



## **MODERN SLAVERY STATEMENT (FYE 31 DEC 2020)**

Just Eat (Acquisitions) Pty Limited (“Just Eat”) publishes this statement pursuant to the Australian Modern Slavery Act 2018 (*Cth*). This statement covers steps taken by Just Eat, during the 2020 financial year.

### **Our business**

#### **Our services and customers**

Just Eat, as part of the Just Eat Takeaway.com group of companies, operates a hybrid marketplace for online food delivery - combining our marketplace offering with the targeted roll-out of delivery capability. We provide proprietary technology to offer a quick and efficient digital ordering service to connect millions of customers with our restaurant partners in Australia and in other countries around the world.

Just Eat is not a food producer or retailer. The restaurants on our platform are independent from Just Eat and the vast majority of those are small, independent restaurants or small chains though we do also work with national and international branded restaurant groups.

Our customer base is broad and comes from all walks of life, ordering takeaway at home, in the office or with friends, whenever or wherever they are. The vast majority of orders are delivered to customers’ doors by our independent restaurant partners’ own couriers. We also provide delivery capability for some restaurants on our platform, utilising different delivery models across the group.

#### **Our company structure**

Just Eat (Acquisitions) Pty Limited is a wholly owned indirect subsidiary of Just Eat Limited. Just Eat Limited was acquired on 31 January 2020 and is now a subsidiary of Just Eat Takeaway.com N.V., which is listed in Amsterdam, London and, as of 15 June 2021, New York. Although the acquisition took place on 31 January 2020, it was only cleared by the UK Competition and Markets Authority (“CMA”) on 15 April 2020.

Just Eat (Acquisitions) Pty Limited is the parent company of our Menulog entities (Menulog Group Limited, Menulog Pty limited, Eat Now Services Pty Limited, and Menulog Limited), which are registered and operate in Australia and New Zealand.

#### **Location of operations**

Over 2020 Just Eat Limited and its subsidiaries (the “Just Eat Group”) operated in the following countries - Australia, Canada, Denmark, France, Ireland, Italy, Spain, New Zealand, Norway and the United Kingdom.



## **Workforce composition**

At the start of the year most people employed by the Just Eat Takeaway.com Group had office-based roles operated by a local subsidiary, except for the field sales teams and certain members of the operations teams who were home-based, however this changed early in the year with the vast majority of our people transitioning to working from home in compliance with local Covid-19 lockdown restrictions.

Our People teams managed the hiring and contracting of staff as well as taking responsibility for their well-being wherever they were working. Where we engaged agency workers and independent contractors, they were usually for the provision of skilled, semi-skilled or professional services. However in 2020 we increased the use of independent contractors as couriers in comparison to 2019.

Trade unions represented some employees across our markets, however we did not track how many of our workers were represented by trade unions. We did however work with employee representatives where we needed to consult meaningfully and effectively with our employees on changes across the company.

## **Tier 1 suppliers and categories of procurement**

Our direct suppliers were mostly located within Europe, Australia, New Zealand and North America, generally providing specialist technical, marketing or other highly skilled services. Our restaurant management technology hardware was sourced from China and our third party contact centres which helped with customer support were located in some countries that score above 30 on the Global Slavery Index and these suppliers were, therefore, subject to a higher level of scrutiny and contractual obligation (further details are provided in the section **Assessment of Modern Slavery Risk & Supplier Commitments** below).

## **Policies**

### **Leadership and expert stakeholders**

As Just Eat Limited was acquired by Just Eat Takeaway.com N.V. in early 2020 the leadership and stakeholder structure changed from a committee of a holding company to ownership and responsibility for strategic decisions sitting with the senior management team of our new headquarters in Amsterdam. Day-to-day management of our Australian operating business remained the responsibility of our Australian management team throughout 2020.

### **Internal Policies and availability**

To support our modern slavery commitments, we had a Modern Slavery Policy and a Code of Conduct which set out the ethical standards we expected our staff to meet and underlined our commitment to acting ethically and with integrity in all our business relationships. All company policies were made available on the Kitchen (Just Eat's internal communication site) and the policies related to Modern Slavery were available to our suppliers upon request.



These policies were supported by the Whistleblowing Policy which provided clear encouragement and guidance to all staff about raising concerns, including those related to modern slavery, without fear of retaliation. Our whistleblowing hotline was available in all our operating countries. Cases raised through the hotline went directly to the General Counsel, Commercial.

### **Supplier Policies, Onboarding & Monitoring**

Supplier onboarding continued to be subject to our Third Party Supplier Modern Slavery and Ethical Audit Process which required different measures to be taken according to the assessed level of modern slavery risk (please see the Due Diligence section of this Statement below for more information). For some suppliers this may have meant signing up to our Ethical Compliance Statement, and for other suppliers this would have entailed additional steps including compliance with our Social & Ethical Compliance Policy (based on the Ethical Trading Initiative (ETI) base code) and undergoing audits which were carried out by independent audit companies, and at least annually where Covid-19 restrictions permitted. In the event that we or the independent auditor identified signs of modern slavery, whether for a higher risk supplier or otherwise, we required the supplier to address our concerns and rectify the situation in a timely manner. If our concerns were not resolved we took appropriate measures, which may have included termination of the supplier's contract. If the relationship with the supplier continued, regular monitoring for improvement would have been required, particularly of the areas that raised concerns.

### **Prohibition of Financial Burdens**

We had, and continue to have a zero tolerance approach to the imposition of any financial burdens, such as withholding wages or imposing recruitment fees, within our business and supply chains. To date, no such incidents have been brought to our attention, however in the event this is brought to our attention we would take appropriate steps to address this.

### **Due Diligence**

#### **Assessment of Modern Slavery Risk & Supplier Commitments**

The commitment we expected from our suppliers was based on the level of modern slavery risk for the services or goods provided, looking at the skill level involved, staff volume and the supplier location. Where suppliers were providing highly skilled services with a low volume of staff and were located in countries that score below 30 on the Global Slavery Index the minimum commitment required would have been agreeing compliance with local laws. Where the volume of highly skilled staff increased or the supplier location is in a country scoring above 30 on the Global Slavery Index our suppliers were requested to sign our Ethical Compliance Statement, which included onward obligations on their suppliers, or the suppliers were required to provide evidence that their modern slavery processes were at least equivalent to ours. For suppliers providing services or production of goods involving a high volume of semi-skilled or low skilled workers we required suppliers to comply with our Social & Ethical Compliance Policy, sign our Ethical Compliance Statement, and undergo an audit process on an at least annual basis by independent audit companies, subject to Covid-19 restrictions.



### **Effectiveness**

We required higher risk third party suppliers to either (i) sign up to our code and we audited the supplier's information on test houses or the Sedex database, or other similar industry bodies; or (ii) undergo an independent SA8000 audit at all operating locations that support Just Eat. These audits were repeated annually and we monitored the scores in all areas.

To date all current higher risk suppliers who underwent a SA8000 audit had a valid audit, and we continued work on setting an appropriate median score for our business. In several instances both new and existing suppliers performed below our standards in some areas of the SA8000, so we worked directly with those suppliers to remedy these deficiencies and re-audit.

### **Modern Slavery Statement Approval**

The present Modern Slavery Statement, is presented on behalf of the following entity:

- Just Eat (Acquisitions) Pty Limited

Morten Belling and Jon Vella, as represented signatories for the above-mentioned entity reviewed and approved, on its behalf, the present updated statement the past 6th of September.

A handwritten signature in black ink, appearing to read "Morten Belling".

**Morten Belling**  
**Director**

*Senior Director Country Management AU/NZ*  
Just Eat (Acquisitions) Pty Limited



A handwritten signature in black ink, appearing to be "Jon Vella".

**Jon Vella**  
**Director**  
*Finance Director AU/NZ*  
Just Eat (Acquisitions) Pty Limited