

Papa John's (GB) Limited

Modern Slavery Statement

Financial Year 2022 – 2023

This statement is made pursuant to section 54 of the **Modern Slavery Act 2015**. It sets out the steps that Papa John's (GB) Limited (referred to below as Papa Johns GB) has taken during the 2022/2023 financial year to prevent slavery and human trafficking from taking place in its supply chains or in any part of its business. It also sets out the additional steps we plan to take going forwards.

Papa Johns (GB) is a wholly owned subsidiary of Papa John's International Inc ("Papa Johns International"). Where we refer to both Papa Johns (GB) and Papa Johns International, we use the term "Papa Johns" otherwise all references to we or our is to Papa Johns (GB).

This is our first Modern Slavery Statement.

Introduction

Modern slavery crimes are abhorrent and Papa Johns firmly believe that there is no place for them in the world today. Papa Johns is committed to acting responsibly and to improving its practices to combat all forms of slavery, forced labour and human trafficking with a view to ensuring that its business and supply chains are free from human rights abuses.

About Papa Johns


Papa Johns is the world's **third-largest pizza delivery company** with more than 5,300 restaurants across 49 countries and territories. We operate via a 100% franchised business model, but all of our operations make the same promise:

“BETTER INGREDIENTS. BETTER PIZZA”

Papa Johns International's main global hub is based in Atlanta, US with another hub for its finance, supply chain, Integrated Delivery System (IDS) and legal team in Louisville Kentucky.

Papa Johns (GB)'s main office, international hub and manufacturing facility are all based at one site in Milton Keynes UK.

PAPA JOHNS (GB) AT A GLANCE



180 employees
across the UK

In the UK, our employees work across Corporate Head Office, Manufacturing and Distribution.



1 corporate
office in Milton
Keynes

Our International Hub is based in Milton Keynes. The site incorporates manufacturing, and we make our own dough here and distribute it across the country to our franchisees.



Over 530
franchised
outlets

Many of our franchisees run multiple outlets.

Papa John's GB - Our organisational structure

Papa Johns (GB) is part of the Papa Johns group (**Group**), and our parent company is Papa John's International. Papa Johns (GB) also has a wholly owned subsidiary PJ Corp Stores Limited which is also headquartered in Milton Keynes and who operates a number of stores subject to a franchise agreement with us.

Board of Directors of Papa John's International

Papa Johns International has a Board of Directors (the Board) that predominantly consists of directors who are independent based on the Nasdaq Rules for director independence. The Board is led by an independent non-executive chair. The Board also has three committees:

Audit Committee

The Audit Committee has primary responsibility for representing and assisting the Board in fulfilling its oversight responsibilities for the accounting, financial reporting and internal control functions of the Group including:

- i) accounting and financial reporting processes;
- ii) the independent auditor's qualifications, independence and performance; and
- iii) compliance with legal and regulatory compliance.

Compensation Committee

The Compensation Committee determines the compensation of the CEO and all other senior officers and assists the Board in carrying out its responsibilities in relation to the Group's overall compensation strategies.

Corporate Governance and Nominating Committee

The Corporate Governance and Nominating Committee assists the Board in identifying individuals for service as directors or Board committee members, develops and oversees the process for evaluating Board effectiveness and oversees the development and administration of the Group's corporate governance guidelines. The committee is also responsible for overseeing the Group's code of ethics and business conduct and it reports to the Audit Committee as needed. It also reviews the code of ethics and business conduct annually and recommends changes to the Board as appropriate

For each of the committees, there is a charter which can be viewed on Papa Johns International's corporate governance site <https://ir.papajohns.com/corporate-governance-0>

Key people

INTERNATIONAL:

At a corporate international level, we have a President and Chief Executive Officer, Rob Lynch, and a Chief International Officer, Amanda Clark.

UK

The senior leadership team for Papa Johns GB in the UK consists of the following **key individuals**:

- UK Managing Director - Christakis Phylactou
- Vice President, HR (UK and International) - James Furnell
- Senior Director UK Operations and International Ops Excellence - Lee Reed
- Senior Director, UK Corporate operations - Grant Read
- Director of Business Development - Amit Pancholi
- Director UK Marketing – Rebecca Carroll
- Vice President, International Technology and Digital – Rob Beattie

Our supply chains

We are proud to partner with suppliers that we know and trust. We partner with predominantly larger food and packaging businesses as they have the capacity to meet our ever-growing volumes, though we do work with smaller businesses that meet our commercial and ethical requirements. We only use suppliers that have Global Food Safety Initiative (“GFSI”) certification. Our procurement teams also receive training on our Code of Ethics and Business Conduct. The most recent round of training was given in December 2023.

In the UK, we make all the pizza dough used in our pizzas at our Quality Control Centre (QCC) in Milton Keynes, which processes up to 100,000 fresh doughballs every day. A team of 60 people work in shifts to prepare the twice weekly delivery of fresh dough to every store in the UK. We also consolidate food supplies centrally, which we then distribute to our network of franchise stores.

Our purchasing scale and expertise has two key benefits:

- Firstly, it allows our franchisees to enjoy the benefit of a much bigger business, assisting them to be competitive even when they are small enterprises;
- Secondly, it means we are able to ensure that all ingredients used in any of our franchise restaurants are purchased from our trusted suppliers, each of whom has signed up to certain ethical policies (see further below). Robert Taylor our Senior Director QCC and Supply Chain, has overall responsibility for our dough manufacturing and distribution along with all the warehousing for the food ingredients.

We also source the packaging in which our food is delivered to customers. This approach means that although our UK business is based on a franchise model, we have oversight of key areas and this greater control means we can more effectively tackle modern slavery within our supply chains.

We operate a supplier on-boarding process which focuses on food safety, quality and manufacturing capabilities. Before we engage our suppliers we send them guidance on our expectations regarding food safety, authenticity, product formulation as well as our ethical information requirements. As part of that guidance, we ask prospective suppliers to provide copies of their modern slavery policies and for confirmation of how they monitor their supply chains. Our contractual agreements stipulate our ethical standards, prohibit suppliers from using forced or child labour or facilitating human trafficking and oblige suppliers to communicate those policies throughout their organisations. We encourage suppliers to use Sedex which undertakes ethical trading audits and monitors compliance with ethical trading standards. Sedex is an independent industry-leading platform which provides data and insight to manage and report risk within our supply chain. Our suppliers are required to comply with our Modern Slavery Policy, which is appended to our supply agreement and other commercial contracts.

Recruitment

At Papa Johns, we believe that our people are our best ingredient. We take recruitment seriously and we understand the potential risk that exists for the supply of candidates through agencies to be targeted by traffickers and unlicensed gang masters.

We also use reputable recruitment agencies to identify and source candidates for employment opportunities with us. The recruitment agencies screen candidates as part of their process and we obtain copies of passports for all employees.

Papa Johns also recognise that the temporary need for workers to meet seasonal demands can be high risk in terms of exploitation and forced labour. To mitigate this risk, we ensure that none of our work is seasonal.

Franchisees

Although franchisees operate their own teams independently we share with them the tools and policies we use to enable them to operate to the same standards as we do.

Before we grant a franchisee a right to franchise and operate a Papa Johns store, we conduct a vetting process to ensure that a potential franchisee is capable of running a Papa Johns store in accordance with our high standards. Our franchisees must comply with our policies, and this extends to obligations to ensure their employees, such as delivery drivers, are legally and ethically hired. All franchisees are required to sign up to our franchisee code of conduct. We carry out regular audits of our franchisees' stores and operations to ensure they meet our standards and our standard franchise agreement includes specific anti-modern slavery compliance provisions which all franchisees must comply with. We reserve the right to terminate a franchise agreement in the event of a serious ethical or operational breach.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. One of our core values is “DO THE RIGHT THING” and we strive to embed this into our culture. To this end, we have a number of policies in place which are set out below.

Modern Slavery Policy

Our Modern Slavery Policy, which can be accessed here <https://www.papajohns.co.uk/pdfs/modern-slavery-policy.pdf>, reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our Modern Slavery Policy is applicable to both our employees and to our suppliers. With respect to our employees, our Modern Slavery Policy obliges employees to report any suspicious activity to our Anti-Slavery Officer so that it can be investigated. This policy is closely linked to our Whistleblowing and Grievance Policies which encourage reporting without fear of repercussions (see below).

With respect to our suppliers, our Modern Slavery Policy makes it clear that we will not tolerate the abuse of human rights within its supply chain, and this includes the supply chain of our suppliers. If modern slavery is found within one of our supplier’s business or supply chains, we have the ability to terminate our relationship with the supplier.

Corporate Responsibility and Sustainability Report

In 2019, Papa Johns International published its first Corporate Responsibility Sustainability Report (the **Report**) which covered the period from 31 December 2018 to 29 December 2019. Updates to the Report are released annually.

The Report and its updates gave a high-level overview of topics including:

- Corporate governance;
- Compliance and business ethics;
- Diversity, equality and inclusion;
- Fair and equitable pay and benefits;
- Responsible sourcing;
- Environmental disclosures;
- Animal welfare matters;
- Minimising resource consumption and waste;
- Economic impact on the community; and
- The Papa Johns Foundation for Building Community.

Franchise Agreements

Our standard franchise agreements contain provisions obliging our franchisees to comply with all applicable anti-slavery and human trafficking laws, including the Modern Slavery Act 2015. In addition, the franchisee must report any actual or potential slavery or human-trafficking offences to us in order for it to be investigated.

Code of Ethics and Business Conduct Policy

Papa Johns' commitment to conducting its business lawfully, responsibly and with the highest moral and ethical standards is set out in an internal Code of Ethics and Business Conduct Policy (the Code) which was most recently approved in August 2022. The Code applies to the entire Group and sets out the expectations of every person within it. It covers key areas including:

- Honesty and fair dealing;
- Conflicts of interest;
- Use of corporate assets;
- Confidential and proprietary information;
- Data privacy;
- Maintaining books and records;
- Public disclosure;
- Compliance with law, rules and regulations; and
- Reporting and violations.

The Corporate Governance and Nominating Committee (the Committee) is responsible for overseeing the Code and it reports to the Audit Committee as needed. The Committee also reviews the Code annually and recommends changes to the Board as appropriate. Regular reviews of the Code ensure that it is always up-to-date and relevant and also ensures it is at the forefront of the business.

The Code sets out the ways in which possible misconduct or any concerns or queries can be raised. In the first instance, team members are encouraged to contact their supervisor, manager, Human Resource Business Partner or the Chief Legal Officer, as appropriate.

In addition, the Group retains a third party service provider, EthicsPoint, which any team member can contact 24/7 either by phone or via their website in order to confidentially and anonymously (so far as is legally permitted) report a potential misconduct or concern.

The Audit Committee has also adopted the Audit Committee Concern Reporting Procedures which discusses, in detail, the process for submitting and reviewing complaints or concerns regarding accounting, auditing matters, and potential or actual violations of any of Papa Johns' policies (including the Code) or of any other applicable laws or regulations. We believe that transparency is key to giving our people the confidence to report ethical or other breaches, which is why this document can be accessed internally via the Papa Johns intranet.

Finally, the Code sets out the repercussions of non-compliance, which could include disciplinary action, termination of contract and referral for criminal prosecution.

Grievance and Whistleblowing Policies

In order to encourage the reporting of illegal acts, Papa Johns operates a Whistleblowing Policy. The policy states that, under certain circumstances, employees are protected from suffering any detriment or termination of employment if they report misconduct or wrongdoing, or suspected misconduct or wrongdoing.

In addition, we operate a three stage grievance procedure as set out in our Grievance Policy. This allows employees to raise a grievance or concern internally, and escalate the same to the next level if the grievance is not resolved.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we ensure that we have a procurement policy in place, and we monitor and audit our suppliers. The supplier on-boarding processes primarily focusses on ensuring food safety, quality and manufacturing capabilities but we ensure that our contractual arrangements contain a robust position with respect to modern slavery (see the section on supplier adherence below).

Supplier adherence to our values and ethics

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain, including contractors, comply with our values and ethics we include anti-slavery provisions in our contractual arrangements, and we also incorporate and require compliance with our ethical standards and Modern Slavery Policy. We have an audit schedule for our suppliers to ensure their compliance with our policies. If any of our suppliers are found to be non-compliant, we reserve the right to terminate the relationship.

We also intend to commence the process of developing a supplier code of conduct which will incorporate obligations on our suppliers to comply with specific ethical standards including anti-slavery and anti-human trafficking.

Our effectiveness in combatting modern slavery

At Papa Johns, we are pleased to report that we have never had an incident where slavery or human trafficking has been discovered or suspected within our business or supply chain. However, this has not made us complacent and we continually strive to find new ways of ensuring our business is free from human rights abuses.

As part of our commitment to having a positive impact, we intend to conduct an externally facilitated review of our corporate social responsibility activities to bring insights on ways we can improve, including ways to tackle slavery and human trafficking. We plan to use the findings of that review to strengthen our position across a range of areas, with a view to ensuring we have a positive impact on all aspects of society, including economic, social, and environmental.

Further steps

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains, we intend to take the following further steps to combat slavery and human trafficking:

1. Review and update the existing anti-slavery and anti-human trafficking clauses in our contractual arrangements with a view to strengthening these where possible;
2. Finalise our supplier code of conduct and incorporate it into our contractual relationships with suppliers; and
3. Review the findings of the external review with a view to implementing new strategies and ways of combatting modern slavery.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our anti-slavery and anti-human trafficking statement for the financial year ending 2024. It was approved by the Board February 2024.

Signature:



Managing Director

Papa John's (GB) Limited

Date: Apr-08-2024