



MODERN SLAVERY ACT 2018 MODERN SLAVERY STATEMENT FY21

NANDO'S AUSTRALIA PTY LTD and NANDO'S PERI-PERI AUSTRALIA PTY LTD
24 February 2020 to 28 February 2021

1. Nando's Introduction

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 24 February 2020 to 28 February 2021 (**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 (described further in point 2 below) and we therefore operate on the South African financial year which, for the previous financial year ran from 24 February 2020 to 28 February 2021 (**Reporting Period**). Consequently, this Statement is being lodged by 27 August 2021 pursuant to Section 14(2)(f)(i) of the Act, being 6 months after the end of Nando's Reporting Period.

At Nando's we aim to ensure that, within our own business and across our supply chain, all business partners operate with respect for, amongst other things, human rights. To help achieve this, we have 5 core values and 8 core behaviours (described in detail below) that act as a guide on what it means to be part of Nando's known as our compass (**Compass**).

Core Values

- *Pride* – loving our PERi-PERi chicken and working together to succeed
- *Passion* – being positive and enthusiastic and loving what we do
- *Courage* – speaking up for what we believe in and loving a challenge
- *Integrity* – taking responsibility and keeping our word
- *Family* – listening to, supporting and respecting each other and welcoming everyone

Core Behaviours

- Never compromising on quality
- Making work fun
- Treating everyone fairly
- Showing appreciation
- Supporting the team
- Sharing knowledge
- Helping others to be their best
- Making customers happy

2. Nando's Structure, Operations and Supply Chains

2.1. 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.



NPPA is a private limited (by share) liability company incorporated in Victoria, Australia with its central support office located at Level 3, 223 Liverpool Street, Darlinghurst NSW 2010.

Nando's is part of a larger group that operates both corporate and franchised Nando's branded restaurants in South Africa, the United Kingdom, Ireland, 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 NPPA is Nando's Group Holdings Limited (**NGHL**). NGHL has numerous other subsidiary companies in the group, including Nando's New Zealand Limited (4995100) which is responsible for operating the Nando's network in New Zealand which 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 NPPA. Also, although the full-time equivalent employees in our franchise network is difficult to quantify given Nando's does not employ them directly (and are made up of numerous full-time, part-time and casual employees), we estimate that there are approximately a further 900 employees employed directly by our franchisees to work within Nando's franchised restaurants.

2.2. Operation

Nando's Australia operates primarily in the fast-moving consumer goods retail food industry, operating a chain of 170 fast-casual dining restaurants across Australia specialising in the retail sale of afro Portuguese flame-grilled chicken basted with Peri-Peri chilli sauce and served with various sides and accompaniments. Of the 170 restaurants operating under the Nando's brand in Australia, 51 are independent businesses operated by Nando's franchisees under franchise agreements with Nando's and 119 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 like marinades, salts and rubs for retail sale both directly from Nando's restaurants and through various supermarket supply chains, including Coles and Woolworths.

2.3. 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 NPPA, from Southern African suppliers.

Nando's Australia

In FY21, Nando's Australia engaged with more than 667 suppliers to provide goods or services directly and indirectly into our restaurants. For completion, this relates to the 119 restaurants owned and operated by Nando's directly as corporate restaurants as in some instances Nando's franchisees may engage their own suppliers. Of the total suppliers used, we have 20 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 183 suppliers provide products and services indirectly into our restaurants which accounts for a further 16% of our total supplier and procurement spend. Therefore, approximately 75% of Nando's total supplier and procurement spend occurs with approximately 203 suppliers despite us having engaged with more than 650 suppliers in FY21.



For completion, the definition of products and services provided direct and indirect are:

- direct suppliers are those that we transact with frequently and who supply products and services directly into our restaurants that are fundamental to our core business (e.g. food and drink); and
- indirect into restaurant suppliers are those that supply products and services supplementary to our core business (e.g. small wares, crockery, cleaning and security for restaurants); and
- indirect overhead suppliers are those that 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).

Our largest category of supplier spend is on food, drink and packaging direct into restaurant. These products are then produced into Nando's meals at our restaurants and sold directly to customers for dine-in or off premise consumption through takeaway or delivery. Our second largest category of supplier spend is on products and services indirect to the general restaurant operations with purchases like shopfitting, furniture, small wares, crockery, uniforms, point of sale, logistics, repairs and maintenance, waste, cleaning and security. Our remaining supplier and procurement spend is on indirect overhead costs like professional services, utilities, rent, information technology, conferences and recruitment.

When reviewing the core known 128 suppliers that still provided products and services directly or indirectly into our restaurants, we identified that:

- 14 were surveyed by Nando's in its previous financial year and indicated they would legally need to submit their own modern slavery statement (so was not sent Nando's survey);
- 9 had modern slavery management and reporting obligations already built into their contracts with Nando's (so was not sent Nando's survey);
- 3 were part of the Nando's global corporate group and captured in global reviews (so was not sent Nando's survey);
- 3 were identified as requiring a separate survey with bespoke questions given the services provided and would be incorporated into the next round of supplier surveys sent by Nando's (so was not sent Nando's survey);
- 37 failed to respond to Nando's survey request;
- 14 have a consolidated revenue over \$100 million;
- 26 do not manufacture or acquire goods outside of Australia or have employees or contractors based outside of Australia;
- 14 do manufacture or acquire goods outside of Australia or have employees or contractors based outside of Australia and indicated that they have already taken steps to comply with the Act and outlined those steps to Nando's; and
- 8 do manufacture or acquire goods outside of Australia or have employees or contractors based outside of Australia and indicated they would be taking steps to comply with the Act.

Of these 22 suppliers, 8 featured in Nando's detailed risk assessment process for identifying and mitigating modern slavery risks in FY20.

Therefore, a large portion of our supplier and procurement spend is with suppliers based in countries, like Australia, that have a lower risk of experiencing modern slavery practices, 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.

NPPA

In FY21, NPPA engaged with 48 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 84% 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 therefore is on food products imported directly into Australia for 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.

When reviewing our top 10 suppliers by spend we identified that they all operate out of either the UK or Australia, both having been identified as having a lower risk of experiencing modern slavery practices, as identified 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.

3. 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 second year of reporting requirements under the Act, Nando's continued its rigorous process of continuing 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. To continue this exercise from the work completed in FY20, Nando's previously established internal project team comprising of representatives from the legal, risk, procurement, people and culture and training functions of the business for both Nando's Australia and NPPA continued to meet regularly to specifically address the risks of modern slavery practices in its business and supply chain (**Project Team**).

The process that the Project Team went through in FY21, which was continually supported by direct oversight from Nando's leadership team and board, highlighted that we are, similarly to FY20, 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. Nando's reached this conclusion because, whilst Nando's has a relatively large workforce, these employees are all employed in Australia 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). Also, Nando's has maintained its strong Compass to guide its operations and employment practices with a robust internal grievance and external whistleblowing process allowing any employees, suppliers or stakeholders to raise concerns and grievances directly with us, or anonymously where preferred.



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

Conversely, Nando's identified that its largest risks are in situations where it may inadvertently contribute to modern slavery practices occurring, for example if suppliers in its supply chain act 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. 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, like our suppliers' contractors or subcontractors.

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 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 known countries to have a higher risk of modern slavery practices occurring, as identified by the GSI.

In addition to the geographical risk highlighted above, the Project Team identified that the second most immediate risk of modern slavery practices occurring in our supply chain is that it's not always possible for us to have clear visibility over our entire end to end supply chain. For example, of the 667 suppliers that Nando's Australia engaged with last financial year, about 475 of these suppliers were not frequent or contracted suppliers of ours and may have been, for example, once off local repair or maintenance contractors. Furthermore, while Nando's Australia has strong relationships with its core suppliers providing products and services directly in our restaurants, we do not necessarily have 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 3 most salient human rights risks, based on GSI geography risk and the industries our assessed suppliers are in, are:

- 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 sub-contractors to fulfil contractual terms); and
- Work hours (e.g. agencies who may require varying work hours to achieve project and contractual milestones).

Therefore, Nando's focus in FY21, after having mapped and better understood its supply chain in more detail in FY20, was to revisit the risk assessments completed on its identified high risk suppliers from FY20 to ensure continuous proactive attention, but also to complete 88 new 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 board) to continue to put the necessary foundations in place to implement a detailed and thorough risk assessment program and subsequent mitigation strategies moving forward.

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

Scoping

In FY20 the initial steps were for the Project Team to complete a detailed scoping and risk assessment exercise to gain further insight into the risks of modern slavery practices occurring in our 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 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 coming years.

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). The same risk categories from FY20 were also used 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.

NPPA followed a similar approach to the above, however were able to simplify the risk categories into only "direct" (suppliers that supply products and services direct to NPPA that are fundamental to its core business (e.g. the bottled sauces and marinades)) and "indirect" (suppliers that supply products and services indirectly to NPPA 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.

To identify the suppliers who would have a detailed risk assessment completed in FY20, the Project Team prepared a questionnaire for the 47 suppliers identified to answer online. The aim of the questionnaire was to give us a better understanding of each suppliers' business and help prioritise our internal risk assessments and covered questions about their:

- consolidated revenue (to understand if they already needed to submit their own modern slavery statement under either the Act or the *Modern Slavery Act 2018 (NSW)* (**NSW Act**));
- business type (to understand if they were in an industry or sector that had been flagged as a high-risk industry or sector by the GSI); and



- geographical location in terms of both the goods they manufactured or acquired and the employees and contractors they engaged (to understand if they were in a geographical location that had been flagged as a high-risk location by the GSI).

In FY20 Nando's then excluded the suppliers that fell into the following categories from the first round of internal risk assessments to prioritise and focus on the highest risk areas:

- the suppliers that only operate in NSW with a consolidated revenue over \$50 million (as they are already required to report under the NSW Act and should reasonably have applied their minds to the risks of modern slavery practices occurring in their business and supply chain);
- the suppliers with a consolidated revenue over \$100 million (as they are already required to report under the Act and should reasonably have applied their minds to the risks of modern slavery practices occurring in their business and supply chain); and
- the suppliers that do not manufacture or acquire goods outside of Australia and do not have employees or contractors based outside of Australia (as they do not fall under the geographical risk category identified as being the most prevalent and urgent risk).

Nando's then completed detailed risk assessments (including identifying the likely key risks of modern slavery practices impacting that supplier, the likelihood of the identified risks occurring, what the consequences of those risks occurring would likely be, the resulting overall risk rating for the supplier, the current risk controls we have in place for the supplier and the recommended additional risk controls to be implemented) on 10 suppliers remaining in the list for Nando's Australia and none for NPPA which had no suppliers falling outside the exclusion criteria.

In FY21 Nando's followed the same assessment process above 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 88 risk assessments were identified by:

- 99 surveys sent to suppliers to further understand consolidated revenue, business type and geographical locations (37 did not respond);
- From the 62 questionnaire responses received:
 - 14 of the suppliers had a consolidated revenue over \$100 million (and therefore are already required to report under the Act);
 - 26 of the suppliers do not manufacture or acquire goods outside of Australia and do not have employees or contractors based outside of Australia;
 - 14 of the suppliers do manufacture or acquire goods outside of Australia or do have employees or contractors based outside of Australia but have also identified themselves as having already taken steps to comply with the Act; and
 - 8 of the suppliers do manufacture or acquire goods outside of Australia or do have employees or contractors based outside of Australia but have also confirmed that they will take steps to comply with the Act (but have not taken steps yet).

This risk matrix for the 8 suppliers initially reviewed in FY20 and the 88 new suppliers reviewed in FY21 was presented to the leadership team for ratification before the relevant departments within the business then started actioning any of 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 use 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 FY21 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 we updated our supplier screening process for new and renewing suppliers to include questions addressing modern slavery risks. In FY21 we reviewed this screening process and updated the questions and review mechanisms based on learnings from the previous 12-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 is investigating SEDEX certification requirements for suppliers based overseas moving forward to assist with the screening process.

We also continued to implement our refreshed and updated Business Partner Code of Compliance (**Code**) that explains what we stand for as a business and the standards of behaviour we expect of our suppliers, which now expressly incorporates and addresses modern slavery risks based on updates made in FY20. We expect our suppliers to read and understand the Code and ensure that their business and supply chain partners similarly meet the standards outlined in the Code by communicating the requirements to their related entities, suppliers and subcontractors who support them in supplying goods and services to us.

We also continued to utilise the template supplier contract updated in FY20 which now expressly includes modern slavery risk reviews and reporting as a key performance indicator under the contract, including a requirement for the supplier to participate in modern slavery audits implemented by Nando's and provide information to ensure compliance with the Act. At the end of FY21 9 of Nando's direct supplier contracts utilised this template or had the modern slavery KPI and reporting requirements built into the supplier's template contract which will continue to increase as existing contracts are renewed or renegotiated.

Board Involvement

We believe that involvement from the Nando's leadership team and the board in any project is fundamental to its ultimate success by "leading from the top down". During FY21, a separate agenda item on 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.

Employment

At Nando's we rely on a highly diverse workforce 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 group of individuals employed in our People & 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 and leave entitlements.

Supplier Statements

In addition, as those 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, once the public modern slavery register was made available, we accessed and downloaded these suppliers modern slavery statements to include in our overarching modern slavery risk matrix.

COVID-19

In Nando's FY21 reporting period, the impacts of COVID-19 were felt by both businesses, 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 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 board in periodic board meetings but also as part of specific COVID-19 updates through its internal crisis team formed 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 type of communication (e.g. email bulletins and updates and key contacts from Nando's and key suppliers checking-in weekly to manage risks) and 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 and both come out the other side). 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; and
 - 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.
- collaborating with suppliers and employees to identify approaches available to protect and support vulnerable workers, including:
 - continuing to educate its own employees about modern slavery risks to put them in the best position to identify them if they arise (coupled with Nando's whistleblowing policy described in section 7 below);



- ensuring employees were protected from illness by providing protective equipment (e.g. face masks), access to leave and pay arrangements in addition to the Government grants offered directly to its employees', rolling out e-learning training on COVID-19 impacts and restrictions to ensure employees are well informed and have a "single source of truth" during the pandemic and having a clear and robust COVID-19 safety plan to ensure its employees, suppliers and stakeholders remain safe.

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 FY21 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 impacts of COVID-19 and spent time working directly with a group of key suppliers to manage payment terms, demand and supply needs to allow the businesses to survive the pandemic and thrive thereafter together with sourcing and negotiating new supply chains for protective equipment (e.g. face masks and premises deep-cleaning suppliers). In addition, internal training that was scheduled for halfway through FY21 needed to be postponed due to staffing level restrictions and travel restrictions and was instead completed towards the end of FY21.

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). However, 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 its Code, modern slavery clauses in supply agreements and incoming assessment criteria and reviews.

5. How Nando's Assesses the Effectiveness of Actions

We did not identify any instances of modern slavery in our audit program in FY21. 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 board.

To help ensure the effectiveness of our commitments, in FY20 we implemented a mandatory staff training e-learning module with an 73% completion rate by the end of FY21 and continues to be a mandatory requirement at the induction stage for new employees and periods of refresher training to continue reinforcing the importance of modern slavery risks with our employees). In addition, Nando's arranged for key representatives from its procurement team to attend further external training on identifying and addressing modern slavery run by the Chartered Institute of Procurement & Supply (CIPS) as this team is in the most likely position to become aware of, or be exposed to, these risks. We believe that 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.

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

- the per cent completion rates of employees completing compliance training on topics like 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 alerts opened, closed and that remain active each year; and
- the number of notifiable incidents relating to customer complaints and matters.

During FY21, 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; and
- prepare the modern slavery statement required by the Act annually.

6. Process of Consultation

Nando's Australia and NPPA 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, the NPPA Managing Director is a member of the Nando's Australia leadership team and therefore a participant in Nando's Australia board meetings and NPPA's Finance and Supply Chain Director is a member of the Project Team and all scoping exercises were undertaken by both Nando's Australia and NPPA (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 NPPA. Nando's therefore developed this joint statement in consultation with both Nando's Australia and NPPA through our Project Team which includes representatives from both Nando's Australia and NPPA each reporting entity and met on a monthly basis in FY20 to establish the group-wide modern slavery approach and process and quarterly in FY21 over the reporting period. The consultation process involved consideration of how modern slavery risks vary across both Nando's Australia and NPPA 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 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 NPPA, both of which collaborated in the process and are covered in this joint statement.

7. 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).



This will involve more detailed training 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. After this training is complete, we are then planning to extend this more detailed training to employees who might be involved in developing labour contracts.

The Project Team will also 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 completes 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.

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 and suppliers to report their concerns through an independent service provider specialising in handling sensitive reports and disclosures.

In addition, Nando's leadership team and board review the de-identified data and reports in periodic board meetings to help identify and spot any issues and trends that may be forming, with the aim of proactively addressing any concerns.

Representatives from Nando's legal department also reviews 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 NPPA, to collaborate and share findings, especially where the suppliers of bespoke Nando's branded products like our marinades and sauces from NPPA 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 24 February 2020 to 28 February 2021. This Statement has been approved by the Nando's leadership team and the board of Nando's Australia and NPPA.

Signed by Amanda Banfield
Chief Executive Officer
Nando's Australia Pty Ltd

27 August 2021

Signed by Laurence Morris
Managing Director
Nando's Peri-Peri Australia Pty Ltd

27 August 2021