



Modern Slavery

Statement 2024

Reporting Entities:

RG Restaurants Pty Ltd

Century 101 Pty Ltd

Westpark Operations Pty Ltd





Introduction

This Statement relates to the reporting period that commenced on 1 July 2023 and ended on 30 June 2024 (“Reporting Period”) and is prepared as part of our compliance with the Modern Slavery Act 2018 (Cth) (“the Act”).

Throughout this Reporting Period, we have continued our commitment to increase our awareness of the risks of Modern Slavery across our business.

This Statement reports on the activities of RG Restaurants Pty Ltd alongside its related entities, Westpark Operations Pty Ltd as trustee for Westpark Operations Unit Trust (“Westpark Operations”) and Century 101 Pty Ltd (“Century 101”). We confirm this Statement has been reviewed and approved by the Directors of each of these companies.

As provided in our past statements, our group is predominantly a franchisee business within the brand of KFC Australia. This Statement should be read in conjunction with the Modern Slavery Statement submitted by KFC Australia, for reasons explained in this Statement.



The Reporting Entity

RG Restaurants Pty Ltd ACN 611 108 911 (“RG Restaurants”) is an Australian private company limited by shares with its main office in Shepparton, Victoria.

RG Restaurants operates alongside its related entities, Westpark Operations Pty Ltd as trustee for Westpark Operations Unit Trust (“Westpark Operations”) and Century 101 Pty Ltd (“Century 101”).

RG Restaurants’ journey with KFC Australia began more than 30 years ago with one restaurant in Shepparton, Victoria. Together with its related entities, RG Restaurants owns and operates 64 KFC restaurants and employs more than 3,800 employees throughout Victoria at the conclusion of the Reporting Period.

Our Structure, Operations and Supply Chains



Structure and Operations

RG Restaurants is a franchisee of the KFC franchise system operated by Kentucky Fried Chicken Pty Ltd (ACN 000 578 780) and its related entities (“KFC Australia”).

As a requirement of our Franchise Agreement, our restaurants are run by a significant organisational structure that supports the operation of the business and continues to create development opportunities.

Our employees range from the front-line workers within our restaurants to the support services providing finance, marketing, people and culture and other administrative support to our business.



Supply Chain

Our supply chain can be categorised into two;
Core Suppliers and **Non-Core Suppliers**.



Core Suppliers

To ensure the quality and consistency of the products sold within our restaurants, we are required under our Franchise Agreement to engage with suppliers who have been approved by KFC Australia.

These suppliers are known as our Core Suppliers, as they are essential to the operation of our business within our restaurants. Our Core Suppliers include:

- Food and Beverage Suppliers.
- Packaging Suppliers.
- Distribution Partners.
- Delivery Aggregators.
- Equipment Providers.
- Information technology systems providers.
- Uniform Providers.



Non-Core Suppliers

Beyond the Franchise Agreement, we have other suppliers who provide goods and services which are known as our Non-Core Suppliers.

These suppliers are those who we have had many long-term relationships with and include the following:

- Suppliers of equipment used in our restaurants.
- Development and construction suppliers.
- Accommodation providers.
- Marketing agencies.
- Information technology systems providers.
- Professional services providers of legal and financial services.
- Human resources; and
- Cleaning and maintenance services.



Assessing our Risk of Modern Slavery in our Operations & Supply Chains

Risk within our Structure and Operations

We recognise there is an inherent risk of forced labour and/or risks surrounding wage compliance within the food industry.

As a people-focused business, we are committed to ensuring the highest standards of safety and employment within our restaurants. Our team members are all paid in accordance with market conditions, relevant employment awards and applicable legislation.

Our robust framework for communication and training provides the ability for our employees to receive annual reminders on different policies, including workplace rights, whistleblowing, open-door and other similar policies. As such, we have assessed there to be an extremely low risk of Modern Slavery occurring in our Structure and Operations.

Risk within our Supply Chains

Core Suppliers

Our Core Suppliers are identified as those suppliers who are critical to the operation of our restaurants in maintaining quality and consistency of the products sold.

KFC Australia conducts sourcing and purchasing negotiations for food, packaging, equipment and other items on behalf of KFC Australia and RG Restaurants as a franchisee partner.

KFC Australia began their assessment of Modern Slavery risks in the food and paper supply chain in March 2019. In December 2021, KFC Australia found that majority of suppliers within food and paper industry achieved a low or medium rating for the risk, based on Sedex reporting.

With their endeavours to continue to mitigate and identify potential risks, KFC Australia has now extended Sedex registration and self-assessment questionnaire to both:

- (a) supply partners that KFC Australia deems are of a significant size and value; and
- (b) those suppliers who are smaller but are deemed medium to high risk from the Sedex reports.

This expansion has led to the ability for KFC Australia to have a greater insight into their supply chain to identify risks of Modern Slavery. We will continue to support our Franchisor in their assessment, review and audit in our supply chain of our Core Suppliers.

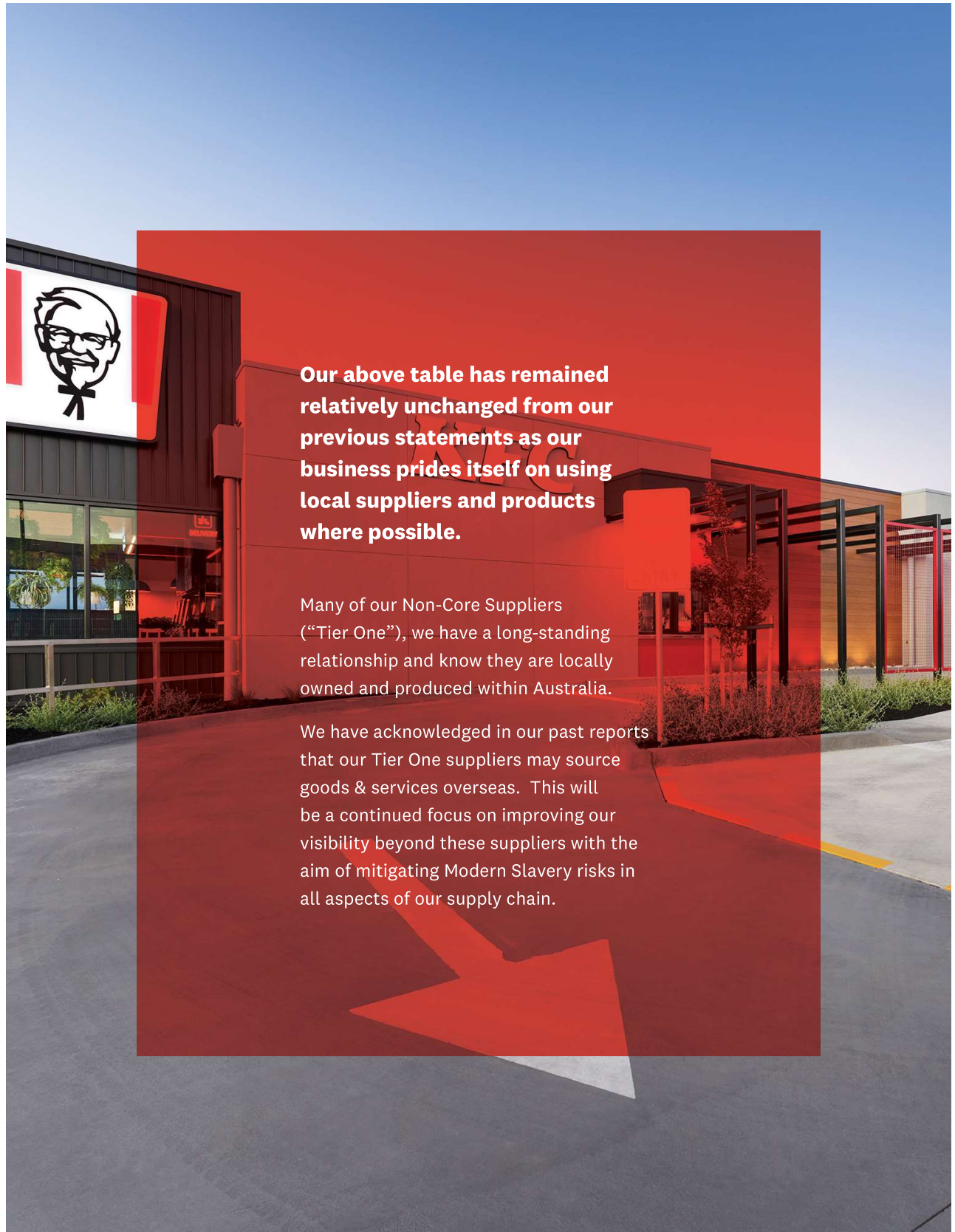


Non-Core Suppliers

Our Non-Core Suppliers provide services outside our Franchise Agreement.

The table below maps our Non-Core Suppliers and assessment of risks:

Category	Risk Assessment	Findings
Accommodation Providers	Low / Medium	The accommodation sector is often vulnerable to Modern Slavery risks due to the use of low skilled or migrant workers and supply chains. We do have longstanding relationships with some of our accommodation providers and believe that the risk of Modern Slavery is low. However, we are mindful of accommodation providers that we might not have the same relationship and the need to establish greater transparency beyond the tier one provider.
Cleaning Services	Medium /High	Given the nature of this industry and demographic of workforce, there is a need to establish onboarding and monitoring procedures for these providers. We are building commentary and information in our contracts around Modern Slavery to educate those involved.
Development and Construction	Medium /High	We have longstanding relationships with our tier one companies within this industry. Due to those relationships, we believe the risk of Modern Slavery is low. However, we are mindful that due to the nature of subcontracting and lack of visibility beyond tier one, there is a need to establish onboarding and monitoring procedures for these providers.
Equipment	Medium /High	We source majority of our equipment directly from our Franchisor and some equipment directly from a provider who is approved by our Franchisor. We have considered the risk to be Medium to High, until we establish a greater transparency of the supply chain beyond the tier one provider.
Human Resources	Low	Risk considered low due to the nature of services provided and demographic of workforce.
Maintenance services	Medium /High	Given the nature of this industry and demographic of workforce, there is a need to establish onboarding and monitoring procedures for these providers. We are building into our Contracts various commentary and information around Modern Slavery to educate those involved.
Marketing services	Low	Risk considered low in professional agencies and activation events. Additional consideration on how we verify the sourcing of our merchandise such as promotional shirts may be required.
Professional services for legal, financial, and accounting	Low	Risk considered low is to the nature of services provided and demographic of workforce. These areas are also heavily governed by Fair Work Australia for those professional services that are administrative based.
Uniform for Administration and Support Office Staff	Low / Medium	Whilst uniform procurement is often medium risk, we have taken the opportunity to engage with companies who pride themselves on adhering to Modern Slavery requirements. We have considered this low risk as we made a conscious effort to source from likeminded companies.



Our above table has remained relatively unchanged from our previous statements as our business prides itself on using local suppliers and products where possible.

Many of our Non-Core Suppliers (“Tier One”), we have a long-standing relationship and know they are locally owned and produced within Australia.

We have acknowledged in our past reports that our Tier One suppliers may source goods & services overseas. This will be a continued focus on improving our visibility beyond these suppliers with the aim of mitigating Modern Slavery risks in all aspects of our supply chain.

Actions taken to Address the Risk of Modern Slavery

The risk of Modern Slavery is an ongoing concern within our industry, and as a business we must ensure that we reflect on actions we have taken over the past twelve (12) months.

These actions are in addition to past actions we have taken and continue to build on each year.

Embracing Sustainability Initiatives

With our passion to work towards the implementation of more sustainable alternatives, we have worked with our Non-Core Suppliers in educating and procuring materials or goods from ethically sourced suppliers. We have also aimed to improve our visibility of these suppliers by seeking additional information about the sourcing of goods and services before engaging with the supplier.

Partnering and Collaboration

With our reliance on KFC Australia to negotiate and source our Core Suppliers due to our franchisee relationship, we acknowledge the need to partner and collaborate with KFC Australia to reduce Modern Slavery in these supply chains. A working group was created with KFC Australia and other Franchisees to share learning, enhance Modern Slavery Statements and implement greater oversight in our respective supply chains. The working group meets regularly to discuss ways we can support each other to mitigate the risk.

Looking beyond Tier One Suppliers

We continue our endeavours to educate our Tier One suppliers on ethically sourcing products, services and supplies. We recognise that there will inevitably be Modern Slavery risks beyond our Tier One suppliers. In the short term we will continue to provide education and explore ways of extending our reach to influence the lower levels of our supply chain of Modern Slavery risks.

Delivery Aggregators (Core Suppliers)

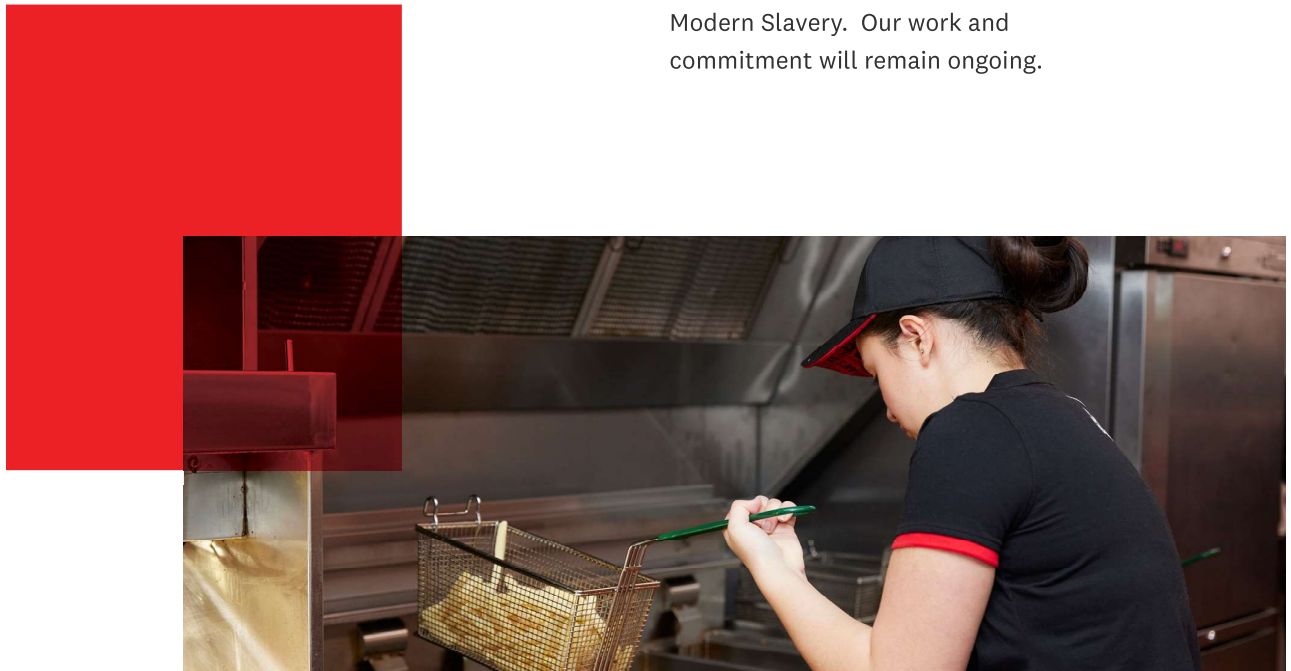
We have continued to monitor our Delivery Aggregators in the past twelve (12) months as we are mindful that this is an industry vulnerable to Modern Slavery risks due to the employment of low skills and/or migrant workers. At the date of publishing the report, we have not received any reports relating to incidents of Modern Slavery. We will continue to monitor with the support of our Franchisor, KFC Australia, given its importance.

Assessment of the effectiveness of our actions

At the date of publishing this Statement, we have not identified any issues that could be linked to Modern Slavery in our Operations or Supply Chain.

Whilst we have not been notified of any Modern Slavery incidents, we acknowledge this does not constitute the end of our efforts to mitigate Modern Slavery within our Operations and Supply Chains.

We will continue to implement strategies and anti-Modern Slavery measures in areas within our operations and supply chain that have an inherent risk of Modern Slavery. We will set short term goals each year to improve different aspects of our business. By setting and achieving these short-term goals, we aim to have a long-term impact on eradicating Modern Slavery. Our work and commitment will remain ongoing.



Focus Areas for the next 12 months

Construction Contracts

With the continuous growth of our company, there is a requirement to expand our Non-Core Supplier group.

We have been fortunate to have very long-standing relationships with many of our suppliers within the construction industry, which has allowed us to strengthen relationships and educate our Non-Core Suppliers about Modern Slavery.

However, we are mindful that seeking additional suppliers may attract a greater risk of Modern Slavery practices in price negotiations and

seeking of different products and services.

We aim to prepare contracts specifically for construction which will include Modern Slavery due diligence and conditions of termination for misconduct. We will seek to include information in our tender process that also aims to educate new Non-Core Suppliers to be aware of their obligations in mitigating Modern Slavery.

2030 Environment, Social and Governance Plan (ESG)

As our company has grown, we need to formalise our approach towards investing in sustainability, being socially responsible and managing our environmental impacts.

Our business has changed rapidly and as we approach the conclusion of 2024, we now need to look to the future. We have taken the initial step in strengthening our Environmental, Social and Governance practices and will be aiming to launch our 2030 plan in the next Reporting Period.



Focus Areas for the next 12 months

Right to Disconnect

With the introduction of the “Right to Disconnect” legislation in August 2024, we will use the next twelve months to focus on updating our policies and educating our employees.

The new legislation aims to establish clear boundaries around out-of-hours work communication. This is important legislation for our employees to understand their rights and regulate their limits of communication with other employees in our organisation, ultimately creating balanced work-life integration.



Appendix

Introduction	1
The Reporting Entity	2
Structure, Operations & Chain Supply	3
Assessing our Modern Slavery Risks	6
Actions Taken by RG Restaurants	10
Assessment of the effectiveness of our actions	11
Focus Areas for the next 12 Months	12
Sign Off	15



Sign Off

This statement was approved by the Boards of each of the three reporting entities covered in this Statement.

This Statement was approved by the Boards of RG Restaurants Pty Ltd (ACN 611 108 911) on 19 December 2024, and approved by the Boards of Century 101 Pty Ltd (ACN 147 149 646) and Westpark Operations Pty Ltd (ACN 084 391 864) on 19 December 2024.

This Statement is signed by Stephen Retzos in his role as the Managing Director of RG Restaurants Pty Ltd.



Stephen Retzos
Managing Director



RG
RESTAURANTS