



## JUST EAT MODERN SLAVERY STATEMENT FYE 31 DECEMBER 2021

Just Eat Limited, Just Eat Holding Limited, Just Eat.co.uk Limited and Just Eat (Acquisitions) Pty Limited (“Just Eat”) publish this statement pursuant to section 54 of the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 (*Cth*). This statement covers steps taken by Just Eat, during the 2021 financial year.

### **Our business**

#### *Our services and customers*

Just Eat, as part of the Just Eat Takeaway.com group of companies, operates a hybrid marketplace for online food delivery - combining our marketplace offering with our courier delivery service. We provide proprietary technology to offer a quick and efficient digital ordering service to connect millions of customers with our restaurant partners in the United Kingdom and in other countries around the world.

Just Eat is not a food producer or retailer. The restaurants on our platform are independent from Just Eat and the vast majority of those are small, independent restaurants or small chains although we do also work with national and international branded restaurant groups.

Our customer base is broad and comes from all walks of life, ordering takeaway at home, in the office or with friends, whenever or wherever they are.

The vast majority of orders in the UK are delivered to customers’ doors by our independent restaurant partners’ own couriers. In Australia, the majority of orders are delivered by Just Eat couriers.

#### *Our company structure*

Just Eat Limited is wholly owned by Just Eat Takeaway.com N.V., a company domiciled and registered in the Netherlands. Just Eat Takeaway.com N.V. is listed on Euronext Amsterdam and the London Stock Exchange. Just Eat Holding Limited is a wholly owned direct subsidiary of Just Eat Limited, and Just Eat.co.uk Limited and Just Eat (Acquisitions) Pty Limited are wholly owned direct subsidiaries of Just Eat Holding Limited.

#### *Location of operations*

Throughout 2021, Just Eat Limited and its subsidiaries (the “Just Eat Group”) operated in the following countries - Australia, Canada, Denmark, France, Ireland, Israel, Italy, Spain, New Zealand, and the United Kingdom.

#### *Workforce composition*

With the exception of our field sales teams, and our Scoober hub staff and couriers (please see below for an explanation of our Scoober model), the majority of our people worked from home during H1 2021, due to the ongoing COVID-19 pandemic. We introduced a phased return to the office during H2 2021, and prepared to introduce a hybrid working policy for our previously office-based personnel at the end of the year.



Our HR teams managed the hiring and contracting of staff as well as taking responsibility for their well-being wherever they were working. Where we engaged agency workers and independent contractors, they were partially for the provision of skilled, semi-skilled or professional services, such as in our Technology function. Other agency workers and independent contractors were engaged across our delivery networks, for the provision of lower skilled delivery services.

In the UK, Just Eat uses delivery to complement our marketplace model, enabling us to give customers the widest possible choice. Since the start of the pandemic we have seen huge growth in our delivery operations and it now forms a core part of wider business. We utilise four different delivery models across the group:

- Self delivery - Just Eat is predominantly a marketplace, which means in the majority of cases, the couriers who deliver customers' food to the door are engaged or employed by independent restaurants
- Scoober - Agency worker model - Couriers are on assignment to Just Eat through an agency model
- Third party - Couriers are engaged by the third party as self-employed independent contractors
- Independent couriers - Self-employed independent contractors engaged directly by Just Eat or a Just Eat group company

Scoober was launched at the end of 2020 in the UK, and we now operate from 7 hubs across 6 cities.

In Australia, Just Eat uses a variety of delivery models, including the self delivery and independent courier models deployed in the UK. Additionally, in mid-2021, a small scale courier employment trial was launched in the central business district of Sydney.

Works councils and trade unions represented some employees across our markets, particularly in France and Italy. We also worked with employee representatives in several of our markets where we needed to consult meaningfully and effectively with our employees on changes across the company.

#### *Tier 1 suppliers and categories of procurement*

Our direct suppliers were mostly located within Europe, Australia, New Zealand and North America, generally providing specialist technical, marketing or other services (comprising highly skilled services relating to professional services, and lower skilled services such as delivery services provided by our delivery partners). Our restaurant management technology hardware was sourced from China and our third party contact centres which helped with customer support were located in some countries that score above 30 on the Global Slavery Index and these suppliers were, therefore, subject to a higher level of scrutiny and contractual obligation.

#### **Our policies**

##### *Leadership and corporate governance*

Day-to-day leadership of the Just Eat Group's operations in the UK was managed by Andrew Kenny, our UK Managing Director as at FYE 31 December 2021. Morten Belling, the Australia &



New Zealand Managing Director as at FYE 31 December 2021 was responsible for day-to-day leadership of Australian operations. As the Just Eat Group is part of the wider Just Eat Takeaway.com group, the Management Board and Supervisory Board were ultimately responsible for the Just Eat Group throughout 2021.

#### *Internal policies*

To support our modern slavery commitments, we had a Modern Slavery Policy and a Code of Conduct which set out the ethical standards we expected of our staff and suppliers to meet and underlined our commitment to acting ethically and with integrity in all our business relationships. All company policies were made available to our people on the Kitchen (Just Eat's internal communication site) and the policies related to Modern Slavery were available to our suppliers upon request.

In order to reinforce its commitment to prevent conducts that may foster modern slavery, Just Eat has included in its Code of Conduct specific references to the organisation's zero tolerance to modern slavery, not only among its employees, but also in its supply chain. Also, Just Eat encourages every employee and suppliers, through its Code of Conduct, to report any misconduct that may specifically involve some form of modern slavery.

These policies were supported by the Speak Up Policy, launched across the Just Eat Group in March 2021 and the Just Eat Takeaway.com group in May 2021, which provided clear encouragement and guidance to all staff about raising concerns, including those related to modern slavery, without fear of retaliation. Our whistleblowing hotline was available in all our operating countries. Cases raised through the hotline went directly to the Ethics & Compliance team. The team was responsible for reviewing each case received via the hotline and assigning an appropriate investigator (where the issue was not investigated by the Ethics & Compliance team themselves). No reports relating to allegations of modern slavery or other human rights violations were received via the whistleblowing hotline in 2021.

#### *Supplier Policies, Onboarding & Monitoring*

Supplier onboarding continued to be subject to our Third Party Supplier Modern Slavery and Ethical Audit Process which required different measures to be taken according to the assessed level of modern slavery risk (please see the Due Diligence section of this Statement below for more information). For some suppliers this may have meant signing up to our Ethical Compliance Statement, and for other suppliers this would have entailed additional steps including compliance with our Social & Ethical Compliance Policy (based on the Ethical Trading Initiative (ETI) base code) and undergoing audits which were carried out by independent audit companies, and at least annually where Covid-19 restrictions permitted. In the event that we or the independent auditor identified signs of modern slavery, whether for a higher risk supplier or otherwise, we required the supplier to address our concerns and rectify the situation in a timely manner. If our concerns were not resolved we took appropriate measures, which may have included termination of the supplier's contract. If the relationship with the supplier continued, regular monitoring for improvement would have been required, particularly of the areas that raised concerns.

#### *Prohibition of Financial Burdens*

We had, and continue to have a zero tolerance approach to the imposition of any financial burdens, as outlined in our Code of Conduct, such as withholding wages or imposing recruitment fees, within our business and supply chains. To date, no such incidents have been



brought to our attention. However, in the event that allegations of this nature are brought to our attention, we would take swift and appropriate steps to investigate and address this.

### **Our due diligence processes, approach to risk assessment and risk management**

#### *Assessment of Modern Slavery Risk & Supplier Commitments*

The commitment we expected from our suppliers was based on the level of modern slavery risk for the services or goods provided, looking at the skill level involved, staff volume and the supplier location. Where suppliers were providing highly skilled services with a low volume of staff and were located in countries that score below 30 on the Global Slavery Index the minimum commitment required would have been agreeing compliance with local laws. Where the volume of highly skilled staff increased or the supplier location is in a country scoring above 30 on the Global Slavery Index our suppliers were requested to sign our Ethical Compliance Statement, which included onward obligations on their suppliers, or the suppliers were required to provide evidence that their modern slavery processes were at least equivalent to ours. For suppliers providing services or production of goods involving a high volume of semi-skilled or low skilled workers we required suppliers to comply with our Social & Ethical Compliance Policy, sign our Ethical Compliance Statement, and undergo an audit process on an at least annual basis by independent audit companies, subject to Covid-19 restrictions.

#### *Effectiveness*

We required higher risk third party suppliers to either (i) sign up to our code and we audited the supplier's information on test houses or the Sedex database, or other similar industry bodies; or (ii) undergo an independent SA8000 audit at all operating locations that support Just Eat. These audits were repeated annually and we monitored the scores in all areas.

To date all current higher risk suppliers who underwent a SA8000 audit had a valid audit, and we continued work on setting an appropriate median score for our business. In several instances both new and existing suppliers performed below our standards in some areas of the SA8000, so we worked directly with those suppliers to remedy these deficiencies and re-audit.

### **How we train our people**

In September 2021, we launched a Just Eat Takeaway.com group-wide compliance eLearning course, which focussed on the ethical standards outlined in our Code of Conduct. The eLearning course included examples of modern slavery warning signs, and our people were directed to either inform the Ethics & Compliance team or report to the whistleblowing hotline immediately if they observed any such warning signs.

### **Consultation among entities included in this report**

The directors of the entities referenced in this statement form part of the Just Eat Takeaway.com Group Senior Leadership Committee. The Just Eat Takeaway.com group has been tasked with developing an aligned, group-wide approach to combating modern slavery.



A handwritten signature in black ink, appearing to read "Andrew Kenny".

**Andrew Kenny**

*Director*

Just Eat Limited  
Just Eat Holding Limited  
& Just Eat.co.uk Limited

A handwritten signature in black ink, appearing to read "Morten Belling".

**Morten Belling**

*Director*

Just Eat (Acquisitions) Limited