



Modern Slavery Statement

This statement is made by Grill'd Pty Ltd as the reporting entity under the *Modern Slavery Act 2018* (Cth) (the **Act**) in relation to the financial year ending 30 June 2025 and is prepared in accordance with the requirements of section 14 of the Act.

PURPOSE AND COMMITMENT

Grill'd is committed to operating ethically and with integrity in all our business dealings. We have a zero tolerance to modern slavery, we recognise the risks of modern slavery and we are committed to identifying, preventing, and addressing any risks of modern slavery within our operations and supply chains.

At Grill'd, we are guided by the values of Passion, Leadership, Ownership, Trust and Sustainability. We deeply embed the Grill'd values into our culture of a people first organisation.

Our purpose is to positively impact the lives of our people and our communities through engagement, education, and energy.

This statement sets out how Grill'd addresses the risks of modern slavery in our operations and supply chains.

OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Grill'd operates a restaurant burger chain in the Accommodation and Food Service Activities sector with its support office located in Melbourne, Australia. Grill'd operates 174 restaurants across Australia. We predominantly source our products in Australia.

Of the 174 Grill'd restaurants, 149 are operated by Grill'd directly, while 25 are operated as independent businesses by Grill'd franchisees. Grill'd directly employs approximately 5,000 employees and it is estimated that its franchisees employ approximately 1,000 employees. Each franchisee is contractually responsible for the employment of those persons in their own operations.

RISKS IN OUR OPERATIONS AND SUPPLY CHAINS

Risks in our operations

We recognise that modern slavery risks may exist in our operations and supply chains, including forced labour, human trafficking, and exploitation. We are committed to continuously assessing and mitigating these risks.

Grill'd has a relatively young work force and is not within the highest risk industries identified by the Global Slavery Index in Australia. All employees are employed directly by Grill'd or its franchisees. All Grill'd restaurant employees operate under an enterprise agreement. Franchise employees operate predominantly under their own enterprise agreements, or the relevant award. Grill'd Support Office employees are predominantly covered by common law contracts or awards.

Our People and Culture team provides ongoing assistance and guidance to Franchisees in relation to employee compliance matters and have a connection with external workplace

advisory services to provide additional support as needed. Grill'd's People and Culture team also work with Franchisees to ensure any annual wage increases are implemented across their business. As such, we believe there is a minimal risk of modern slavery in our operations.

Risks in our supply chain

Grill'd engages with a total of 796 Tier 1 suppliers for goods and services. Our supply chain consists predominantly of Australian suppliers, with 95% of total suppliers and our top 70 suppliers by spend based in Australia.

For the relevant reporting period, Grill'd reviewed the categories of 100% of its Tier 1 international suppliers and 139 of its Tier 1 Australian suppliers (which made up 90% of our total Australia supplier payments) to understand the risk profile of these suppliers.

Our largest category of supplier spend is on wholesale trade and our second largest supplier spend category is manufacturing, when categorised by the ANZSIC classifications. From our international supply chain, the majority (74%) of supplier spend is on software and technology services.

Our largest supplier (36% of total supplier spend) is our food distributor from whom we purchase stock. We undertook a deeper analysis of this supplier based on publicly available information to understand their level of modern slavery risk. According to its own Modern Slavery Statement, this supplier has no operations outside of Australia, employs a majority of its employees directly, has strong governance processes for recruitment and only engages with licensed labour hire providers. All of its direct suppliers are located in Australia and New Zealand and it has its own Responsible Sourcing Policy by which it acts. Based on the information available, we assessed this supplier as being low risk for modern slavery risk.

We conducted a country level risk assessment of our direct suppliers by reviewing publicly available and reputable sources such as the Global Slavery Index to understand whether any of our direct suppliers operate in inherently higher risk countries. Through this we have established that none of our direct suppliers are in countries that the Global Slavery Index or the Trafficking in Persons Report has rated as a high risk country for modern slavery risk. As such, we believe there is a minimal risk of modern slavery in our supply chain.

Grill'd franchisees are required to use goods and services that are sourced and approved by Grill'd to provide consistency and quality of Grill'd products. All franchisees are required to operate in full compliance with their franchise agreement obligations and the law. Therefore, we believe the risk assessment is the same for Grill'd franchisees.

ACTIONS TAKEN TO ADDRESS MODERN SLAVERY

Despite the minimal risk of modern slavery in our operations, Grill'd is committed to ethical sourcing and upholding its commitment and meeting its legal obligations under the Act. Grill'd has taken a range of actions to address and assess modern slavery within its operations. These include:

Modern Slavery Working Group

Grill'd established a Modern Slavery Working Group consisting of key organisational representatives from the legal, finance, commercial, supply and people teams. The Working Group created and implemented a modern slavery action plan, identified risks and prepared policies and frameworks.

Gap Analysis

We have undertaken a comprehensive gap analysis within the business to identify current practices, areas for improvement, and any vulnerabilities related to modern slavery risks.

Modern Slavery Policy

We have developed a comprehensive Modern Slavery Policy. This policy outlines our commitment, expectations, and responsibilities regarding the prevention of modern slavery.

Ethical Sourcing and Supplier Code of Conduct

We have developed a supplier code of conduct that is included in our supply contracts. This code clearly sets out our expectations regarding ethical practices, human rights, and modern slavery prevention. The code of conduct requires suppliers to adhere to minimum standards including relating to safe working conditions, sustainable procurement, minimum labour rates and working hours and legal compliance.

Supplier Agreements

We have incorporated specific modern slavery clauses into our contracts with suppliers to ensure alignment with our standards and to require compliance with relevant laws and ethical practices.

Modern Slavery Questionnaire and Procurement Process Update

We have developed and included a modern slavery questionnaire as part of our supplier contract process. Additionally, we have updated our procurement processes to ensure the questionnaire is consistently integrated throughout the supply chain engagement and evaluation phases.

Whistleblower Policy

We operate a whistleblower policy and access to an external hotline so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals. Suppliers are included in our whistleblower policy.

ACCESSING EFFECTIVENESS OF OUR ACTIONS

Grill'd has not identified any specific instances of modern slavery within its operations or supply chain. Grill'd is committed to strengthening its approach to identifying and managing modern slavery risks through continuous monitoring, assessment, and improvement.

GRIEVANCES AND REMEDIATION

Grill'd has a procedure for reporting and receiving grievances related to modern slavery. Grill'd has a Whistleblower Policy and an external whistleblower hotline which offers confidential services for employees or other stakeholders to report actual or suspected workplace misconduct.

FUTURE STEPS

We will continue to monitor and improve our approach by:

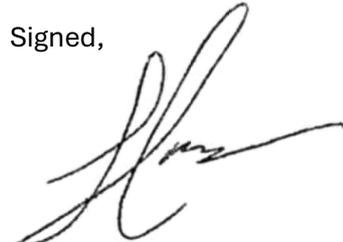
- Implementing training and promoting awareness for employees and suppliers.

- Conducting regular risk assessments
- Conducting regular supplier audits.
- Ensuring all new suppliers are assessed before we commence trade with them.

Approval

This statement was approved by Simon Crowe, as sole director and principal governing body of Grill'd Pty Ltd on 18 December 2025.

Signed,

A handwritten signature in black ink, appearing to read 'Simon Crowe', with a long horizontal flourish extending to the right.

Simon Crowe
Managing Director
18 December 2025