

MODERN SLAVERY STATEMENT

As at 30 June 2023

SEAGRASS
BOUTIQUE HOSPITALITY GROUP

The Reporting Entity:

This statement addresses the obligations and compliance of Seagrass Holdco Pty Limited ABN 91 634 224 936 together with its affiliated entities and subsidiaries ('Seagrass') in relation to the Modern Slavery Act 2018.

The Structure:

Seagrass is a management entity which operates hospitality venues predominately in Australia such as 6 head (1788), The Meat & Wine Co, Hunter & Barrel, Italian Street Kitchen and Ribs & Burgers. Seagrass is the ultimate beneficiary of each operating entity which it manages, with each company operating in its capacity as a separate legal entity.

As at 30 June 2023, Seagrass employs 1,920 employees in Australia. Seagrass employs an additional 268 staff in international regions determined as follows:

- 3 in the United Kingdom;
- 127 in the United Arab Emirates; and
- 138 in South Africa.

The Operations and Supply Chain Summary:

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.

At Seagrass, we have an established range of suppliers specifically in the meat, dairy and produce sectors of the market. We regularly source premium products with a focus of securing supplies from Australian based providers. These products are quality tested and established training guides are in place, governed by Seagrass, to ensure all products meet our standards and specifications prior to serving to our customers.

Seagrass purchases goods and services predominately from suppliers and contractors in Australia. When importing items from International Regions, Seagrass engages the services of domestic companies to oversee the procurement and transport of such items to take advantage of their economies of scale and buying power given Seagrass does not specialize in foreign markets. For example, Seagrass' restaurants stock and sell foreign wines, however such wines are purchased from domestic wholesalers.

The Risks Within Operations and Supply Chains:

The hospitality sector is vulnerable to modern slavery risks, such as forced labor and trafficking, due to the use of low-skilled and migrant workers. Managing modern slavery risks in procurement and supply chain is essential, and the hospitality industry should encourage suppliers to adopt responsible business practices.

To address this, in FY23, Seagrass undertook an assessment of its supplier list to locate the top 100 utilized suppliers (in terms of dollars spent). With the assistance of market leaders

such as Sedex, Seagrass prepared and sent a detailed Modern Slavery Checklist (Self-Assessment) to each selected supplier. A summary of the Checklist appears at the end of this report.

The Modern Slavery Checklist (Self-Assessment) comprised a detailed questionnaire targeting five key risk areas in procurement:

1. Regulatory Compliance,
2. Internal Policies,
3. Supply Chain Management,
4. Previous Violations, and
5. Worker Treatment.

Of the 100 suppliers, as at 30 June 2023, Seagrass received 81 responses.

The suppliers were then classified using the Risk Matrix into four categories:

1. Satisfactory,
2. Risk-Low,
3. Risk-Incomplete, and
4. Risk-Assess.

Risk Assessment Results:

Based on the responses received from the Checklist, the results were summaries as follows:

- **Satisfactory:** 27 Suppliers, fully compliant with no areas of concern
- **Risk-Low:** 21 Suppliers, partially compliant with minor concerns
- **Risk-Incomplete:** 24 Suppliers, lacking information due to inapplicable or unanswered sections
- **Risk-Assess:** 9 Suppliers, with significant concerns due to most sections being unanswered

19 out of the 100 suppliers failed to reply to the Checklist despite numerous follow ups. These suppliers were subsequently notified of the risks involved in non-compliance with the request including but not limited to Seagrass no longer engaging in transactions with said supplier.

Actions Taken:

For suppliers with satisfactory and low-risk results, a regular monitoring system will be implemented to ensure continued compliance. Those who fell under Risk-Incomplete and Risk-Assess categories will require more tailored strategies. We have engaged in active dialogue with them to understand and address their specific concerns.

From the level of response received, Seagrass has identified no significant areas of concerns with respect to the Act. Seagrass is however concerned with the level of engagement and response from its supply chain on the Checklist.

As a result of the above, Seagrass has recognized the diversity within its supply chain, and is working on developing a more tailored approach for the small businesses who makes up a large portion of our supply chain. There's a need to adapt our checklist and risk assessment to accurately assess these businesses which Seagrass is currently actioning.

Our risk assessment has revealed various levels of compliance amongst our suppliers, highlighting areas for concern and improvement. Moving forward, a focus on dialogue, adaptation of the checklist, and regular monitoring will be vital in ensuring continued compliance and progress in our efforts against modern slavery.

In addition, given Seagrass now has an adequate framework of responses, it can utilize these to compare future results to ensure continual improvement from suppliers within the supply chain.

Specific Actions Taken for Incomplete or Information-Lacking Responses:

Seagrass has determined, based on the feedback received from the Checklists, further education and assistance is required to be provided to the suppliers who provided incomplete responses.

As a result, Seagrass has shared with a number of its supplies redacted versions of our policies and procedures such as Seagrass':

- Whistleblowing Standard;
- Disciplinary Action Standard;
- WHS Standard & Procedures;
- Employee Handbooks;
- HR & Payroll Standard;
- Long Service Leave Standard;
- Social Media Standard;
- Privacy Standard; and
- Company Culture Statement.

Seagrass has also established clear communication channels, focusing predominately on small businesses, with our suppliers to assist in understanding and implementing the above standards and procedures which Seagrass views as imperative to help address Modern Slavery Risks.

Specific Actions Taken for Non-Responsive Suppliers:

Seagrass has placed all suppliers who failed to provide responses to the Checklist on notice that supplier accounts will be ceased until such time responses are received or adequate reasoning is provided on why responses were not submitted within the required timeframe.

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 2023 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.



Shadi Harb

In House Counsel – shadi@seagrassbhg.com

THE MODERN SLAVERY CHECKLIST (SELF-ASSESSMENT) SUMMARY

The Modern Slavery Checklist (Self-Assessment) includes a variety of questions, focusing on five key areas of risk related to modern slavery:

1. **Regulatory Compliance:** Questions in this section assess whether suppliers are legally compliant with modern slavery regulations, including reporting under the Modern Slavery Act (Cth) 2018 (q 1.7) and conformance with third-party fair labour codes of conduct or certification (q 1.6).
2. **Internal Policies:** This section examines the suppliers' internal policies and procedures to mitigate the risk of modern slavery. These include policies and processes to identify, investigate and remedy modern slavery risks within the organisation (q 2.1), provision of training for workers on modern slavery risk (q 2.2), and having a policy or process that prohibits modern slavery, including all forms of forced labour, bonded labour and human trafficking in its operations and in those of its suppliers (q 2.12).
3. **Supply Chain Management:** Questions here focus on the visibility and management of the supply chain (q 1.2, q 1.8), including due diligence on suppliers (q 2.4), requirement for suppliers to conduct due diligence on their suppliers (q 2.5), and actions taken when modern slavery practices are suspected (q 2.6).
4. **Previous Violations:** This section involves a review of any past breaches of human rights regulations related to modern slavery and labour standards (q 2.3).
5. **Worker Treatment:** The final section focuses on the treatment of workers, encompassing a wide range of topics from identity document retention (q 2.13) and wage deductions (q 2.15), to mechanisms for workers to raise grievances (q 2.23, q 2.24), ensuring child labour is not being used within the organisation or by the suppliers (q 2.10), compliance with the United Nations ILO Conventions (q 2.9), and providing workers with adequate living conditions where applicable (q 2.18, q 2.19).