



**craveable
brands.**

Modern Slavery Statement.

2024.



Modern Slavery Statement.

This Modern Slavery Statement is presented by the Craveable Brands Group. It details the steps we take to identify and address modern slavery risks within our operations and supply chain, highlights our actions to mitigate these risks, and reaffirms our commitment to maintaining a business, restaurants, and workplaces free from modern slavery. By promoting safe and respectful environments, we ensure that all individuals can thrive without fear of exploitation.

Acknowledgement of Country.

Craveable Brands acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and community. We pay our respects to them and their cultures and to Elders both past and present.





Mandatory Reporting Criteria of the Modern Slavery Act.

This statement was prepared in compliance with the requirements of the Modern Slavery Act 2018 (Cth). The table below identifies where in our statement the mandatory criteria can be located.

Index of content addressing mandatory criteria in section 16 of the Modern Slavery Act 2018 (Cth)

Criteria	Refer to Pages
1. Identify the reporting entity	4
2. Describe the reporting entity's structure, operations and supply chains	5, 7, 8
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	9-12
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	13-15
5. Describe how the reporting entity assesses the effectiveness of these actions	12
6. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement)	12
7. Any other information that the reporting entity, or the entity giving the statement, considers relevant	6



Who We Are.

This statement is a joint statement made pursuant to the *Modern Slavery Act 2018* (Cth) on behalf of the following entities:

PAGAC Chicken Tenders Holdings IV Pty Ltd ACN 634 718 602

PAGAC Chicken Tenders Holdings III Pty Ltd ACN 634 719 458

PAGAC Chicken Tenders Holdings II Pty Ltd ACN 634 720 068

PAGAC Chicken Tenders Holdings I Pty Ltd ACN 634 495 275

Craveable Brands Pty Ltd ACN 151 143 065

QSRH Borrowing Midco Pty Ltd ACN 151 149 834

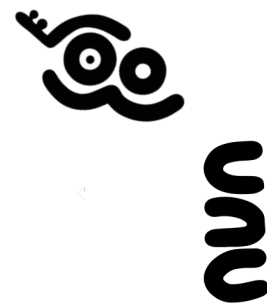
QSRH Borrowing Co Pty Ltd ACN 151 147 518

Quick Service Restaurants Holdings Pty Ltd ACN 124 415 041

Quick Service Restaurants Finance Pty Ltd ACN 124 415 032

Australian Fast Foods Pty Ltd ACN 008 647 907

Red Rooster Foods Pty Ltd ACN 008 754 096



Craveable Brands Pty Ltd (**Craveable Brands**) is the parent company of Oporto, Red Rooster, Chicken Treat and Chargrill Charlie's. The businesses conduct franchising operations in the fast food industry in Australia and elsewhere.

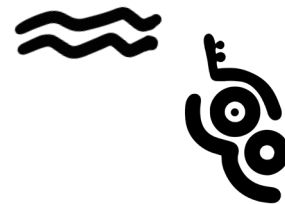
The majority of Oporto, Red Rooster, Chicken Treat and Chargrill Charlie's restaurants are franchised restaurants with approximately 2% of restaurants operated by Craveable Brands. Collectively, these restaurants form the Craveable Brands Network.

As of November 2024, there are a total of 623 restaurants within the Craveable Brands Network comprised of:

328 RESTAURANTS	210 RESTAURANTS	63 RESTAURANTS	22 RESTAURANTS
			

Within the Craveable Brands Network, there are approximately 14,000 employees working across most Australian States and Territories.

Our Values.



craveable brands. **WIN TOGETHER**

We share different ideas, expertise, knowledge and cultural backgrounds in order to exceed the needs of our people, our partners, our customers.

Behaviours

Be Present • Be Generous
Be Respectful • Be Collaborative

Competencies

Relationship Building • Partnering
Flexibility • Interpersonal Skills

craveable brands. **MAKE A DIFFERENCE**

We have real impact on our partners' and customers' lives by questioning the status quo, innovating solutions and remaining agile to their changing needs.

Behaviours

Be Inventive • Be Nimble
Be Inquisitive • Be Bold

Competencies

Creativity • Innovation
Strategic Thinking • Conflict Management

craveable brands. **OPEN & HONEST**

We communicate with our people, partners, customers and each other with transparency and respect.

Behaviours

Be Attentive • Be Inclusive
Be Truthful • Be Constructive

Competencies

Integrity & Honesty • Accountability
Stakeholder Challenges

craveable brands. **CUSTOMER FANATICS**

We deeply understand our customers and use that knowledge to better serve and delight them on every occasion.

Behaviours

Be Supportive • Be Innovative
Be Engaging • Be Curious

Competencies

Service Motivation • Cultural Awareness
Customer Service



Our Supply Network.

The Craveable Brands supply chain can be segmented into 2 categories: core and non-core suppliers.

Core.

Food & Ingredients | Beverages | Packaging | Distribution
| Logistics | Delivery Aggregators

Non-Core.

Equipment (Sales & Repairs) | Uniforms | Utilities | Marketing Services
IT Products and Services | Construction & Fit-Out Products & Services
Janitorial Products and Services | Professional Services / Consultants

The core supply chain is critical in the operations of the Craveable Brands Network across Australia.

Our Franchisees must purchase all core ‘approved’ products:

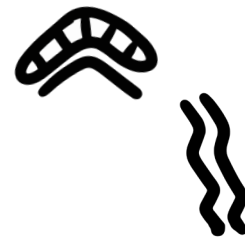
- | | |
|----|--|
| 1. | Directly from Craveable Brands approved core suppliers; or |
| 2. | from Craveable Brands |

An overwhelming majority of the food purchased by our franchisees and sold through our restaurant network is produced in Australia by local suppliers and using predominantly domestically grown produce.

Craveable Brands require all our food and packaging suppliers to trace all ingredients used in Craveable Brands’ products to ensure ethical practices are observed through to raw material origins. All core suppliers are risk assessed and are managed according to the risk level they pose to the business, which may include 3rd party on-site audits which include reviewing social accountability policy and controls.

All prospective core suppliers are required to agree to the “Craveable Brands Business Partner Code of Conduct” policy prior to being granted status as a Craveable Brands approved supplier.

Craveable Brands aims to make a positive impact across our supply chain from the farmer right through to the team members in our restaurants. We believe that with our strong supplier relationships combined with great systems and policies, we can improve the standard of labour practices around the world.





Risks of Modern Slavery.

In considering the risks of Modern Slavery in our Operations and Supply Chain we have considered the Global Slavery Index 2023 and the Global Estimates of Modern Slavery (2022).

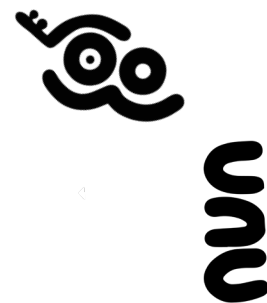
Operations.

The Global Estimates of Modern Slavery reports that there has been a rise in the prevalence of forced labour when considering the estimates in 2016 and the estimates in 2021. No region of the world is spared from forced labour, however it reports that the share of migrants in the group of people in forced labour is much higher than the share of migrants in the overall labour force.

We acknowledge that there remains a risk of vulnerable workers in our industry, as many of our Franchisees and the employees in our Restaurant Network were born outside of Australia. We are proud to have a particularly multi-cultural workforce. We acknowledge that there is a risk that our labour force may be subjected to modern slavery practices, although we consider the risk of this in our operations to be low.

Craveable Brands is committed to ensuring that all employees are treated with respect, dignity and fairness and that our working environment is free from unlawful discrimination and harassment. To protect and support our workforce we have established policies such as:

1.	Respectful Workplace Policy	5.	Diversity and Inclusion Policy
2.	Grievance Policy	6.	Anti-Bribery and Corruption, Gifts and Benefits Policy
3.	Recruitment and Selection Policy	7.	Whistleblowers Protection Policy
4.	Code of Conduct Policy	8.	Restaurant Workforce Management Policy



Our Franchisees are required to comply with all Australian employment laws, including those governing payment of wages, when employing staff for the Craveable Brands Network and this is a contractual term of their Franchise Agreement. Furthermore, we regularly engage a third party to undertake Industrial Relations Audits of our Franchisee operations to ensure compliance with Employment Agreements, payroll obligations, employment records and compliance with the obligations under any legislation including the Fair Work Act (2009).

Craveable Brands has an externally managed Speak Up (Whistleblower) Line, an Employee Relations Helpline and an Employee Assistance Program that is free and easily accessible for all franchisees and team members.

Supply Chain.

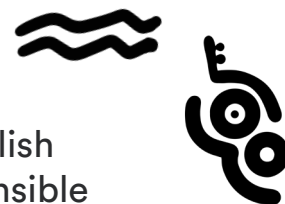
While most of our food supply sourced for our restaurants is produced here in Australia it is important that we work with our local manufacturers to ensure their labour hire practices meet the minimum legal standards required of them in Australia.

Notwithstanding above, we see our biggest risks of modern slavery coming from exposure to products not sourced from Australia. These include food ingredients & other raw materials, uniforms, packaging, equipment, construction and fit out material.

To manage these risks, we have policies in relation to our core supply chain such as:

- | | |
|----|---|
| 1. | Code of Conduct: Supply Partners |
| 2. | Supplier Social Accountability & Ethical Sourcing |
| 3. | Supply Agreements |

Craveable Brands encourages suppliers to be members of SEDEX. To ensure alignment with our business policies, values and principles, we require these suppliers to complete the self-assessment questionnaire (SAQ) on Sedex. The SAQ captures important details about their policies, management systems, practices and workforce.



This information allows us to make informed decisions and establish partnerships with suppliers who share our commitment to responsible and ethical sourcing practices.

We understand there are still further opportunities to partner with all our suppliers and to continue to identify and mitigate potential risks throughout our supply network particularly those sourcing products and/or ingredients outside of Australia.

Information Technology.

The Craveable Brands Information Technology department is responsible for all software, hardware and services related to the provision of information technology and operational technology through all office and stores.

We consider that the main risk in this area is the importation of the hardware as electronics are identified by the Global Slavery Index as an at-risk import for the majority of G20 countries. The overwhelming majority of hardware is procured from reputable listed companies who also undertake strategies to mitigate the risk of Modern Slavery in their supply chain.

Our current focus is on our direct suppliers. For a company of Craveable's size and locale, we believe this is the best use of our resources when ability to investigate and influence decision making further down the chain is considered.

Craveable Brands spends the vast majority of its budget on technology companies incorporated in low or medium risk countries as rated by walkfree.org. Further action will be undertaken to examine these suppliers in the coming year by onboarding them to Sedex.

Construction and Development.

Craveable Brands undertakes construction works in relation to fit outs of new stores and refurbishments of existing stores.



Modern slavery in the construction industry in Australia is a significant issue, with several risks that affect workers, businesses and the overall integrity of the industry. These risks can arise from various factors such as:

1. Labour exploitation - migrant workers, particularly those on temporary visas are susceptible, workers may have wage theft due to employers not paying for hours worked or paying below the award rate;
2. Unsafe working conditions – both excessive hours and inadequate safety; and
3. Inadequate regulatory oversight – given the number of subcontractors and small business working on sites the monitoring of their practices can be difficult, especially in remote and regional areas.

How We Assess the Effectiveness of our Actions.

We have been assessing our effectiveness by the increased engagement of our network and business to identify risks, undertake corrective actions and resolve issues to create an improved space around Modern Slavery.

As we develop our risk management processes, we will continue to increase the engagement and feedback from the Group and will use that to drive our further development in this area.

Consultation.

We have consulted with our franchisors in Australia, Red Rooster Foods Pty Ltd ACN 008 754 096, Oporto (Franchising) Pty Ltd ACN 083 011 349 A.F.F Franchising Pty Ltd ACN 009 370 594 and Chargrill Charlie's Franchise Holdings Pty Ltd ACN 619 933 265 in relation to the requirements in our operations and in relation to our shared suppliers.

Actions Taken to Address Risks of Modern Slavery.

Over the Past Year

Craveable Brands became a buyer member of Sedex (Supplier Ethical Data Exchange) in November 2022. Over the last 12 months, we have continued to connect with additional food & ingredient, beverage and packaging suppliers on the Sedex platform. This online platform enables companies to monitor and assess their supply chains for responsible sourcing practices. By utilising Sedex, Craveable Brands:

- (i) gains visibility into our suppliers' practices
- (ii) maintains effective oversight of existing social audits (SMETA)
- (iii) identify potential modern slavery risks and ensures that suppliers are working towards mitigating them



Approximately 70% of the ingredient, beverage, packaging, cleaning chemicals, uniform, equipment and smallware suppliers for Red Rooster, Oporto and Chicken Treat have been registered and linked with us on the Sedex platform. Over 85% of these supplier sites linked with Craveable Brands have completed their SAQ and 12% in progress.

In FY24, 25 social audits were conducted within that supply base via the Sedex platform. All critical corrective actions have been remediated by the suppliers. Our newly acquired Chargrill Charlie's brand shares some core suppliers with our other brands and onboarding more of their suppliers will be part of our focus for the next year.



As identified in our previous Statements, our workforce is diverse and sometimes vulnerable. We have regular auditing of our Franchise Network and their Employment Relations practices and we have appointed PKF, an external advisor to conduct more in-depth auditing of our Franchisee network to continue to ensure franchisee compliance with the relevant legislation and best practices. We have continued the auditing of our Franchisees' employment relations practices and have audited 109 Franchisees in 2023/24. This brings our total to 243 Franchisees that have been audited.

Craveable Brands has an Employment Relations Compliance Playbook that articulates all internal processes and controls as it relates to each part of the franchisee lifecycle. Craveable utilises a Consequences Management Framework to provide guidance or take appropriate disciplinary steps where areas of non-compliance are identified.

An Annual Workplace Certification Survey managed by external auditors PKF, provides Craveable with an ER risk assessment and dashboard of the network that enables the proactive planning of ER audits. Between July 2023 and October 2023 this was completed by 483 of our stores. The Survey gathers a sample of information from the Franchisees on various ER matters which gives the Franchisor an overview of that Franchisee's understanding and practices in relation to ER. The Franchisees who did not complete the Survey were audited by PKF.

As a result of the Survey, Craveable Brands ran several training sessions for those Franchisees who we identified in the Survey as needing assistance. The training sessions covered different topics that were identified on the Survey or requested by Franchisees, eg ensuring compliance in relation to parental consent forms or education on the Fast Food Industry Award.

The Survey will be conducted again in February 2025.

In FY23/24 we have implemented a market-leading workforce management system throughout all restaurants (TANDA). TANDA has robust compliance features to provide enhanced onboarding, time and attendance and electronic record-keeping features.



With these features we can assist our Franchisees to reach a higher standard of compliance, minimising the exploitation of any vulnerable workers within our restaurant network.

Next year (1 July 2024 – 30 June 2025)

Looking ahead, we aim to refine our practices in the coming year and beyond. By taking proactive steps, implementing effective policies, and maintaining vigilance, we strive to contribute to addressing this global issue.

Supply Chain	We will be focusing on an expansion of Sedex across other business units and operations to provide more comprehensive oversight, expansion works commencing across Chargrill Charlie's and the IT and Construction teams.
Workforce Management	We will continue to standardise labour systems, training and tools to allow for a high degree of compliance, monitoring and assurance. In order to do this we will be running the next phase of training with Franchisees and their teams focusing even more on compliance, rostering, recruitment and the key features of the system. We will also be building new reporting mechanisms to flag risk amongst our networks.
Employee Relations Franchisee Compliance Survey	We will be running a compliance audit with all Franchisees in the network in February 2025. This helps to identify areas of opportunity with training and education as well as potential Franchisees that are at high risk of non-compliance so that we can examine their business further.

This statement was approved by the Board of Craveable Brands Pty Ltd and is signed by Karen Bozic, CEO of Craveable Brands Pty Ltd ACN 151 143 065 on behalf of all of the reporting entities.



Karen Bozic
CEO Craveable Brands Pty Ltd
Date: 19 December 2024