

MODERN SLAVERY STATEMENT

As at 30 June 2022

SEAGRASS
BOUTIQUE HOSPITALITY GROUP

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1. INTRODUCTION – WHO WE ARE:

Seagrass Operations Pty Limited t/as Seagrass Boutique Hospitality Group (**'Seagrass'**) (ACN 634 378 135), and all subsidiaries (together referred to as **'Seagrass'**) are based in Rhodes, NSW. For the purposes of this statement, Seagrass is the reporting entity.

Seagrass specialises in creating innovative restaurant concepts across multiple market segments that attract customers by uniquely combining quality, taste and experience to create memorable dining occasions. With over 60 venues across Australia, United Kingdom and Dubai, our brands include The Meat and Wine Co and 6 Head (1788) in premium dining, Hunter & Barrel, Italian Street Kitchen and Butcher and the Farmer in casual dining, and Ribs & Burgers and Five Guys in the fast casual market. We employ in excess of 1,500 staff within our group.

Given the commitment we have to the quality of our products, we welcome the opportunity to report on the requirements recently established via the *Modern Slavery Act 2018* (Cth) (the **'Act'**) and, through this report, we will detail our approach and findings with respect to modern slavery risks within our business and across our supply chain. This statement will serve subsequent to our initial report filed on 21 February 2022.

2. ENDEAVOURS UNDERTAKEN SINCE LAST REPORTING:

- Created an internal committee to oversee the reporting requirements of the Act;
- Developed a detailed supply chain Modern Slavery Self-Assessment Checklist (the **'Checklist'**) designed to:
 - 2..1. Enable businesses to assess and address modern slavery risks as required under the Australian Modern Slavery Act (Cth) 2018.
 - 2..2. Support the identification of modern slavery risks;
 - 2..3. Foster collaborative efforts to address these risks;
 - 2..4. Improve transparency; and
 - 2..5. Identify areas for further due diligence.
- Finalise and get ready to issue the Checklist to members of our supply chain.

3. **MODERN SLAVERY FRAMEWORK:**

In order to mitigate Modern Slavery risks within our organisation, Seagrass has adopted the following process to assess such risks:

- Strategise and Design
- Assess and Categorise
- Issue Checklist
- Review Feedback
- Report Findings

Strategise and Design:

Within Seagrass, we established an internal committee to oversee the reporting requirements under the Act. The committee contained members within the procurement, legal, human recourse and culinary teams (the '**Committee**').

The Committee worked internally, to establish the entire supply chain within the Seagrass group. Following review, the Checklist was created which served the primary purpose of identifying modern slavery risks within Seagrass and its supply chain.

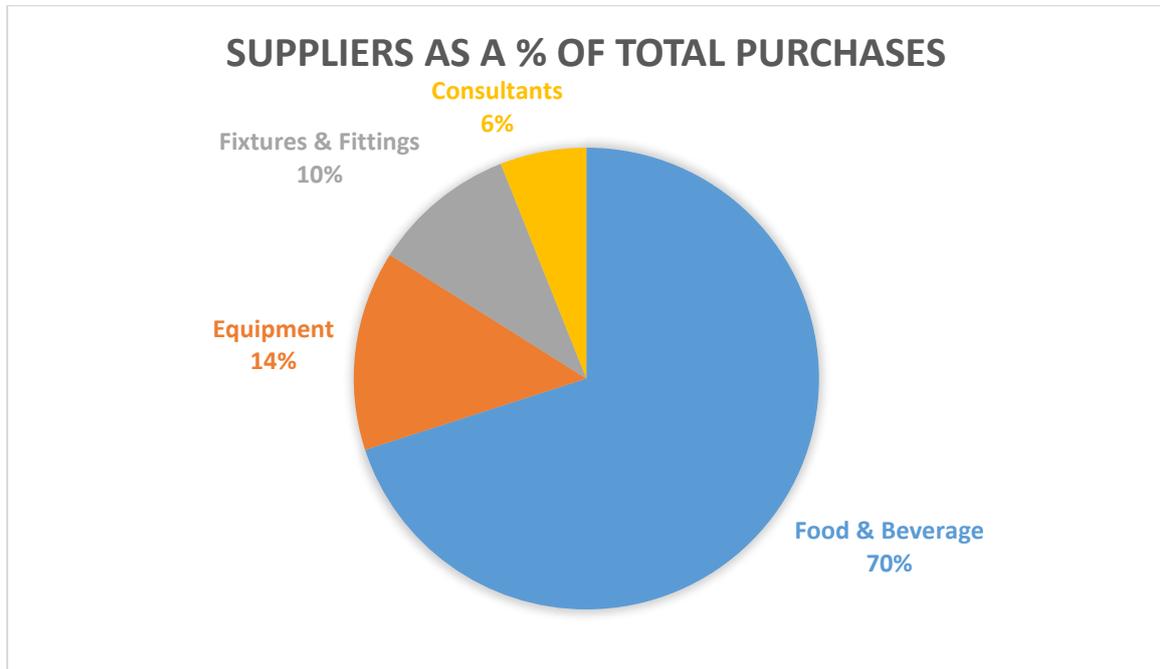
Assess and Categorise

As a business, with a supply chain of in excess of 1,000 supplies, both domestically and worldwide. As a result, the Committee made a decision to focus on procurements and suppliers that involve high risk goods or services, certain geographic locations and high-risk sectors.

As a result, the Committee selected a group of 100 suppliers in an initial round of analysis, and issued the Checklist for completion and categorised the group of suppliers in the following categories:

- Food & Beverage
- Equipment
- Fixtures & Fittings; and
- Consultants

From the initial 100 suppliers selected, the percentage which fall in the above categories is as follows:



Issue Checklist – COVID Update

Due to the extended COVID lockdown, our head office staff were stood down from work within the first six (6) months of FY22. As a result, it stalled our progress on finalising the Checklist. Notwithstanding this, upon return to work in 2022, the Committee finalised the checklist and planned issue to our supply chain on 12 July 2022. We can confirm, on 12 July 2022, the Checklist was issued to the 100 members referred to above. Final return dates of the Checklist were requested to be due by 28 September 2022, providing members in excess of two months to respond.

4. SEAGRASS' CURRENT POLICIES AND PROCEDURES IN PLACE

To minimise the risk of Modern Slavery within Seagrass' operations, the following policies and procedures are in place, readily accessible and provided to all staff:

- All staff are paid in accordance with the appropriate industry award taking into consideration all applicable legislation;
- Recruitment policies in place to ensure employees are of working age and choose to work without duress and at their free will;

- Employees have access to a thorough and compliant Orientation & induction program, in order to fully integrate into the business and their role;
- Training in accordance with their position is conducted prior to operating independently, with periodic training refreshers & procedural updates given through mediums such as pre-shift briefings, workshops, E Learning, and Nationally Recognised Qualifications; and
- Fair evaluation of skills takes place at time-appropriate intervals, which gives employees the opportunity to receive and provide feedback in regards to their training, employment experience, and ongoing development.

In addition to the above, Seagrass' HR team have created a number of policies and procedures in place to protect our staff from a range of employment related issues such as:

- Whistleblowing Standard;
- Appropriate Behaviour in the workplace standard;
- Recruitment Standard;
- Performance Management Standard;
- Disciplinary Action Standard;
- WHS Standard & Procedures;
- Sponsorship Standard;
- Employee Handbooks;
- HR & Payroll Standard;
- Long Service Leave Standard;
- Social Media Standard;
- Privacy Standard; and
- Company Culture Statement.

5. MOVING FORWARD:

Seagrass will await feedback from the Checklist to determine the Modern Slavery Risks within our supply chain. Further to this, it is our intention to continue with the Checklist process and expand our suppliers outside of the 100 initial selected members with the view of comparing results with the initial data selected.

6. **GOVERNANCE:**

Seagrass, being a management entity, ensures all its subsidiaries incorporate all the policies and procedures put in place at management level across all associates restaurant groups. Seagrass meets with the management team employed across all brands regularly and modern slavery risk are discussed frequently.

The related entities of Seagrass and all subsidiaries have the same Board of Directors, and therefore Directors of all related entities have been consulted in preparing this Modern Slavery Statement. Bradley Martin Michael is the Company Secretary of all the Reporting Entities and has taken an active role in ensuring there has been engagement and consultation with each entity.

This statement is made pursuant to the Act and constitutes Seagrass' Modern Slavery statement in respect of the 30 June 2022 financial year and is approved by the principal governing body of Seagrass, being its board of directors.

This statement has been approved by the Seagrass Board of Members.



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