

# Domino's Modern Slavery Statement 2023

*This statement has been prepared for the year ending 31 December 2023 in accordance with the requirements of the Modern Slavery Act 2015. With approval from the Board of Directors, the statement sets out the actions taken by Domino's Pizza Group plc and its subsidiary companies ('DPG') to prevent modern slavery in our operations and supply chain.*

## INTRODUCTION

At Domino's Pizza Group plc ('DPG'), we continue to be guided by our core purpose of delivering a better future through food people love. By doing so, we can have a positive impact on everyone who interacts with us: our customers, colleagues, franchise partners, investors, and the communities we serve. Our purpose is underpinned by our sustainability strategy which ensures a better future; one where, among other things, our environmental impact is minimised, our workplaces are inclusive, and our products are responsibly sourced.

We take our responsibility to respect the human rights of people who work for us seriously, and we do business with franchise partners, suppliers and business partners that respect human rights for their respective employees. We do not tolerate any form of modern slavery within our operations and supply chains and work hard to minimise risk. This is our eighth statement in line with Section 45 of the Modern Slavery Act 2015 and it details the efforts we have taken to prevent modern slavery in our business and supply chains during 2023.

In 2023, we took several significant steps towards mitigating the risk of modern slavery in connection to our business. These included:

- All suppliers that received over £5 million of business annually, or deemed as high ethical risk by Domino's, were required to complete a SEDEX members ethical trading audit (SMETA) 2 pillar audit or equivalent.
- All suppliers complete a Domino's audit annually including on the Ethical section of Domino's standard.
- All suppliers have signed up to the Modern Slavery clauses in our Supplier Code of Conduct, this is reviewed on an annual basis.

We rolled out bespoke people-focused training for franchise partners, including on modern slavery.

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## DPG STRUCTURE AND SUPPLY CHAINS

DPG is the UK's leading pizza brand and a major player in the Irish market. We are part of the global Domino's system, the biggest pizza delivery operator in the world. We hold the exclusive master franchise rights in the UK & Ireland under a long-term agreement with Domino's Pizza International Franchising Inc., the international arm of Domino's Pizza Inc which is listed on the New York Stock Exchange, and which owns the Domino's brand across the globe. Our core business is in the UK & Ireland, where we have a clear number one market share.

### DPG by numbers

- Group revenue: £679.8m
- Colleagues: 1,585
- Franchise partners: 61
- Domino's stores: 1,319
- Raw materials spend: £216.7m

### Domino's stores

DPG primarily operates through franchise partners with 55 operating in the UK, and 6 in Ireland, one of which also operates in the UK, covering 1,319 stores. In 2023, we opened 61 new stores, operated by 23 different franchise partners. The Group operates 31 corporate stores, all in the London area, where we hold full responsibility for their operations.



**DELIVER**  
...piping hot food with an average delivery time of 25 minutes in 2023.

**COLLECTION**  
...from one of our 1,319 stores. Collection orders grew 13.3%.

**COOK**  
...a wide range of freshly made food from sustainably sourced, high-quality ingredients.

**SELL**  
...to customers with 90% of system sales now through digital channels.

**PRICE**  
...set locally by our franchise partners and with a wide range of pricing strategies. Following the resolution with our franchise partners we are also now able to offer national value campaigns.

We choose our franchise partners carefully for their commitment and entrepreneurial approach. We have a Standard Franchise Agreement in place which allows us to provide continued support to franchise partners through our central functions, led by experienced colleagues. These functions include technology systems, supply chain management, strategy and insight, operations, human resources, communications, legal, property and marketing. Franchise partners independently employ, train, and develop their own teams, and set their own prices. Franchise partners are expected to purchase our dough, as well as other food and non-food items from our supply chain centres, benefitting from our purchasing scale and expertise.

### Supply Chain

An efficient supply chain is integral to advancing our sustainable growth, and the relationship with our suppliers is a key element in achieving our goals. We have 119 direct suppliers, 70 supplying food and 49 supply non-food goods. These suppliers are based in 27 different countries. Our top five sourcing countries are the UK, Thailand, Denmark, Portugal, and Ireland – together, these account for 80% of our supplier spend.

We own and operate our own Supply Chain Centres, with our main operations based in Warrington (England), Milton Keynes (England), Cambuslang (Scotland) and Naas (Ireland). We also operate a 'cross-dock' facility in Avonmouth (England) which allows us to warehouse products there for more efficient distribution across the South-West of the country. All franchise partners are expected to

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purchase their raw ingredients from our Supply Chain Centres, helping to ensure that all products sold from every Domino's store have been procured centrally, from our trusted suppliers that have signed up to our Supplier Code of Practice.

### POLICIES

We are committed to ensuring that everyone who helps to make our products is treated with dignity and respect, in safe and fair workplaces. Our approach is informed by the United Nations Guiding Principles on Business and Human Rights and underpinned by the principles of the Universal Declaration of Human Rights and Conventions on Rights of the Child, and the OECD Guidelines for Multinational Enterprises.

To effectively communicate our expectations on modern slavery, we have implemented policies and procedures that are designed to support our high standards in ethical and responsible business and supply chain practices. The policies cover how we source our products, employ people appropriately, and how we operate and interact with modern slavery legislation in our business and with suppliers.

Our key policies are reviewed annually and are signed off by the board. Our franchise partners set their own policies, but they must operate within all local laws and regulations, including the Modern Slavery Act 2015, and the Bribery Act 2010. The SFA also requires all franchise partners to uphold the Domino's brand values. While explicitly detailed in the SFA, we expect franchise partners to play their part in helping to minimise the risk of modern slavery in our business and supply chains.

#### Speak Up Policy

Our Speak Up Policy, which was re-approved by the Board in 2023, encourages colleagues and third parties to report any genuine concerns regarding ethical misconduct and malpractice. It also emphasises the Company's zero-tolerance approach to detrimental treatment against anyone who does raise concerns. We remain committed to conducting business in an environment of openness and transparency with integrity engrained in everything we do. No reports relevant to the Speak Up Policy were received in 2023.

We continue to provide access to an independent, confidential reporting hotline available 24 hours, 7 days a week to ensure that any matters of ethical concern are investigated, and appropriate follow-up actioned. In 2023, we expanded the hotline to enable DPG colleagues, and particularly our Operational Excellence Coaches, to make anonymous reports of suspected cases of modern slavery in our operations. In 2023, no modern slavery issues were identified.

#### Anti-Bribery and Corruption Policy

The Anti-Bribery and Corruption Policy outlines our expectations for how colleagues and third parties should conduct business honestly, without engaging in activities such as corruption or bribery. The Policy outlines our commitment to preventing bribery, our principles, who must comply, how problems may arise (including examples), and how employees should raise concerns.

We have a separate Due Diligence Policy within the Anti-Bribery and Corruption policy that we use to assess the potential risk of bribery with new suppliers, and the appropriate level of due diligence

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required as a result. Our Anti-Bribery and Corruption Policy is shared with all new suppliers before onboarding with us, and again at any contract review. If any supplier were to act in contravention of the standards of this policy, their contracts with Domino's could be terminated immediately.

The Anti-Bribery and Corruption Policy is supported by an online training module, which all our directly employed colleagues are enrolled on as part of their onboarding journey with us. The policy provides practical examples of what colleagues should look out for, what should be reported, and how.

### Human Rights Policy

Our Human Rights Policy applies to all operations where DPG has management control, including our Support Office, Supply Chain Centres, DPG-owned stores, and to those related parts of our business where we have significant influence, including our franchise operations and our supply chain. The policy outlines our zero-tolerance approach to modern slavery and all forms of human rights violations. It also signposts to other relevant documents, including our Speak Up Policy and our Modern Slavery Statement. Whilst accountability for performance against our Human Rights Policy rests with the DPG Leadership Team, the Policy itself is set by the Board.

### Supplier Code of Practice, Supplier Technical Manual and Responsible Sourcing Policy

Our Supplier Code of Practice, along with the and associated Supplier Technical Manual, and Responsible Sourcing Policy outline the standards we expect our business partners and suppliers to work to achieve within their businesses, as well as the standards they can expect from DPG. It is based on international standards and good practice and is an extended version of the Ethical Trading Initiative (ETI) Base Code, in alignment with the SEDEX Members Ethical Trade Audit (SMETA) Scheme. It applies to all suppliers working with us, including any third-party labour agencies and service providers, and is shared with suppliers at the onboarding stage.

In 2022, we incorporated modern slavery clauses into the Supplier Code of Conduct and, since then, we have required all suppliers to attest that they will adhere to this clause. We will continue to mandate that all suppliers reconfirm their adherence to this policy on an annual basis.

## RISK ASSESSMENT

We conduct a rigorous risk assessment of our suppliers, both new and existing, at least every two years, with support from Carnstone Partners Ltd, a consultancy specialising in ESG and sustainability. Our most recent assessment was carried out in late 2023.

We use a bespoke tool that assesses seven risk elements: country, labour, health and safety, bribery and corruption, environment, product category and spend. The tool is informed by several internationally recognised indices, including but not limited to: ITUC's Global Rights Index, UN Development Programme's Human Development Index, Transparency International's Corruption Perception Index, FAO's Global Forest Resource Assessment and WRI's Baseline Water Stress Index amongst others.

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Each risk element then informs an overall combined risk profile for each supplier, which in turn defines the way we interact with them. Of the 108 food and non-food suppliers reviewed, 18% are considered High Risk, 8% are considered Medium Risk, and 74% are considered Low Risk. The percentage of high and medium risk suppliers has increased since our last assessment, which is mainly due to changes in country risk profiles, as the countries and businesses that we source from have not significantly changed. Whilst the methodology used to calculate the overall risk has remained the same as the previous assessment, additional indices have been factored in, including the Freedom of Association, Gender Inequality Index and Global Estimates on International Migrant Workers.

We primarily focus on the suppliers and products that hold the highest combined spend with ethical sourcing risk. We hold regular meetings with these top suppliers and are now able to monitor them more closely with the recent updates to our Supplier Code of Practice.

### Identifying areas of risk

Through horizon scanning and regular SEDEX alerts / reviews we continue to monitor risk. We constantly review our supply chain risks and discuss key global events with our suppliers. All events and risks identified are picked up directly with individual suppliers at monthly meetings within the supplier assurance team.

## DUE DILIGENCE

Our franchise partners are the foundation of our business, and our suppliers help us to create brilliant products. Our high expectations of ourselves as a business are reflected in the high standards, we expect from our franchise partners and suppliers.

### DPG: own operations

At DPG we have due diligence processes in place to identify any incidents of labour exploitation. Across all our operations, including offices, Supply Chain Centres and corporate stores, we actively carry out due diligence on potential hotspots for slavery or human trafficking, such as the recruitment process. We carry out rigorous checks to ensure all our direct colleagues have the right to work, and carry out cross-checks of their identity, bank details and addresses through our payroll system and use a third-party reference checking service. On occasion we use labour agents to identify temporary staff for our Supply Chain Centres during peak times. These agents are chosen from a preferred supplier list – suppliers that have gone through due diligence checks – and we ensure we have contracts in place before working with them.

### Franchise Partners

Whilst franchise partners operate independently, they are the foundation of our business, and we offer support where necessary. In 2023, our franchise partners were audited at least twice per year through our Operational Evaluation Reports (OERs), which assesses them against our brand standards. We completed 3,912 OERs in 2023. If a store does not meet our brand standards, we seek to resolve the non-conformance(s) with a corrective action plan and follow up visit. This process is mandatory and must be completed during a set timeframe which is usually between 30-60 days, depending on the issue found. Our Supplier Assurance and Technical teams work closely with

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franchisees to resolve any issues within the timeframe. Any store that receives less than a 70% in an OER twice within a 12-month period will go into default. Any store that loses more than 21 standards points (excluding service) back-to-back, will receive additional visits to check for consistent standards. If this occurs, our Operational Evaluation team will work within the store, and alongside the store team, to carry out workshops and training. In addition to this, a member of the Learning & Development team delivers training classes, and a Business Partner will visit the store every month to ensure they get the guidance they need until they are reassessed.

### Suppliers

All suppliers, including any new suppliers ahead of the onboarding process, undergo a strict due diligence process. The Supplier Code of Practice outlines our expectations of our suppliers, third-party labour agencies and service providers. Before working with us, all are required to read, understand, and agree to adhere to the Supplier Code of Practice. Our primary (tier 1) suppliers are expected to share the document with their respective suppliers and cascade it throughout their supply chains, to ensure DPG products are made according to our values. The Supplier Code of Practice specifies that workers must not be required to log deposits or identity papers with their employer and all employees must have their freedom of association and right to collective bargaining respected.

In 2021, we implemented a new stage gate process with our New Product Development team, to ensure we are asking both existing and new suppliers the right questions upfront before we start working with them on new products and factories. In 2022, we developed a document that sets out a selection of minimum requirements to move into engagement stage. This is now sent out with NDAs for suppliers to agree with before progressing with sample submissions.

We continue to require all our suppliers to register on SEDEX, the membership organisation with a platform for companies to manage and improve working conditions in global supply chains. SEDEX provide practical tools, services, and a community network to help companies improve their responsible and sustainable business practices, and source responsibly<sup>1</sup>. By signing up to SEDEX, our suppliers are able to voluntarily share data with us through the platform. We ask them to share their most recent audits, details on their supply chains, as well as employment and business practices. We are connected with 100% of our food suppliers on SEDEX. We are currently connected with 65% of our non-food suppliers and will continue to focus on registering and linking with our remaining non-food suppliers.

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<sup>1</sup> [SEDEX](#)

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We operate a risk-based due diligence approach, recognising the value in completing routine ethical audits and it is our ambition that all suppliers will complete a SMETA audit following the below criteria:

Suppliers receiving >£5million of business annually, or classed as high ethical risk	Suppliers receiving <£5million of business annually	New suppliers
<ul style="list-style-type: none"> <li>• SMETA 2 pillar audit* (or equivalent)</li> </ul>	<ul style="list-style-type: none"> <li>• SMETA 2 pillar audit* (or equivalent)</li> </ul>	<ul style="list-style-type: none"> <li>• Supply is only awarded when the applicable audit to the size of the business is completed</li> </ul>

*\*BSCI audits are accepted as an alternative to SMETA 2 pillar audit.*

The audit must be repeated every two years, or sooner depending on the severity of issues raised. When non-conformances are found, a formalised action plan is issued, and follow-up audits may be required. DPG works closely with each supplier (including new suppliers) on their action plans to ensure continuous improvement. Where a supplier fails to meet Dominos expectations, we will not approve them for supply. The ethical audits are graded using an internal system by the Supplier Assurance team, and the scores go towards their Supplier Scorecards. Supplier Scorecards measure overall supplier performance and inform priority levels in our selection process when developing new products. In 2024, we will continue to undertake risk based SMETA audits for our suppliers which will include non-food supply.

Alongside these ethical audits, suppliers are required to undergo an audit against Domino's Supplier Manufacturing Standards. This internal audit, carried out by our Procurement and Supplier Assurance teams, ensure our requirements for safe, legal, and high-quality products are met and it also covers ethical standards. For a new supplier approval audit, all sections are covered. For a routine supplier audit, a minimum of four sections will be selected.

## On-site & virtual audits

### Food suppliers

Our Supplier Assurance team carried out audits of 100% of food suppliers in 2023, with onsite audits completed based on supplier risk level. If the audit was not completed on site, then a live video site tour was requested which included looking for signs of possible modern slavery. Additionally, desk-based audits were conducted among all food suppliers covering ethical and responsible sourcing elements. Suppliers are also required to have a third-party accreditation from a globally recognised food safety standard, namely the Global Food Safety Initiative (GFSI) standard.

### Non-food suppliers

We are currently reviewing how we could potentially conduct on-site audits with our non-food suppliers.

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## Training

We recognise the importance of training to ensure our employees are able to identify the signs of modern slavery and act on them appropriately. We provide a range of modules to all our staff through our e-learning platform. The training includes both mandatory and voluntary modules on matters including, but not limited to:

- anti-bribery and corruption (mandatory)
- health and safety (mandatory)
- CCO training (mandatory)
- GDPR (mandatory)
- MAR training (mandatory)
- modern slavery
- harassment and bullying
- whistleblowing

Given their important role working with suppliers, all members of the Supplier Assurance team who conduct on-site supplier audits, completed additional training on how to spot signs of modern slavery. In October 2023, we rolled out this training programme for managers of Domino's own supply chain operations so that they can spot possible signs, and for our Operational Excellence Coaches who conduct in-store audits.

We have developed a bespoke people-focused training for franchise partners, including on modern slavery and how to spot potential signs, that was rolled out in 2023. In addition, all franchise partners have been provided with one-page factsheets on spotting the signs of labour exploitation, including useful resources and details on who to contact if modern slavery indicators are found. E-learning is also provided through Skills Slice which includes modules and topics relating to modern slavery and is assigned to employees based on their role.

## WORKFORCE ENGAGEMENT

Since the introduction of Colleague Forums within our SCCs in 2018, and within our support office and corporate stores since 2020, we have continued to enhance our communication and feedback channels, so that we are able to effectively listen and respond to our colleagues, as well as identifying opportunities to better meet their training and development needs. Now that our offices have re-opened, these forums meet regularly face-to-face. Our Colleague Forums enable us to understand colleague concerns and provide an effective opportunity to update the workforce on relevant business matters. The forums are also utilised for collective consultations. During 2023, we continued to develop the Employee Forum framework and embed it as part of our overall cadence of dialogue with our colleagues.



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The forums met regularly face-to-face and afforded our colleague representatives an opportunity to see parts of the business they would otherwise not; for example, our corporate stores colleagues can visit our production facilities. There were many opportunities where our representatives were informed about all aspects of the business, growth, future plans and ask questions. These meetings were also used as a forum for engagement and consultation, including the revamping of the Long Service Award. This was changed as a result of taking onboard feedback from these groups. We look forward to continuing to work closely with our forums in 2024.

QUARTERLY COLLEAGUE FORUMS	BUSINESS AREA FORUMS	FUNCTIONAL MEETINGS/HUDDLES
<ul style="list-style-type: none"> <li>Chair: Designated Non-executive Director</li> <li>People Director</li> <li>Nominated Colleague Representatives</li> </ul>	<ul style="list-style-type: none"> <li>Chair: Functional Leader</li> <li>HR Representative</li> <li>Elected Colleague Representatives</li> </ul>	<ul style="list-style-type: none"> <li>Locally organised by teams, normally as part of weekly or monthly functional meetings</li> </ul>
<p><b>4</b> SCC Representatives (1 from each SCC)</p> <p><b>2</b> Support Office Representatives</p> <p><b>1</b> Senior Leadership Team Representative</p> <p><b>1</b> Operations Representative</p>	<p><b>Stores:</b> <b>6</b> Store Representatives</p> <p><b>SCC:</b> <b>4</b> Held in each of 4 sites and Network of over 30 Representatives</p> <p><b>Support Office:</b> <b>10-12</b> Representatives from all functions of the support office</p>	<p>Attended by all relevant team members, and lead by senior member of local management team</p>

## KEY PERFORMANCE INDICATORS

In 2022, we refreshed our sustainability strategy after consulting with colleagues, customers and franchise partners, and modern slavery is a focus area listed within it. As part of the updated strategy, we have established both a Board Sustainability Committee and Sustainability Steering Committee to provide additional focus and operational oversight on the Group's approach, including human rights and modern slavery. We have also set remuneration policies and practices to support the strategy and promote long-term sustainable success. For the full year of 2023, we published our first annual Sustainability Report outlining our targets and progress to date against our sustainability strategy.

## NEXT STEPS

While 2023 saw no reported incidents of modern slavery, we continue to proactively manage the risk.

The Human Rights Risks Assessment that was carried out in 2023 has flagged some additional areas of how we can increase the robustness of our processes, which we will develop a strategy to address in 2024.

**Andrew Rennie**  
**Chief Executive Officer**  
**Domino's Pizza Group plc**  
**24<sup>th</sup> June 2024**

*This statement will be updated annually to reflect our ongoing focus and commitment to the Modern Slavery Act 2015. It has been approved by the DPG Board and signed by Andrew Rennie, CEO on its behalf.*