



GUZMAN Y GOMEZ LIMITED - FY24

MODERN SLAVERY STATEMENT

This statement is made in accordance with the Modern Slavery Act 2018 (Cth) reporting on the financial year commencing 1 July 2023 to 30 June 2024. It covers all activities undertaken by Guzman y Gomez Limited ("GYG") and its subsidiaries (collectively, the GYG Group).

1 As at 30 June 2024, GYG's Australian subsidiaries are Guzman y Gomez Franchising Pty Ltd, Guzman y Gomez Restaurant Group Pty Ltd, Guzman y Gomez Leasing Pty Ltd, Guzman y Gomez Trading Pty Ltd; and its American subsidiaries are Guzman y Gomez Corp and Guzman y Gomez Restaurants, LLC.

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Co-CEOs' Message

At GYG, we believe people are at the heart of everything we do. Our commitment begins with ensuring everyone in our operations and supply chain - from farm workers to kitchen staff - is treated with dignity and respect.

Our mission goes beyond serving quality food – it's about creating positive change through ethical business practices. We carefully select suppliers who share our values and demonstrate fair labour practices. We invest in our GYG team members' well-being, support our franchise partners' growth, and work closely with suppliers to ensure their workers receive fair treatment and safe working conditions.

The value of "got your back" and taking care of people has guided us since the beginning. We recognise our responsibility as an organisation to protect human rights and create a positive social impact in every community we serve. We take a strong stance against modern slavery and are dedicated to protecting human rights across all aspects of our business. At GYG, our success is measured not just by the food we serve, but by how we treat and empower people throughout our entire network.

We are proud that in 2024 GYG increased its ongoing commitment to mitigating modern slavery with the engagement of iPRO's Modern Slavery Assessment Tool. The platform has enabled GYG to conduct our own assessment and manage self-assessment of 325 of our suppliers. We are

committed to setting KPI benchmarks and driving continuous improvement.

Modern Slavery can only be ended through collaboration and education. This year GYG also focused on increasing awareness of modern slavery as an issue to our GYG internal networks and suppliers and creating action plans outlining what we can do as a business to minimise the risk to all people.

Today, we are proud to publish our fourth Modern Slavery statement. As we continue to do our due diligence to understand risk factors to our business, GYG will refine our approach and goals.

On behalf of the GYG's leadership team, we would like to thank our team, franchisees and supply partners for their ongoing commitment and efforts to GYG's modern slavery mitigation strategy.



Steven Marks
Founder and Co-CEO



Hilton Brett
Co-CEO

ABOUT GYG

Headquartered in Surry Hills, Sydney, Guzman y Gomez is a quick service restaurant (QSR) business, delivering clean, fresh Mexican-inspired food. GYG has a vision to ‘reinvent fast food and change the way the masses eat’.

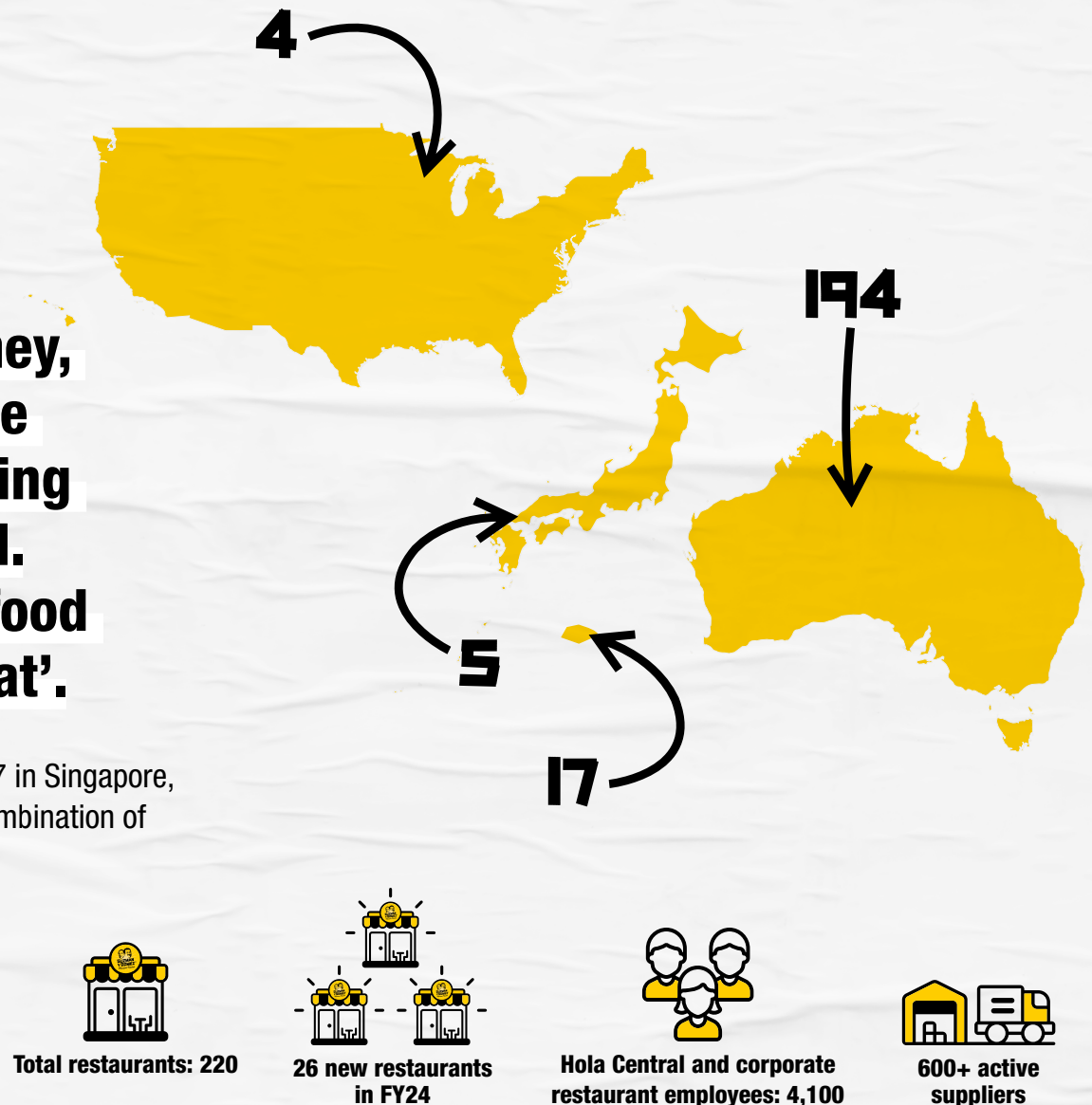
In FY24, GYG grew to 220 restaurants globally, with 194 Australia, 17 in Singapore, 5 in Japan and 4 in the United States (US). GYG restaurants are a combination of corporate owned (64 restaurants) and franchise (130 restaurants).

Australia: 194 restaurants (64 corporate, 130 franchise)

Singapore: 17 restaurants (master franchise)

Japan: 5 restaurants (master franchise)

USA: 4 restaurants (corporate)



Our Values

How will we be on this journey?



IT'S ALL ABOUT THE FOOD!

Our food is what separates us from all others. It's our brand, our heart and soul. Execution must be perfect – every order, every day!



MAKE EVERY GUEST LOVE US

We control our guest experience. Make it memorable, every time! And don't forget... Our smiles are contagious!



BE REAL

We say (with respect) what we think, and we don't make excuses



GOT YOUR BACK

We are in this together. We take care of each other - always!



IT'S UP TO US!

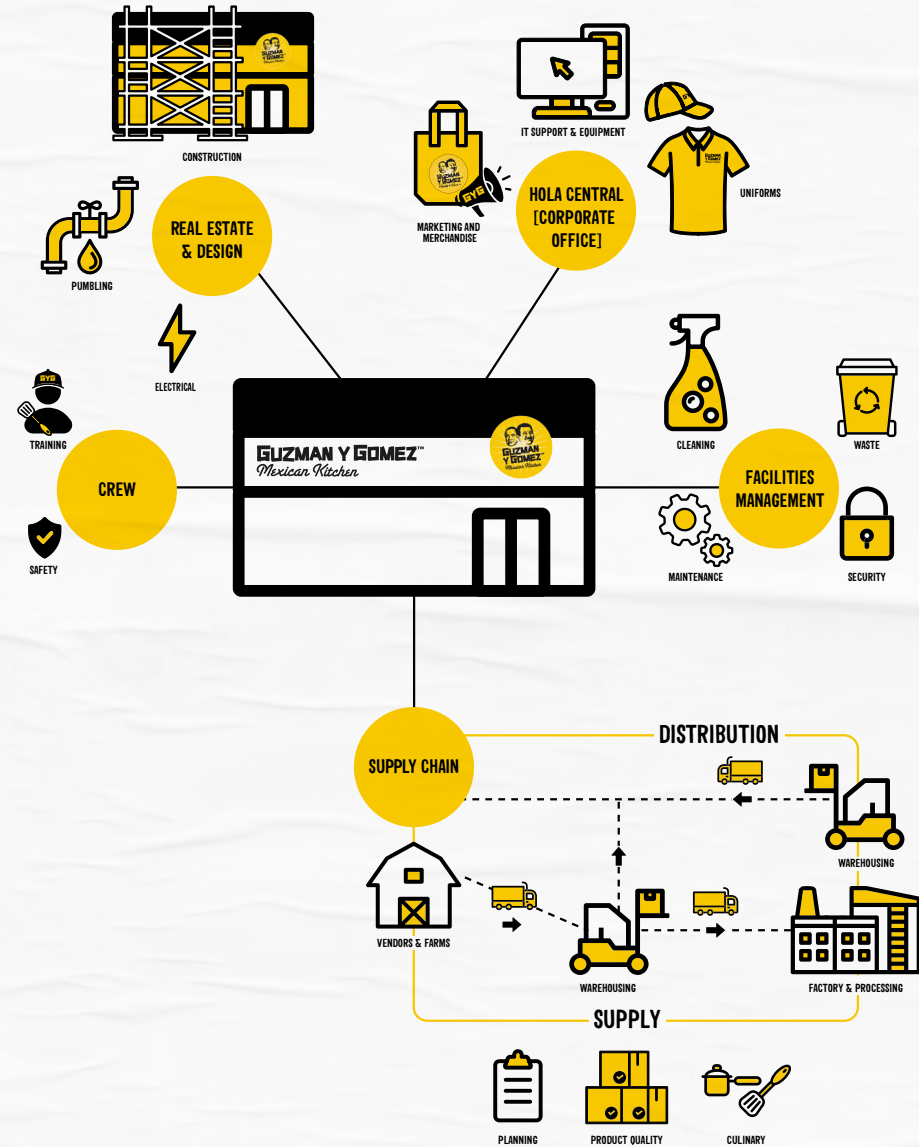
The future is ours to dominate!

Our Operations

The GYG network comprises corporate-operated and franchised restaurants. Each location receives regular deliveries of fresh ingredients and prepares menu items daily.

Our restaurant crew plays a crucial role in our operations and undergoes comprehensive culinary and safety training to ensure that all procedures are followed correctly. Each restaurant is supported by the Hola Central (Corporate office) teams, which include experts in finance, operations, supply chain, human resources, marketing, IT, construction, legal and compliance, corporate office and sustainability.

The GYG Group directly employs 4,100 people across Hola Central (Corporate office) and corporate restaurants in Australia and the US.



Our Supply Chain

Our suppliers operate in the following sectors to support restaurant operations and Hola Central corporate activities:

- Accommodation and Food Service Activities
- Administration and Support Services
- Agriculture, Forestry, and Fishing
- Arts, Entertainment and Recreation
- Building services contractor
- Cleaning
- Construction
- Domestic work
- Education
- Electricity, Gas, Steam and A/C supply
- Finance and Insurance
- Government administration, Defence and Social Security
- Health and Social Work
- Information and Communication
- International organisations, Diplomatic and Consular Services
- Labour hire
- Maintenance and Repair of motor vehicles
- Manufacturing
- Mining and Quarrying
- Personal services
- Professional and Scientific Services
- Real estate
- Retail
- Security services
- Transportation and Storage
- Water supply, Sewerage and Waste Management
- Wholesale



OUR SUPPLIERS OPERATE IN MANY LOCATIONS ACROSS THE WORLD

GOVERNANCE STRUCTURE AND POLICIES

GYG BOARD OF DIRECTORS

Overall responsibility for Modern Slavery Act Compliance

AUDIT AND RISK COMMITTEE

Board committee responsible for corporate governance and risk management

EXECUTIVE LEADERSHIP TEAM

Internal management team

RISK STRATEGY FORUM

Risk management working group

Key Governance Documents and Policies

Our corporate governance policies guide and support our monitoring efforts through the following key documents:

- GYG Code of Conduct
- Whistleblower Policy
- Human Rights Policy
- Anti-Bribery and Corruption Policy
- Disclosure Policy
- Respect at GYG Policy

These policies help us uphold our commitment to ethical practices and safeguard human rights within our operations.

The GYG Code of Conduct is available on the company's website at guzmanygomez.com.au/constitution-codes.

GRIEVANCE AND REMEDICATION

We have implemented a clear procedure for receiving grievances related to any breaches of our Modern Slavery Policy.

Our external whistleblower hotline offers a confidential service for employees and other stakeholders to report actual or suspected workplace misconduct, allowing them to do so anonymously or by name.

Stakeholders can easily access this service through a toll-free hotline, a dedicated website and postal address.

UNDERSTANDING OUR MODERN SLAVERY RISK

Modern slavery refers to various forms of exploitation and coercive practices that deprive individuals of their freedom, rights and dignity. It encompasses situations where individuals are forced or coerced into labour, servitude, or human trafficking against their will. Modern slavery can take different forms, including forced labour, debt bondage, forced marriage, human trafficking, and child labour.

The International Labour Organisation estimates that over 50 million people around the world are victims of modern slavery. In recent years, supply chain transparency is a key policy strategy used by governments to identify and prevent business practices that lead to modern slavery.

GYG has a zero-tolerance approach to Modern Slavery in any of its forms, and is actively working to assess, address and monitor current and potential suppliers to minimise risk and avoid these unacceptable practices.

Geographical Risks

GYG operates in Australia, Singapore, Japan and the United States of America.

The Trafficking in Persons Report (U.S. Department of State Office to Monitor and Combat Trafficking in Persons, 2024) reviews countries and regions and their government's efforts to eliminate severe forms of trafficking, the nature and scope of trafficking, and trends in efforts to combat trafficking in their respective country. Countries are then ranked by Tier.

Australia, the United States of America, and Singapore are Tier 1, meaning that they are countries and regions whose governments, at the date of this assessment, fully meet the Trafficking Victims Protection Act's (TVPA) minimum standards for the elimination of trafficking.

Japan is Tier 2, meaning that they are countries and regions whose governments, at the date of this assessment, do not fully meet the TVPA's minimum standards, but are making significant efforts to meet those standards for the elimination of trafficking.

Food Service Sector Risks

GYG operates in the Accommodation and Food Service Activities sector as a quick service restaurant (QSR) business. This sector can be described as high-risk,

according to the Global Estimates of Modern Slavery and Child Labour: Global Estimates 2020 Trends and the Road Forward (ILO and UNICEF, 2021).

We provide food service as part of our operations in the Accommodation and Food Service Activities sectors, which can be described as high-risk (ILO and UNICEF, 2021).

Food, packaging and facilities management sourcing is a part of our operations, in the Accommodation and Food Service Activities sector. Some of the sectors we source from can be described as high-risk (ILO and UNICEF, 2021). These are: The Accommodation and Food Service Activities, Agriculture, Forestries and Fishing, Building Service Contracting, Cleaning, and Construction sectors. We also source from other sectors, which are not described as high-risk.

Operationally, we service our restaurants through the facilities management sector that are generally considered high-risk.

- Commercial Cleaning
- Electrical
- Facilities maintenance
- Leisure, Entertainment or Hospitality cleaning
- Plumbing
- Waste management

In Australia, GYG engages facilities management services and solutions to provide corporate restaurants with maintenance, pest control, waste and cleaning services via a central model. The facilities management supplier manages field-based team members to perform facilities management services and expects all sub-contractors and suppliers to comply to their modern slavery policy and expectations.

Restaurant and Franchise Operations Risks

The risks of modern slavery within our operations are primarily associated with vulnerabilities in our supply chain, franchise operations, and labour practices. We recognise these potential risk areas and have already begun implementing measures to ensure that both our practices and those of our franchisees are protected by robust risk controls.

Hospitality Workforce Risks

Our organisation employs between 5,001 and 10,000 workers and agents. Our youngest employee is 14 years old and under, and we do hire low-skilled migrant workers, both foreign and domestic. Recruitment is managed directly by our team of recruiters, who do not engage subcontractors.

We are committed to ethical employment practices. Utilising the Action Plans from the iPRO Modern Slavery Assessment

Tool, we are beginning to implement additional measures to reinforce these practices with robust risk controls.

Food and Ingredients Risks

GYG sources a range of fresh ingredients and food products for our restaurants. We source some food and ingredients in countries or regions as listed on either the 2022 List of Goods Produced by Child Labor or Forced Labor or the 2022 List of Products Produced by Forced or Indentured Child Labor. Both lists are produced by the US Department of Labor's Bureau of International Labor Affairs (ILAB).

Coffee is considered a high-risk category, however GYG coffee is Rainforest Alliance Certified, a scheme that supports the rights of farmworkers and their communities, providing assurance of positive practices around human rights and labour.

How We MANAGE MODERN SLAVERY RISK

Assess our own operations and our suppliers

Guzman y Gomez uses a third-party tool, the iPRO Modern Slavery Assessment Tool to support our assessment of modern slavery risks in our operations and supply chain. We engaged iPRO during the reporting period to conduct the assessments on our operations, and a bulk assessment of 325 of our suppliers. We intend to carry this process forward as an annual assessment of our operations and supply chain.

Participating suppliers were asked to complete a self-assessment questionnaire online. After each supplier completed and submitted the questionnaire, their responses were assessed to determine their modern slavery risk scores and associated risk category.

Each supplier that completed the assessment was assigned one of the following risk categories:

- High-risk (high levels of inherent risk)
- High-risk (inadequate risk control)
- Medium-risk (partial risk control)
- Low-risk (adequate risk control)
- Low-risk (low levels of inherent risk)

To determine the appropriate risk category, responses were first evaluated for risks inherent to a supplier's operations, production, and sourcing. This is referred to as the Inherent Risk Score. The Inherent Risk Score was calculated based on the geographical, type of goods, industry sector, and workforce parameters that the supplier indicated in the Modern Slavery Assessment Tool (MSAT).

Next, the Unmitigated Risk Score was evaluated. This score was calculated based on the policy and procedure responses on the questionnaire. A supplier's Unmitigated Risk Score determined whether they were categorised as having inadequate, partial, or adequate risk control.

HOW WE MANAGE MODERN SLAVERY RISK

Then, the risk scores for each assessed supplier were aggregated and averaged, resulting in an Aggregated Inherent Risk Score and an Aggregated Unmitigated Risk Score for the overall supply chain.

Guzman y Gomez also completed a self-assessment using the same process to determine a risk category for our operations.

Other ways we are assessing modern slavery risks in our operations include:

- Making management aware of Modern Slavery and associated policies via company intranet
- Employee survey and interviews (annual engagement survey, exit interviews, etc)
- Training and awareness programs
- Reporting mechanisms (whistleblower, reporting to Human resources)

Other ways we are assessing modern slavery risks in our supply chain include:

- Supply chain mapping
- Incorporating Modern Slavery clause in supplier contracts to ensure compliance and highlight importance
- Including Modern Slavery updates in business reviews between GYG and suppliers
- Supplier due diligence
- Supplier audits

Address identified items for enhancement

Suppliers who completed the self-assessment received tailored action items to address after the assessment. These action items were specifically designed based on their questionnaire responses and, if implemented, will help mitigate the identified risks.

Measuring Effectiveness of our Actions

We utilise the benchmarking and KPI's in the iPRO Modern Slavery Assessment Tool to assess the effectiveness of our actions.

As this is the first year, we have used the platform to conduct our assessments and due diligence, we will be able to objectively measure the effect when the assessments are completed during the next reporting period.

The main KPIs we are using to benchmark our efforts are the risk scores that are generated as part of the assessment process.

Each organisation who completed the assessment questionnaire was assessed and given 2 risk scores.

- Inherent Risk Score
- Unmitigated Risk Score

The Inherent Risk Score measures modern slavery risks that are intrinsic/built-in to the operations of an organisation. This is determined by asking which countries, regions, sectors, and high-risk goods are part of their operations, production, or supply chain.

The Unmitigated Risk Score measures the organisations risk that is still present (remains) after accounting for modern slavery risk controls that have been implemented. This is determined by asking suppliers about the policies, processes, and procedures in place to reduce modern slavery risks.

Guzman y Gomez is provided an aggregated risk score of all the assessed suppliers, and we use this aggregated score to measure the risk on an overall supply chain level.

We aim to continuously improve on these KPI's.

As we take actions within our organisation, and with our suppliers, we will be able to assess the effectiveness of our modern slavery action plan to reduce the Unmitigated Risk Score by introducing relevant policies and procedures.

We also measure the effectiveness of our engagement with suppliers and will continue to encourage participation in our assessment programme to better identify and mitigate modern slavery risks in our supply chain.

Entities Owned by Guzman y Gomez Limited

Australia:

- Guzman y Gomez Franchising Pty Ltd
- Guzman y Gomez Leasing Pty Ltd
- Guzman y Gomez Property Pty Ltd
- Guzman y Gomez Restaurant Group Pty Ltd
- Guzman y Gomez Trading Pty Ltd

United States of America:

- Guzman y Gomez, Corp (Delaware Corporation)
- Guzman y Gomez Restaurants, LLC (Illinois Corporation) – held indirectly through Guzman y Gomez, Corp

All entities listed above are 100% owned subsidiaries of Guzman y Gomez Limited, except for Guzman y Gomez Restaurants, LLC, which is held indirectly. This ownership structure enables comprehensive control and alignment with our organisational standards and practices.

While GYG does not exercise direct control over its franchisees, it holds them responsible for compliance with laws, promoting ethical practices, and conducting due diligence to mitigate risks associated with modern slavery within the broader business network.

Consultation Practices

At GYG, we prioritise transparency and collaboration in our consultation processes with our subsidiaries and business network. Below is an overview of our consultation practices:

- **Stakeholder Identification:** We identify all entities within our ownership and control, including franchisees, supply chain partners, and internal divisions.
- **Regular Meetings:** We hold regular meetings with these stakeholders to discuss operational performance, strategic initiatives, and any concerns. These meetings involve representatives from management and relevant departments, facilitating a comprehensive exchange of information.

- **Feedback Mechanisms:** Formal feedback channels, such as engagement surveys and advisory groups, have been established to allow entities within our business network to share insights and concerns related to operational practices, product offerings, and customer service.
- **Documentation and Follow-Up:** All discussions and feedback are thoroughly documented, with follow-up actions tracked to ensure concerns are addressed and stakeholders are informed of decisions made as a result of the consultations.

Consultation with the Responsible Entity

Our consultation processes are designed to promote collaboration, transparency, and effective communication. By engaging with various stakeholders across our business network, we ensure that all perspectives are considered and that our operational practices align with industry standards and stakeholder expectations.

- **Identification of Responsible Entity:** Guzman y Gomez Limited serves as the responsible entity, providing the necessary statement regarding compliance, operational standards, and other relevant aspects.
- **Initial Briefing:** An initial briefing is conducted with senior leadership and department heads to clarify the purpose of the statement, the required information, and the timelines involved. This ensures clarity and alignment on expectations.
- **Ongoing Communication:** We maintain open lines of communication throughout the consultation process, providing regular updates to various stakeholders.
- **Draft Review:** Before finalising the statement, we share a draft with select stakeholders to gather feedback and make necessary revisions. This collaborative approach helps ensure accuracy and completeness.
- **Finalisation and Approval:** Once the statement is agreed upon, we proceed with the final approval process, which includes sign-offs from relevant senior leaders and the Board, confirming mutual agreement on the statement's contents.

CURRENT AND FUTURE ACTIONS

At GYG, identifying and managing our modern slavery risks is an ongoing commitment. We have outlined key initiatives to engage with our suppliers and enhance capacity and visibility on these critical issues:

Comprehensive Training

Modules: We provide training as part of the employee induction process to ensure a foundational understanding of modern slavery risks.

Annual Awareness

Training: All employees and franchise teams participate in annual training sessions that focus on increasing awareness and actionable steps related to modern slavery and our Human Rights Policy.

Informational Resources:

We create educational materials for employees, crew members, and franchisees to help them recognise modern slavery risks and incorporate best practices into their daily activities.

Regular Monitoring and

Discussion: Modern slavery is integrated into our monitoring and reporting processes, ensuring it is a key topic at supplier business review forums and meetings throughout the year, especially during contract renewals.

Policies & procedures:

Annual review and development of Modern Slavery Policy and associated Policies to incorporate explicit guidance across all Human Rights topics.

These initiatives are designed to foster a culture of awareness and proactive engagement in addressing modern slavery risks across our operations and supply chain.

CONCLUSION

GYG is committed to ensure continued mitigation of modern slavery risks in our operations and supply chain through awareness and action.

Guide to THIS STATEMENT

MODERN SLAVERY ACT CRITERION	CRITERION	REFERENCE IN THIS STATEMENT
(a)	Identify the reporting entity	Title (p 0)
(b)	Describe the structure, operations and supply chains of the reporting entity	About GYG (p 2-4,6)
(c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Understanding our modern slavery risk (p 8-10)
(d)	Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	How do we manage modern slavery risk (p 6-7, 11-12)
(e)	Describe how the reporting entity assesses the effectiveness of such actions	Measuring the effectiveness of our actions (p 13)
(f)	Describe the process of consultation with (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a (joint modern slavery) statement under section 14, the entity giving the statement	Consultation practices (p 14-15)
(g)	Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Current and future actions (p 16)