

Domino's Modern Slavery Statement 2024

This statement has been prepared for the year ending 31 December 2024 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 remain committed to our core principle: creating a better future through food people love. By living this purpose, we strive to make a meaningful difference for our customers, our colleagues, and the communities we serve. Our dedication is supported by our ESG strategy, which drives us to minimise our environmental footprint, foster inclusive workplaces, and ensure 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 ninth 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 2024.

In 2024, we continued to strengthen our approach to identifying, mitigating, and managing the risks of modern slavery within our operations and supply chains. Our actions included:

- All suppliers that received over £5 million of business annually or were identified as presenting high ethical risk by Domino's, were required to complete a SEDEX Members Ethical Trading Audit (SMETA) 2-pillar audit or equivalent recognised assessment.
- All suppliers participated in Domino's annual audit process, which includes a dedicated section assessing compliance with the ethical requirements outlined in our Supplier Standards.
- All suppliers have agreed to the Modern Slavery clauses set out in our Supplier Code of Conduct. Compliance with these clauses is reviewed annually as part of our ongoing supplier management and due diligence processes.

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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: £664.5m
- Colleagues: 2,058
- Franchise partners: 66
- Domino's stores: 1,372
- Raw materials spend: £442m

Domino's stores

DPG primarily operates through franchise partners with 59 operating in the UK, and 6 in Ireland, one of which also operates in the UK, covering 1,372 stores. In 2024, we opened 54 new stores, operated by 21 different franchise partners.

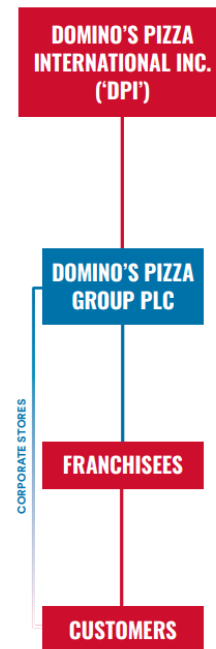
We choose our franchise partners carefully for their commitment and entrepreneurial approach. We have a Standard Franchise Agreement in place which allows us to provide continued support to franchise partners through our central functions, led by experienced colleagues. These functions include technology 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 required 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 96 direct suppliers, 70 supplying food and 29 supplying non-food goods. These suppliers are based in 28 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 required to

Our operating model →



DELIVER

...piping hot food with an average delivery time of 24.5 minutes in 2024.

COLLECTION

...from one of our 1,372 stores. Collection orders grew 0.5% in 2024.

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. We are also able to offer national value campaigns to our customers.

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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 Standard Franchise Agreement (SFA) also requires all franchise partners to uphold the Domino's brand values. 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, reviewed and re-approved by the Board in 2024, encourages colleagues to report genuine concerns about ethical misconduct or malpractice, including issues related to modern slavery. The policy underlines our zero-tolerance approach to any detrimental treatment against individuals who raise concerns, ensuring everyone can speak up without fear of reprisal. Domino's remains committed to fostering a culture of openness, transparency, and integrity throughout our organisation.

In 2024, no reports relevant to the Speak Up Policy were received, and no modern slavery issues were identified. We continue to provide DPG colleagues with access to an independent, confidential reporting service, available 24 hours a day, seven days a week, to ensure that all ethical concerns can be reported and are thoroughly investigated with appropriate follow-up actions taken.

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 required as a result. Our Anti-Bribery and Corruption Policy is shared with all new suppliers before

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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 sets out our zero-tolerance approach to modern slavery and all forms of human rights violations. It also provides clear links to other relevant documents, including our Speak Up Policy, which details the steps individuals should take if they suspect any human rights violations, as well as our Modern Slavery Statement. While overall accountability for performance against our Human Rights Policy lies with the DPG Leadership Team, the policy itself is established by the Board.

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

Our Supplier Code of Practice, along with the associated Supplier Technical Manual, and Responsible Sourcing Policy outline the standards we expect our business partners and suppliers to work towards achieving 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, every two to three years, with support from SLR Consulting, an international sustainability consultancy. We will conduct our next risk assessment in 2026.

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 and reviews, we continue to monitor risk. We constantly review our supply chain risks and discuss the potential impact of 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

Franchise partners are the foundation of our business, operating independently while receiving support from DPG as needed. In 2024, we conducted at least two audits per year for each partner through our Operational Evaluation Reports (OERs), which assess compliance with our brand standards. We completed a total of 3,943 OERs in 2024. If a store fails to meet our standards, we implement a corrective action plan and conduct a follow-up visit to address the issues. This process

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in mandatory and must be completed within a set timeframe, typically between 30 to 60 days, depending on the nature of the issue. Our Supplier Assurance and Technical teams collaborate closely with franchise partners to resolve the issues within that timeframe. Stores that score below 70% on two consecutive Operational Evaluation Reviews (OERs) within a 12-month period and/or lose more than 21 standards points (excluding service) consecutively are provided with additional support through extra visits to help maintain consistent standards. In such instances, our Operational Evaluation team works directly with the store team to deliver workshops and training sessions. In addition, a member of our Learning & Development team conducts training classes, and a Business Partner visits the store monthly to offer ongoing guidance until a reassessment takes place.

Suppliers

All suppliers, including any new suppliers ahead of onboarding, 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 adhere to the Supplier Code of Practice. Our primary (tier 1) suppliers are expected to cascade the document through 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 addition to our Supplier Code of Practice, we have introduced further safeguards to ensure that our approach is equally rigorous with prospective suppliers as it is with existing ones. We have established a strict set of minimum requirements that must be met before progressing to the engagement stage. These requirements are now issued alongside non-disclosure agreements, which suppliers must agree to prior to submitting samples.

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 provides practical tools, services, and a community network to help companies improve their responsible and sustainable business practices and source responsibly¹. By signing up to SEDEX, our suppliers can 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 maintain SEDEX connections with 100% of our food suppliers, ensuring full transparency and ethical oversight across our food supply chain. Additionally, we are connected with 65% of our non-food suppliers on SEDEX, including complete coverage (100%) of our packaging and uniform suppliers. The remaining non-food suppliers, who are not yet connected, have been assessed and categorised as low risk concerning modern slavery.

We operate a risk-based due diligence approach, recognising the value in completing routine ethical audits and we require all suppliers to go through at least a SMETA 2 pillar audit or equivalent (BSCI

¹ [SEDEX](#)

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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 Domino's 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 2025, we will continue to require suppliers to undertake risk-based SMETA audits, which include non-food suppliers.

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, ensures our requirements for safe, legal, and high-quality products are met, and it also covers ethical standards.

On-site & virtual audits

Food suppliers

In 2024, we implemented a risk-based assessment of our suppliers and adjusted the frequency of onsite audits according to the outcome of each supplier's risk evaluation. We now ensure that all suppliers identified as high-risk suppliers receive onsite audits. In addition, all food suppliers underwent comprehensive desk-based audits to assess their adherence to ethical and responsible sourcing practices. To further strengthen our assurance processes and reduce the risk of modern slavery, we require all suppliers to hold third-party accreditations from globally recognised food safety standards.

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 vital role in working with suppliers, all members of the Supplier Assurance team who carry out on-site supplier audits have completed additional training on recognising the signs of modern slavery. In 2024, we also delivered training to all Operational Excellence Coaches who

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conduct in-store audits, ensuring they are fully aware of the indicators of modern slavery and the appropriate actions to take should any concerns arise on site.

In 2024, we have continued to strengthen our commitment to combating modern slavery across our franchise network. Building on our bespoke, people-focused training for franchise partners (originally launched in 2023), we have updated and expanded the content to reflect the latest best practice and legislative developments. This training remains a core requirement for all partners and includes enhanced modules on identifying and responding to potential signs of modern slavery.

All franchise partners continue to receive concise, updated factsheets outlining the key indicators of labour exploitation, along with practical resources and clear guidance on reporting concerns. These materials are reviewed annually to ensure accuracy and relevance.

Additionally, in 2024, we have further developed our e-learning platform, Skills Slice. It now offers a broader range of interactive modules on modern slavery, tailored to specific roles within our organisation. These modules are regularly assigned and tracked to ensure that every employee receives the appropriate level of training for their responsibilities.

Through these ongoing initiatives, we remain committed to equipping our franchise partners and staff with the knowledge and tools needed to help prevent and address modern slavery within our operations.

WORKFORCE ENGAGEMENT

We introduced Colleague Forums in our Supply Chain Centres in 2018 and rolled that out to our support office and corporate stores in 2020. Our Colleague Forums enable us to understand colleague concerns, undertake collective consultations and provide an effective opportunity to update the workforce on relevant business matters.

SUSTAINABILITY STRATEGY

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 a 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 2024, we published our second annual Sustainability Report outlining our targets and progress to date against our sustainability strategy.

NEXT STEPS

While 2024 saw no reported incidents of modern slavery, we continue to proactively manage the risk.

In 2023, our Human Rights Risk Assessment identified key areas for improvement. In 2024, we proactively addressed these by strengthening our processes, including clarifying the governance

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structure for human rights, extending modern slavery training to additional key departments, and updating our approved labour agency list.

Andrew Rennie
Chief Executive Officer
Domino's Pizza Group plc
10 June 2025

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.