



# Modern Slavery Statement



NANDO'S AUSTRALIA PTY LTD and NANDO'S PERI-PERI AUSTRALIA PTY LTD  
28 February 2021 to 27 February 2022



One day, when the rain was close, they knew they'd tasted something  
making the difference to a close, they knew they'd tasted something  
that had to be shared. PERI-PERI was about to make one more journey -  
from Rosettenville to the world. Thank you for sharing it with us.  
As they say in Mozambique, bcom proveite!



# Acknowledgement of Country

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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

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**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.

Our key actions achieved in this, our third Modern Slavery Statement are:

- Identifying internal subject matter experts and providing them with external training on Modern Slavery legislative requirements and risk identification, with the goal of running internal education programs for staff who are most likely to be exposed to Modern Slavery risks.
- Implementing a dedicated training module for all staff to complete as part of our training suite.
- Embedding Modern Slavery fact finding questions in our 'new supplier evaluation criteria' to ensure we embark on supply partnerships with organisations who are equally as committed to eradicating Modern Slavery. In conjunction with our Risk Assessment process, this will rapidly ensure Nando's is conducting business in a fair and equitable ecosystem of supply partners.

I am pleased to present this statement, which was approved by Nando's Leadership Team on 25 August 2022.

**Amanda Banfield**  
Director





# Nando's Introduction

## THE STORY OF ROBBIE & FERNANDO

Back in Johannesburg, South Africa in 1987 two mates walked into a PERi-PERi chicken restaurant as customers and came out owners. That's the power of PERi-PERi.

Since then they've been obsessing over those flavours, so today our famous PERi-PERi sauces, marinades and basting are made with Nando's very own African Bird's Eye Chillies that we grow in Southern Africa, plus a dash of lemon, garlic, onion and herbs.

In 1990 they opened the first Nando's in Australia 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 2021 to 27 February 2022 (**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 Compass**

**OUR VALUES**

<p><b>PRIDE</b></p> <ul style="list-style-type: none"> <li>► We love our PERi-PERi chicken</li> <li>► We work together to succeed</li> </ul> <p><b>PASSION</b></p> <ul style="list-style-type: none"> <li>► We are positive &amp; enthusiastic</li> <li>► We love what we do</li> </ul> <p><b>COURAGE</b></p> <ul style="list-style-type: none"> <li>► We speak up for what we believe in</li> <li>► We love a challenge</li> </ul>	<p><b>INTEGRITY</b></p> <ul style="list-style-type: none"> <li>► We take responsibility</li> <li>► We keep our word</li> </ul> <p><b>FAMILY</b></p> <ul style="list-style-type: none"> <li>► We listen to, support &amp; respect each other</li> <li>► We welcome everyone</li> </ul>
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**OUR BEHAVIOURS**

<ul style="list-style-type: none"> <li>► I never compromise on quality</li> <li>► I make work fun</li> <li>► I treat everyone fairly</li> <li>► I show appreciation</li> </ul>	<ul style="list-style-type: none"> <li>► I support my team</li> <li>► I share what I know</li> <li>► I help others to be their best</li> <li>► I make customers happy</li> </ul>
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To help achieve this, we have **five core values** and **eight core behaviours** that act as a guide on what it means to be part of Nando's known as our compass (**Compass**).

Formed with the help of our team members around Australia, it represents our culture, what we believe in, how it feels to work at Nando's and shapes how we deliver the best experience when working with us.



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

## ► STRUCTURE

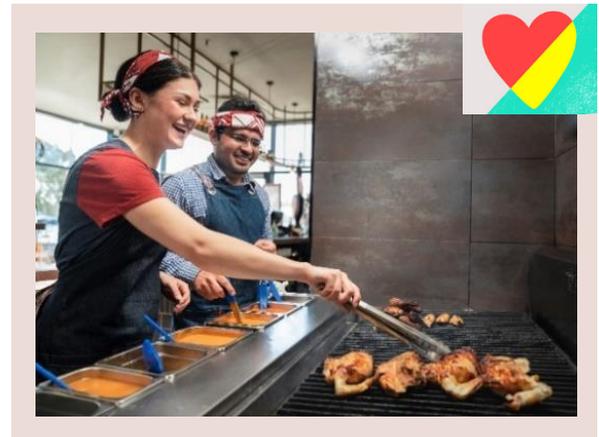
Nando's Australia is a private limited (by shares) liability company incorporated in Victoria, Australia with its central support office located at 40 Mollison Street, Abbotsford VIC 3067.

Nando's PERi-PERi Australia is a private limited (by shares) liability company incorporated in Victoria, Australia with its central support office located at Level 3, 223 Liverpool Street, Darlinghurst NSW 2010.

Nando's Australia is part of a larger group that operates both corporate and franchised Nando's branded restaurants in South Africa, the United Kingdom, Ireland, 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 Nando's Australia and Nando's PERi-PERi Australia 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 Nando's Australia exercises direct day-to-day control over.

Nando's employs approximately 1,528 full-time equivalent employees (including full-time, part-time and some casual employees) directly in Australia across both Nando's Australia and Nando's PERi-PERi Australia. Also, although the full-time equivalent employees in our franchise network is difficult to quantify given Nando's does not employee them directly (and are made up of numerous full-time, part-time and casual employees), we estimate that there are approximately a further 800 employees employed directly by our franchisees to work within Nando's franchised restaurants in Australia.



## ► OPERATIONS

Nando's Australia operates primarily in the fast-moving consumer goods retail food industry, operating a chain of 147 fast-casual dining restaurants across Australia specialising in the retail sale of flame-grilled PERi-PERi chicken, served with various sides and accompaniments. Of the 147 restaurants operating under the Nando's brand in Australia, 33 are independent businesses operated by Nando's franchisees under franchise agreements with Nando's and 114 are operated by Nando's directly as corporate restaurants.

Nando's PERi-PERi Australia operates primarily in the wholesale industry, importing and selling Nando's branded PERi-PERi products like marinades, salts and rubs for retail sale both directly from Nando's restaurants and through various supermarket supply chains, including Coles and Woolworths.



## ▶ SUPPLY CHAIN



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



### NANDO'S AUSTRALIA

Our supply chain in Australia continues to remain stable as we work actively with our trusted local and global supply partners, to meet our high moral and ethical obligations to support local communities, meet our sustainability goals and combat Modern Slavery.

In FY22, Nando's Australia consolidated its supplier base down from 667 to engage with 559 suppliers to provide goods or services directly and indirectly into our restaurants. These numbers relate to the 114 restaurants owned and operated by Nando's directly as corporate restaurants.

Of the total suppliers we engaged with, we have 22 key suppliers that provide products and services directly into our restaurants and account for approximately 60% of our total supplier and procurement spend.

In addition, a further 216 suppliers provide products and services indirectly into our restaurants which accounts for a further 20% of our total supplier spend. Therefore, approximately 80% of Nando's total supplier and procurement spend occurs with approximately 238 suppliers despite us having engaged with more than 559 suppliers in the reporting period.

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 eve.

Based on our internal review of our supplier base, we have identified that our suppliers operate in a multitude of industries such as agriculture, logistics, manufacturing, meat processing, textiles and maintenance and construction.

### DEFINITIONS

The definition of products and services provided direct and indirect into our restaurants are:

- Direct suppliers: transact with frequently and supply products and services directly into our restaurants that are fundamental to our core business (e.g. food products, ingredients and drinks).
- Indirect into restaurant suppliers: supply products and services supplementary to our core business (e.g. small wares, crockery, cleaning and security for restaurants).
- Indirect overhead suppliers: supply products and services that are not part of our core business or supplementary to it but are still necessary to operate safely and efficiently (e.g. insurance, staff recruitment, rent and utilities).



A large portion of our supplier and procurement spend is with suppliers based in countries that have a lower risk of experiencing modern slavery practices, such as Australia, as identified by the Global Slavery Index (GSI). However, there are some suppliers that fall in a higher vulnerability to modern slavery category, such as parts of South Africa and China.

Whilst geography is only one factor used in assessing the overall risk of a supplier, it has been an important baseline for the business to undertake appropriate risk assessments and implement various risk mitigation strategies within its supply chain.

## NANDO'S PERI-PERi AUSTRALIA

In FY22, Nando's PERi-PERi Australia engaged with 44 suppliers to provide goods or services. Of the total suppliers used, 1 supplier is in the NGHL network, Nando's Grocery International Ltd (UK), and accounts for 75% of procurement and supplier spend. 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 or 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 GSI. Like Nando's Australia, 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

Nando's is a diverse business with a relatively large workforce and supplier base. On scale alone, this naturally raises risks of modern slavery practices potentially being caused, contributed to or being directly linked to our operations and supply chains.

In the third 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. Established in FY20, our internal project team is comprised of representatives from the procurement, risk, people and culture and legal functions of the business for both Nando's Australia and Nando's PERi-PERi Australia who meet regularly (at a minimum quarterly) to specifically address the risks of modern slavery practices in its business and supply chain (**Project Team**). This team is continually supported by direct oversight from Nando's leadership team and local board.

FY22 reporting highlighted that we are still most at risk of either contributing to, or being directly linked to, modern slavery practices in our supply chains, rather than causing modern slavery practices directly ourselves, which was a similar outcome to our reviews in both FY20 and FY21. Whilst Nando's has a relatively large workforce, these employees are all employed in Australia or New Zealand directly by Nando's and are not within the highest-risk sectors and industries identified by the GSI (e.g. the fishing industry and cocoa agriculture).

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 where preferred.

This gives Nando's the ability to closely manage and monitor any concerns or reports of modern slavery practices or risks we could otherwise cause directly and is therefore still not our current highest risk area requiring focus and attention of the Project Team and the broader business.

Nando's identified that its largest risks are in situations where it has the potential to inadvertently contribute to modern slavery practices occurring, e.g. a supplier acts in a way that attempts to find the cheapest labour to source products or turns a blind eye to workers being exploited to achieve their own internal cost targets and delivery timeframes through their own supply chain. Similarly, the risk of Nando's being directly linked to modern slavery practices occurring was also identified as a possibility, for example if we are connected to entities in our supply chain that we have no direct visibility over, such as contractors or subcontractors of our suppliers.

Importantly, through the scoping and risk assessment exercises, the Project Team identified that the highest and most immediate risk of modern slavery practices occurring in our supply chain is still based on the geographic location of some of our key suppliers. For example, a few of our suppliers are based in parts of Southern Africa and China, both of which are countries known that have been identified by the GSI to have a higher risk of modern slavery practices occurring.

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 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 these suppliers were not frequent or contracted suppliers of ours and may have been, for example, a once off local repair or maintenance contractors.

Our strong relationships with our core suppliers who provide products and services directly into our restaurants does not necessarily extend to full visibility over their individual supply chains, including their agents, contractors and subcontractors.



Finally, given the nature of our business and the products and services we generally acquire, we identified that the three most salient human rights risks, based on GSI geography risk and the industries our assessed suppliers are in, are still linked to:

- Labour (human rights) (e.g. suppliers based overseas with higher risks of modern slavery according to the GSI).
- Wages and benefits (e.g. shopfitters who may engage contractors or sub-contractors to fulfil contractual terms).
- Work hours (e.g. agencies who may require varying work hours to achieve project and contractual milestones).

Having mapped and better understood our supply chain in more detail in prior years, Nando's focus in FY22 continued to be to revisit the risk assessments completed on its 10 identified high risk suppliers from FY20 and FY21 to ensure continuous proactive attention, but also to complete 15 new detailed supplier risk assessments to continuously build and strengthen the businesses awareness and 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 local board) to continue to put the necessary foundations in place to implement a detailed proactive and thorough risk assessment program and subsequent mitigation strategies moving forward so that it becomes part of its "business as usual" approach to risk management.





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

#### ► SCOPING

In 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 which identified that, like many businesses, Nando's has quite a complex operation and supply chain involving hundreds of other entities. Consequently, it wasn't feasible for us to immediately assess and act on every area of our business and every supplier in our supply chain that may be at risk of modern slavery practices. Therefore, in FY20 and FY21 the Project Team focused on the areas within the business and supply chain where these modern slavery practices risks were likely to be most significant and cascade them down to other lower risk areas of the business and supply chain in the following years until it became part of "business as usual" and proactive risk assessments were reviewed and updated annually.

In FY21 Nando's continued to follow the scoping practices from FY20 by categorising its suppliers into 'direct', 'indirect into restaurant' and 'indirect overheads' (described in point 2.3 above) but expanded the group of suppliers that were included in the risk assessment process given the learnings from the FY20 approach. The same risk categories from both FY20 and FY21 were then also used in FY22 as follows:

- Classifying our direct suppliers as "known" (suppliers we transact with frequently);
- Segmenting our indirect into restaurant suppliers into categories of "known" (suppliers that account for 80% of Nando's spend in this area) and "unclassified" (suppliers that we transacted with only once or a few times and fall outside the 80% spend referred to above (e.g. one off local repair and maintenance contractors)); and

- 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.

Nando's PERi-PERi Australia followed a similar approach, however given its smaller size and supplier pool 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)).

In FY20 the Project Team focused on its highest procurement spend areas of "direct" and "indirect into restaurant" and those products that carried Nando's intellectual property, being 47 suppliers in total. These areas were identified as carrying the highest risk and would give Nando's the best bargaining power and ability to address any modern slavery risks identified in this group of suppliers as the supply relationships in these categories are generally governed by formal supply agreements, codes of conduct and terms of trade. The identification process for these suppliers is listed in detail in [Nando's FY20 Modern Slavery Statement](#). In FY21 Nando's followed the same assessment process but expanded the detailed risk assessment process to the next category tier of suppliers in its supply chain, resulting in risk assessments for 88 new suppliers and revisiting the risk assessments from FY20 for the 8 suppliers. The classification process for these suppliers is listed in detail in [Nando's FY21 Modern Slavery Statement](#).



## ► SCOPING (CONT.)

In FY22 Nando's reassessed the supply chain risk to highlight the top high-risk suppliers based on spend annually exceeding \$100,000, the GSI industries, predominately Horticulture, geographical locations and labour hire. Detailed risk questionnaires were sent to medium and high risk suppliers. From the questionnaire responses received:

- 13% of suppliers had a consolidated revenue over \$100 million (required to separately report under the Act).
- 22% of suppliers source their goods or services from outside Australia, including Singapore, Hong Kong, China, Portugal, Poland, Italy, Malaysia, India and Thailand. The remaining 78% source all goods and services from within Australia or New Zealand.
- 84% do not have employees or contractors based outside of Australia.
- 20% have employees or contractors based outside of Australia but have also identified themselves as having already taken steps to comply with the Act.
- 27% of high risk suppliers have mapped the full supply chain for key product and services, 40% have identified the major Tier 1 suppliers or partially mapped the supply chain and 33% are working towards developing their visibility of their supply chain.
- 53% confirmed they use either one or multiple methods to ensure they are complying with the Act e.g. Anti-Slavery policies, risk assessments, compliance audits, third party inspections and

other policies. The remaining 47% have either indicated they will take steps to comply with the Act or they are open to a conversation on best practice.

This risk matrix for the 96 suppliers initially reviewed in FY20 and FY21 and the 15 new suppliers reviewed in FY22 was presented to the leadership team for ratification before the relevant departments within the business started to action the additional recommended risk controls.

It is important to note however that by completing the above scoping exercise, we are not suggesting that we have disregarded the risks of other suppliers in our supply chain, or the risks that are not based primarily on geographical location. Instead, we intend to continue using this scoping exercise as a priority framework to review other suppliers in our supply chain, other risk areas not driven by geographical location and risks that are purely internal to our own business in the future as part of our overall risk mitigation plan to constantly address the risk of modern slavery practices occurring in our operation and supply chain.





## ► PROCUREMENT

In FY22 Nando's has continued to dedicate resources towards reviewing and updating our internal process for identifying, mitigating and accounting for potential adverse human rights in our operation and supply chain, including modern slavery.

In FY20 and FY21 we updated our supplier screening process for new and renewing suppliers to include questions addressing modern slavery risks. In FY22 we reviewed this screening process again and updated the questions and review mechanisms based on learnings from the previous 24-months, including Nando's commercial department exercising judgment to ask modern slavery questions during the screening process. Importantly, many suppliers Nando's have partnered with recently have their own modern slavery identification and management processes and Nando's requires this to be provided as part of its contracting process.

We also refreshed and further updated our Business Partner Code of Compliance (**Code**) based on learnings from the prior 24-months of Nando's and NGHL. The Code explains what we stand for as a business and the standards of behaviour we expect of our suppliers, expressly including modern slavery requirements and is annexed to most supplier contracts.

The Code is publicly available on Nando's website to ensure our business and supply chain partners can meet the required standards for the supply of goods and services to us. We continued to use the template supplier contract that was updated in FY20 to expressly include modern slavery risk reviews and reporting as a key performance indicator (**KPI**) under the contract with new and renewing suppliers. This KPI includes a requirement for suppliers to participate in modern slavery audits implemented by Nando's and providing relevant information to ensure compliance with the Act via a robust and thorough modern slavery statement each year.

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## ► BOARD INVOLVEMENT

We believe that involvement from the Nando's leadership team and the local board in any project is fundamental to its ultimate success by "leading from the top down". During FY22, a separate agenda item addressing modern slavery risks and our rolling risk matrix portfolio continued to be included in periodic board meetings, with summary reports and recommendations provided by the

Project Team for consideration and presented by representatives from the legal and risk department. In addition, during FY22 a risk and audit sub-committee from the local board was established and included a standing agenda item to review and address modern slavery risks and recommendations.

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## ► 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 as a minimum and covers core employment conditions such as minimum wages, hours of work, allowances, breaks and leave entitlements.

During FY22 Nando's managed the "Working at Nando's" project which involved a small internal working group together with externally engaged legal and project management resources to conduct a review and audit of Nando's industrial relations framework, which helped to further ensure that core employment conditions were maintained.



## ► SUPPLIER STATEMENTS

Our suppliers that identified themselves in questionnaires as needing to submit their own modern slavery statement under the Act were excluded from Nando's initial detailed risk assessments at first instance to ensure focused attention could be given to those suppliers who weren't otherwise covered. Once the public modern slavery register was made available, our legal team implemented a monthly review process whereby they checked the register each month to access and download the modern slavery statements of the suppliers in this category to

include in our overarching modern slavery risk matrix. Nando's continued this process into FY22 as many supplier statements had been delayed given the impacts of COVID-19.

Despite at least one modern slavery statement now being due, multiple suppliers in this category have not yet uploaded their statements. In FY23 our commercial team will reengage with these suppliers to request copies of their statements and updates regarding why they are not yet publicly available and update its risk assessments accordingly.

## ► COVID-19

In Nando's FY21 and FY22 reporting period, the impacts of COVID-19 were felt by both Nando's Australia and Nando's PERi-PERi Australia, and we acknowledged early that the pandemic may increase the vulnerability of those in our global operations and supply chains to modern slavery, including in Australia. During the pandemic Nando's experienced factory shutdowns of some of its suppliers, order cancellations, impacts to workforce reductions, significant reductions in the availability of labour, border restrictions and sudden changes to supply chain structures. These included potential loss of income or fear of loss of income, low awareness of workplace rights, requirements to work excessive overtime to cover capacity gaps, increased demand due to supply chain shortages or the inability to safely return to home countries.

During the COVID-19 pandemic, Nando's continued to integrate consideration of modern slavery risks into our broader response to the pandemic, not only by continuing the practice of providing information about modern slavery risks to the Nando's leadership team and local board in periodic board meetings but also as part of specific COVID-19 updates through its internal crisis team to address the ongoing impacts that COVID-19 was having on its business and supply chain.

As part of addressing these newly identified risks stemming from the COVID-19 pandemic, Nando's considered and implemented the following:

- Took additional proactive steps to maintain supplier relationships by increasing frequency of communication and the type of communication (e.g. email bulletins, updates and direct check-ins to manage risks).
- Took all reasonable steps to honour existing supplier contracts (but negotiating payment term extensions and other mitigation strategies in good faith between the parties to ensure the businesses could share the impacts of the pandemic while maintaining solvency and business operations). This involved Nando's making the following commitments:
  - Negotiating with suppliers on payment terms as a portfolio to manage ongoing cash-flow for all parties.
  - Completing audits and reviews remotely or through "self-audits" to ensure compliance of all parties with the various Government restrictions but to ensure workers were provided with protective equipment, had the required COVID-19 safety plans and implementing practices to minimise risk of infection.
  - Liaising closely with suppliers impacted heavily by Government restrictions or positive risk infections (particularly in factories producing goods) and where practicable and agreed between the parties temporarily engaging alternative suppliers to provide products and services to the Nando's business and allow the impacted supplier to manage their restrictions, demand and workforce.



## ► COVID-19 (CONT.)

- Collaborating with suppliers and employees to identify approaches available to protect and support vulnerable workers, including:
  - Continuing to educate employees about modern slavery risks, putting them in the best position to identify them if they arise (coupled with Nando's whistleblowing policy described above).
  - Ensuring employees were protected from illness by providing protective equipment (e.g. face masks), providing leave and pay arrangements in addition to the Government grants offered, rolling out e-learning training modules on COVID-19 impacts and restrictions to ensure employees were well informed, had a "single source of truth" during the pandemic. Clear and robust COVID-19 safety plans were also implemented to ensure employees, suppliers and stakeholders remained safe in our environments.

While Nando's was able to complete the above during the COVID-19 pandemic, unfortunately not all anticipated steps to address modern slavery risks in its business and supply chain could be taken in either FY21 or FY22 as there was a reduced capacity to conduct audits and risk assessments and prepare statements as the team members responsible for these actions were necessarily involved in other projects and working groups to address the immediate and significant impacts of COVID-19 to allow the businesses to survive the pandemic. Importantly, as the COVID-19 pandemic continues, the economic impact is still being assessed which may require changes within the supply chain structure (with unfortunate insolvency and bankruptcy resulting for some suppliers post the pandemic) and the need for Nando's to pivot to changing consumer trends and habits to ensure customer demand and expectations are met (which may require new supply chain streams to be established). Nando's believes it is well-equipped to handle any changes that may be needed in this area, given the strong foundational work completed in FY20 to implement the Code, modern slavery clauses in supply agreements and incoming assessment criteria and reviews.

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## ► TRAINING

In April 2021, key representatives from the Project Team (particularly the procurement team who are most likely to become aware of, and be exposed to, modern slavery risks) attended external training on the process of identifying and addressing modern slavery run by the Chartered Institute of Procurement & Supply (CIPS). This externally delivered training program addressed the following important topics:

- Understand the importance of recognising slavery within the Supply Chain.
- Know the different types of slavery and signs that slavery may be present.
- Map the supply chain and exploring ways of creating transparency.
- Carry out an impact assessment across the supply chain.
- Use tools and techniques to help prevent slavery.



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

We did not identify any instances of modern slavery in our audit program in FY22. We are committed to continuing to complete the detailed risk assessments and ongoing business reviews and address any instances of modern slavery identified during these audits, or any practice that is inconsistent with our Code both through the Project Team (specifically representatives from the legal and risk departments) with oversight from Nando's leadership team and local board.

To help ensure the effectiveness of our commitments, in FY20 we implemented a mandatory staff training e-learning module which 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 with our employees.

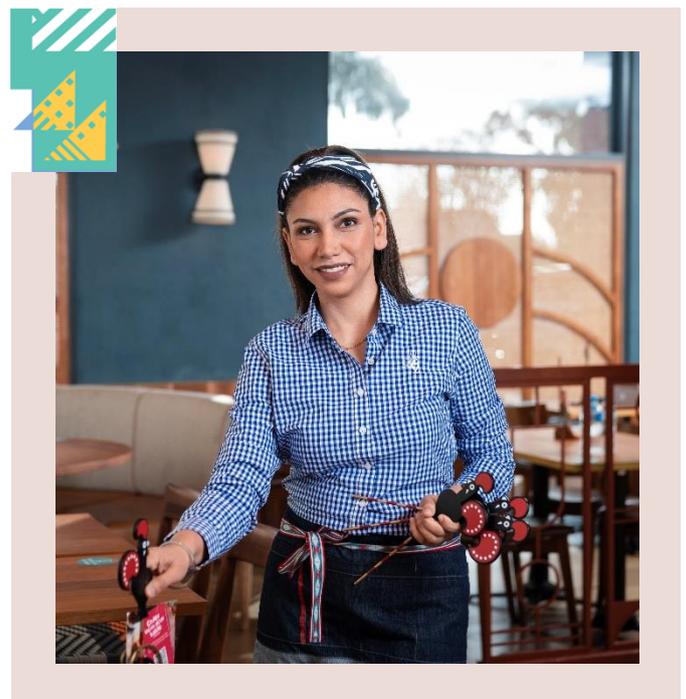
We continue to believe that awareness, education and training is an essential component of our risk management, governance and compliance framework and ensures that all employees are aware of their obligations under our compliance policies and have access to further information about these when required. In FY23 Nando's intends to introduce an additional e-learning module which covers more specific detail on the process of identifying and addressing modern slavery (like the topics covered by the CIPS course) which takes the training beyond simply education and awareness into practical application.

In addition to the training modules implemented, we also review and report on numerous internal metrics to ensure effectiveness, including:

- The completion rate percentage 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.

During FY22, the Project Team has continued to hold quarterly meetings to:

- Review the outcomes of internal audits;
- Continue expanding on the supplier group forming part of the internal risk assessments.
- Monitor specific steps taken to address modern slavery risks.
- Considering new or increased risks that may arise over time.
- Prepare the modern slavery statement required by the Act annually.





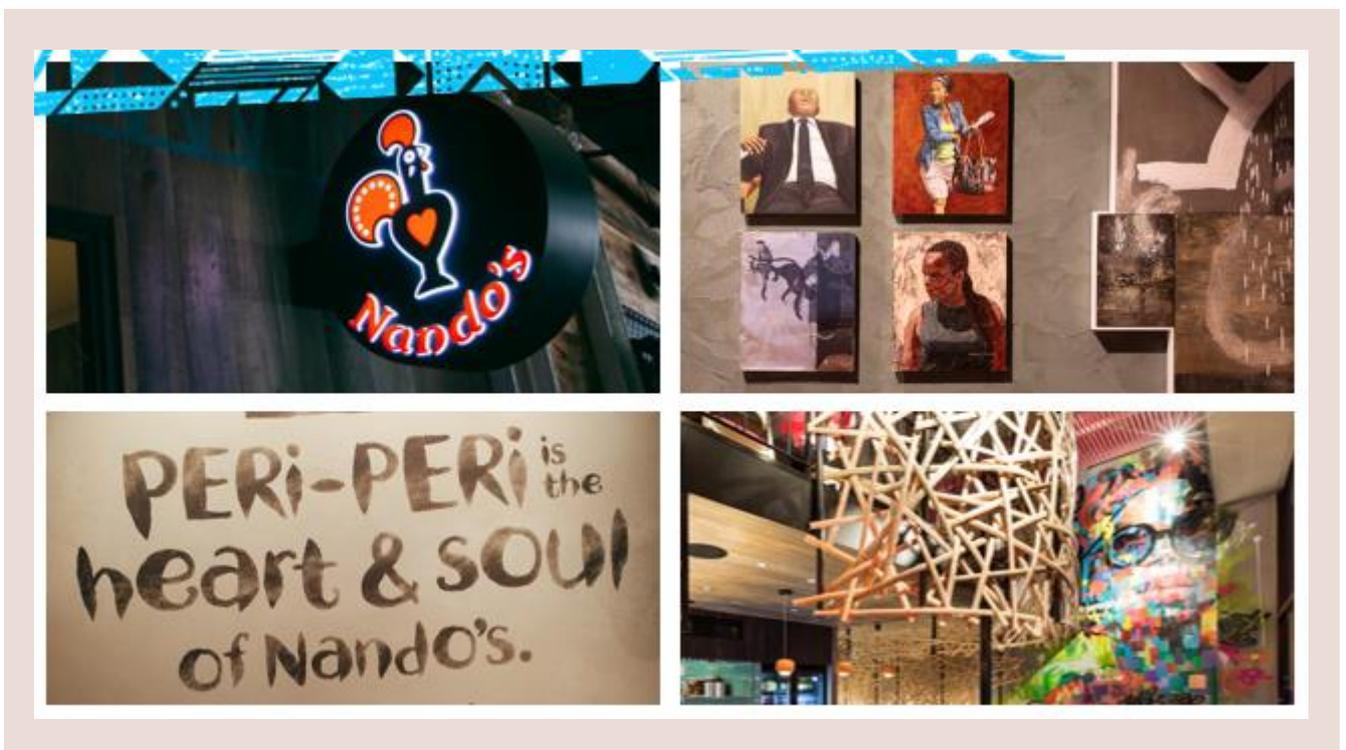
## 5. Process of Consultation

Nando's Australia and Nando's PERi-PERi Australia consulted frequently during the lead up to, and the preparation of, this statement. The businesses, while separated geographically, still work closely together across many areas of its business, given they operate under the same brand "Nando's". Importantly, a key representative of Nando's PERi-PERi Australia is a member of the Nando's Australia leadership team and therefore a participant in leadership team meetings and one of the Directors of Nando's PERi-PERi Australia is a member of the Project Team and all scoping exercises were undertaken by both Nando's Australia and Nando's PERi-PERi Australia (e.g. supplier mapping, questionnaires and subsequent risk assessments).

Nando's is committed to developing and maintaining a robust all-encompassing response to modern slavery from Nando's Australia and Nando's PERi-PERi Australia. Nando's therefore developed this joint statement in consultation with both Nando's Australia and Nando's PERi-PERi Australia as reporting entities through our Project Team which includes representatives from both businesses who met on a monthly basis in FY20 to

establish the group-wide modern slavery approach and process and quarterly in FY21 and FY22 to continue the ongoing implementation and review process. The consultation process involved consideration of how modern slavery risks vary across both Nando's Australia and Nando's PERi-PERi Australia given the different industries they operate in, despite being under the same brand banner from a public perspective, and implementation of a group-wide risk assessment process led by the risk department of Nando's Australia, 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 and the local board for approval (both 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 Nando's Australia and Nando's PERi-PERi Australia, both of which collaborated in the process and are covered in this joint statement.





## 6. Other Information

### ► FUTURE STEPS

We intend to provide more detailed internal e-learning training for employees outside the procurement team that are also involved in managing supplier compliance and procurement relating to our human rights obligations (e.g. the IT and marketing departments who negotiate with several suppliers to access and deliver products and services to the business). These steps were due to be taken in FY21 and FY22 but unfortunately was delayed as a result of ongoing COVID-19 impacts.

This training will involve covering more detail on human rights risks, including those related to modern slavery, like the external training provided to the procurement team by CIPS and as an expansion of the mandatory awareness module that has already been rolled out internally to our employees when the Act was introduced, as part of its onboarding program for new employees and released periodically through refresher modules. After this training is complete, we then hope to extend this more detailed training to employees who might be involved in developing labour contracts to ensure more employees in our business receive this depth of awareness.

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.

As the Project Team completes more detailed risk assessments and follow-up reviews on previously completed detailed risk assessments, a large risk matrix and portfolio of all suppliers in Nando's supply chain will become available. 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); and
- Developing a standardised approach to actioning the results using remediation, contract variation or terminations.

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### ► GRIEVANCE PROCESS & WHISTLEBLOWING

As a business, we also 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.

In addition, Nando's leadership team and local board review the de-identified data and reports in periodic board meetings to help identify and spot any issues or trends that may be forming, with the aim of proactively addressing any concerns, and representatives from Nando's legal department review the whistleblowing policy, and the process framework that sits behind the whistleblowing policy, 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 Nando's Australia and Nando's PERi-PERi Australia, to collaborate and share findings, especially where the suppliers of bespoke Nando's

branded products like our marinades and sauces from Nando's PERi-PERi Australia 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.

This statement is made pursuant to section 14(1) of the Act and constitutes the mandatory joint modern slavery statement of Nando's Australia Pty Ltd and Nando's Peri-Peri Australia Pty Ltd for the reporting period 28 February 2021 to 27 February 2022. This Statement has been approved by the Nando's leadership team and the local board of Nando's Australia and Nando's PERi-PERi Australia.

**Amanda Banfield**

Director

Nando's Australia Pty Ltd & Nando's Peri-Peri Australia Pty Ltd

25 August 2022

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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 2021 to 27 February 2022 (**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 2021 to 27 February 2022 (**Reporting Period**). Consequently, this Statement is being lodged by 26 August 2022 pursuant to Section 14(2)(f)(i) of the Act, being six months after the end of Nando's Reporting Period.