

# KFC MODERN SLAVERY STATEMENT

2024

1 JANUARY 2024 – 31 DECEMBER 2024

The reporting entities for the purposes of this modern slavery statement are:

Kentucky Fried Chicken Pty Ltd ACN 000 587 780 (KFCPL),

KFC ADCO Limited ACN 083 047 992 (KFC Adco) and

ACN 085 239 998 Pty Ltd ACN 085 239 998 (ACN 085),

Collectively KFC Australia or KFC for the purposes of this statement.

Please refer to slide 4 for further details on the entities and the scope of this statement.

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# GENERAL MANAGER'S MESSAGE



**KRISTI WOOLRYCH**  
**GENERAL MANAGER**  
**KFCPL**

A stylized, handwritten signature in blue ink, appearing to read 'K Woolrych'.

On behalf of KFC Australia, I am pleased to present the sixth iteration of KFC Australia's modern slavery statement. This statement details the work undertaken by KFC Australia for the period 1 January 2024 to 31 December 2024.

KFC Australia's culture is built around putting people first. This ethos underpins our commitment to ethical, legal and socially responsible business practices. As part of our obligations under the Modern Slavery Act 2018 (Cth) (MSA) and building on our last modern slavery statement, KFC Australia's modern slavery working group continues to build on its commitments to identify and mitigate modern slavery risks within our operations and supply chain.

Throughout 2024, our modern slavery working group built on the initiatives it committed to in our 2023 statement. These initiatives included reinforcing our compulsory modern slavery awareness training for all new and ongoing KFC Australia RSC team members as well as the engagement of a multi-national law firm to conduct a thorough review of our internal human rights due diligence practices against the United Nations' Guiding Principles on Business (UNGPs). This work provided insights into the strengths within our current processes, guiding meaningful improvements to our ongoing commitment to protecting human rights.

Further to this, the working group closely collaborated with key franchise partners and the team at Sedex via monthly forums and in person workshops where all parties were invited to share insights, knowledge and future actions regarding how best to combat modern slavery together. This group also begun the collective effort of onboarding all mutual suppliers to Sedex who meet the registration threshold. This is in addition to our ongoing work with existing supply partners to engage with Sedex and complete the registration process. By fostering this collaboration, KFC Australia believes that it has and will continue to make an impactful contribution to mitigating modern slavery risks in our operations and supply chain.

On behalf of KFC Australia's leadership team, I extend my gratitude to KFC Australia's modern slavery working group, franchise partners and supply partners for their ongoing commitment to KFC Australia's modern slavery mitigation strategy.

Thank you.

Kristi Woolrych  
General Manager, Kentucky Fried Chicken Pty Ltd

KFC Australia acknowledges the Traditional Owners of Country throughout Australia, and pays respects to Elders past, present and emerging.

# WHO WE ARE



KFC Australia is part of Yum! Brands, Inc. (**Yum! Brands**). KFC is a brand that has a rich, decades long history of success and innovation. It all started with one cook, Colonel Harland Sanders, who created our world-famous Kentucky Fried Chicken recipe more than 75 years ago – a list of 11 secret herbs and spices scratched out on the back of his kitchen door. Today, the brand still follows his formula for success, with real cooks breading and freshly preparing delicious chicken by hand.

Yum! Brands is listed on the New York Stock Exchange, and is based in Louisville, Kentucky. It is the world's largest restaurant company, with a combined global system of more than 61,000 restaurants in over 155 countries and territories, across the KFC, Pizza Hut, Taco Bell and The Habit Burger Grill brands.

While each of the reporting entities covered in this statement is a subsidiary of Yum! Brands, specifically we note:

1. **ACN 085** is a franchisor of the KFC brand in Australia and the

holding company of KFCPL. This is a non-trading entity.

2. **KFCPL** is the primary franchisor of the KFC brand in Australia and New Zealand. KFCPL owns and operates company-owned restaurants in Australia. KFCPL owns 4 entities that are non-trading entities: Northside Fried Chicken Pty Ltd, Ashton Fried Chicken Pty Ltd, Gloucester Properties Pty Ltd and Newcastle Fried Chicken Pty Ltd. KFCPL has restaurant support centres (**RSC**) in New South Wales, Victoria and South Australia. These RSCs work closely with the KFC franchise

network across Australia and New Zealand.

3. **KFC Adco** is primarily involved in the management of marketing and advertising spend for its members, and the promotion of the KFC brand in Australia. The members of this company are KFCPL and KFCPL's franchise partners in Australia.



**1968**

First Australian KFC opened in 1968 in NSW. There are 810 restaurants in Australia including 68 company owned stores.



**50,000**

KFC restaurants employ approximately 50,000 team members between KFCPL and KFC franchise partners.



**5,200**

KFCPL employs 5,200 direct staff across its company owned stores and its restaurant support centres in NSW, VIC and SA.



**49**

Franchisor of 49 franchise partners who own 91% of KFC restaurants in Australia.



**61,000**

KFC Australia and its related entities are subsidiaries of Yum! Brands. Yum! Brands has over 61,000 restaurants in 155 countries and territories and is listed on the New York Stock Exchange.



**\$11.640m**

The KFC Youth Foundation in Australia has raised over \$11.640m, with \$1.852m raised in 2024 alone.



# OVERVIEW OF OPERATIONS

KFCPL's operating business consists of operating both the KFC restaurants that KFCPL owns directly, and licensing, in its capacity as franchisor, the KFC system, system property and trademarks to KFC franchise partners in Australia and New Zealand. KFCPL's operations also include the provision of certain supply chain management services for franchise partners and the provision of certain advertising and marketing services for KFC Adco. In addition, from time to time, KFCPL sources information systems, equipment and services for KFC restaurants, along with building and construction materials and maintenance services.

KFCPL's operations in Australia require the support of various internal departments, primarily located at KFCPL's RSCs. These departments include development, operations, food innovation and technology, quality assurance, marketing, supply chain, legal, information systems (IS), corporate affairs, finance and human resources.

KFCPL franchise partners do not form part of KFCPL's operations and supply chain for the purposes of MSA reporting but do provide fees to KFC Australia through the payment of royalties, and advertising and supply chain contributions pursuant to their franchise agreements.

KFC Adco's operational activities are completed by KFCPL, and as such KFC Adco's operations should be considered in conjunction with KFCPL for the purposes of this statement

ACN 085 is non-trading holding company, and as such does not have any operations required for consideration as part of this statement.



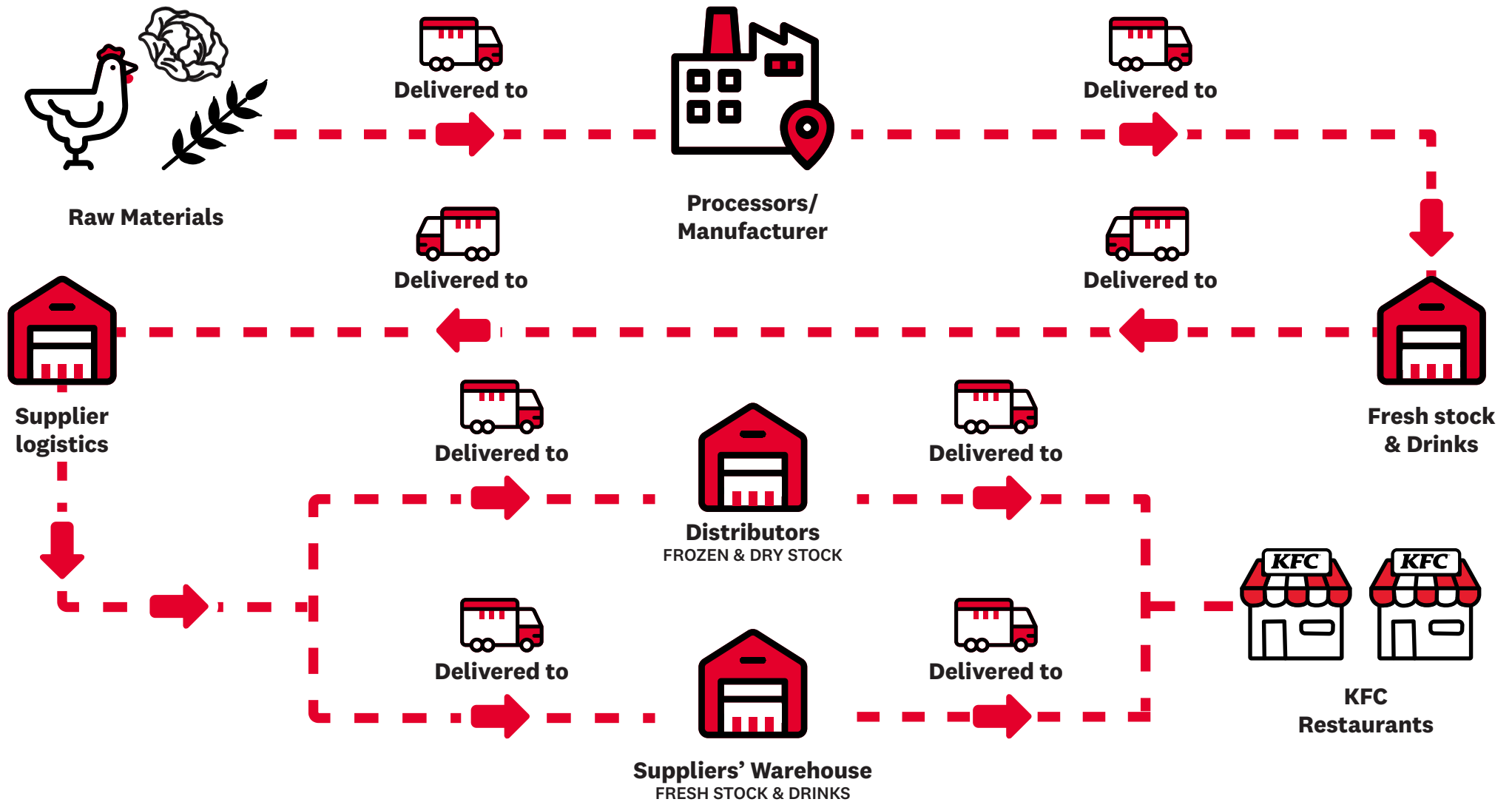


Based on a high-level review of KFC Australia's supply partners, please see slide 8 for a map detailing the location of KFC Australia's key supply partners.

ACN 085 is non-trading holding company, and as such does not have any supply chain considerations for this statement.

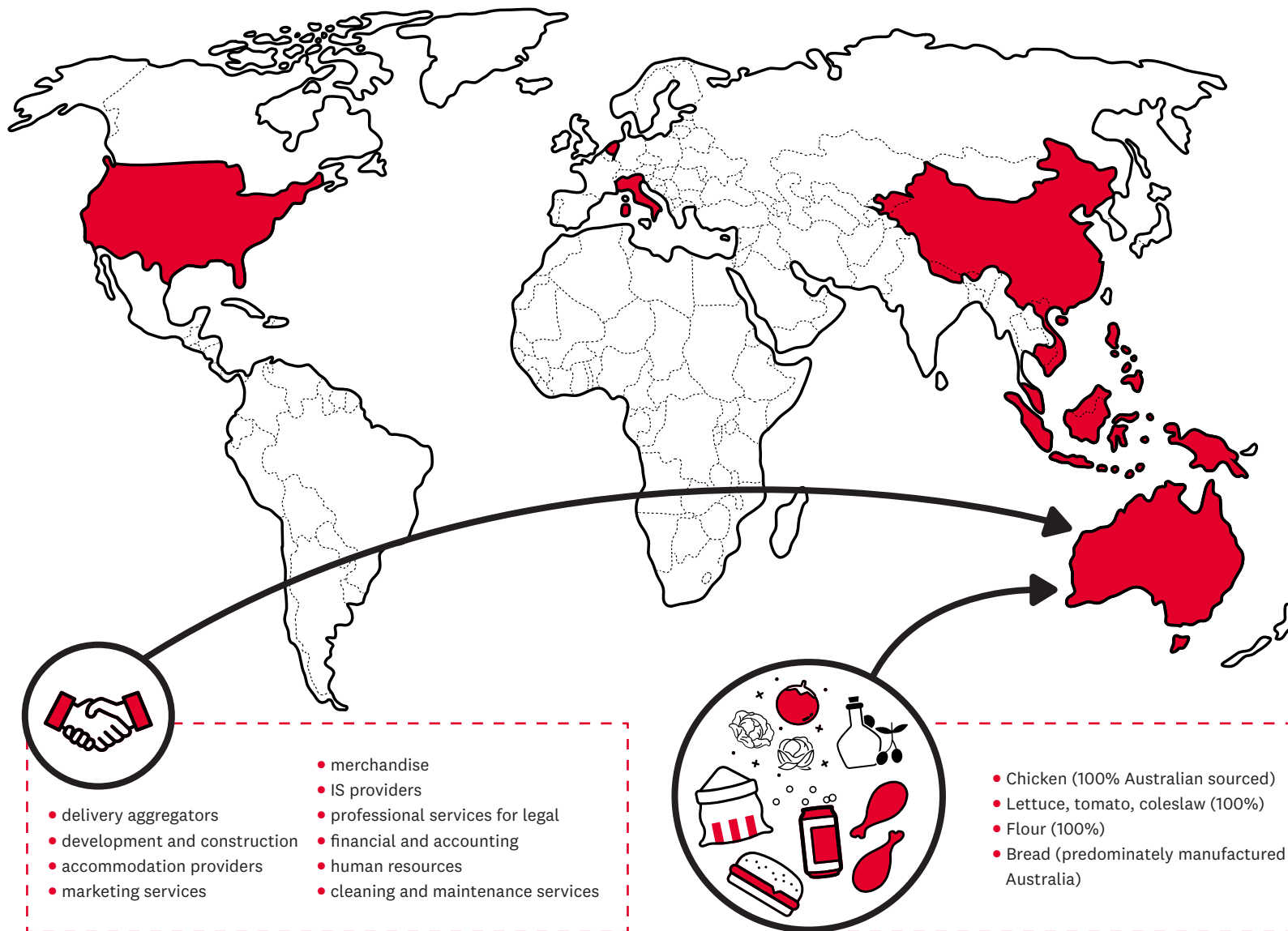


# DIAGRAM OF SUPPLY CHAIN



# MAP OF SUPPLY CHAIN

While some items contain imported ingredients, approximately 98.7% of KFC Australia's food (based on spend) is manufactured in Australia.



## Packaging

- Australia
- China
- Vietnam
- Hong Kong
- Indonesia
- Malaysia
- USA



## Chips

- Australia
- New Zealand
- Netherlands



## Uniforms & Merchandise

- China



## Equipment

- USA
- Italy
- China
- Germany



## Smallwares

- South East Asia
- North America



# RISKS OF MODERN SLAVERY IN OPERATIONS

## Risk Assessment and Mitigation Actions – Operations

Utilising KFC Australia's internal risk assessment tools, we have assessed there to be an extremely low risk of modern slavery occurring amongst KFC Australia's team members who are employed within the RSCs, or the KFCPL owned KFC restaurants in Australia.

Despite our internal risk assessment tools confirming a significantly low modern slavery risk existing in relation to our Australian team members, we recognise that the quick service restaurant industry employs a large proportion of vulnerable categories of workers such as young people. As such, we have implemented a number of measures to mitigate the risk of any modern slavery occurring within KFC Australia's operations. These measures are outlined on the next page.



# RISKS OF MODERN SLAVERY IN OPERATIONS

## Risk Assessment and Mitigation Actions – Operations

In an effort to identify and mitigate the risk of modern slavery in KFC Australia's operations, we note the following.

- 1** KFC Australia is a people-focused business. We are committed to ensuring the highest standards of safety and employment both at our company owned restaurants and at the restaurants owned and operated by our franchise partners. KFC Australia has a robust framework in place for communication and training on workplace rights and conditions, and requires compliance with all relevant labour legislation and standards within its franchise agreements.
- 2** KFC Australia's team members are all paid according to market conditions or the relevant award and applicable legislation. We have in place processes to ensure that staff are legally entitled to work, including that they are of legal working age.
- 3** In 2020, KFC Australia and its franchise partners implemented a workforce management software solution that manages time and attendance functions for all KFC restaurants. This system aims to ensure that all of our team members, and the team members of our franchise partners, are paid correctly in accordance with the KFC National Agreement 2020.
- 4** KFC Australia has centralised training programs that train our team members on how to operate our equipment in restaurants, provide world-class customer service and also on ethical behaviour and our KFC service standards. These training programs include a compulsory national onboarding training program which trains team members on both the

whistleblowing policy and KFCPL's open-door policy. These policies are supported by posters in restaurants providing contact phone numbers for anyone looking to raise concerns, and compulsory annual refresher training on these policies.

- 5** In 2021, KFC and its franchise partners commenced the implementation of a safety management software solution that manages vendor and contractor compliance with aspects of the Workplace Health & Safety Act 2011 (Cth). This program provides risk information to ensure worker competence and safety, and assesses insurance coverage to ensure that it is adequate and valid for the work being conducted. This system allows criteria to be developed into a workflow management system which can then assess risk and accountability, and generate corrective actions where required. A national roll out of this system has been completed by KFC Australia.
- 6** To support compliance, KFC has independent third-party auditors that verify that KFC brand standards and food safety practices are adhered to at all of its restaurants. These audits are carried out at all KFC restaurants quarterly. These auditors have been trained to inspect team member files and conduct random checks to ensure all team members are of working age. In addition, our people excellence coaches assigned to our KFC Australia restaurants review these records, check that team members are of working age and conduct reviews of staff rosters.



# RISKS OF MODERN SLAVERY IN SUPPLY CHAIN

## Risk Assessment and Mitigation Actions – Supply Chain

KFC Australia has continued to refine its internal risk assessment criteria and practices around modern slavery when considering entering into agreements with new supply partners.

These risk assessments are undertaken by appropriately qualified personnel at KFC Australia across industries including food, beverages, packaging, restaurant development and maintenance, IS, marketing, merchandise, office contractors, finance and delivery aggregators. This risk assessment process involves KFC Australia's team members having conversations with supply partners according to an internal risk assessment toolkit that has been developed in conjunction with the legal and compliance department. The toolkit guides teams during their risk assessment processes to ensure effective engagement with suppliers to understand practices and mitigation strategies that may be in place or be required to be implemented as a result of the risks identified through the assessment process. With consideration given to the annual expenditure

of KFC Australia with the relevant supply partner, and the results of the internal risk assessment, KFC Australia requires all significant supply partners, and those supply partners that are deemed to be of medium to high risk in the context of the internal risk assessment, to register with Sedex. Sedex is the world's largest collaborative platform for sharing responsible sourcing data on supply chains.

While we began to ask food and paper supply partners to register with Sedex in March 2019, we have now extended Sedex registration and the completion of the Sedex self-assessment questionnaire (**SAQ**), to both:

- 1 the supply partners that are of significant size and value to KFC Australia; and
- 2 smaller supply partners deemed to be of medium to high risk from the results of our internal risk assessments. This process is also supported with the supply partner form in 2023.

This form requires compliance with the above criteria namely that a supply partner is eligible to be established in KFC Australia's payment systems.



Kentucky  
Fried Chicken



# RISKS OF MODERN SLAVERY IN SUPPLY CHAIN

For context, the Sedex SAQ process collects data on four pillars: labour standards, health and safety, business ethics and environment. Following the completion of SAQs by the supply partner, Sedex assesses the supply partner's responses and each site receives a "combined risk rating" to indicate a supply partner's potential modern slavery risk. KFC Australia uses these ratings to understand the risk of modern slavery associated with each of its supply partners. Our supply partners are regularly being asked to review their data captured in Sedex and provide regular updates to our teams on where risks have been identified and how these risks have been mitigated or eliminated.

To ensure that modern slavery prevention remains a regular discussion point with KFC Australia's supply partners, modern slavery and Sedex

is a standing item agenda for all quarterly and annual business reviews. We continue to partner with all supply partners, maintain a continuous dialogue with them and focus on modern slavery across KFC Australia's supply chain.

Please see slides 13 and 14 for further details on Sedex, and a snapshot of the risks identified via the Sedex platform.

In conjunction with our internal risk assessment toolkit, mitigation plans and Sedex registration requirement, we include contractual provisions in our supply chain contracts that require our supply partners to comply with modern slavery legislation and the KFC Supplier Code of Conduct.





# SEDEX - MAPPING SUPPLY CHAIN



The SAQs collected data from suppliers on above four pillars.

## What is Sedex?

Sedex is a responsible business trade membership organisation acting to improve working conditions in global supply chains by helping businesses achieve end-to-end supply chain transparency. It began in 2004 as a data platform to help suppliers share data with multiple customers. “Sedex” stands for “Supplier Ethical Data Exchange”. Sedex is now a global company and network, servicing over 90,000 members across 180 countries.

Sedex provides a standardised risk assessment framework involving three tiers of risk information. At its broadest level this information includes high level country, sector and commodity risk. More specifically individual suppliers can be subjected to a risk assessment utilising a standardised self-assessment questionnaire to understand their particular circumstances in relation to areas such as labour, environmental considerations, occupational health and safety and corporate ethics. The third and most targeted information level is obtained via on site audits utilising the Sedex Members Ethical Trade Audit (SMETA) methodology. These audits are aimed at identifying specific deficiencies or areas of non-compliance within the audited supply partner. These audits form the basis for remediation plans in respect of areas of non-compliance.

## Using Sedex to gain greater transparency on our supply chains

In February 2019 KFC Australia became a member of Sedex. We engaged with Sedex’s team to help us shape the development of the KFC Australia anti-modern slavery compliance project, and we continue to engage with Sedex regularly to understand best practices in the area of anti-modern slavery and the potential risks in our supply chains.





# ASSESSING RISKS – SUPPLY CHAIN AND OPERATIONS

From the results of our risk assessments, we are cognisant of the inherent and apparent risks in the textile, agriculture and meat processing industries, and by extension, our supply partners who operate in those industries due to the vulnerable nature of their workforce, the repetitive production process and the competitive pressures of those industries.

We are also aware that we do not have sufficient data on those supply partners who have not yet registered with Sedex, completed their SAQ nor been audited by Sedex.

We also recognise that reliance on the combined risk rating alone is limited to the extent that it looks at the potential risk of modern slavery at the site level of each of our direct supply partners, but does not offer enough insights into the supply chains and operations of our supply partners. This risk is coupled with the fact, that until an independent audit is completed by Sedex, we are reliant on our due diligence and the information shared by our supply partners.

Further we have assessed that there is a risk that KFC Australia may be linked to potential modern slavery in the operations and supply chains of its KFC franchise partners. However, we are not aware of any actual instances of modern slavery and have provided information to our largest franchise partners about modern slavery and their obligations under the MSA. We will continue to engage with our largest franchise partners on embedding anti-modern slavery processes and procedures.

We recognise that there will inevitably be modern slavery risks below our first-tier supply partners that will be difficult to detect, and we are exploring ways of extending our reach beyond our first-tier supply partners. Our goal in the short term is that our influence on our direct supply partners in our first-tier supply chain will influence the level of modern slavery risks in the lower tiers of their supply chain.



# ASSESSING RISKS – SUPPLY CHAIN AND OPERATIONS

In 2019, KFC Australia mapped its supply chain relating to our non-core supply partners. We engaged external advisors to assist us with this analysis. We assessed the non-core supply partners against three contextual categories:

- 1 country and sector context;
- 2 workforce demographics; and
- 3 the characteristics of risk management processes or controls.

While the majority of our non-core supply partners are based in Australia, providing goods and services to our RSCs and KFC restaurants in Australia, these supply partners are now subject to our internal risk assessment process, and required to register with Sedex as appropriate.



## KFC'S NON-CORE SUPPLY PARTNERS

| Category                                                                                                                                  | Origin                                         |
|-------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|
| Equipment                                                                                                                                 | Italy, U.S.A, China, India and the Philippines |
| Development and construction                                                                                                              | Australia – mapping further                    |
| Key raw materials and construction materials used in our KFC restaurants                                                                  | Australia – mapping further                    |
| Accommodation providers                                                                                                                   | Australia                                      |
| Marketing services                                                                                                                        | Australia                                      |
| Merchandise                                                                                                                               | Australia, China                               |
| Information and technology service providers that provide direct support to KFC's restaurants and RSCs and support our ecommerce channels | Australia                                      |
| Professional services for legal, financial and accounting                                                                                 | Australia                                      |
| Human resources                                                                                                                           | Australia                                      |
| Cleaning and maintenance services                                                                                                         | Australia                                      |
| Delivery aggregator services                                                                                                              | Australia                                      |



| Category                                                                                                                                | Risk Assessment | Findings                                                                                                                                                                                                                                                                                                                                                          |
|-----------------------------------------------------------------------------------------------------------------------------------------|-----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Equipment                                                                                                                               | Medium/High     | We have requested that identified high/medium risk supply partners register with Sedex for further risk assessment.                                                                                                                                                                                                                                               |
| Development and construction                                                                                                            | Medium/High     | We are focused on risks in the area of construction and development due to the nature of the workforce and subcontracting in this industry. We have prepared a training video for use in this area.                                                                                                                                                               |
| Accommodation providers                                                                                                                 | Medium          | Given the nature of this industry and the demographic of the workforce, our teams use KFC Australia's internal risk assessment toolkit to assess these providers.                                                                                                                                                                                                 |
| Marketing services                                                                                                                      | Low             | Risk considered low in professional agencies and activation events. We are seeking Sedex registration by merchandise providers.                                                                                                                                                                                                                                   |
| Information and technology service providers that provide direct support to KFC's restaurants, RSC's and support our ecommerce channels | Low             | IS hardware and software support services are subject to the new vendor process, and we are seeking Sedex registration by the majority of these providers.                                                                                                                                                                                                        |
| Professional services for legal, financial and accounting                                                                               | Low             | Risk considered low due to the nature of services provided and demographic of the workforce.                                                                                                                                                                                                                                                                      |
| Human resources                                                                                                                         | Low             | Risk considered low due to the nature of services provided and demographic of the workforce.                                                                                                                                                                                                                                                                      |
| Cleaning and maintenance services                                                                                                       | Medium/High     | Given the nature of this industry and the demographic of the workforce, our teams use KFC Australia's internal risk assessment toolkit to assess these providers.                                                                                                                                                                                                 |
| Delivery aggregator services                                                                                                            | Medium/High     | To address this risk, we have included contractual provisions requiring compliance with modern slavery legislation and the KFC Supplier Code of Conduct. In addition, in an effort to monitor contractual compliance we have engaged with the aggregator service providers in an effort to improve their policies and procedures relating to anti-modern slavery. |

# ADDRESSING RISKS – SUPPLY CHAIN AND OPERATIONS



SEDEX

**1** KFCPL began membership of Sedex in 2019 and remains a member.

**2** In 2019 KFC Australia invited direct food and paper supply partners to join Sedex. This invitation has since been extended to new food and paper supply partners.

**3** The work of encouraging new and existing supply partners to register with Sedex is an ongoing workstream.

**4** KFCPL was previously a member of the SEDEX Advisor Group. This provided KFC Australia with an opportunity to learn best practice across industries for addressing modern slavery risks.

**5** Yum! Brands has become a Sedex member at a global level, allowing KFC Australia to leverage the scale of Yum! Brands to drive Sedex registration and SAQ completion by global supply partners.

**6** KFC Australia expanded the Sedex registration requirement to all supply partners who meet the registration threshold, capturing the areas of development, operations, food innovation and technology, quality assurance, marketing, supply chain, legal, IS, corporate affairs, finance and human resources.

**7** In 2023 KFC Australia partnered directly with Sedex, authorising them to reach out on our behalf to KFC Australia's supply partners to explain the benefits of Sedex, and requesting registration by those supply partners to Sedex on KFC Australia's behalf.

**8** In 2024 a collaborative project between KFC Australia, some of our key franchise partners and the team at Sedex began, with a collective goal to onboard mutual suppliers to Sedex. With this combined effort KFC Australia expects the number of onboarded suppliers and franchise partners to increase.



# ADDRESSING RISKS – SUPPLY CHAIN AND OPERATIONS



**1** KFC Australia has:

- facilitated modern slavery workshops and Sedex training for food and paper supply partners;
- arranged and held training (refresher and updates) for the supply chain management, marketing, development and finance teams on preventing modern slavery and utilising Sedex; and
- delivered modern slavery training and risk assessment training to the modern slavery

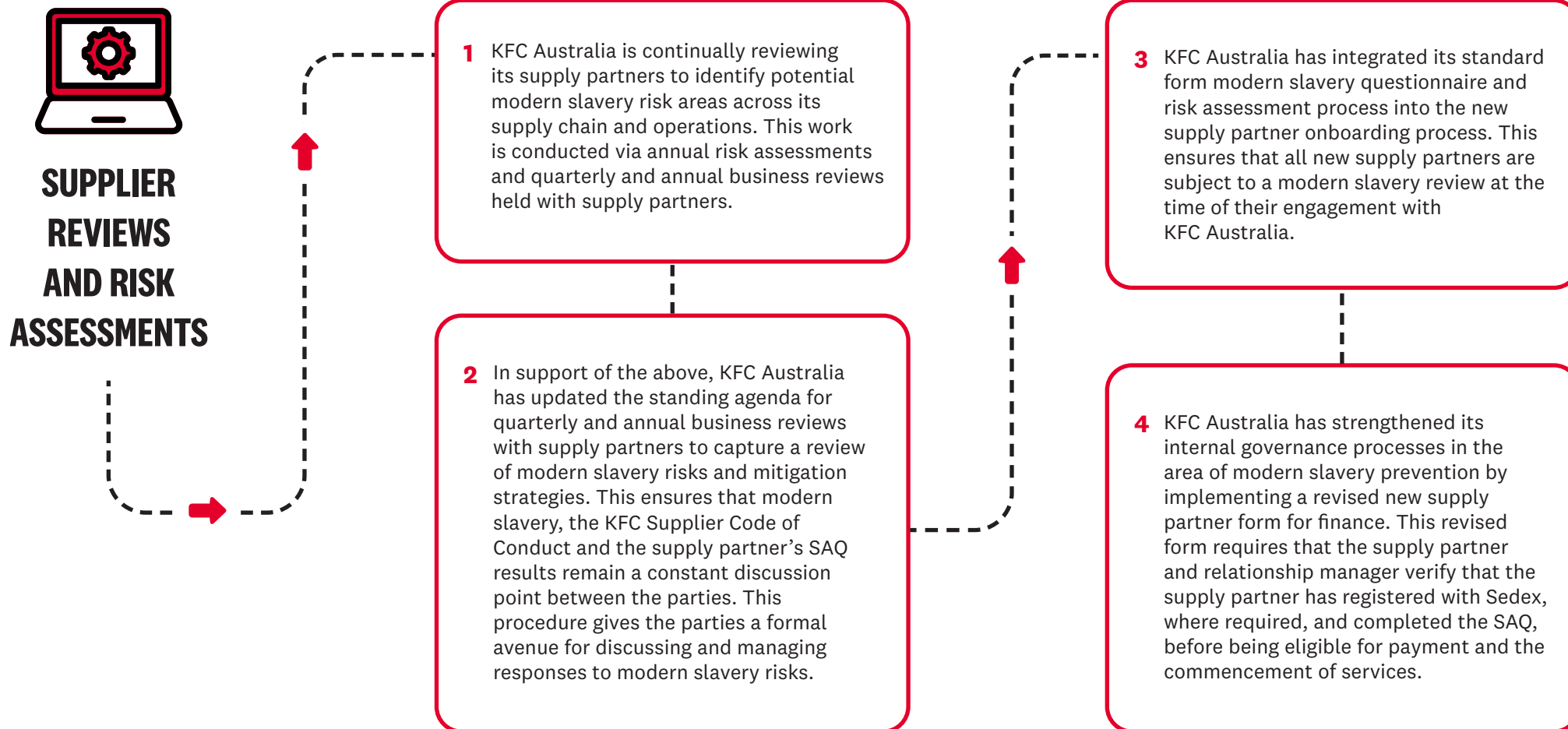
**2** KFC Australia has had each member of its RSCs complete a compulsory online modern slavery training course, developed in consultation with an external party. This course is compulsory for all new starters in the KFC Australia RSCs, and is intended to be completed by all RSC staff every two (2) years. This training provided information on KFC Australia's policies and processes, and greatly assists implementation, governance and accountability in relation to modern slavery.

**3** KFC Australia requires all team members to complete an annual compliance program which includes materials and training on whistle-blowing, and KFC Australia's open door policy.

**4** In 2023 KFC Australia developed a training video that can be shared with supply partners and on-site contractors, reminding these parties of the importance of compliance with KFC Australia's policies and procedures, including in relation to modern slavery and Sedex registration.

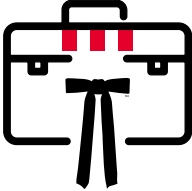
**5** In 2024, KFC Australia and some of our key franchise partners attended a workshop facilitated by Sedex and hosted at their offices. As well as the useful sharing of insights around modern slavery prevention, there was interest from the franchise partners to supplement their own modern slavery training with KFC's online training course. KFC will maintain this discussion point as part of our monthly forums with franchisees.

# ADDRESSING RISKS – SUPPLY CHAIN AND OPERATIONS





# ADDRESSING RISKS – SUPPLY CHAIN AND OPERATIONS



## POLICIES, STATEMENTS AND CONTRACTS

**1** KFC Australia developed a modern slavery roadmap and drafted KFC Australia's first modern slavery policy. This has been followed up with the submission of five (5) further modern slavery statements.

**2** KFC Australia conducted a GAP analysis of KFC Australia's policies and procedures for modern slavery risk.

**3** In 2020, KFCPL and KFC Adco adopted formal Modern Slavery and Whistleblower Policies which communicate processes and protections when disclosing information as well as providing access to a Whistleblower Protection Officer, a confidential hotline and online disclosure form to encourage team members to whistleblow in safety. KFC Australia has worked to raise awareness of these policies across its business units, with the annual compliance training being a valuable tool in ensuring the team members are aware of these policies and tools.

**4** KFCPL updated the KFC Supplier Code of Conduct to specifically address compliance with modern slavery, illegal workplace practices and illegal workers. Via inclusion in its Supply Agreements, it is KFC Australia's continued expectation that supply partners comply with the KFC Supplier Code of Conduct.

**5** The Franchise Policies Manual, being the KFC brand's operational manual in Australia, has been amended to require KFCPL's franchise partners to provide their supply partners with a copy of KFC's Supplier Code of Conduct.

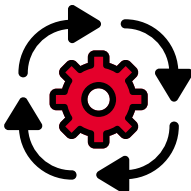
**6** KFCPL and KFC Adco has updated the terms of its contracts, and the contracts with many of our supply partners, to include provisions requiring our supply partners to comply with the MSA and amongst other things, to register with Sedex where appropriate.

**7** In 2023, KFC requested that Yum! Brands' managed template contracts be updated to incorporate modern slavery and Sedex obligations. The business determined that bespoke modern slavery provisions should be incorporated and managed by each region. KFC Australia continues to adopt these obligations into its contracts with supply partners.

**8** In 2023 Yum! produced (with KFC Australia's input) the Responsible Sourcing and Sedex Playbook, which provides an overview of responsible sourcing and provides guidance and recommendations on the use of Sedex. This playbook is for use by KFC Australia, its franchise partners and supply partners.

**9** In 2024, KFC Australia's policy review team undertook a comprehensive analysis and update of a number of internal employment and team member policies, including the Whistleblower and Modern Slavery Policies, applying a modern slavery lense to its review.

# ADDRESSING RISKS – SUPPLY CHAIN AND OPERATIONS



## WORKING GROUP AND TOOLS

**1** KFC Australia has established a cross-functional modern slavery working group which meets regularly to develop and implement KFC Australia's modern slavery strategy. The modern slavery working group reports into KFC Australia's compliance committee, which in turn reports to the board.

**2** KFC Australia has:

- developed a supply partner toolkit to support our supply partners in tackling modern slavery risks.
- developed a toolkit to support KFC Australia's RSC teams to identify, assess and address modern slavery risks.
- implemented an anti-modern slavery process in respect of low-risk contractors and supply partners, utilising a standard form questionnaire and a risk assessment process.

**3** All KFC Australia employees, supply partners and franchise partners to whom the MSA reporting obligations apply are expected to understand and comply with the MSA. KFC Australia regularly reminds its employees, supply partners and franchise partners of this expectation and encourages reporting of any modern slavery violations or concerns. KFC Australia's Modern Slavery Policy and Whistleblowing Policy identify how and who to report concerns to.

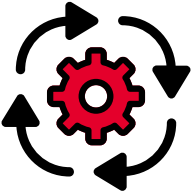
**4** In the event of a modern slavery incident arising, the working group will be responsible for developing a remediation plan. Remediation is intended to be on a case-by-case basis, but at a high level will involve:

- working with and consulting affected individuals and stakeholders to address and remedy the situation;
- reviewing processes to prevent similar risks happening again; and
- if necessary, terminating relationships in cases of non-compliance or referring matters to the authorities.

**5** As well as KFC Australia's internal modern slavery group, KFC Australia works closely with its franchise partners. Workshops and monthly forums have been established to collaborate and knowledge share amongst the group, with an ongoing commitment to continue this work.

**6** In 2024 with the assistance of a multi-national law firm, a set of key performance indicators (KPI's) were developed for KFC Australia relating to modern slavery mitigation strategies and remediation processes and policies. KFC Australia is using these KPI's to guide and build out present and future internal processes that tackle modern slavery and to assist in future actions through the way we govern, our human resources and supplier procurement. More details on these future actions can be found at *Our Path Forward*.

# ADDRESSING RISKS – SUPPLY CHAIN AND OPERATIONS



## REVIEW OF HUMAN RIGHTS DUE DILIGENCE PROGRAM

**1** In 2024, KFC Australia engaged a multi-national law firm to review its human rights due diligence program in the context of the UNGP's. The UNGP's are the authoritative framework guiding responsible business conduct and addressing human rights abuses in business operations and global supply chains.

**2** In conducting the review, the law firm found that Yum! Brands' Human Rights and Labor Practices Policy (**HRLP**) addressed the UNGP's foundational principles. The HLRP requires that KFC Australia conduct its business practices in a way that protects human rights. These protections consider the foundational principles which are:

- the responsibility to respect and avoid infringing human rights;
- avoiding activities that contribute to adverse human rights;
- prevention and mitigation strategies; and
- policies which commit to the above and remediation.

**3** The UNGP's also list operational principles with the review identifying that the HLRP and KFC Australia's Modern Slavery Policy embed an expectation that the business protects human rights, becoming part of day-to-day operations. By communicating policy requirements via training on a regular basis, the review identified KFC Australia as having achieved UNGP expectations of policy transparency and compliance.

**4** The review further identified that the HRLP sets out KFC Australia's human rights due diligence approach, with KFC Australia integrating this into practice via the Global and KFC Supplier Codes of Conduct. To date, KFC Australia has not identified any human rights impacts, and the review identified that KFC Australia's regular engagement with suppliers via modern slavery questionnaires, internal risk assessment processes when onboarding and open lines of communication has led to this mitigation.

**5** The HRLP sets out the mitigation and remediation processes including:

- confidential mechanisms to raise concerns;
- annual compliance training which includes information about reporting concerns; and
- working with suppliers to remedy incidents, as well as regular disclosure and reporting.

Should an incident arise requiring remediation, the review identified that the above strategies are incorporated by KFC Australia into everyday practice via the whistleblower policy, compulsory compliance training as well as regular communication and risk assessment of suppliers. These strategies are intended not only to mitigate but provide avenues for cooperation and effective remediation.

**6** The review identified recommendations for KFC Australia's modern slavery working group to bolster the internal human rights approach which include:

- engagement with available data on Sedex, SAQ's and questionnaires to assess supplier risks;
- communicating the revised Modern Slavery Policy to the business with a focus on operationalising within KFC Australia's supply chain and operations; and
- whilst remediation remains a case-by-case basis, strengthening KFC Australia's remediation process and developing a plan if an incident were to occur.



# ASSESSMENT OF EFFECTIVENESS

## Reported Incidents

As of the date of publishing this statement, we have not been notified of any modern slavery related incidents or human rights violations during the period of this statement. Further, KFC Australia has not been notified of any potential claims pursuant to the whistle-blower hotline.

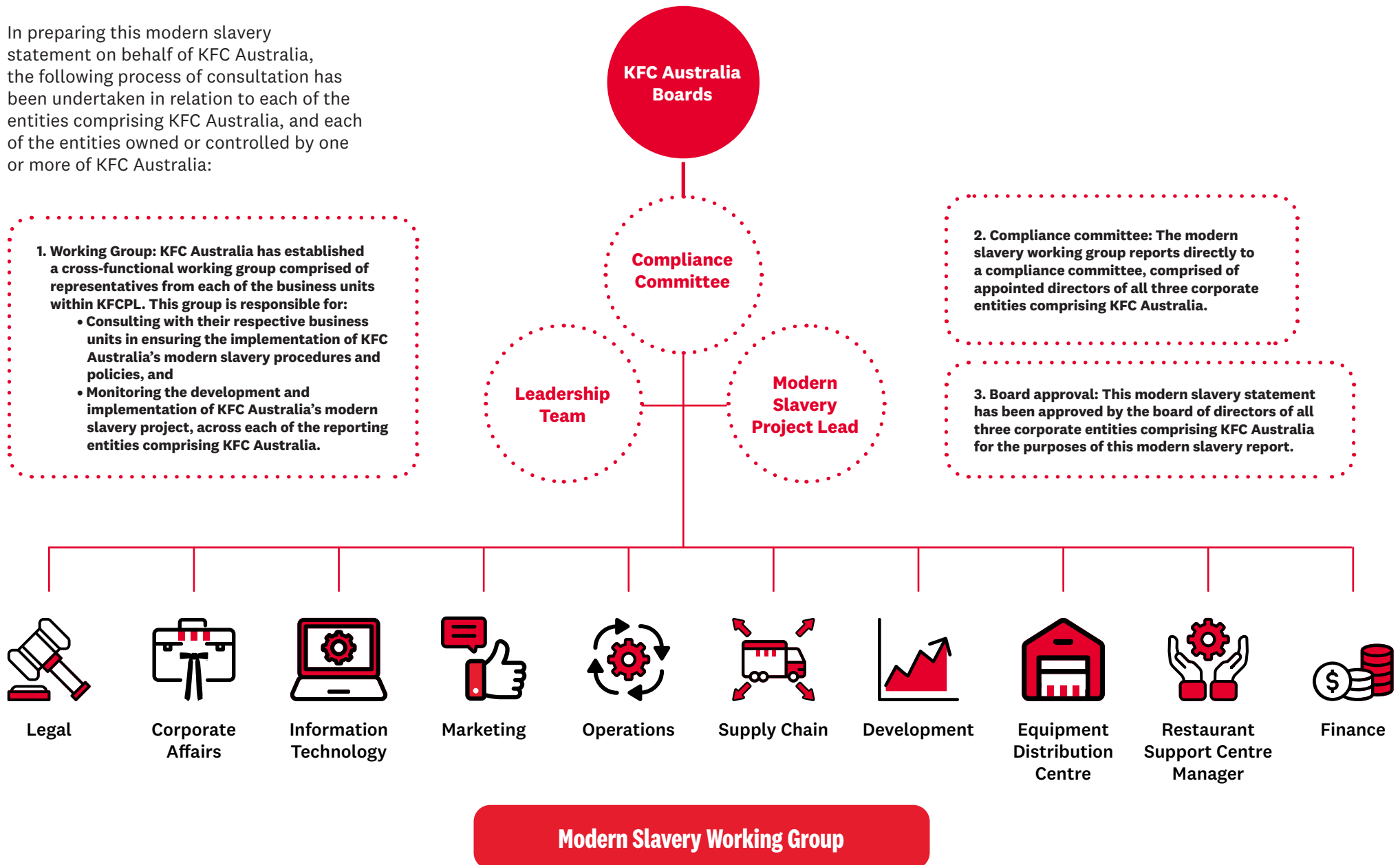
We acknowledge that this does not constitute a finish-line, and we will continue to implement anti-modern slavery measures and in turn also

reflect on our incident reporting processes to ensure that we are made aware if there is a modern slavery related incident in our operations or supply chain.



# CONSULTATION PROCESS

In preparing this modern slavery statement on behalf of KFC Australia, the following process of consultation has been undertaken in relation to each of the entities comprising KFC Australia, and each of the entities owned or controlled by one or more of KFC Australia:



# OUR PATH FORWARD

KFC Australia is committed to undertaking the following work in an effort to further mitigate the risk of modern slavery occurring within KFC Australia's operations and supply chain.

| Ongoing commitment and further mitigation                                                                                                                                                         | KPI                                                                                                                                                                                                                | Status                                                                                                                               |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| KFC Australia, in unison with franchise partners, will continue to encourage new and existing supply partners to register with Sedex.                                                             | KFC Australia's goal is to have all supply partners, who meet the internal registration threshold, registered with Sedex.                                                                                          | This is an ongoing commitment that will remain relevant as new supply partners are engaged.                                          |
| KFC Australia is committed to maintaining compulsory modern slavery training for new starters, regular modern slavery training for RSC staff and annual compliance training for all team members. | KFC Australia's goal is to ensure that all new RSC staff receive modern slavery training within six (6) weeks of commencing employment and that all RSC staff receive modern slavery training every two (2) years. | This is an ongoing commitment that remains a key pillar within KFC Australia's modern slavery prevention strategy.                   |
| Complete a review of all of KFC Australia's employment and team member related policies, applying a modern slavery prevention lens.                                                               | To have completed a review of KFC Australia's employment and team member related policies during 2025.                                                                                                             | This work commenced in 2023 with the whistleblower policy, and is an ongoing body of work. This is expected to be completed in 2025. |
| KFC Australia's modern slavery working group will review and operationalise the key learnings from its human rights due diligence program review.                                                 | To have operationalised no less than two (2) recommendations from KFC Australia's human rights due diligence program review.                                                                                       | This is a new body of work which is due to be completed by the time of the next statement.                                           |



## SIGN OFF

The board of Kentucky Fried Chicken Pty Ltd ACN 000 587 780 approved this statement on 30 June 2025, on its own behalf and on behalf of ACN 085 239 998 Pty Ltd ACN 085 239 998.

The board of KFC ADCO Limited ACN 083 047 992 approved this statement on 30 June 2025.



Kristi Woolrych  
General Manager of Kentucky Fried Chicken Pty Ltd

