

# Modern Slavery Statement 2022

# Content

1. Introduction	2
2. Our Business	3
3. Our Company Structure	3
4. Our Operations	3
5. Our Supply Chain	4
6. Our Governance and Policies	4
7. Our Speak Up Culture	5
8. Risks of modern slavery practices in the operations and supply chains	5
9. Actions taken to assess and address modern slavery risks.	6
10. Assessing the Effectiveness of Actions Being Taken to Assess and Address Modern Slavery Risks.	7
11. Modern Slavery Statement Approval	7



## 1. Introduction

The Modern Slavery Statement is made on behalf of the following reporting entities:

Just Eat (Acquisitions) Pty Limited ACN 605 645 547

Menulog Group Limited ACN 120 943 615

Menulog Pty Limited ABN 76 120 943 615

Menulog Limited 3530684

Throughout this statement, we refer to these entities, collectively, as “Menulog”.

This statement is submitted on behalf of the above reporting entities pursuant to the Modern Slavery Act 2018 (Cth) for the period 1 January 2022 to 31 December 2022.

We take the issue of modern slavery extremely seriously. We will not tolerate modern slavery in any form within our business or our supply chains. We truly believe that valuing and caring for human rights is not only critical to the sustainable operation of our business but also contributes to the recognition of such rights whilst also being a force for good.

## 2. Our Business

Menulog, as part of the Just Eat Takeaway.com group of companies, operates a hybrid marketplace for online food delivery - combining our marketplace offering with our courier delivery service. 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.

Menulog is not a food producer or retailer. The partners on our platform are independent from Menulog and the vast majority are small, independent restaurants or small chains although we 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.

## 3. Our Company Structure

Menulog is a proud part of the global Just Eat Takeaway.com network, a leading global online food delivery marketplace, headquartered in Amsterdam. With over 692,000 connected partners worldwide, Just Eat Takeaway.com offers consumers a wide variety of food choices.

Just Eat Takeaway.com has rapidly grown to become a leading online food delivery marketplace with operations in the United States, the United Kingdom, Germany, the Netherlands, Canada, Australia, Austria, Belgium, Bulgaria, Denmark, France, Ireland, Israel, Italy, Luxembourg, New Zealand, Poland, Slovakia, Spain and Switzerland.

Menulog Pty Limited is a wholly owned direct subsidiary of Menulog Group Limited. Just Eat (Acquisitions) Pty Limited are wholly owned direct subsidiaries of Just Eat (Acquisitions) Holding Limited. Just Eat Holding Limited is a wholly owned direct subsidiary of Just Eat Limited. Just Eat Limited is wholly owned by Just Eat Takeaway.com N.V., a company domiciled and registered in the Netherlands. Just Eat Takeaway.com N.V. is listed on Euronext Amsterdam and the London Stock Exchange.

## 4. Our Operations

Menulog continues to operate from our Head Office in Sydney, with large local teams spanning marketing, sales, operations, human resources, finance, analytics, product and technology. Menulog also has teams across both Australia and New Zealand, as well as onground teams across both countries.

Menulog employs 363 people across Australia and New Zealand. Our HR 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 partially for the provision of skilled, semi-skilled or professional services, such as in our Technology function. Other agency workers and independent contractors were engaged across our delivery networks, for the provision of lower skilled delivery services.

In Australia, Menulog uses delivery to complement our marketplace model, enabling us to give customers the widest possible choice. Since the start of the pandemic we have seen huge

growth in our delivery operations and it now forms a core part of our wider business. We utilise four different delivery models across the group:

- Self delivery - Just Eat Takeaway.com is predominantly a marketplace, which means in the majority of cases, the couriers who deliver customers' food to the door are engaged or employed by independent restaurants
- Scoober - Agency worker model - Couriers are on assignment to Just Eat Takeaway.com through an agency model
- Third party - Couriers are engaged by the third party as self-employed independent contractors
- Independent couriers - Self-employed independent contractors engaged directly by Just Eat Takeaway.com group company

In Australia, Menulog uses a variety of delivery models, including the self delivery and independent courier models deployed. Additionally, Menulog employs 26 couriers, who operate in the central business district of Sydney.

## 5. Our Supply Chain

Menulog primarily has suppliers in Australia, however we also engage with suppliers in the US, UK, The Netherlands, and some of these suppliers manufacture in China and Bangladesh.

Menulog procures services to support its business needs, such as software, advertising, marketing, call centre services in Sydney and the Philippines, payment services, restaurant order pads, office real estate, paper bags for restaurants, telecom and technology services.

Procurement managed suppliers are taken through a Just Eat Takeaway.com Group approved process. At supplier selection, this step includes engagement with Infosec, Data Protection, and Ethics, with mandatory risk-related questions. Sourcing governance and sustainability make up a significant weighting using our scorecard when aligning vendor selection. Menulog holds contracts that can be either short term, longer terms of 36 months, or evergreen.

## 6. Our Governance and Policies

Morten Belling, the Australia & New Zealand Managing Director as at YE 31 December 2022 was responsible for day-to-day leadership of Australian operations. As Menulog is part of the wider Just Eat Takeaway.com Group, the Management Board and Supervisory Board were ultimately responsible for Menulog throughout 2022.

To support our modern slavery commitments, we had a Code of Conduct which set out the ethical standards we expected of our staff and suppliers to meet and underlined our commitment to acting ethically and with integrity in all our business relationships. All company policies were made available to our people on the Kitchen (Just Eat Takeaway.com's internal communication site). The Code of Conduct is also available for our partners and suppliers on the corporate website - [www.justeattakeaway.com](http://www.justeattakeaway.com)

In order to reinforce its commitment to prevent conduct that may foster modern slavery, Just Eat Takeaway.com has included in its Code of Conduct specific references to the organisation's zero tolerance to modern slavery, not only among its employees, but also in its supply chain.

Also, Just Eat Takeaway.com encourages every employee and suppliers, through its Code of Conduct, to report any misconduct including any form of modern slavery.

## **7. Our Speak Up Culture**

Your voice matters - Speak Up! This is our motto and we encourage our employees and third parties to Speak Up about any (suspected) wrongdoing or anything unethical or simply not aligned with our Code of Conduct.

We maintain an independent third-party, multilingual Speak Up hotline that operates 24/7, 365 days a year, where anyone, whether it's an employee, an independent contractor, a supplier, a Restaurant, Grocery or Convenience Partner, a shareholder, a customer, or a relative of any of the above, can raise a concern or report a (suspected) wrongdoing. Any report can be made anonymously. Cases raised through the hotline went directly to the Ethics & Compliance team. The team was responsible for reviewing each case received via the hotline and assigning an appropriate investigator (where the issue was not investigated by the Ethics & Compliance team themselves). Just Eat Takeaway.com publicises the Speak Up hotline through Code of its Conduct and Speak Up Policy. The Policy and the hotline link is available via intranet, the corporate website on all the platform websites. One report relating to allegations of modern slavery or other human rights violations was received via the Speak Up hotline in The Netherlands in 2022. This report was handled by the Ethics & Compliance team and the local authorities.

## **8. Risks of modern slavery practices in the operations and supply chains**

Menulog takes the potential for modern slavery risks within our business very seriously.

In 2022, Menulog used fewer than 200 suppliers - with less than 15 suppliers who we prefer to do business with, however with no commitment to do business with. These regular suppliers are spread across industries such as IT software service, media and advertising, call centre services, payment services, IT hardware and mobile services for restaurant partners, merchandise and protective clothing for couriers, packaging for restaurants' use, and rent for offices and warehousing across Australia. Our small number of regular suppliers in the tech and textile space engage with their suppliers in China, US, Philippines, Bangladesh and locally in Australia.

It was defined that industries with low skilled labour and labour intensive industries - primarily factory based manufacturing of IT hardware and textiles and other courier equipment, present a high risk of modern slavery practises, as well as construction and outsourced customer services.

We had, and continue to have a zero tolerance approach to the imposition of any financial burdens, as outlined in our Code of Conduct, such as withholding wages or imposing recruitment fees, within our business and supply chains. In the event that allegations of this nature are brought to our attention, we would take swift and appropriate steps to investigate and address this.

## 9. Actions taken to assess and address modern slavery risks

A modern slavery risk assessment of Just Eat Takeaway.com's suppliers was carried out in the second half of 2022 and this includes Menulog's suppliers.

Workshops with category managers were used to create a list of suppliers that may be working in high risk geographies and industries to produce goods and services for Just Eat Takeaway.com.

We assessed our supply chain on the geography where a good or service is physically produced in, and evaluated said geography's modern slavery risk using the Global Slavery Index Country Vulnerability List. This is important as most of our direct (tier 1) suppliers outsource the manufacture of goods to another third party so assessing our tier 1 supplier would not be sufficient.

The category workshops enabled us to understand the end manufacturing location of the goods and services that Just Eat Takeaway.com source. We then categorised high risk geographies as any country that scored > 50 on the Global Slavery Index Country Vulnerability List, Medium risk countries as those with a score 20-49 and Low risk countries as those with a scoring of <20.

Secondly, we defined high-risk industries as those that are labour intensive and of low-skilled labour as those industries with greatest risk of modern slavery specific to Just Eat Takeaway.com's supply chain.

Lastly, we used the results of our independent supplier sustainability assessments to give suppliers a third and final modern slavery risk scoring. The assessment measures suppliers' labour and human rights credentials, and also their own social procurement credentials, which we assessed as important given the aforementioned outsourcing nature of our tier 1 suppliers. Where a supplier had not undergone an assessment and subsequently no score was available, the supplier was automatically given a high risk rating for this part of the assessment.

Scores for the 3 assessments listed above were then combined and a final score reflecting the modern slavery risk of that supplier was allocated and subsequent risk criticality ratings were applied.

Accordingly, we found that factory-based manufacturing of IT hardware, and courier equipment like textiles, which are also produced in the high-risk geographies, are the industries with greatest risk of modern slavery to Just Eat Takeaway.com and Menulog.

Beginning in 2023, our mitigation plan with the identified high-risk suppliers will consist of growing our mandatory desk-based sustainability (social) audits to determine if our suppliers have suitable labour and human rights policies. This will be combined with the launch of on-site audits to be carried out by a third party auditor that will address a range of social issues to help ensure workers in our value chain are protected. Given that many products we source are produced in China where Uyghur forced labour exists, we have also added a Modern Slavery Clause to our Goods' contract template that prevents suppliers from operating, or trading with any third party that operates in regions that are subject to modern slavery bans such as the Xinjiang region of China.

## 10. Assessing the Effectiveness of Actions Being Taken to Assess and Address Modern Slavery Risks

All new suppliers will be assessed using the same criteria as mentioned above, and will be required to undergo audits based on their risk rating. These audits will be carried out starting from July 2023 and we will assess the audit outcomes of all suppliers and will mandate that suppliers undergo any remedies should they be required. Or equally, establish whether the nature and number of breaches would warrant Just Eat Takeaway.com to exit the supplier and factory rather than working with them to improve.

To mitigate bribery & corruption in the auditing process, Just Eat Takeaway.com plans to attend a selection of supplier audits with our appointed audit partner. Our audit partner was chosen through a diligent vetting process which required them to share their own practices that mitigate against bribery & corruption and help ensure integrity in the auditing process. Lastly, and to this end, Just Eat Takeaway.com plans to rotate auditing companies every few years to minimise the risk of corruption in the process.

## 11. Modern Slavery Statement Approval

This statement was approved and signed by Morten Belling and Jon Vella as the principal governing body of each of the reporting entities on the 27 of June, 2023.



Morten Belling  
Director  
Senior Director Country Management AU/NZ



Jon Vella  
Director  
Finance Director AU/NZ