rise in all our markets

as both customers and our people face ongoing cost of living challenges, hence Domino's reviews inflation and cost of living metrics across all markets when determining annual wage increases to ensure our people are appropriately rewarded.

### **EMPLOYEE SURVEYS**

We conduct comprehensive employee engagement surveys across our support offices, corporate stores and numerous franchise partners to gauge the satisfaction and well-being of our team members. These surveys are vital for gaining insight into our employees' experiences and sentiments within the company. We anticipated a global decline in engagement due to a large-scale business restructure, which was implemented at different times throughout the fiscal year. The table below shows the employee satisfaction rate (ESat) from FY22 to FY24. It should be noted that we have included scores for both the first and second half of FY24 to illustrate the impact of the timing of the restructuring by country.

While some countries have experienced expected declines, others have seen notable increases in engagement levels. For example, Australia, which underwent its restructure early in FY24, has already shown a notable increase in engagement results.

We take all feedback from our team members very seriously and are committed to addressing as many concerns as possible to boost overall engagement. The high response rates to our surveys are especially encouraging and reflect our employees' recognition and appreciation of the value we place on their voices and feedback. This level of participation underscores our commitment to fostering an inclusive and responsive work environment.

Country	FY	Employee satisfaction rate (ESat)	Difference	Response rate	Difference	ESat benchmark
	2022	75%	-	86%	-	
Australia	2023	69%	<b>-6</b> %	75%	-11%	
Australia	H1 2024	54%	-15%	73%	<b>-2</b> %	
	H2 2024	69%	15%	72%	-1%	
	2022	75%	-	90%	-	
New Zealand	2023	57%	-18%	70%	-20%	
New Zedidilu	H1 2024	70%	13%	83%	13%	
	H2 2024	70%	0%	83%	0%	
	2022	60%	-	82%	-	
laman	2023	63%	3%	91%	9%	
Japan	H1 2024	57%	-6%	95%	4%	
	H2 2024	55%	<b>-2</b> %	92%	-3%	
	2022	67%	-	73%	-	
F	2023	65%	<b>-2</b> %	81%	8%	
France	H1 2024	57%	-8%	44%	-37%	
	H2 2024	70%	13%	91%	47%	74%
	2022	87%	-	84%	-	
Carran	2023	81%	-6%	83%	-1%	
Germany	H1 2024	67%	-14%	88%	5%	
	H2 2024	63%	-4%	48%	-40%	
	2022	73%	-	62%	-	
Netherlands	2023	69%	-4%	62%	0%	
Netherlands	H1 2024	71%	2%	63%	1%	
	H2 2024	66%	-5%	49%	-14%	
Taiwan	H1 2024	60%	-	95%	-	
Taiwan	H2 2024	64%	4%	90%	-5%	
Malague	H1 2024	60%	-	61%	-	
Malasya	H2 2024	64%	10%	90%	29%	
Singapara	H1 2024	70%	-	89%	-	
Singapore	H2 2024	67%	-3%	86%	-3%	
Cambodia	2024	N/A	N/A	N/A	N/A	

Table 5: Employee Engagement results

In FY24, the introduction of new survey technology enabled us to connect more effectively with a larger proportion of our team members. This advancement has facilitated continuous engagement, allowing us to address concerns promptly and significantly strengthen our relationships with employees across all regions.

We have also created a Culture Champions Group with nominated Culture Champions from across the business. This group focuses on key areas of feedback from the engagement survey, including wellbeing, belonging and recognition.

### **WORKPLACE HEALTH & SAFETY**

We are deeply committed to the health and safety of our team members. Safety training for staff is important for several reasons.

Most importantly, our commitment to safety focuses on employee wellbeing and reducing workplace accidents and injuries. We aim to instil a culture of vigilance and responsibility, promoting proactive hazard identification and risk mitigation, with road safety being a top priority. We are taking a number of actions to support our goal, including:

- Implementation of Global Safety Forums to align markets on baseline reporting standards.
- Completion of in-person driver training in Singapore with an external provider of competency-based training standards.

 Introduction of ongoing mandatory compliance and refresher training to drive a learning culture and raise the standards of safe work practices across the network.

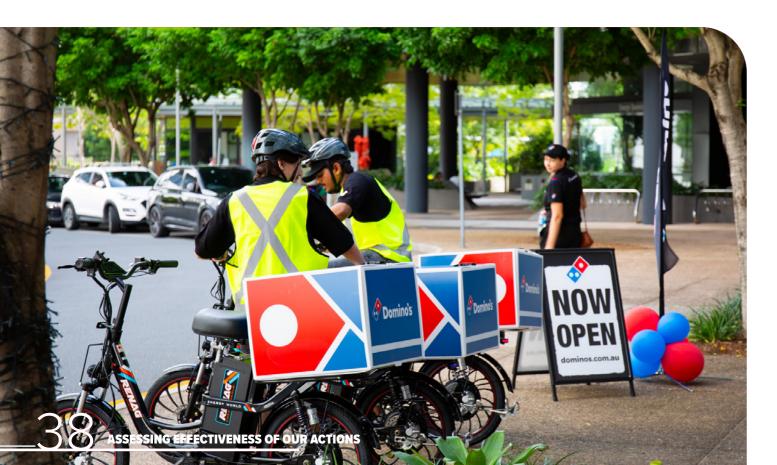
#### **WHISTLEBLOWER**

We reviewed and analysed all whistleblower cases reported at Domino's ANZ for FY24. See next section for further information.

#### **ABOUT OUR FRANCHISE PARTNERS**

Since 2014, we have proactively worked with franchise partners and our corporate-owned stores to reduce the risk of labour rights issues in our operations, particularly the issue of underpayment. Our franchise partners are required to operate in full compliance with all applicable laws and regulations and to uphold the Domino's brand values as part of our agreement with them. As previously disclosed, the SFA mandates compliance with employment law and we provide training in Employment Law obligations and compliance specifically.

We conduct regular inspections in our franchise stores to ensure they meet our strict compliance criteria. We take strict approach to workplace obligations, if a franchisee is identified as deliberately underpaying team members, action can include termination of a franchise agreement. Domino's has policies in place to ensure affected team members receive their entitlements wherever possible as part of this process.



### IN OUR SUPPLY CHAIN: AS A BUYER

### TRACKING EFFECTIVENESS AND CONTINUOUS IMPROVEMENT

The buyer monitors the business partner's progress closely after engaging with them to resolve any non-conformity or specific human rights risks found during the process. This includes tracking the implementation of corrective actions within an agreed-upon time frame. Our team ensures full remediation of the issue and works closely with the business partner to prevent future occurrences. To achieve this we have monitoring tools in place including regular check-ins to assess whether the improvements are sustainable over time.

While we have this operational framework in place, we did not implement it in FY24, as no significant human rights risks were identified.

Effectiveness of the risk analysis is confirmed by the business partners identified in the due diligence survey as high risk on top of the business partners based in high-risk countries or delivering from high-risk supply chains.

We expect to have the results and effectiveness of the described measures to be disclosed in next year's statement.

### SUMMARY OF SOME OF OUR ACTIONS TAKEN AND THEIR EFFECTIVENESS

The actions taken and the measurements that help us track our progress addressing modern slavery risks during FY24.

Area	Activity	Outcome FY24
Governance	ARC meetings	4 meetings
	Modern slavery training and discussions for key global personnel	121 meetings with IB
Risk Management in our own operations	Operations evaluation report (OER) audits	4 audits globally 12,426 global store inspections
	Due diligence questionnaire	60% responded
Risk Management in our supply chain	In depth analysis for more concrete insights into supply chain risks	10% of our Australian business partners
	Responsible Sourcing Policy adherence	85% of our food and packaging global business partners
Grievance Mechanisms	Cases of grievances to be reported	0

Table 6: Summary of actions taken addressing modern slavery risks



### GRIEVANCE MECHANISMS, INCIDENTS & REMEDIATION ACTIONS

Domino's is committed to a culture of corporate compliance, honest and ethical behaviour and strong corporate governance. To foster this culture throughout the Group, the Company encourages its staff and external partners who have knowledge of, or reasonable suspicions of, any incident or reportable conduct to report the matter through the appropriate channels at their earliest opportunity.



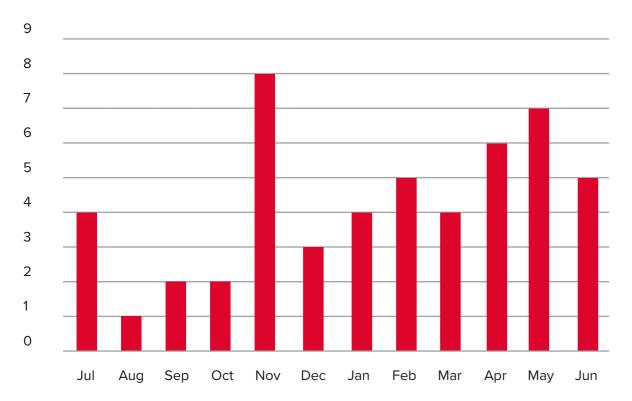
The Company recognises the importance of ensuring a safe, supportive and confidential environment where people feel confident about reporting wrongdoings and are supported and protected throughout the process.

We have a number of processes and resources in place such as in-house counsel to assess and monitor compliance risk. Our wage assistance hotline in Australia/New Zealand is managed internally, and our Whistleblower Hotline is managed by a third party. Both hotlines are communicated to employees through posters which are permanently

placed in all Domino's workplaces, including retail stores. Displaying these posters is mandatory and their presence is monitored through Domino's Operations Evaluation Report (OER), our store audit and review process.

In FY24, the Whistleblower Hotline received, assessed and resolved 49 complaints from Australia and 3 from New Zealand. All of them were resolved within 30 days and with one day of average response time. The number of whistleblower cases reported at Domino's ANZ increased from 37 on FY23 to 52 in FY24.

### **CASES PER MONTH**

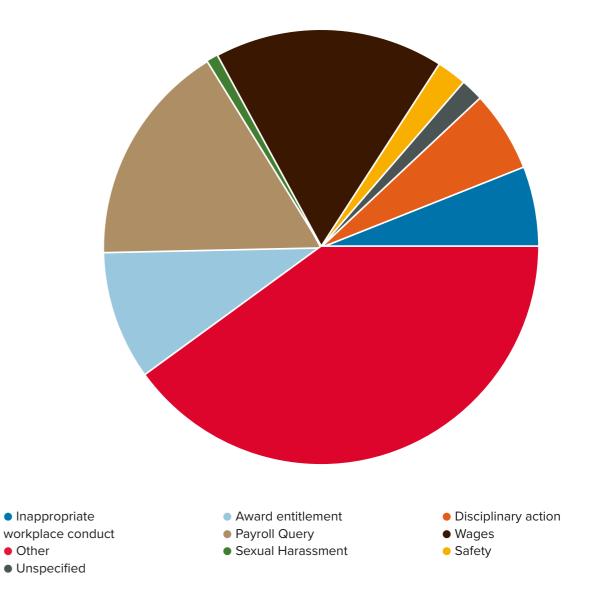


Moreover, our Employee Relations team reported 2,392 cases where 2,389 are resolved and 3 are active.

49 cases Australia	3 cases New Zealand		
Average response time: 1 day			
Average case closure time: 30 days			

100% cases are resolved

### **CATEGORY BREAKDOWN**



Note - 'other' category skews the data. Cases are named 'other' when they do not fit within one of the other established categories.

Other



### LOOKING AHEAD

Domino's acknowledges that eliminating modern slavery requires collaboration so we continue to assess our own performance and that of our supply chain to address these risks. Because we are committed to continuous improvement in the fight against modern slavery, over the next year and beyond, we plan to:

### **EXTEND SUPPLY CHAIN MAPPING**

We acknowledge that our efforts so far are not yet fully sufficient to address the entire supply chain beyond the first-tier. Therefore, we have made it a high priority to map our supply chains at all levels, prioritising key products and services to identify critical business partners during the next few years. We plan to achieve this through the implementation of traceability technologies that will provide us with clear visibility into the labour practices at the second-tier business partners and beyond.

We also aim to expand our analysis to focus on a global level, across our 12 markets and report about our supply chain transcending the Australian market.

### FURTHER IMPLEMENTATION OF SOCIAL COMPLIANCE

We aim to expand social compliance audit reports to all tiers located in high-risk countries, as well as to the identified high-risk supply chains, even if they are not located in high-risk countries.

### **ALIGNING WITH SECTOR-WIDE INITIATIVES**

We are looking forward to partnering with key initiatives focused on tackling specific human rights issues that are relevant to the industry where Domino's operates and are seeing as high risk or with a potential negative impact.

### **TRAINING**

We are considering making human rights related training compulsory for key team members and business partners to ensure the effective implementation of our policies and procedures and foster collabouration. Although we provide



training to our buyers, we will focus on more in-depth and specific human rights risks identification moving forward.

### **ESTABLISHING KPIS**

We are looking into ways to increase the visibility of our supply chain and due diligence survey responses. We also aim to provide more specific KPIs for modern slavery overall.

### **UNGP FRAMEWORK ADOPTION**

We plan to adopt this framework to improve the way we disclose information, management of modern slavery and human rights related risks as well as grievance mechanisms amongst others.

### PRINCIPAL GOVERNING BODY APPROVAL

This Statement was reviewed and approved by the board of Domino's Pizza Enterprises Limited in their capacity as the principal governing body of Domino's Pizza Enterprises and its subsidiary companies on 16 December 2024.

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Mark van Dyck
CEO and Managing Director

16 December 2024

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### **APPENDIX 1: SUBSIDIARIES**

Name of entity	Activity	Outcome FY24
Hot Cell Pty Ltd (i)	Australia	100%
Silvio's Dial-a-Pizza Pty Ltd (i)	Australia	100%
Impressu Print Group Pty Ltd (i)	Australia	100%
Catering Service & Supply Pty Ltd (i)	Australia	100%
Domino's Pizza Enterprises Ltd Employee Share Trust	Australia	100%
Construction, Supply & Service Pty Ltd (i)	Australia	100%
Ride Sports ANZ Pty Ltd (i)	Australia	100%
Domino's Pizza New Zealand Limited	New Zealand	100%
DPH NZ Holdings Limited	New Zealand	100%
Domino's Pizza Japan, Inc.	Japan	100%
Domino's Pizza Europe B.V.	The Netherlands	100%
Domino's Pizza Netherlands B.V.	The Netherlands	100%
DOPI Vastgoed B.V.	The Netherlands	100%
Domino's Pizza Geo B.V.	The Netherlands	50%
N4N B.V.	The Netherlands	50%
Domino's Pizza Belgium S.P.R.L.	Belgium	100%
Daytona Holdco Limited (UK)	UK	100%
Ausmark ApS	Denmark	100%
Daytona Germany GmbH	Germany	100%
Domino's Pizza Deutschland GmbH	Germany	100%
DPEU Holdings S.A.S.	France	100%
Domino's Pizza France S.A.S.	France	100%
HVM Pizza S.A.R.L.	France	100%
Fra-Ma-Pizz SAS	France	100%
Pizza Center France SAS	France	100%
Groupe AVB S.A.S	France	100%
Taiwan Domino's Pizza Co., Ltd	Taiwan	100%
PizzaVest Co., Ltd	Taiwan	100%
Dommal Food Services Sdn Bhd	Malaysia	100%
Domino's Singapore Pte Ltd	Singapore	100%
D.Pizza Co. Ltd	Cambodia	100%
DPE Global Support Centre Poland sp.zo.o	Poland	100%
DPE Shared Services SDn. Bhd	Malaysia	100%
Origin Pizza Holdings S.r.L	Italy	100%

<sup>(</sup>i) This entity is a member of the tax-consolidated group where Domino's Pizza Enterprises Limited is the head entity within the tax-consolidated group.

### **APPENDIX 2: POLICIES**

Policy	Description	Link
Anti-Bribery and Corruption	This policy ensures that the Group takes all reasonable measures to prevent any practice or behaviour which could be construed as being or could potentially lead to, bribery or corruption. This policy applies to all officers, employees (whether permanent, fixed-term or temporary), contractors, consultants and franchisees of the Group	<u>Here</u>
Code of Conduct for Employees	To guide behaviour, enhance investor confidence in the Company and demonstrate the commitment of the Company to comply with its legal obligations as well as to ethical standards and practices. This policy applies to all Directors, senior executives and employees (Employees).	<u>Here</u>
Continuous Disclosure and External Communications	The Company is committed to complying with its obligations relating to the disclosure of market sensitive information and providing shareholders and the market with equal and timely access to information.	<u>Here</u>
Diversity and Inclusion	Sets out the diversity and inclusion principles alongside the roles and responsibilities amongst everyone at Domino's. The company is committed to building and maintaining a vibrant culture that is entirely inclusive of diverse experiences, perspectives and backgrounds.	<u>Here</u>
Governance Code of Conduct	Outlines the standards of behaviour in the workplace that the Company expects of each employee on a range of issues in order to promote a culture of fair and ethical behaviour.	Here
Humans Rights Policy	This Policy is guided by International Human Rights principles encompassed by the Universal Declaration of Human Rights, including those contained within The International Bill of Rights and the International Labour Organisation's (ILO) 1998 Declaration on Fundamental Principles and Rights at Work.	<u>Here</u>
Responsible Sourcing Policy	This policy is an overarching document which summarises our commitments and requirements on a broad set of ESG topics. This Policy and its annexures will replace the Business Partner Code of Conduct. We require that all our Business Partners and their upstream supply chains meet the standards and promote the principles outlined within this Policy.	Here
Risk Management	The purpose of the policy is to enable the fulfilment of the Board's risk management duties and responsibilities. This Board policy ensures that an approach to managing risk is implemented as part of the day-to-day operations of the Company.	Here
Whistleblower	Through this policy the Company encourages its staff and external partners who have knowledge of, or reasonable suspicions of, any incident or reportable conduct to report the matter through the appropriate channels at their earliest opportunity.	<u>Here</u>
Zero Deforestation & Land Use Policy	We are committed to preserving our planet's forests and ensuring sustainable production practices. Our Policy prohibits any form of deforestation or forest land conversion, legally or illegally, to produce commodities such as palm oil, soy, coffee, cocoa, wood, rubber and cattle, that are used in Domino's products.	<u>Here</u>
Beef Policy	This Policy covers deforestation topics for business partners supplying Beef and products containing Beef to DPE. Beef products can be found on menus in all DPE markets and therefore it is crucial to our Responsible Sourcing objectives that we minimise our environmental footprint and prevent deforestation within our supply chain.	<u>Here</u>
Cocoa Policy	Human rights issues such as low income, child labour and forced labour coupled with a volatile market has led to further poverty having a devastating impact particularly in primary cocoa-producing regions like West Africa. Consequently, we are committed to only using responsibly and sustainably sourced cocoa to help improve the conditions in the industry and reduce the negative impact on people, (indigenous) communities and the environment	<u>Here</u>
Coffee Policy	Along with significant environmental impacts including deforestation, coffee cultivation plays a significant role in social challenges experienced by many coffee farmers often in developing countries. At DPE, coffee is not included in many products nevertheless, we are committed to ensuring that the coffee we do use is produced using farming practices that are environmentally and socially responsible and supports a deforestation-free supply chain.	<u>Here</u>
Palm Oil Policy	Palm oil is used in several DPE products due to its unique characteristics and versatility. It is mostly used in our desserts but also in some dough premix recipes amongst other products. Unfortunately, the production of palm oil has had significantly damaging effects on rainforests and contributed to climate change, loss of biodiversity and human rights violations. At DPE wherever possible we will first aim to remove or exclude palm oil from our recipes and products. Where palm oil cannot be substituted in a recipe and must be used, DPE is committed to only using palm oil that adheres to robust sustainability standards	<u>Here</u>
Paper and Pulp Policy	Paper products are essential in delivering millions of pizzas to our customers every day. They help protect, maintain and deliver our products and packaging to our stores and then to our customers in all of our markets. Domino's is committed to only using responsibly and sustainably sourced paper to minimise the negative impact to the environment and to affected communities and farmers.	Here
Soy Policy	Soy is used in several DPE products directly (such as cooking oil) or indirectly in feed mix for animal products that are used by DPE. We recognise that through our purchasing practices and further engagement with our stakeholders we have an opportunity to help improve the conditions in our supply chains and mitigate the negative impact on the environment and (indigenous) communities therefore it will continue to be an essential priority for us.	<u>Here</u>

## APPENDIX 3 – LIST OF RELEVANT COMMODITIES WITH HIGH RISKS OF MODERN SLAVERY AND HUMAN RIGHTS

Ingredient	Country of origin	Modern slavery risk
Palm oil	Indonesia, Malaysia	These 2 countries are the largest producers of palm oil and have documented cases of child labour, particularly among migrant workers and low-income families.
Soy	Australia, Brazil, USA	Deforestation-driven displacement: Indigenous communities may be displaced as forests are cleared for soy plantations, particularly in Brazil.  Exploitation of migrant labour: Migrant workers often face poor working conditions, low wages, and lack of legal protections.
Cocoa*	Côte d'Ivoire, Ghana, Peru	High risk of child labour and forced labour, especially in West African countries.
Meat	Australia, Brazil, USA	Processing plants in Brazil and the USA may have higher risks of labour exploitation, especially of migrant worker.  Australia's meat processing plants often rely on temporary migrant workers and visa holders, some of whom may be at risk of exploitation due to language barriers, lack of awareness of labour rights, and reliance on employer-sponsored visas. These workers may face poor working conditions, underpayment, or excessive working hours.  Many meat processing companies in Australia use labour-hire firms to source workers. Some labour-hire agencies have been found to exploit workers by underpaying them or withholding wages, creating a vulnerability to forced labour conditions.
Wheat	Australia, USA, Ukraine, China	Low wages, poor working conditions may be applicable in processing, particularly in countries with large seasonal or migrant workforces.

\*We source cocoa in minimal volumes and therefore not highly relevant in terms of supply chain risks, but we acknowledge the significant human rights risks.

### APPENDIX 4 – DUE DILIGENCE SURVEY ALERTS

The following table provides an overview of the risks and their specific risk level assessed in the due diligence survey results.

Risk	Risk Level
Modern slavery	High
Child Labour	High
Forced Labour	High
Freedom of Association	High
Unequal Treatment	High
Living Wage	High
Land Rights	High
Security Forces	High
Anti-Slavery	High
Risks and Interests of Indigenous People or the Cultural Heritage of Indigenous People	High
Disabled Workers	High
Conscripted Workers	High
Displaced Workers (i.e. refugees)	High
Itinerant Workers (including backpackers)	High
(low-skilled) Migrant Workers	High
Prison Workers	High
Young Workers (under 18)	Medium
Indigenous Workers	High

### APPENDIX 5: MODERN SLAVERY ACT, MANDATORY REPORTING CRITERIA

This statement was produced to meet the mandatory reporting criteria established under the Modern Slavery Act 2018 (Cth). The table below lists the seven mandatory reporting criteria of the Act together with page references as to where information is disclosed in this statement.

Modern Slavery Act mandatory criteria		Reference in this statement
1	Identify the reporting entity	Page 8
2	Describe the reporting entity's structure, operations, and supply chains	Pages 8 to 17 Appendix 1
3	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Pages 18 to 26 Appendix 3 and 4
4	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Pages 28 to 33 Appendix 2
5	Describe how the reporting entity assesses the effectiveness of these actions	Pages 34 to 40
6	Describe the process of consultation with any entities the reporting entity owns or controls	Page 11
7	Provide any other relevant information	Pages 42 to 47

### **APPENDIX 6: SOURCES USED FOR DESK STUDY**

- amfori BSCI. Country Risk List. amfori BSCI, 2022
- Business & Human Rights Resource Centre. "Beef Companies Failing to Protect Human Rights. <u>Beef</u> companies failing to protect human rights
- Fair Work Ombudsman (Australia) Inquiry into the Harvest Trail: Wage Exploitation in the Agricultural Sector.
   Fair Work Ombudsman Harvest Trail Inquiry Report
- Food Empowerment Project. Slavery in the Chocolate Industry. <a href="https://foodispower.org/human-labor-slavery/slavery-chocolate/">https://foodispower.org/human-labor-slavery/slavery-chocolate/</a>
- Global Slavery Index (Walk Free). 2022 Report on Coffee Production and Labour Exploitation in Brazil and Colombia. Global Slavery Index | Walk Free
- Human Rights Watch. 2021 Report on Exploitation in the Meatpacking Industry in the USA. <u>US: Meatpacking</u> Workers' Rights Under Threat | Human Rights Watch
- International Labor Rights Forum. The Human Cost of Palm Oil Revisited. Human\_Cost\_Revisited\_0.pdf
- International Labour Organization (ILO). Global Child Labour Index. ILO, 2024. Child rights and business | UNICEF
- International Trade Union Confederation (ITUC).
   Global Rights Index. ITUC, 2024. <u>ITUC-Global-Rights-Index-2023.pdf</u>
- OECD. Business Handbook on Due Diligence in the Cocoa Sector. OECD, 2022. https://www.oecd.org/en/ publications/business-handbook-on-due-diligence-inthe-cocoa-sector\_79812d6f-en.html

- Parliament of Australia Joint Standing Committee on Migration – Report on the Exploitation of Temporary Migrant Workers in Australia. A National Disgrace: The Exploitation of Temporary Work Visa Holders
- Rainforest Alliance. "Tackling Child Labor in Coffee Supply Chains in Vietnam." Project Profile. <a href="https://www.rainforest-alliance.org/in-the-field/tackling-child-labor-in-coffee-supply-chains-in-vietnam-project-profile/">https://www.rainforest-alliance.org/in-the-field/tackling-child-labor-in-coffee-supply-chains-in-vietnam-project-profile/</a>
- Roundtable on Sustainable Palm Oil (RSPO). 2021 Labour Rights Assessment in Indonesian and Malaysian Palm Oil. A global partnership to make palm oil sustainable Roundtable on Sustainable Palm Oil (RSPO)
- The Cocoa Barometer. 2022 Cocoa Barometer. Cocoa Barometer 2022
- The New York Times. "Meat-Packing Industry Criticized on Human Rights Grounds." <a href="https://www.nytimes.com/2005/01/25/business/meat-packing-industry-criticized-on-human-rights-grounds.html">https://www.nytimes.com/2005/01/25/business/meat-packing-industry-criticized-on-human-rights-grounds.html</a>
- United Nations Development Programme (UNDP).
   Human Development Index. UNDP, 2023. <u>Human</u>
   Development Index | Human Development Reports
- US Department of Labor. 2022 List of Goods Produced by Child Labor or Forced Labor. Washington, D.C.: U.S. Department of Labor, 2024. TVPRA; 2024 List of Goods Produced by Child Labor or Forced Labor

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