

# Modern Slavery

STATEMENT



NANDO'S AUSTRALIA PTY LTD  
AND NANDO'S PERI-PERI AUSTRALIA PTY LTD  
28 FEBRUARY 2022 TO 26 FEBRUARY 2023





Nando's acknowledges the Traditional Custodians of the land on which we live, work and serve our customers and communities. We pay our respects to Elders past and present and to the rights they hold as traditional custodians.

We recognise the continuing connection to land, waters, culture and community as the Traditional Custodians of country throughout Australia.

# CEO Statement



**Our purpose at Nando's is Changing Lives, Together. At its core, this means we want to change the world around us by making a real difference to people's lives. We believe that business can be a force for good.**

This passion to make a difference starts with our staff, because when they're being their best, brilliant selves, epic things happen. Beyond this, it underpins everything we do for our customers, supply partners, our stakeholders and in our communities.

Upholding human rights is fundamental to Changing Lives, Together. Guided by our five values of **pride, passion, courage, integrity and family**, our Modern Slavery Working Group is a passionate, skilled team from across the business who lead our commitment to better understanding and addressing the issues of modern slavery to ensure we respect and support the rights of all people, regardless of where they may live or work.

To assess and address the risks of modern slavery within our company and supply chains, Nando's has:

- Engaged in additional detailed supplier questionnaires with a broader supplier base to allow us to expand our supply chain knowledge and more thoroughly assess modern slavery risks while building the risk profiles of our existing suppliers with ongoing risk assessments
- Further enhanced our dedicated training module for all staff to complete as part of onboarding and refresher training suite in addition to development work on a more in-depth training module for team members who frequently engage with contracts and supplier negotiations
- Strengthened the supply relationships governed by formal supply agreements, ensuring the contracts include modern slavery compliance and reporting clauses, KPIs that are linked to modern slavery requirements, codes of conduct and terms of trade

- Proactively taken steps to maintain and deepen supplier relationships by increasing frequency of communication, including site visits and business reviews

I am pleased to present this statement, which was approved by Nando's Leadership Team on 18 August 2023.

**Amanda Banfield**  
Director & CEO  
Nando's Australia Pty Ltd  
& Nando's Peri-Peri Australia Pty Ltd





# Nando's Introduction

## THE STORY OF ROBBIE & FERNANDO

It all started in 1987, when two mates walked into a humble Johannesburg chicken restaurant as customers and came out owners. That's the power of PERi-PERi.

One taste was all it took and since then they've been obsessing over those flavours. That's why our famous PERi-PERi sauces, marinades and bastings are still made today with Nando's' very own African Bird's Eye Chillies, grown in Southern Africa.

That unforgettable flavour created a global family spanning 30 countries, with the first Australian Nando's opening in 1990 before landing in New Zealand in 2000.





## OUR COMMITMENT

This modern slavery statement is provided as a joint statement under section 14(1) of the Modern Slavery Act 2018 (Act) for the period from 28 February 2022 to 26 February 2023 (Statement) for Nando's Australia Pty Ltd ACN 079 066 407 (Nando's Australia) and Nando's Peri-Peri Australia Pty Ltd ACN 627 885 956 (Nando's PERi-PERi Australia) (together Nando's).

Nando's aims to ensure that within our own business and across our supply chain, all business partners operate with respect for, amongst other things, human rights.

Our guiding Compass helps us stay true to that commitment. Comprised of five core values, eight core behaviours and five leadership beliefs, it represents our culture, what we believe in, how it feels to work at Nando's and, importantly, what we look for in our leaders.

Formed with the help of our team throughout Australia and New Zealand, it shapes how we deliver the best experience for our staff, customers and suppliers.

# Our compass

## OUR VALUES

### PRIDE

- > We love our PERi-PERi chicken
- > We work together to succeed

### PASSION

- > We are positive & enthusiastic
- > We love what we do

### COURAGE

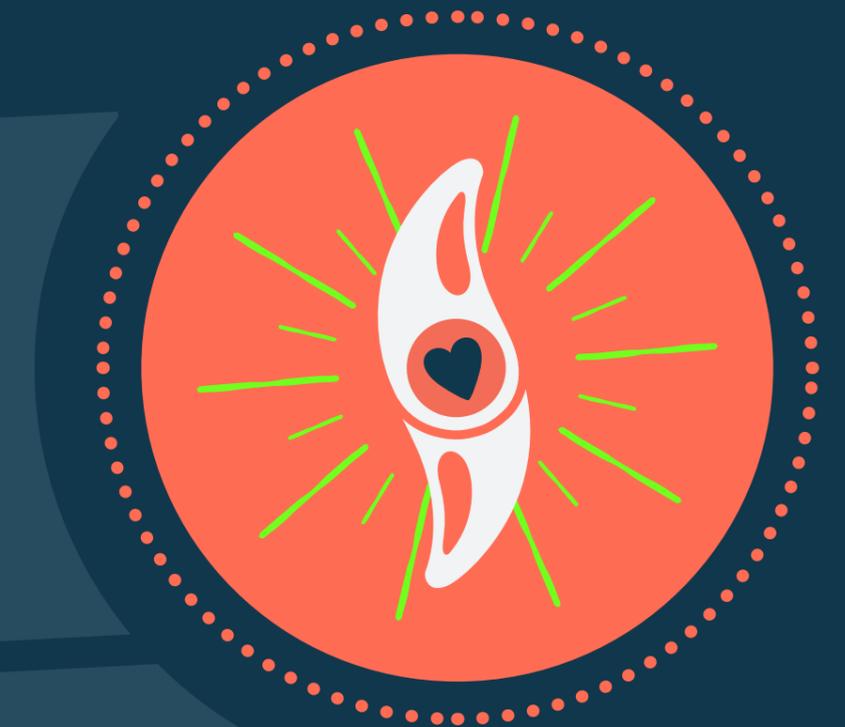
- > We speak up for what we believe in
- > We love a challenge

### INTEGRITY

- > We take responsibility
- > We keep our word

### FAMILY

- > We listen to, support & respect each other
- > We welcome everyone



## OUR BEHAVIOURS

- > I never compromise on quality
- > I make work fun
- > I treat everyone fairly

- > I show appreciation
- > I support my team
- > I share what I know

- > I help others to be their best
- > I make customers happy

# 1. Nando's Structure, Operations and Supply Chains

## STRUCTURE

Nando's Australia (**NAPL**) is a private limited (by shares) liability company incorporated in Victoria, Australia with its central support office located at 40 Mollison Street, Abbotsford VIC 3067.

Nando's PERi-PERi Australia (**NPPA**) is a private limited (by shares) liability company incorporated in Victoria, Australia with its central support office located at 40 Mollison Street, Abbotsford VIC 3067.

NAPL is part of a larger group that operates both corporate and franchised Nando's branded restaurants in South Africa, the United Kingdom, Ireland, India Middle East & Africa (IMEA), New Zealand, Malaysia and Singapore. Further information on the global operation of the brand can be found here.

The ultimate parent holding company of both NAPL and NPPA is Nando's Group Holdings Limited (**NGHL**). NGHL has numerous other subsidiary companies in the group, including Nando's

New Zealand Limited (4995100) and NNZ Restaurants Limited (5443130) which are the entities responsible for operating the Nando's restaurant network in New Zealand, which the management team of NAPL exercises direct day-to-day control over.

Nando's employs approximately 2,684 employees (1,596 full-time equivalent) including full-time, part-time and some casual employees in Australia across both NAPL and NPPA. The full-time equivalent employees in our franchise network is difficult to quantify given Nando's does not employ them directly, their employees and are made up of full-time, part-time and casual employees. We estimate that there are approximately a further 750 employees employed directly by our franchisees to work within Nando's franchised restaurants in Australia.

## OPERATIONS

NAPL operates primarily in the fast-moving consumer goods retail food industry, operating a chain of 145 dining restaurants across Australia specialising in the retail sale of flame-grilled PERi-PERi chicken, served with various sides and accompaniments. Of the 145 restaurants operating under the Nando's brand in Australia, 32 are independent businesses operated by Nando's franchisees under franchise agreements with Nando's and 113 are operated by Nando's directly as corporate restaurants.

NPPA operates primarily in the wholesale industry, importing and selling Nando's branded PERi-PERi products such as sauces, PERinaise, marinades, salts and rubs for retail sale both directly from Nando's restaurants and through all major Australian supermarket supply chains.



## SUPPLY CHAIN

### NANDO'S AUSTRALIA

In FY23, Nando's continued to consolidate its supply base to improve visibility and gain a deeper understanding of the systems and processes where its goods and services are sourced from. Since the modern slavery legislation was introduced, Nando's has consolidated over 250 suppliers while strengthening its relationships with its key partners.

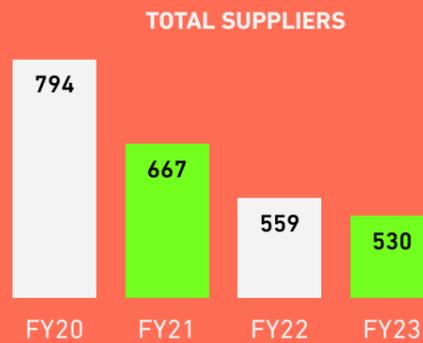
During the FY23 year, NAPL engaged with 530 suppliers to provide goods or services, both directly and indirectly into our restaurants. These numbers relate to the 113 restaurants owned and operated by Nando's directly as corporate restaurants because in some instances Nando's franchisees may engage their own suppliers.

Of the total suppliers used, we have 24 Tier 1 suppliers that provide products and services directly into our restaurants and account for approximately 62% of our total supplier and procurement spend. A further 348 suppliers provide products and services indirectly into our restaurants, accounting for a further 26% of our total supplier and procurement spend. The supply relationships in these categories are generally governed by formal supply agreements that include modern slavery

compliance clauses, KPIs that include modern slavery reporting requirements, codes of conduct and terms of trade.

Approximately 90% of Nando's total supplier and procurement spend occurs with only 61 suppliers, despite us having engaged with 530 suppliers in FY23. This focus further strengthens our ability to build, strengthen and nurture these relationships and ensure that we are putting practices in place to support reducing modern slavery risks together.

Our supply chain in Australia continues to remain stable as we work with our trusted local and global supply partners. This ensures we're able to meet our high moral and ethical obligations to support local communities, meet our sustainability goals and combat modern slavery.



## OUR SUPPLIERS

### Nando's Products

These products are produced into Nando's meals and sold directly to customers for dine-in or off premise consumption through takeaway or delivery

Our main supplier categories are:

### Tier 1 Direct Suppliers

The suppliers of the final product and transacted with frequently:

- > Distribution centres
- > Fresh Chicken
- > Fresh Produce & Beverages

### Tier 2 Direct Suppliers

Suppliers or subcontractors of our Tier 1 Direct Suppliers:

- > Chips
- > Packaging
- > Sauces and marinades
- > Other menu ingredients

### Tier 3 Direct Suppliers

Suppliers or subcontractors of our Tier 2 Direct Suppliers

- > Source ingredients (potatoes, plastic etc)

### Indirect Into-Restaurant Suppliers

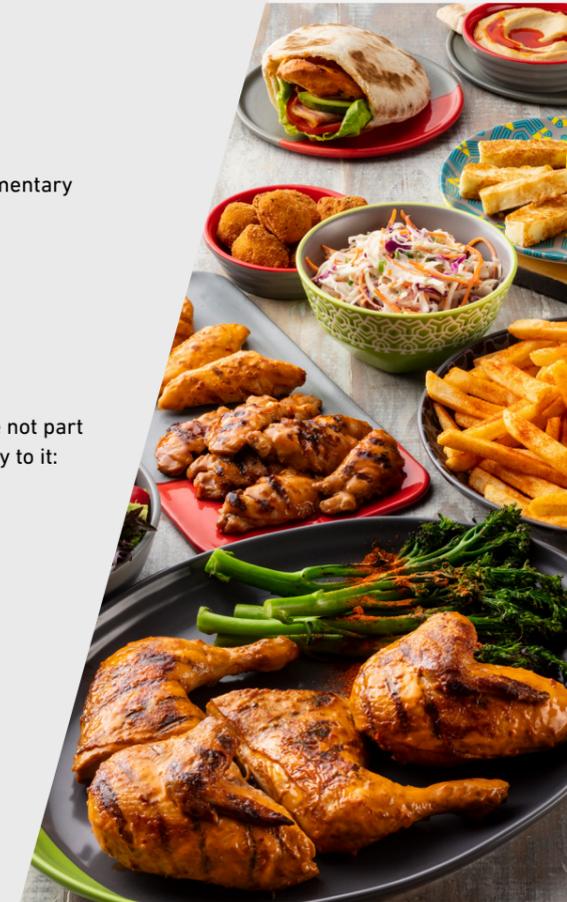
Supply products and services supplementary to our core business:

- > Facilities Management
- > Kitchen equipment & smallwares
- > Uniform
- > Waste & cleaning

### Indirect Overhead Suppliers

Supply products and services that are not part of our core business or supplementary to it:

- > Insurance
- > IT & Telecoms
- > Financial Services
- > Legal
- > Marketing
- > Recruitment
- > Utilities





This is supported by our new supplier induction process to assess the suitability of suppliers coming into the business, comprising of:

- 🔥 Regular surveys and questionnaires to get up-to-date insights and feedback
- 🔥 Risk assessments on high-risk suppliers
- 🔥 Mitigation strategies and contractual requirements to support visibility (e.g. modern slavery compliance, prohibition on subcontracting without prior notice to Nando's and inability to assign contract without Nando's consent)

#### FRANCHISEE PARTNERS

Part of Nando's Australia's operations is to provide certain supply chain management services for our Franchisee partners. Our Franchisees are required to use goods and services that have been sourced and approved by Nando's Australia to prepare, market and sell products in their restaurants. These requirements ensure the quality and consistency of all products served to our valued customers, as well as ensuring we're doing everything we can to eliminate modern slavery in our supply chain as the suppliers they use are pre-vetted through Nando's processes.

#### CHANGING LIVES PURPOSE

As part of our Nando's Changing Lives Purpose we actively engaged with social procurement agencies and suppliers. From this investment into social procurement, we have been able to strengthen our connection with our local and indigenous communities, directly leading to the creation of new employment opportunities. This has also enabled Nando's to improve our understanding of modern slavery in higher-risk industries and mitigate those risks by connecting with the correct partners and consolidating supply bases.

Most of Nando's direct supply chain spend is with suppliers in Australia, however we do procure some core ingredients from Southern African suppliers, including the chillies used in our restaurants and in the PERi-PERi drizzle, spice packs and retail sauce range sold through Nando's PERi-PERi Australia,

#### PERI FARMS

We work with local farming organisations to educate and empower these farmers to run their businesses successfully. We always guarantee a fair price for their crops, which means the farmers and their families have better access to education, healthcare, water, energy and housing.

We now have over 1,400 farmers hand-picking over one billion chillies each year in Malawi, Mozambique, Zimbabwe and South Africa.

#### NANDO'S PERI-PERi AUSTRALIA

In FY23, NPPA engaged with 47 suppliers to provide goods or services. Of the total suppliers used, one supplier is in the NGHL network, Nando's Grocery International Ltd (UK), and accounts for 73% of procurement and supplier spend.

Our next largest supplier is our distributor from whom we repurchase stock and reimburse trade investment on promotions. Of the remaining suppliers, each individually accounts for between only 1-6% of total procurement and supplier spend, with the largest supplier of this group in the United Kingdom and largely managed directly from a global perspective by NGHL.

Our largest category of supplier spend is on food products imported directly into Australia from suppliers that form part of the NGHL group. These products are then delivered to restaurants in the Nando's Australia group and authorised distributors. Our remaining supplier and procurement spend is largely on suppliers providing indirect overheads costs like logistics, packaging and marketing activities.

Our top 10 suppliers by spend all operate out of either the UK or Australia, which have both been identified as having a lower risk of experiencing modern slavery practices by the Global Slavery Index (GSI). Like NAPL, geography is only one factor used to assess the overall risk of a supplier, however this has been an important baseline for the business to undertake appropriate risk assessments and implement various risk mitigation strategies within its supply chain.

## 2. Risks of Modern Slavery Practices in Nando's Operations and Supply Chains

In the fourth year of reporting requirements under the Act, Nando's continued to work through detailed scoping and risk assessment exercises to gain further insight into the risks of modern slavery practices occurring in our operations and supply chains by our internal project team established in FY20.



The Modern Slavery Project Team for Nando's continued to meet at least quarterly to specifically address the risks of modern slavery practices in its business and supply chain with the following rolling agenda:

- Legislative updates on modern slavery (locally and globally)
- Supplier risk identification (i.e. specific suppliers based on risk assessments, reports, surveys or failed/incomplete mitigations)
- Risk assessment criteria (i.e. review ongoing appropriateness, results of risk assessments completed previous quarter)
- Reports and trends (i.e. GSI changes, Government reports, etc.)
- Seminar knowledge sharing from industry experts, webinars, articles etc.
- Training and communications (i.e. existing training updates and progress, crafting improvements to existing training and developing new programs and refresher courses)

### MODERN SLAVERY RISKS IN OUR OPERATIONS

Nando's Australia is a business with a relatively large young part-time workforce and 32 franchised restaurants operated directly by franchisees under agreements with Nando's Australia. All employees are employed in Australia directly by Nando's Australia and are not within the highest risk industries identified by the GSI (e.g. industrial cleaning, horticulture, construction).

Our franchisees are required to operate in full compliance with all applicable laws and regulations under their franchise agreements with Nando's Australia. Broad compliance audits are undertaken with franchisees regularly to assess several key areas (e.g. operational compliance, food safety compliance, employment legislation and other regulatory frameworks). We regularly audit, inspect and monitor the risks of underpayment in franchised restaurants, with our Legal department completing annual audits directly with each franchisee partner and our compliance team reviewing key risk areas in quarterly restaurant reviews.

Internally in our corporate restaurants, we conduct award rates and compliance audits through our People & Culture and risk teams, plus an annual external annual audit, to support ensuring that the required rights are upheld and employees are paid and treated correctly. Any gaps or recommendations for improvement are taken seriously by the business and are raised at Nando's Risk & Audit Committee meeting for review and action plan implementation.

Internal and external reviews are supported by an annual review undertaken by our People & Culture team to ensure wage changes are implemented as required and that salary banding is still appropriate in all circumstances, meeting legislative requirements as per the relevant Award and National Employment Standards in Australia for NAPL & NPPA and relevant legislation in New Zealand. In addition to the regular reviews, we aim to build robust processes in our HRIS (Workday system) to support ongoing governance.

Our People & Culture team maintain connection with external Workplace Advisory services across Australia and New Zealand who provide additional support to our People & Culture team.

**MODERN SLAVERY RISKS IN OUR SUPPLY CHAINS**

Our risk assessments have supported that our greatest risk of modern slavery exposure is via our suppliers and our supply chain, as Nando's has a diverse supplier base, including high risk industries (particularly food sourced from farming and products or services supplied from high risk geographic areas). In addition to the mitigations highlighted above (e.g. contractual requirements, codes

of conduct, terms of trade), for example, in the last 12 months, our Supply Chain team visited one of our major fresh produce suppliers to further understand their exposure to Modern Slavery risks, and to work closely with them to ensure that they have the necessary steps in place to close modern slavery risks.

These mitigations were updated in our internal risk assessment for that supplier and discussed at Modern Slavery Project Team meetings to review the effectiveness of those mitigations and whether further steps are needed.

During FY23 Nando's sent 80 detailed supplier questionnaires to suppliers in its supply chain to further understand modern slavery risks and implement mitigations, these were based on the following criteria:

- 🔥 Annual spend exceeding \$100,000
- 🔥 Identified suppliers in horticulture, food providers and services or products sourced from high risk geographically regions
- 🔥 Suppliers not required by the Modern Slavery Act to submit a statement.



An overall risk score was allocated to the response subcategories to identify potential modern slavery risks. Unfortunately, we only received a 40% response rate to this questionnaire for the suppliers in our supply chain. However, this is 113% volume increase from our FY22 responses (15 in FY22 vs 32 in FY23), suggesting that the steps we are taking to consolidate our suppliers and nurture the core relationships we do have, is heading in the right direction.

In addition to the geographical risk highlighted above, the Project Team identified the relationships with the core suppliers are strong and proactive work takes place with them to understand their supply chains. However, there is a risk that it is still not always possible yet for us to have clear visibility over our entire end to end supply chain. For example, of the 559 suppliers that Nando's Australia engaged with last financial year, approximately 355 of the suppliers were either one-off or low frequency suppliers which were less likely to have dedicated relationship building from a Nando's commercial partner.

Given the nature of our business and the products and services we generally acquire, we identified 125 suppliers (88 captured in the previous years and a further 37 suppliers in FY23) to complete risk assessments on for FY23. Considering the GSI geographic locations, horticulture sector classification and the industries our assessed suppliers are in, the four most salient human rights risks we identified from the 125 risk assessments are linked to:

## 34% WAGES & BENEFITS

This includes shopfitters who may engage contractors or sub-contractors to fulfil contractual terms without our express knowledge that this engagement has occurred.

We attempt to mitigate this risk by negotiating into contracts that our suppliers are not able to assign or subcontract without our prior consent (or at a minimum without prior written notice to us with a linked ability for us to terminate the contract if we disagree) to support giving us more visibility and control over our supply chain.

## 30% LABOUR (HUMAN RIGHTS)

This includes suppliers based overseas with higher risks of modern slavery according to the GSI.

Three suppliers initially provided responses to the employment conditions queries in the questionnaire that raised concerns for Nando's and required clarification with suppliers, who subsequently verified that their employment conditions are compliant (they had misunderstood the question). These responses contributed to a reduction in the high-risk rating to either moderate or low in the risk assessment.

## 15% WORK HOURS

This includes agencies who may require varying work hours to achieve existing or new project and contractual milestones.

We have assessed that there was a higher risk in FY23 of these agencies or businesses, potentially overworking employees in horticulture and in production lines given the labour shortages experienced in the market and the impact of inflationary pressures in the economy.

## 11% HEALTH & SAFETY

Risk of exposure to cleaning chemicals, wastage disposal and facilities management practices.

## 9% OTHER

The remaining modern slavery risk categories across the 125 risk assessments consist of 2% anti-discrimination, 1% child labour and 6% forced compulsory labour.



Our focus in FY23 involved revisiting the risk assessments completed on its 88 identified risk suppliers from FY20 to FY22 to ensure continuous proactive attention. Approximately half of these suppliers were included in the self-assessment questionnaire mailing list to gain further insight on their exposures to modern slavery risks. Nando's completed a further 37 new detailed supplier risk assessments, thus continuously building and strengthening the businesses' understanding of these risks so appropriate mitigations could be implemented.

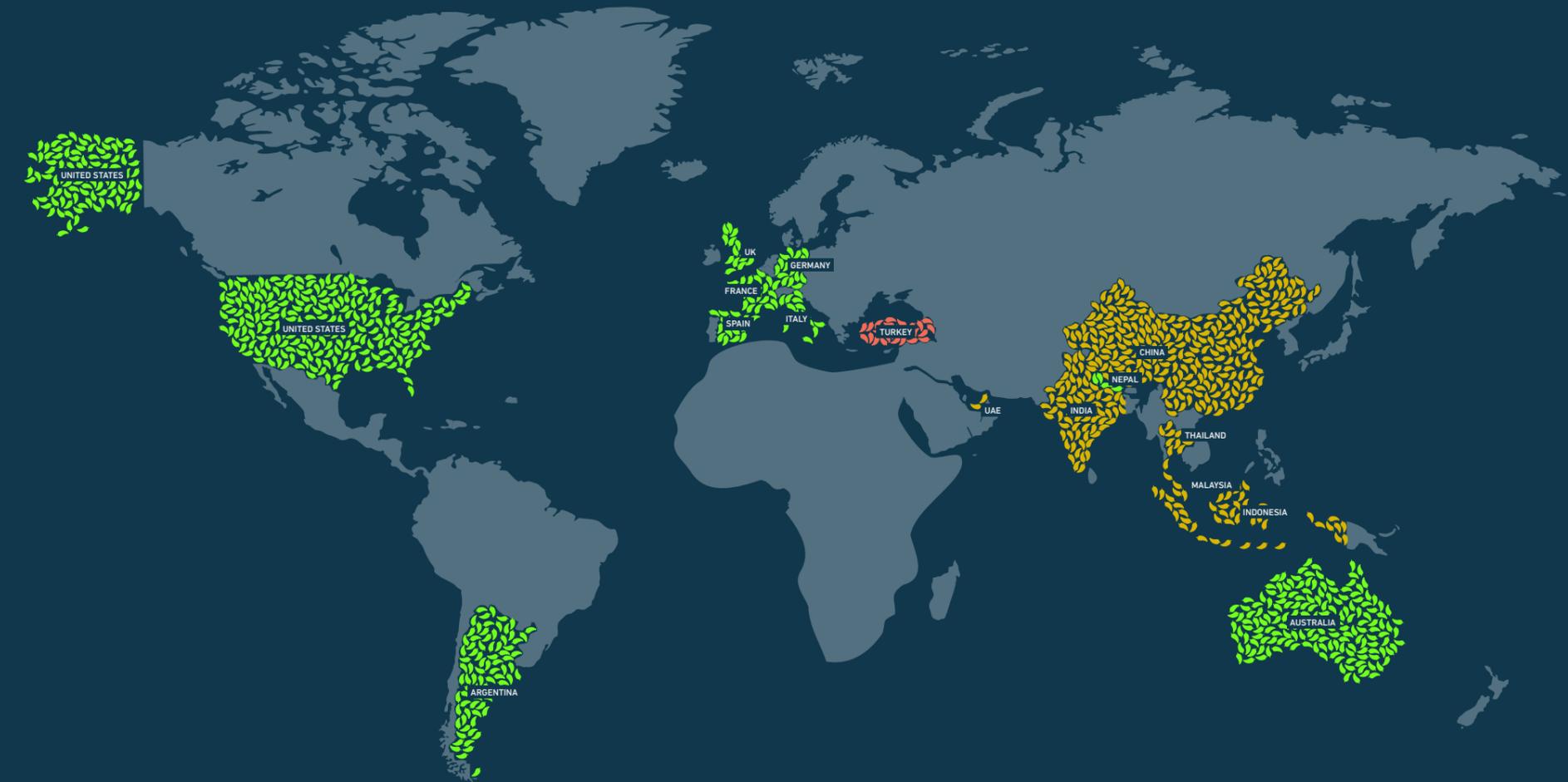
These steps are all aimed at assisting the Project Team (supported by the Nando's Leadership Team and ANZ Subsidiary Board) to continue to build on the necessary foundations in place to implement a detailed and proactive risk assessment program and subsequent mitigation strategies and move toward this becoming part of our business-as-usual approach to risk management (i.e. our long term ambition of having all of the suppliers in our business mapped with a risk assessment for modern slavery which is reviewed and tested periodically).

**GEOGRAPHIC REGIONS:**

Nando's Australian based suppliers included in our risk assessments indicated in their survey responses that they source goods or services from the following range of industries: agriculture, facilities management, packaging, design and construction, food wholesalers, waste disposal and cleaning in the displayed **high (41%), moderate (38%)** and **low (21%)** risk countries:

From these geographic and industry-based assessments, the Project Team overlaid the internal modern slavery questionnaire sent to suppliers for self-assessment. The data provided from this analysis resulted in significant movement to the overall risk ratings; high risks reducing by 25%, moderate risks reducing by 29% and low risks increasing by 200% in FY23.

The Project Team sought and obtained clarification for some of the goods provided from high-risk countries that they are sourced via highly reputable Australian retailers and not directly from overseas suppliers, which further reduced the risk of modern slavery for these high-risk countries as identified in our risk assessments.



Further modern slavery questionnaire insights across high, moderate, low risk countries included:

1. SUPPLIER IDENTIFIED THEMSELVES AS TAKING STEPS TO COMPLY WITH THE MODERN SLAVERY ACT		
e.g. Anti-slavery policies, risk assessments, compliance audits, third party inspections, whistleblower hotlines. Other steps proactively disclosed included Fair Work compliance, training, supplier checks, engaging with ethical suppliers required to submit their own Modern Slavery statement.		
Zero steps	Two steps or less	Three steps or more
35%	45%	20%

2. THE ORGANISATION HAS POLICIES, PROCESSES TO IDENTIFY, INVESTIGATE AND REMEDY THE RISK AND ANY INSTANCES OF MODERN SLAVERY WITHIN THEIR ORGANISATION		
Supplier examples included: code of conduct, recruitment policy, human rights policy, optimising procurement assessment frameworks, updating standard contract clauses, training employees, membership with SEDEX, ethical sourcing policies, SMETA or BSCI audits with suppliers.		
NO	Working towards policies & processes	YES
48%	7%	45%

3. METHODS TO SCREEN SUPPLY CHAIN FOR MODERN SLAVERY RISKS E.G. CHILD LABOUR, LOW SKILLED MIGRANT WORK		
Supplier examples included: proof of age checks, working visa checks, abiding by local, State and Federal government working regulations overseen by their Human Resources Team.		
NO	Considering	YES
39%	16%	45%

4. SUPPLIER KNOWLEDGE OF THEIR SUPPLY CHAIN		
Supplier examples included: Conduct supplier checks, trade references required, supplier questionnaires provided, request SMETA audits if available, request compliance to their supplier code of conduct, site audits, focusing on locally sourced & sustainable, using reputable suppliers required to submit a MS statement.		
Developing: Identified major Tier One suppliers. You have very limited or no visibility of your supply chains below the Tier One level	Moderate: Identified major Tier One suppliers and have partially or fully mapped the supply chains for key products and services of your supply chain	High: Mapped the full supply chain for key products and services used by your organisation and have identified key suppliers at all levels of your supply chain
39%	42%	19%

We provided recommendations to the 35% of suppliers in our supply chain which currently have no steps in place to comply with the Modern Slavery Act to consider, as a minimum, introducing an anti-slavery policy to combat possibilities of modern slavery in their supply chain.

There is an opportunity to work with the 48% of suppliers which identified themselves as having no policies or processes in place to identify and investigate the risk of any instance of modern slavery within their organisation, by sharing our approach and what we are doing to combat risk of modern slavery in our supply chain.

In addition, we have:

- Suggested these suppliers introduce basic training and awareness for their employees where it was indicated that they currently didn't provide any
- Encouraged these suppliers to further investigate their supply chains to understand if there could be risk of modern slavery (e.g. working conditions in factories and fresh produce)

We are passionate about our Partner Business code of conduct to also support these requirements which specifically highlights:

“ Having these same expectations of our business partners in the areas of governance and general compliance, human rights and workplace relations, occupational health and safety, ethical business practices and environmental management. We also expect our business partners to adopt similar principles in dealing with their own suppliers and partners and to complete their own risk assessments and due diligence on a regular basis. Nando's is committed to working with its business partners in an open, constructive and transparent manner and asks that its business partners do the same. ”





### 3. Actions Taken by Nando's to Assess and Address Risks of Modern Slavery Practices

#### SCOPING

##### NANDO'S AUSTRALIA

###### FY20:

- 🔥 The Project Team completed a detailed scoping and risk assessment exercise to gain further insight into the risks of modern slavery practices occurring in Nando's operations and supply chains
- 🔥 Due to the complex nature of operations and the supply chain it wasn't feasible for us to immediately assess and act on every supplier in our supply chain that may be at risk of modern slavery practices
- 🔥 The focus resulted in areas identified as most significant for FY20, continuing into FY21, eventually cascading these risk assessments down to other lower risk areas of the business and supply chain in the following years until it became part of "business as usual"
- 🔥 A framework was implemented to proactively review and update risk assessments annually

- 🔥 The identification process for these suppliers is listed in detail in Nando's FY20 Modern Slavery Statement

###### FY21:

- 🔥 Nando's followed the same assessment process but expanded the detailed risk assessment process to the next tier of suppliers in its supply chain, including revisiting the eight suppliers from FY20 as part of its implemented framework to proactively review and update risk assessments annually
- 🔥 Implemented the first training module for staff
- 🔥 Introduced modern slavery compliance clauses and the Business Partner Code of Conduct into more contracts with its suppliers
- 🔥 The classification process for these suppliers is listed in detail in Nando's FY21 Modern Slavery Statement.

###### FY22:

- 🔥 The same risk categories from both FY20 and FY21 were also used in FY22 with the addition of adding any Nando's defined "high-risk" suppliers based on either the type of supply (e.g. Nando's branded material) or known risk categories (e.g. geographical location) to the category of "known" suppliers
- 🔥 Expanded the training offered to include a more detailed module for those in the business responsible for negotiating contracts and onboarding suppliers
- 🔥 Introducing more direct requirements in contracts for suppliers not to assign or subcontract with Nando's prior written consent (or at a minimum prior written notice to Nando's which a linked ability for Nando's to terminate if it is not comfortable with the assignee or subcontractor)

The classification process for these suppliers is listed in detail in Nando's FY22 Modern Slavery Statement.

that had to be shared. PERI-PERI was about to make its way from Rosettenville to the world. Thank you for sharing it with us.  
As they say in Mozambique, bom proveito!



**NANDO'S PERI-PERI AUSTRALIA:**

NPPA followed a similar approach as Nando's Australia, however given its smaller size and supplier pool we were able to simplify the risk categories into only "direct" (suppliers that supply products and services direct that are fundamental to its core business (e.g. the bottled sauces and marinades) and "indirect" (suppliers that supply products and services indirectly that are not part of or fundamental to its core business but are necessary to operate efficiently (e.g. insurance and merchant fees)).

## SUPPLIER STATEMENTS

Supplier statements provide valuable insights into their approaches regarding addressing modern slavery risks. The Project Team operate a database of these suppliers, including copies of each statement, which has due dates for new modern slavery statements to be uploaded. Our approach has continued to discount suppliers that identified themselves in questionnaires as needing to submit their own modern slavery statement under the Act from being provided further detailed questionnaires.

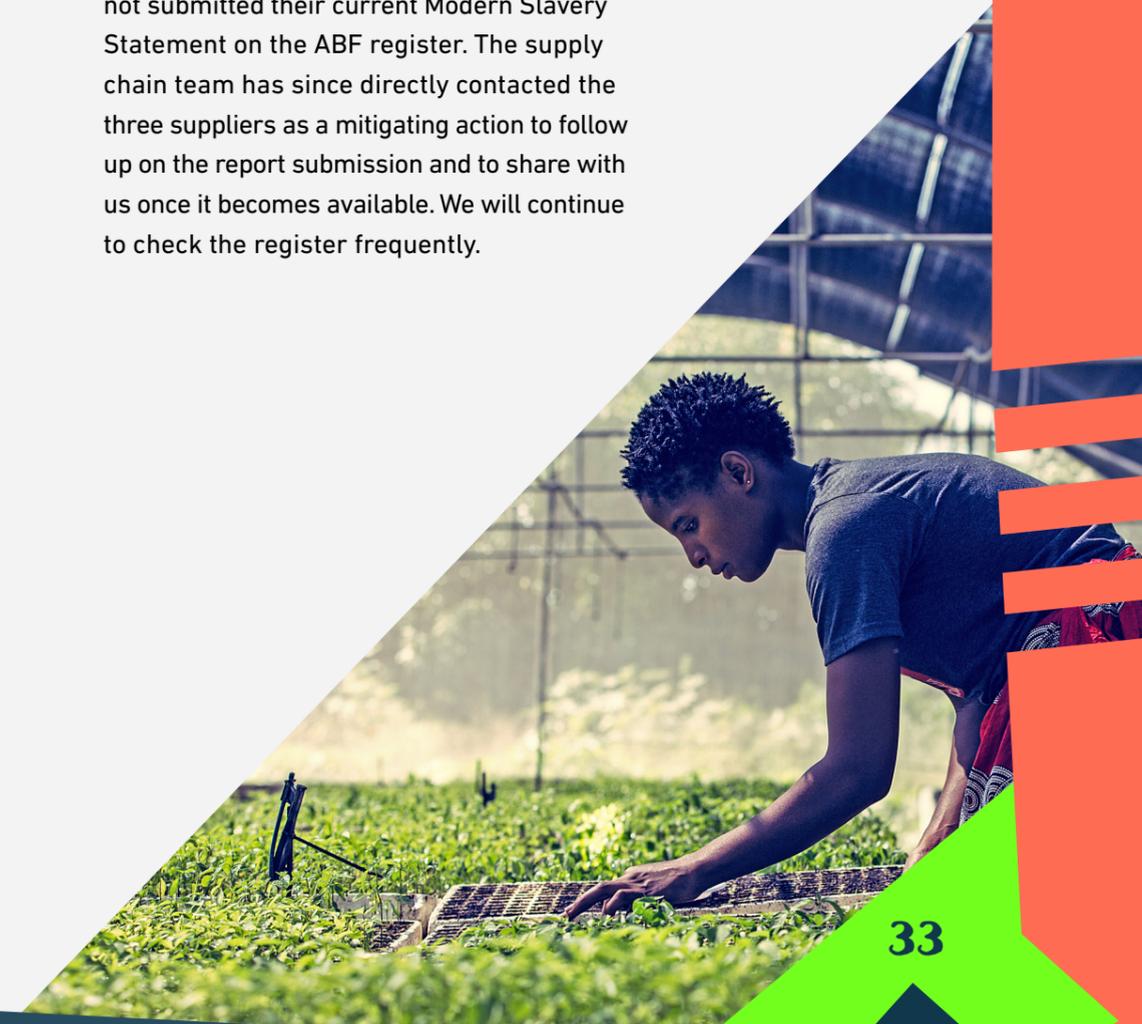
Where this has not occurred, our risk assessment process triggers a follow-up with that supplier to understand why a new modern slavery statement has not been uploaded (as this is a key mitigation step to support Nando's in not completing a more detailed risk assessment on these suppliers in the earlier years, instead focusing first on those who have not implemented steps or operate in high risk geographies or industries). We believe that this approach allows us to focus on new suppliers and those otherwise not covered to ensure we're expending resources in the most appropriate way to manage modern slavery risks.

In FY23, 40 suppliers spread across the various industries and supply tiers displayed, provided a current Modern Slavery Statement or we were able to locate the statement on the Australian Border Force (ABF) register

Fifty suppliers of the total 125 suppliers' risk-assessed were not required to submit a modern slavery statement due to falling under the reporting threshold. These suppliers were sent a questionnaire along with those who remained unclear at the ending of FY23 if they were required to provide a modern slavery statement. Our supply chain team has reached out to have further conversations with the suppliers to seek clarification on their requirements to submit a modern slavery statement.

MODERN SLAVERY STATEMENT SUBMITTED TO THE ABF REGISTRY	40 Suppliers
<b>Direct – Tier 1</b>	<b>22.5%</b>
Fresh Chicken	7.5%
Distribution Centre	2.5%
Beverages	12.5%
<b>Direct – Tier 2</b>	<b>27.5%</b>
Chips	5.0%
Other menu ingredients	12.5%
Packaging	2.5%
Sauces & marinades	7.5%
<b>Direct – Tier 3</b>	<b>7.5%</b>
Source Ingredients	7.5%
<b>Indirect – Into Restaurant</b>	<b>12.5%</b>
Facilities Management	2.5%
Kitchen Equipment	2.5%
Logistics	2.5%
Waste/Cleaning	5.0%
<b>Indirect – Overheads</b>	<b>30.0%</b>
Financial Services	5.0%
Insurance Brokers	5.0%
IT & Telecoms	7.5%
Legal	2.5%
Marketing	2.5%
Recruitment	2.5%
Utilities	5.0%
	<b>100%</b>

In addition to the left, we reviewed any suppliers previously listed as having a statement outstanding and updated the status. At the end of FY23, three suppliers (two food wholesalers one in packaging) had not submitted their current Modern Slavery Statement on the ABF register. The supply chain team has since directly contacted the three suppliers as a mitigating action to follow up on the report submission and to share with us once it becomes available. We will continue to check the register frequently.



## BOARD INVOLVEMENT

We believe that involvement from the Nando's leadership team and the local ANZ subsidiary board in any project is fundamental to its ultimate success by "leading from the top down." During FY23, a separate agenda item addressing modern slavery risks and our rolling risk matrix portfolio continued to be included in periodic ANZ subsidiary board reporting. This was ultimately supported by the creation of a Risk and Audit Committee which, amongst other things, was charged with reviewing and addressing modern slavery risks (supported by recommendations made by the Project Team) and providing recommendations to the ANZ Subsidiary board.

## EMPLOYMENT

We rely on a highly diverse workforce at Nando's and engage people with broad and varied skillsets ranging from retail restaurant employees through to technical experts, generally hired by Nando's directly. As a result, we have a group of individuals employed in our People and Culture team dedicated to implementing a national employment framework that complies with all local laws and covers core employment conditions such as minimum wages, hours of work, allowances, breaks and leave entitlements. This internal team is supported by external ER support lines which the team can access with any queries or concerns regarding these conditions, plus access to an internal legal function to ensure the most accurate advice is available to meet (and exceed) these minimum requirements.

On an annual basis, Nando's also completes the required Workplace Gender Equality (WGEA) reporting to comply with the Workplace Gender Equality Act 2012 and conducts its own internal salary and award review process to ensure compliance and best practice approaches are maintained. The WGEA report specifically provides an annual review of gender equality across all Australian employees and our supporting processes.

## COVID-19

Nando's continues to address the residual risks from the COVID-19 pandemic. Our risk management processes ensure we are continuously assessing risks to our supply chain that may lead to trade disruptions. The lasting effects of COVID-19 has resulted in industrywide labour shortages, supplier disruptions and inflationary pressures on cost which has only amplified the need to focus on these risks and acknowledge that the pressure to "cut corners" could be inflated for our suppliers.

We continue to work towards embedding best practice:

- Proactively take steps to maintain supplier relationships by increasing frequency of communication, plus reinstating site visits and regular business reviews that were restricted during COVID-19 (these in-person visits support more open dialogue and communication which helps us to identify any potential issues faster).
- We work with our core suppliers to look for opportunities to remove inefficiencies in their production processes. Thereby allowing them to redeploy scarce labour and generate commercial benefits that can be shared with us in time. We continue to be open to negotiating payment terms for those suppliers that are still feeling the cashflow burden associated with inflationary pressures.

- Nando's has attempted to reduce these risks by proactively engaging with core suppliers to understand the cost pressures they face directly and, in several instances, agreeing (either temporarily or permanently) to increase the cost Nando's paid for the products supplied by that supplier to ensure they could economically meet and achieve their obligations without resorting to modern slavery type practices. Some of which were already in existing supply contracts with establishing product prices.

Importantly, as the COVID-19 residual risks continue, the economic impact is still being assessed. We've identified and acknowledge that supply chain structures may yet require changes (with unfortunate insolvency and bankruptcy resulting for some suppliers post the pandemic). This highlights a potential need for us to pivot to changing consumer trends to ensure demand and expectations are met (which may require new supply chain streams to be established and/or prioritised).

Nando's has taken steps to put itself in a position where it is well-equipped to handle any changes that may be needed in this area, given the strong foundational work completed in FY20-FY22 to implement the Business Partner Code of Practice, modern slavery clauses in supply agreements and incoming assessment criteria and reviews.

## 4. How Nando's Assesses the Effectiveness of Actions

We are committed to continuing to survey our suppliers, complete the detailed risk assessments and ongoing business reviews. We will address any instances of modern slavery identified during these audits and work with our suppliers to remedy these risks.

We are committed to raising any practice that is inconsistent with our Business Partner Code of Conduct through the Project Team (specifically representatives from the legal and risk departments) along with oversight from Nando's leadership team, Risk & Audit Committee and ANZ Subsidiary Board.

To help ensure the effectiveness of our commitments, we continue to enhance our mandatory staff training e-learning module implemented in FY20. This training continues to be a mandatory requirement at the induction stage for new employees together with periods of refresher training to continue reinforcing the importance of modern slavery risks and identification with our employees.

We believe that awareness, education and training is an essential component of our risk management, governance and compliance framework and ensures that all employees are aware of their obligations under our compliance policies and have access to further information about these when required. In FY23 Nando's strengthened its Organisational Development team to support the development of even more effective and impactful training structures and programs.

### SUSTAINABILITY

Nando's has an aspiration to halve the cost of a meal by 2030. In order to achieve this there are direct impacts that Nando's can influence, however, a significant portion of the footprint involves engagement with and support from our suppliers. Working with these suppliers is crucial to the success of our goal to halve the cost of the meal, by helping ensure all processes of the supply chain are sustainable. This will occur by working closely with our suppliers, while simultaneously seeking world class solutions for continuous improvements to the environment footprint that our supply chain creates.

Three key areas of measurement are assessed:

- 🔥 **People:** These KPIs align with Nando's values to ensure our partners not only adhere to regulations and legislation but focus on the social aspect of changing lives of their employees. For this reason, the People KPIs focus on Occupational Health & Safety (OH&S), Modern Slavery, Community Engagement and Diversity and Inclusion
- 🔥 **Waste:** The Waste KPIs focus on Innovation and Landfill, which directly focuses on how waste is managed and improved
- 🔥 **Planet:** Water, Carbon, Emissions and Renewable energy are the focus on the Planet KPIs, which look at some of the biggest impacts to the environmental footprint of a Nando's Meal. These KPIs may vary depending on the supplier due to the nature of industry.





The weighting in these categories is captured via an annual business review (ABR). Each year a supplier should aim to achieve a minimum score of 80%. If a supplier doesn't reach this score, a conversation is triggered between the Nando's Supply Chain and Sustainability teams during the ABR meeting to understand the challenges the supplier may be facing, the impacts this may have on Nando's own sustainability objectives and to help identify a collaborative pathway for suppliers to achieve the 80% threshold.

In FY23 Nando's introduced an additional e-learning module which covered more specific detail on the process of identifying and addressing modern slavery (like the topics covered by the external CIPS course which several of our Procurement team members attended previously) which takes the training beyond simply education and awareness into practical application. 43% of employees across Central Support have completed this additional module. The Modern Slavery Basics course continues to form part of the learning journey for all employees across Australia and New Zealand. With 89% of all employees having completed the course (91% of Australia and 74% of New Zealand).

We continue to review and report on numerous internal metrics to ensure effectiveness, including:

- ◆ The rate of employees completing compliance training on topics like our code of conduct, ethical behaviour, whistleblowing and modern slavery.
- ◆ Health and safety performance including lost time injury frequency rate and total recordable injury rates.
- ◆ Results of our annual employee engagement survey, conferences and employee forums.
- ◆ The number of whistleblowing reports opened, closed and that remain active each year.

- ◆ The number of notifiable incidents relating to customer complaints and matters.
- ◆ Reviewing the outcomes of internal audits and implementing mitigations where appropriate.
- ◆ Continuing to expand the supplier group forming part of the internal risk assessments.
- ◆ Monitoring specific steps taken to address modern slavery risks.
- ◆ Considering new or increased risks that may arise over time (e.g. understanding current and anticipated future trends and legislative changes).
- ◆ Preparing the modern slavery statement required by the Act annually.

## 5. Process of Consultation

Nando's is committed to developing and maintaining a robust all-encompassing response to modern slavery from NAPL and NPPA. Nando's therefore developed this joint statement in consultation with both NAPL and NPPA as reporting entities through our Project Team.

Our Project Team continues to evolve year on year. Citing the Effectiveness of the Modern Slavery Act Implementation government report, as a group we referred to the findings to develop a best-practice approach for identifying and addressing the risk of modern slavery in our supply chain and operations.

NAPL and NPPA consulted monthly during the lead up to, and the preparation of, this statement. The businesses work closely together across many areas, given they operate under the same "Nando's" brand. Importantly, a key representative of NPPA is a member of the Nando's Australia leadership team and Risk & Audit Committee meeting and therefore a participant in these meetings. One of the

Directors of NPPA is a member of the Modern Slavery Project Team and all scoping exercises were undertaken by both NAPL and NPPA (e.g. supplier mapping, questionnaires and subsequent risk assessments). Procurement and supplier information was provided to be incorporated into the risk assessments by both NAPL and NPPA.

The implementation of a group-wide risk assessment process led by the risk department of NAPL, agreement on an action plan for the next reporting period and review and signoff on the content of the statement prior to submission to the Nando's leadership team, Risk & Audit Committee and the ANZ Subsidiary Board for approval (all of which were subsequently received).

For the purposes of Section 16 of the Act, there are no entities owned or controlled by Nando's which required consultation when preparing this statement outside NAPL and NPPA, both of which collaborated in the process and are covered in this joint statement.





## 6. Other Information

### FUTURE STEPS

The Project Team will continue meeting at least quarterly to focus on reviewing and refreshing our internal suite of policy documents (e.g. our code of conduct, ethical behaviour, health and safety, discrimination and bullying, anti-bribery and anti-corruption, human rights and privacy) which will form part of further mandatory induction and refresher training.

In addition:

- Nando's intends to provide detailed e-learning training relating to our human rights obligations for employees outside the procurement team that are also involved in managing supplier compliance and procurement (e.g. the IT and Marketing departments who negotiate with

several suppliers to access and deliver products and services to the business). These steps will be enhanced by the upweighted resourcing focus on our Organisational Development team.

- Nando's is undertaking a project to implement a new and improved rostering, time and attendance tool to enhance visibility and compliance to the legislative requirements for the employees in our company operated restaurants. This tool will also be available to our Franchise Partners.
- Nando's is engaging on a journey to implement a new 'Source to Contract' and 'Procure to Pay' system. These systems will enable greater visibility and control across all the goods and services we utilise in our supply chain.

- Nando's is adding modern slavery as an agenda item to all its strategic and important suppliers as part of its Supplier Relationship Management (SRM) Program.

A large risk matrix and portfolio of all suppliers in Nando's supply chain will become available as the Project Team completes more detailed risk assessments and follow-up reviews. This will allow Nando's to continue:

- Meeting with our suppliers and discussing key performance indicators
- Undertaking and reviewing supplier audits
- Mitigating and remediating identified risks (where required)
- Developing a standardised approach to actioning the results using remediation, contract variation or terminations

## GRIEVANCE PROCESS & WHISTLEBLOWING

Our Compass, which guides our operations and employment practices, is coupled with a robust internal grievance and external whistleblowing process allowing any employee, supplier or stakeholder to raise concerns and grievances directly with us, or anonymously.

As a business, we continue to encourage anyone to act if they have any concerns about unethical, illegal or improper behaviour related to Nando's. Our whistleblowing policy is supported by an external confidential and anonymous whistleblowing process that provides appropriate protections for our employees, suppliers and other covered parties to report their concerns through an independent service provider specialising in handling sensitive reports and disclosures. Our leadership team and our disclosure officers also receive annual refresher training to ensure that if reports are made outside the formal channels they are still appropriately captured and managed as part of our 'speak up' culture.

In addition, Nando's leadership team, local ANZ subsidiary board and Risk & Audit Committee review the de-identified data and reports in periodic board meetings to help identify and spot any issues or trends that may be forming to proactively addressing any concerns. The Nando's Legal department reviews the whistleblowing policy, and the process framework that sits it, at least annually.

## GLOBAL OPERATIONS

Nando's is also part of a global business operation, including a national office in the United Kingdom that is already governed by legislation covering modern slavery risks. Therefore, the global business has also spent significant time and resources giving thought to the ways modern slavery risks can be reduced within the global business, including submitting its own mandatory modern slavery statement under the UK legislation.

This global relationship has allowed the procurement teams across all jurisdictions, including NAPL and NPPA to collaborate and share findings, especially where the suppliers of bespoke Nando's branded products like our marinades and sauces are often the same and has allowed our businesses to take a holistic approach to managing risks generally, including the risk of modern slavery practices.



**Amanda Banfield**  
 Director & CEO  
 Nando's Australia Pty Ltd  
 & Nando's Peri-Peri Australia Pty Ltd

**18 August 2023**

This Modern Slavery Statement is provided as a joint statement under section 14(1) of the Modern Slavery Act 2018 (Act) for the period from 28 February 2022 to 26 February 2023 (Statement) for Nando's Australia Pty Ltd ACN 079 066 407 (Nando's Australia) and Nando's Peri-Peri Australia Pty Ltd ACN 627 885 956 (NPPA) (together Nando's).

Nando's forms part of a broader global business structure (See Nando's Structure, Operations and Supply Chains section) and operates on the South African financial year which, for the previous financial year ran from 28 February 2022 to 26 February 2023 (Reporting Period). Consequently, this Statement is being lodged by 25 August 2023 pursuant to Section 14(2)(f)(i) of the Act, being six months after the end of Nando's Reporting Period.