



GUZMAN Y GOMEZ LIMITED - FY25

Modern Slavery Statement

This statement is made in accordance with the Modern Slavery Act 2018 (Cth) reporting on the financial year commencing 1 July 2024 to 30 June 2025. It covers all activities undertaken by Guzman y Gomez Limited ("GYG") and its subsidiaries (collectively, "the GYG Group").

1 As at 30 June 2025, GYG's Australian subsidiaries are Guzman y Gomez Franchising Pty Ltd, Guzman y Gomez Restaurant Group Pty Ltd, Guzman y Gomez Leasing Pty Ltd, Guzman y Gomez Trading Pty Ltd; and its American subsidiaries are Guzman y Gomez Corp and Guzman y Gomez Restaurants, LLC.

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Acknowledgement of Country | GYG acknowledges the Traditional Custodians of the lands on which we live, work, and share food across Australia. We recognise their enduring connection to land, waters and community, and pay our respects to Elders past and present.

Co-CEOs' Message

At GYG, our values guide everything we do, and “Got Your Back” is one of the most important. It’s a promise. A promise to protect, support and empower every person connected to GYG, including our crew, our franchisees, our guests, and workers in our supply chain.

This value drives our commitment to human rights and GYG’s stance against modern slavery. We believe everyone deserves to be treated with dignity and respect, and we take our role seriously in ensuring fair and safe working conditions across our operations.

In FY25, we strengthened our approach by partnering with Fair Supply, a supply chain intelligence platform. This helped us:

- Map and assess modern slavery risks across our Australian and US supplier base
- Prioritise higher-risk categories like uniforms, ingredients and packaging
- Build greater confidence in the traceability of our supply chain

We also introduced the GYG Supplier Code, setting clear expectations around labour rights, environmental standards, animal welfare, and

governance. This Code is now being embedded into procurement processes across all business units.

As we publish our fifth Modern Slavery Statement, we remain committed to continuous improvement, transparency and action. We’ll keep refining our approach as we learn more and always guided by our values and our responsibility to do the right thing.

To our team, franchisees and supply partners: thank you for your ongoing commitment. We’ve got your back, and we’re proud to know you’ve got ours.



Steven Marks
Founder and Co-CEO



Hilton Brett
Co-CEO

About GYG

Guzman y Gomez Limited (“GYG”) is one of Australia’s fastest-growing quick service restaurant (“QSR”) brands, delivering clean, fresh, made-to-order Mexican-inspired food to guests at speed.

GYG operates under a hybrid ownership model comprising both corporate-owned and operated restaurants and franchise-owned and operated restaurants, including select master franchise arrangements in Singapore, Japan and South Australia.

Corporate restaurants are owned, managed, and operated directly by GYG. The company maintains full operational control and employs all crew within these restaurants.

Franchise restaurants are operated by franchisees, who are responsible for day-to-day operations, staffing, and associated

operating costs and capital expenditure. Franchisees employ their own teams and pay ongoing royalties to GYG for the use of its brand, intellectual property, and operating systems.

GYG operates corporate restaurants in Australia and the United States, supported by regional corporate offices and franchise networks. The business employs staff directly in restaurants and corporate roles, and indirectly through franchisees, contractors, and suppliers.

Our Vision & Values

VISION

WHY DO WE EXIST?

TO REINVENT FAST
FOOD AND CHANGE THE
WAY THE MASSES EAT.

MISSION

WHERE ARE WE HEADED?

BE THE BEST AND THE
BIGGEST RESTAURANT
COMPANY IN THE WORLD.

BY

BY BUILDING

A SUSTAINABLE FAST
FOOD MODEL, FOR THE
NEXT GENERATION.

OUR VALUES

HOW WILL WE BE ON THIS JOURNEY?



IT'S ALL ABOUT THE FOOD!

Our food is what separates us from all others. It's our brand, our heart and soul. Execution must be perfect – every order, every day!



MAKE EVERY GUEST LOVE US

We control our guest experience. Make it memorable, every time! And don't forget... Our smiles are contagious!



BE REAL

We say (with respect) what we think, and we don't make excuses.



GOT YOUR BACK

We are in this together. We take care of each other – always!

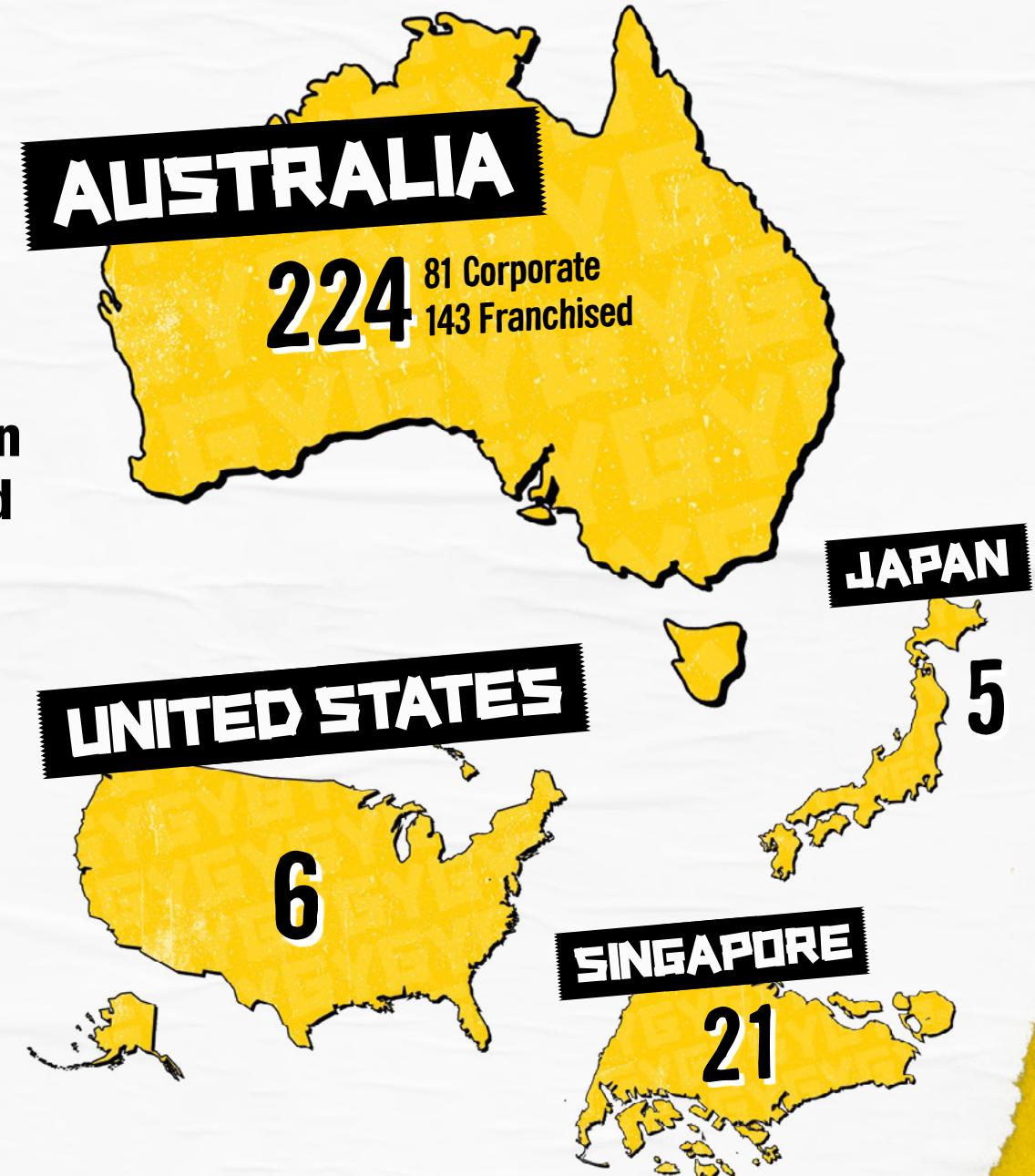


IT'S UP TO US!

The future is ours to dominate!

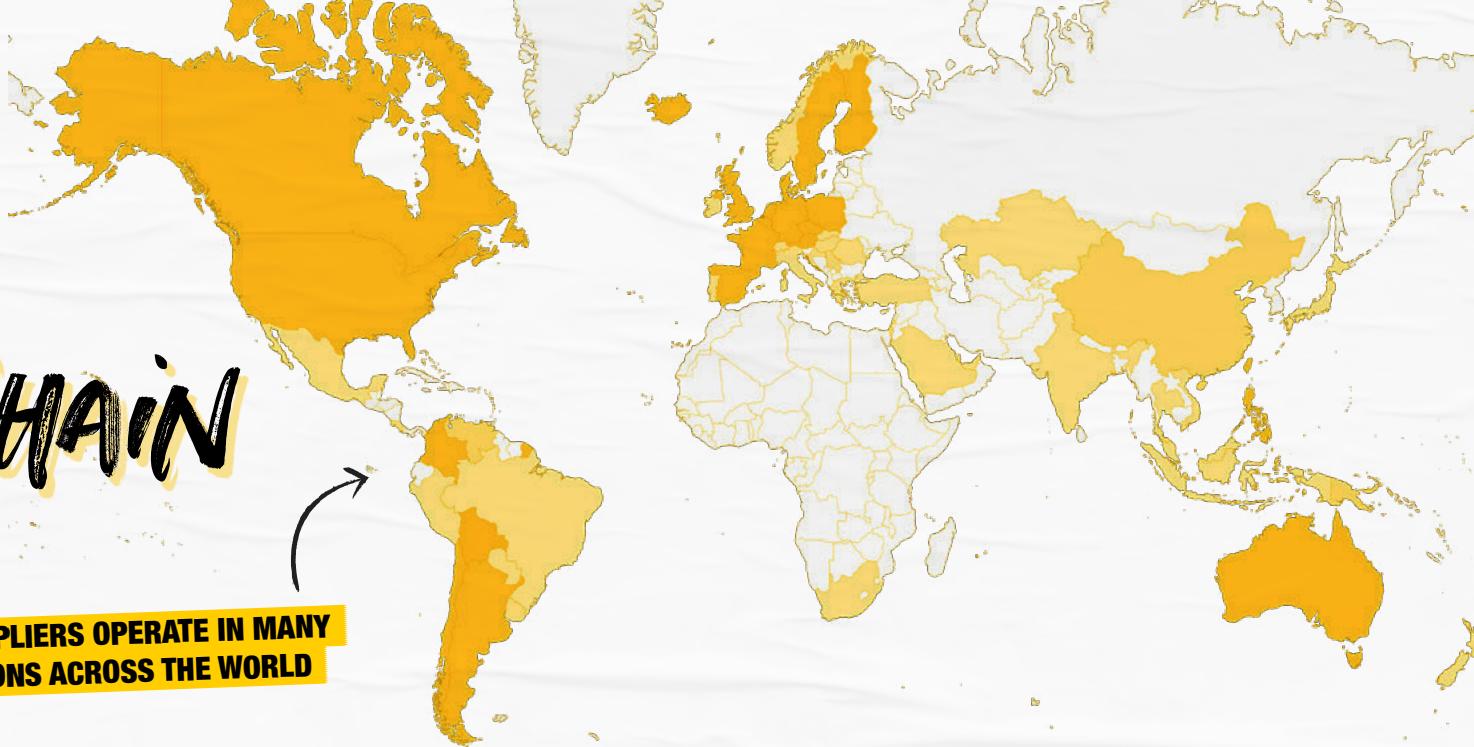
Our Operations

Since opening its first restaurant in Sydney in 2006, GYG has expanded its network to 256 restaurants across four countries, including Australia, Singapore, Japan and the US. GYG employs over 13,000 people across corporate and franchise restaurants in Australia and the US.



Our Supply Chain

OUR SUPPLIERS OPERATE IN MANY LOCATIONS ACROSS THE WORLD



GYG's supply chain supports our restaurant network through the procurement of goods and services such as food ingredients, beverages, packaging, uniforms, equipment, marketing services, technology systems, logistics, and construction services.

Supply chains are primarily concentrated in Australia and the United States, with additional international sourcing for select products and equipment.

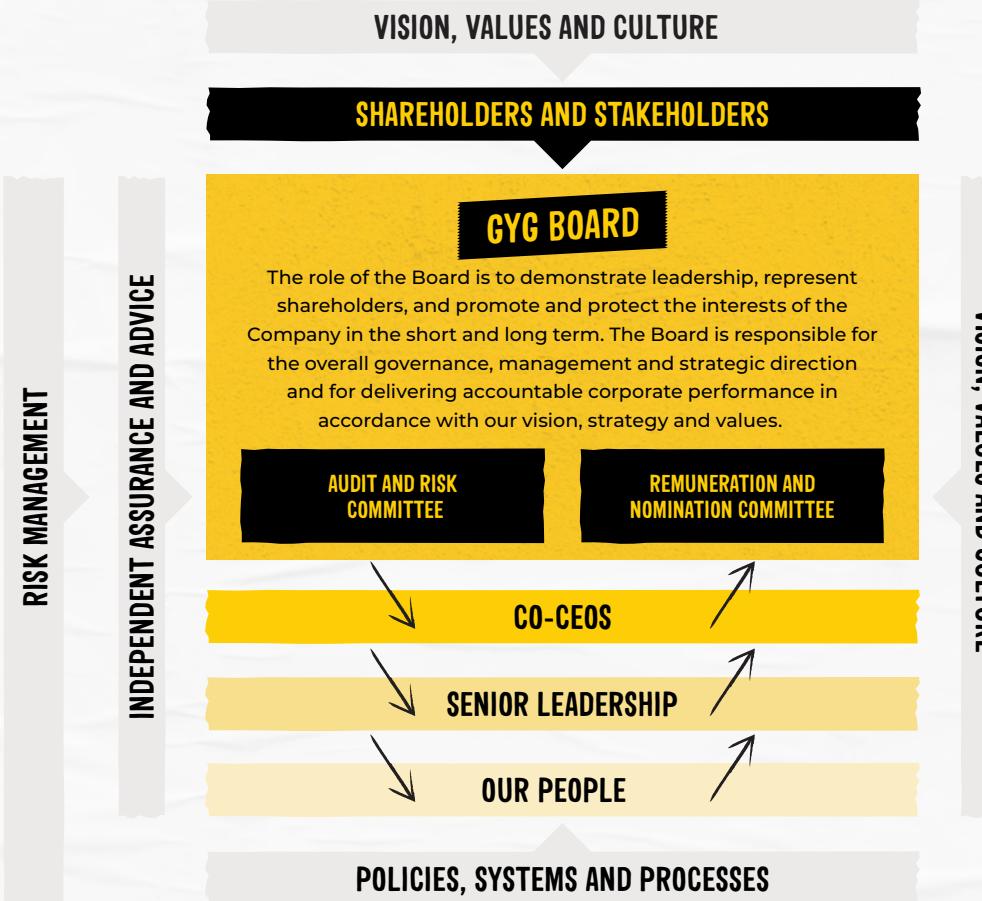
GYG's supply chain includes:

- Food and beverage sourcing (meat, poultry, produce, dairy, beverages, condiments)
- Restaurant construction, fit out, and maintenance services
- Packaging and uniforms
- IT, marketing, and professional services
- Logistics, warehousing, and distribution.

Governance Structure and Policies

Our approach to human rights in our operations and supply chain is informed by the United Nations Guiding Principles on Business and Human Rights ("UNGPs"), our Sustainability Strategy and Risk Management framework.

The Head of Sustainability and Risk role, formed in recent years, has been key in integrating our human rights agenda into our broader sustainability goals and supply chain due diligence.



Our Policies

Our corporate governance policies guide and support our monitoring efforts through the following key documents.

- GYG Code of Conduct
- Whistleblower Policy
- Human Rights Policy
- Anti-Bribery and Corruption Policy
- Disclosure Policy
- Respect at GYG Policy

These policies help us uphold our commitment to ethical practices and safeguard human rights within our operations.

The GYG Code of Conduct is available on the company's website at:
guzmanygomez.com.au/constitution-codes.

Grievance AND Remediation

GYG has implemented a clear and accessible procedure for receiving and managing grievances related to any potential breaches of our Modern Slavery Policy.

Our independent whistleblower hotline provides a confidential channel for employees, suppliers, and other stakeholders to report actual or suspected instances of modern slavery or other workplace misconduct. Reports can be made anonymously or by name via a toll-free hotline, a dedicated website, or postal mail. This mechanism ensures concerns are raised safely and handled in accordance with GYG's Whistleblower Policy and investigation procedures.

UNDERSTANDING AND ASSESSING OUR RISK

GYG partners with a third-party platform, Fair Supply, which conducts modern slavery risk assessment on GYG's suppliers. The analysis is based on a range of risk factors, including the country of origin, industry and category.

For FY25, GYG engaged Fair Supply to conduct an independent, quantitative assessment of modern slavery risks across our Australian and US supplier base, which is now embedded as an annual review.

- **Australia:** 817 suppliers assessed
- **United States:** 154 suppliers assessed

Guiding Principles on Business and Human Rights

Under the United Nations Guiding Principles on Business and Human Rights ("UNGPs"), businesses may be connected to human rights harms in three ways:

- **Cause** – where their own actions directly result in harm.
- **Contribute** – where their practices help enable harm caused by others.
- **Directly linked** – where harm occurs within their business relationships, even if they did not contribute to it.

This framework guides how GYG identifies, prioritises, and addresses modern slavery risks across its operations and supply chains.

Assessing our Operational Risks

GYG considers the risk of modern slavery within its direct operations to be low due to Australian labour laws and internal employment practices. The US operational footprint is currently in the foundation phase, with long term supplier partnerships currently being developed and supported with local services and solutions, including people systems.

Our diverse direct workforce is made up of permanent full-time, part-time, casual and fixed-term positions across Hola Central (head office) and restaurants.

Hola Central (Head Office) & Restaurant Crew

GYG operates a hybrid workforce model comprising both directly employed team members and employees engaged through our franchising network.

During the reporting period, GYG continued to strengthen its workforce management practices by enhancing technology across both corporate and franchise operations with an end-to-end people systems suite that automates the verification of Australian work rights and ensures ongoing compliance with all requirements under the applicable Modern Awards including minimum wages. These improvements have standardised key processes, automated core HR activities, and reinforced

governance and oversight across the network.

All GYG corporate employees (and opt-in for franchisees) have access to a comprehensive wellbeing platform designed to support them both at work and in their personal lives. In addition, GYG provides formal grievance mechanisms to ensure that all workers can raise concerns safely and confidentially.

Facilities Management

In Australia, GYG partners with a facilities management service with solutions encompassing restaurant equipment and maintenance, cleaning, and waste management. GYG's supplier hires sub-contractors and labour hire workers in Australia who are subject to Australian workplace and employment laws, therefore considered low risk. However, there is an inherent risk in some industries such as cleaning. This is an area GYG will continue to monitor and endeavour to gain more visibility on in the future.

Building & Construction

The building and construction category represents another area for potential of elevated modern slavery risk due to the complex subcontracting structures, use of temporary and migrant labour, and multi-tiered material supply chains involved in restaurant fit outs and new store developments. Risks may arise through both direct labour (e.g. in shopfitting, electrical, or cleaning services) and indirect supply chains linked to raw materials such as steel, glass, and concrete.

Assessing our Supply Chain Risks

Higher-risk areas identified through our FY25 risk assessment include:

Protein Processing & Agricultural Supply Chains

The sourcing of proteins and agricultural products represents one of GYG's most significant areas of potential modern slavery exposure. These categories are inherently higher risk due to the labour-intensive nature of agricultural production, reliance on seasonal and migrant labour, and complex multi-tiered global supply chains extending into regions with weaker labour protections.

Through the Fair Supply independent risk assessment, GYG identified elevated inherent risks associated with the procurement of beef, chicken and fresh produce, driven by country-of-origin factors and the use of raw agricultural inputs. These insights have informed GYG's priority focus for supplier engagement and due diligence.

Uniforms & Branded Merchandise

GYG sources staff uniforms and related merchandise through a specialist supplier that imports these items internationally. This category has been identified as a potential area of modern slavery risk due to the global nature of the textile and garment industry. However, our supplier maintains close visibility over its manufacturing partners, supported by certification and traceability documentation to verify ethical production standards.

GYG reviews supplier credentials and certifications (such as social compliance audits and recognised ethical trade standards) to ensure appropriate controls are in place and that any potential risks are actively managed.

Packaging & Consumables

Packaging and consumables form a critical part of GYG's supply chain and represent a moderate to high inherent risk category for modern slavery due to complex manufacturing networks and reliance on raw materials sourced from diverse regions. Items such as paper-based products, plastics, napkins, cups, and utensils often involve multi-tiered global supply chains, where labour exploitation risks can occur in both raw material processing (e.g. forestry, pulp, and petroleum products) and manufacturing stages (e.g. conversion, printing, and assembly).

How We Manage Modern Slavery Risk

During FY25, GYG undertook several actions to identify, assess, and mitigate risks of modern slavery in its operations and supply chains, including:

Independent Risk Assessment

To strengthen our understanding of modern slavery risks across GYG's operations and supply chain, we engaged Fair Supply, an independent advisory firm specialising in modern slavery and ESG risk analytics. Fair Supply's proprietary data platform applies a comprehensive input-output economic model that maps GYG's tier 1 supplier spend across more than 400 industry sectors and 200 countries. This enables GYG to identify inherent modern slavery risk exposure by category, country, and product type.

The independent assessment supports GYG in prioritising high-risk categories, including proteins, packaging, facilities management and construction, and informs the development of our due diligence and supplier engagement plans. Fair Supply's methodology also enables GYG to benchmark year-on-year progress, monitor risk trends, and provide an evidence-based foundation for reporting under the Modern Slavery Act 2018 (Cth).

Integration into Enterprise Risk Management Process

Modern slavery and broader human rights risks are now recognised within GYG's Risk Management framework. During FY25, modern slavery considerations were incorporated into the enterprise risk register and discussions of the Risk Strategy Forum, enabling alignment between operational risk assessments, procurement decisions, and corporate governance oversight. This integration ensures that potential human rights impacts are considered alongside other strategic and operational risks, and that mitigation actions – such as supplier due diligence, audit outcomes, or remediation activities – are reviewed through existing governance processes.

GYG Supplier Code

In this period, GYG has developed a GYG Supplier Code, embedding explicit prohibitions against forced and child labour alongside standards for environmental protection, animal welfare and corporate governance. The intention is for this Code to be embedded in the procurement process for supply chain and across all business units, for existing suppliers and onboarding new ones.

Supplier Engagement

Using outputs of the Risk Assessment, we conducted targeted engagement with high-risk suppliers in meat, poultry, packaging and clothing suppliers to further understand their own policies and processes relating to human rights and supply chain risks. Suppliers were able to share their Sedex Members Ethical Trade Audit (“SMETA”) audit reports used to assess labour standards and performance as well as areas for improvement.

Procurement Practice

During FY25, GYG continued to strengthen procurement governance to ensure that ethical sourcing expectations are clearly defined and operationalised across the business. ESG and human rights considerations have been progressively integrated into supplier onboarding, contract renewal, and tender processes. This includes requiring suppliers to acknowledge the GYG Supplier Code and provide supporting documentation – such as certification, audit reports or policies – demonstrating compliance with labour, health and safety, and ethical trade standard.

Measuring the Effectiveness of our Actions

GYG continues to monitor its modern slavery risk management approach through:

- Comparison of FY25 and FY24 Fair Supply risk scores and sector profiles.
- Supplier engagement and follow-up tracking for high-risk categories.
- Internal reporting to the Board and Senior Leadership Team on progress and risk changes.
- Incorporating training into onboarding and ongoing awareness programs for employees in restaurant group and Hola Central (head office).

Consultation Practices

GYG is committed to transparency and collaboration across its business network. In preparing this statement, GYG consulted with entities it owns or controls to ensure a consistent understanding of modern slavery risks, responsibilities, and actions.

Consultation across GYG entities

- **Identification of entities:** GYG identified all entities within its ownership and control, including corporate restaurants, subsidiaries, and franchise operations, to ensure their inclusion in the consultation process.

- **Structured engagement:** Regular meetings are held with senior leaders and relevant departments to discuss operational performance, modern slavery risks, and progress on due diligence initiatives.
- **Consultation with the responsible entity:** Guzman y Gomez Limited, as the reporting and responsible entity, coordinated the preparation of this statement in consultation with relevant subsidiaries and business functions.
- **Initial briefing:** Senior leaders and departmental heads were briefed on the statement's purpose, scope, and reporting requirements.
- **Ongoing collaboration:** Open communication was maintained throughout the drafting process to gather input from legal, procurement, people, operations, and sustainability teams.
- **Review and approval:** A draft statement was reviewed by key stakeholders before being finalised and approved by GYG's Board, confirming shared accountability for the commitments outlined.

Our Future Focus Areas

In FY26, GYG intends to:

- Conduct deeper engagement with suppliers in high-risk categories (particularly proteins, packaging, facilities management, and construction).
- Highlight human rights and modern slavery guidelines in the Supplier Code through supplier engagement and training sessions.
- Further develop the internal due diligence framework for assessment, remediation and reporting of human rights and modern slavery risks.
- Build internal awareness through onboarding materials and team meetings.
- Integrate modern slavery due diligence into the Risk Strategy Forum meetings to embed progress across the organisation.
- Strengthen governance oversight.

Guide to This Statement

MODERN SLAVERY ACT CRITERION	CRITERION	REFERENCE IN THIS STATEMENT
(a)	Identify the reporting entity	Title (page i)
(b)	Describe the structure, operations and supply chains of the reporting entity	About GYG (pages 2-4,6)
(c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any that the reporting entity owns or controls	Understanding and Assessing our Risk (pages 8-10)
(d)	Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	How we manage Modern Slavery Risk (pages 6-7, 11-12)
(e)	Describe how the reporting entity assesses the effectiveness of such actions	Measuring the Effectiveness of our Actions (page 13)
(f)	Describe the process of consultation with (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a (joint modern slavery) statement under section 14, the entity giving the statement	Consultation practices (pages 14-15)
(g)	Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Future Focus Areas (page 16)

Guzman y Gomez Limited (“GYG”) is committed to conducting business ethically, responsibly, and in compliance with applicable laws and standards relating to human rights.

This Modern Slavery Statement has been prepared to meet the reporting requirements under the Modern Slavery Act 2018 (Cth) (“the Act”) for the financial year ending 30 June 2025.

This statement outlines GYG’s structure, operations, and supply chains; the risks of modern slavery practices; the actions taken to assess and address those risks; and the processes for assessing effectiveness.

