



Just Eat plc

MODERN SLAVERY STATEMENT (FYE 31 DEC 2016)

1 **Statement on modern slavery and human trafficking**

Just Eat is opposed to slavery, servitude, compulsory or forced labour and human trafficking (together, "Modern Slavery"). Just Eat is committed to ensuring that no Modern Slavery takes place in any part of the business which Just Eat controls, or within its supply chain.

2 **Modern Slavery risk in the context of Just Eat's business**

- 2.1 In all jurisdictions in which Just Eat operates, its corporate activities are concerned with the provision of online services to takeaway restaurants and ancillary or related services. Just Eat typically provides those services via locally incorporated and managed companies, each of which is indirectly owned or controlled by Just Eat plc. None of the jurisdictions in which Just Eat provides its services ranks highly on the Global Slavery Index¹.
- 2.2 Just Eat does not employ significant numbers of agency workers or contractors. Where it does so, such services are invariably for the provision of skilled, semi-skilled or professional services.
- 2.3 All employees, contractors and agency workers are required to adhere to the Policy (defined below) and Just Eat's Code of Conduct and Whistleblowing policy.

3 **Modern Slavery risk in the context of Just Eat's supply chain**

- 3.1 Just Eat's suppliers of services are largely suppliers of highly skilled or specialist services, in particular technology services and business advisory services. A handful of services are provided by outsourced providers: these include some highly-skilled technology development and sales services in Europe, and semi-skilled data-inputting services.
- 3.2 Just Eat's suppliers of goods supply IT equipment and office consumables for use by Just Eat, as well as IT equipment for redistribution by Just Eat to takeaway restaurants. Just Eat is also supplied with various branded and non-branded goods for redistribution by Just Eat to takeaway restaurants or occasionally (typically as part of specific marketing activities) to the general public.

4 **Response to Modern Slavery risks**

- 4.1 Just Eat has no cause to suspect that Modern Slavery is currently present within its business or supply chain, nor any evidence that it has been present in the past.
- 4.2 Just Eat:
 - 4.2.1 has in place a Code of Conduct and whistleblowing policy which obliges employees and contractors to report illegal or unethical behavior;
 - 4.2.2 has adopted a straightforward Anti-Modern Slavery Policy (the "Policy"), which is primarily focused on obliging employees and contractors to report Modern Slavery, ensuring that all existing and newly inducted employees and contractors are made aware of the signs of Modern Slavery and what to do if it is detected in Just Eat's business or supply chain. Just Eat will keep this policy under review and update it periodically in line with UK Home Office guidance;
 - 4.2.3 will ensure that responsibility for continuing compliance with the Policy rests with a senior employee of Just Eat;
 - 4.2.4 will ensure that the boards of businesses in which Just Eat holds a minority interest are made aware of the Policy and will encourage them to implement policies within those businesses which are similarly aimed at reducing the risk of Modern slavery;
 - 4.2.5 engages in regular dialogue with suppliers of services, and in particular those involving any element of outsourced labour, and will adopt a risk-based approach to evaluating the risk of Modern Slavery with regard to existing suppliers and supply chains and

4.2.6 requires material suppliers of goods and services to undertake to comply with applicable laws, and where appropriate will include contractual clauses aimed at ensuring suppliers are prohibited from encouraging or engaging in Modern slavery. Just Eat will require new suppliers (or, where agreements are being renewed, existing suppliers) to adhere to them, and will conduct supply chain audits and ethical due diligence on new suppliers where any material risk of Modern Slavery has been identified.

5 **Responsibility**

The Board and senior management of Just Eat will take responsibility for implementing this statement and provide adequate resources and investment to ensure that Modern Slavery is not taking place within the business or its supply chains.

6 **Approval & publication**

This statement has been approved by the Board in accordance with the requirements of section 54(1) of the Modern Slavery Act 2015, which applies to Just Eat for the financial year ending 31 December 2016.



David Buttress
Chief Executive Officer, Just Eat plc

31 December 2016

¹ <http://www.globalslaveryindex.org/findings/>