

EWH	SOCIAL RESPONSIBILITY AND MODERN SLAVERY POLICY AND PROCEDURE FOOD SAFETY MANAGEMENT SYSTEM	Doc No: PR 19 Page No: 1 of 12 Rev: 2 Date: 05.05.25
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PURPOSE:

To ensure that EWH Food Services is socially responsible and does not engage in modern slavery.

SCOPE:

This procedure applies to all aspects of the Company's operation including contractors and labour hire staff.

REFERENCES:

ISO 22000:2018
PRP 3 Document and Data Control

DEFINITIONS:

RESPONSIBILITIES AND AUTHORITIES:

The Managing Director is responsible for ensuring compliance with the requirements of the procedure.

RECORDS:

Nil

SOCIAL RESPONSIBILITY POLICY

At EWH Food Services we take our ethical and social responsibility seriously.

We are fully committed to meeting all New South Wales and federal Australian laws and regulations regarding:

- Business Integrity and Ethics,
- Transparency,
- Labour (including child labour, legal eligibility to work, forced labour, harassment or abuse, non-discrimination, freedom of association and right to collective bargaining, grievance mechanisms, wages, and benefits, working hours, health and safety),
- health,
- safety,
- the environment,
- bribery and corruption,
- supply chain.

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SOCIAL RESPONSIBILITY PROCEDURE

1. Business Integrity and Ethics

- EWH operates in compliance with applicable NSW and Australian legislation related to worker welfare, health and safety, and environmental compliance.
- EWH has the following documentation and licencing for legal operation:
 - Registration as an Australian business,
 - NSW Food Authority registration and licencing,
 - Fire Safety certificates submitted to Georges River Council,
 - Solid waste is removed by a contractor registered with the NSW EPA.
- EWH ensures all of the permits, records and certificates required are maintained and are correct.

2. Transparency

- EWH is transparent with their policies, processes, and records to major customers and affiliated partners.
- If there is an assessment of the Company's Social responsibility, EWH allows assessor(s) full access to its facility premises, workers, and records.
- EWH will not interfere with assessor(s) during the worker interview process or will not "coach" workers to provide false or misleading responses to questions during interviews.
- EWH will provide complete and accurate documents related to payroll, time, attendance, and production records for the past 12 months at the minimum, or longer if available.
- EWH will not hide workers and premises (e.g., warehouses).
- There is no subcontracting or moving production capacity to another site or a worker's home.

3. Bribery and Corruption

- EWH does not offer, pay, solicit, or accept bribes, including payments, gifts, or other favours intended for inappropriate business advantages to and from customers, customer's representatives, third-party auditing firms, customs or trade officials, sub-tier suppliers, recruiting agents, and etc.
- EWH does not bribe assessors in form of any monetary compensation, gifts, or favours that may impact the outcome of the assessment.

4. Management Systems

- The Managing Director has ultimate responsibility for all compliance requirements in the facility or facilities and for providing the resources required for compliance.
- The Managing Director is aware of local law regulations and customer requirements and with senior managers routinely monitors changes in legal compliance.
- EWH has documented the policies and internal procedures to oversee all aspects of compliance, including, but not limited to code of conduct, health and safety, environment, recruitment practices, worker welfare and etc. in this procedure and the key aspects are communicated to all workers through the Mission Statement and Employment Policies when the statement is explained, and a copy is signed by workers when they commence employment with the company. Their signature indicates agreement.

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- Training and training materials are provided in English and all workers have at least basic functional English and training records are maintained on a regular basis.
- There is regular review and update of policy and systems (e.g. meetings with management and workers, workshops and trainings) with changes documented and communicated to workers.
- EWH does not import products, but, if necessary, will communicate relevant standards and expectations of the Responsible Sourcing Policy to suppliers by e-mailing them a copy.
- EWH conducts internal audits of the food safety and quality management system (at least annually) to identify improvement opportunities. Audit reports are maintained and available for review.

5. Modern Slavery

- Australia's *Modern Slavery Act (Cth) 2018* defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour services; and the worst forms of child labour.
- EWH does not engage in Modern Slavery.
- The general company employment practices are defined in this procedure.
- EWH approved suppliers do not engage in modern slavery practices.
- If raw materials are sourced directly from geographical areas where there is a known risk of modern slavery practices the supplier is asked to confirm the companies supplying the raw materials do not engage in modern slavery practices.

6. Hiring, Disciplinary and Termination Practices

- Employment practices are non-discriminatory.
- Workers are employed under the applicable awards which cover work hours, wages and payments, unless more generous provisions are offered.
- Workers are not required to pay EWH to obtain work.
- Workers are not required to leave deposits, identity papers (e.g., passports or visas) or bank cards with EWH.
- Workers are given a copy of the Mission Statement and access to relevant policies when they commence employment.
- Workers are given a Letter of Engagement that outlines the position, terms and conditions of employment including wage, hours of work, overtime and leave entitlements for permanent employees, obligations and confidentiality.
- Probationary periods for permanent workers are outlined in the Letter of Engagement.
- Workers are provided with suitable working conditions.
- Workers are treated fairly and with respect.
- If disciplinary action is required, the following disciplinary policy is followed.

Disciplinary policy:

- Managers and supervisors are trained in the disciplinary procedures and worker engagement practices.
- Where possible every attempt is made to provide guidance or on the job training by a supervisor or manager prior to the need for disciplinary action.
- The worker is treated with respect and the issue discussed with them explaining

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what is required, the consequences if the worker does not address the issue (i.e., further escalation) and the issue is documented.

- Workers are informed when any disciplinary procedure has been initiated against them and they have the right to appeal without fear of reprisal during this process.
- If the issue is not resolved and formal disciplinary action is required, warning letters are provided following the requirements of the Fair Work Act including the acknowledgment of the worker.
- If necessary, the process will be followed to suspension and termination with accurate written records maintained to support the action taken.

7. Child Labour

- Child labour refers to work that:
 - Is mentally, physically, or morally harmful to children.
 - Prohibits educational or social development.
 - Deprives them of the opportunity to attend school.
 - Obliges them to leave school prematurely.
 - Requiring them to attempt to combine school attendance with excessively, or
 - long and heavy work.
- EWH does not use child labour.
- The age of workers is verified when they apply for work.
- Workers are not employed unless they are over 15 years of age.
- If workers younger than 18 are employed the following policy is in place:
 - Their legal guardian is contacted to confirm they are aware of and support the employment.
 - All legal requirements are followed including not rostering at times that affect educational programs.
 - Young workers are encouraged to pursue educational opportunities.
 - If the worker is undertaking a vocational educational program, the relevant documentation is maintained by EWH to support the worker.
 - No overtime or night work is permitted.
 - No hazardous work is permitted.
 - Other workers are made aware that the worker is not an adult and needs to be supported accordingly.
 - The appropriate minimum wage and legally entitled benefits are provided.
- If it is found that an underage worker has accidentally been employed the following remediation plan will be implemented:
 - Action will be taken to ensure the person is treated appropriately for their age and if they are not over 15 years, they will no longer be employed. The worker will be paid for the work completed and any other suitable non-financial support or guidance is provided to the worker and their family.
 - If the person is more than 15 but less than 18 the above policy will be followed.
 - There will be a review of the proof of age documents for other workers to confirm that they meet the company age requirements.
 - There will be a review to determine how the error occurred, and appropriate action taken to prevent recurrence.

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8. Forced labour

- There is no forced labour.
- Employment is freely chosen. All workers have the right to enter into or terminate their employment freely without fear of retaliation, threat of physical or mental coercion, or face unlawful notice periods.
- All overtime work is voluntary. Workers have the right to refuse overtime work without fear of retaliation or disciplinary actions.
- Workers are not to be forced to work by a family member, associate, or friend for any reason.
- Workers retain possession of their own original identification papers.
- EWH does not subject, bind, or encourage workers to employment as a condition of fulfilling terms of debt to a third party or to the employers themselves. EWH does not make personal loans to workers under circumstances where repayment terms suggest debt bondage or forced labour.
- Workers have the freedom of leaving the workplace premise at the end of their working shifts.
- Workers have the freedom of movement during working shifts to take designated breaks (e.g. bathroom, drinking water, etc.) and/or under exceptional cases where they need to take personal leave for family emergencies or illnesses, without fear of retaliation or disciplinary action.
- EWH does not have any employer-owned or controlled housing.

9. Harassment or Abuse

- EWH does not engage in or support any form of corporal punishment, mental or physical coercion such as sexual harassment and verbal abuse, as a means to maintaining labour discipline.
- EWH educate and train supervisors and managers to prohibit the use of or threat of verbal and physical violence, including slaps, pushes, screaming, yelling, demeaning language, or verbal intimidation as a means to maintaining labour discipline.
- EWH does not subject workers to psychological or mental abuse, such as signing letters of self-criticism and publicly humiliating workers who are subjected to disciplinary measures.
- EWH does not conduct pat-downs or other intrusive security measures.

10. Non-Discrimination

- EWH treats all workers with dignity and respect.
- EWH makes employment decisions (e.g., recruitment and hiring, promotions, job assignments, compensation, allowances and bonuses, etc.) on the basis of a worker's education, training, demonstrated skills, and job performance.
- EWH does not discriminate against workers based on individual characteristics, race, caste, social background, disease, ethnic and national origin, religion, age, disability, gender, marital status, pregnancy, sexual orientation, political affiliation, and/or participation in worker organisations.
- All workers have the equal opportunity for employment, promotion, training, and retirement based on their ability and job performance.
- EWH does not require pregnancy or medical testing of workers as a condition of employment. Workers are required to complete a pre-employment medical self-

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assessment to identify potential risks to food safety from the workers' health. Workers also agree to report health issues that may present a potential risk to food safety.

- EWH does not make decisions on a female worker based on her pregnancy status that may result in dismissal, threats, or disadvantages in employment benefits. Pregnant workers shall not be engaged in work that creates substantial risk to themselves and their babies.

11. Freedom of Association and Rights to Collective Bargaining

- EWH respects the right of all workers to freedom of association and collective bargaining. No workers shall be subjected to harassment, intimidation, or retaliation in their efforts to associate or bargain collectively.
- EWH adopts an open attitude towards the activities of worker representative groups and union organisations and does not interfere with or prevent these activities.
- EWH does not discriminate against union members or worker representatives by refusing to hire them or by terminating workers based on union affiliation or organising efforts.
- If there are worker representatives, they will be elected freely without company management interference.
- EWH gives worker representatives access to the workplace to carry out their representative functions, including access to workers and management.
- Where a collective bargaining agreement (CBA) is in place, EWH adheres to the terms of the agreement. The CBA shall be negotiated freely, voluntarily, and in good faith. EWH shall keep all past and present CBAs on record.

12. Grievance Mechanisms

- There are daily opportunities for most workers to interact with senior management. The following grievance mechanisms are in place:
 - A suggestion box that can be used to report issues anonymously.
 - A Complaint Resolution Form, e-mail or note can be completed and submitted to Managing Director, General Manager or Operations Manager.
 - Workers can raise issues directly with the Managing Director, General Manager or Operations Manager, either informally or formally.
 - Workers can organise a meeting with senior management and a support person – another worker, a supervisor, a worker representative or an outside friend or relative to discuss a grievance.
- Grievances are handled confidentially and if necessary, meetings are held away from an open office.
- Every attempt is made to satisfactorily address grievances in a timely manner based on engagement and dialogue.
- Workers are trained and aware of grievance mechanism options and understand that they can communicate without fear of retaliation, intimidation, harassment, or discrimination.
- The General Manager maintains a resolution history of grievances raised, including evidence of communication between management and worker, and whether or not the resolution was reached.

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13. Wages and Benefits

- EWH maintains complete and accurate payroll documents and worker profiles for each worker for at least 7 years as required by Australian Fair Work legislation.
- EWH pays at least the legal minimum wage for regular hours worked under the applicable industry awards or the wage agreed within a CBA (if applicable), whichever is higher.
- EWH pays workers correctly on overtime hours at premium rates as legally required or agreed within a CBA, whichever is higher.
- All workers are provided with written information in a language they understand about their employment conditions including wages, incentive systems, compensation and benefits, and bonuses to which all workers are entitled to under applicable law. This is generally done through the Letter of Engagement.
- EWH maintains a wage calculation example including regular hours and overtime hours (with premium). Wage calculations are communicated to workers during their inductions and acknowledged in writing by signing the letter of engagement.
- EWH provides workers with an understandable wage statement or pay slip, which includes information on days worked, standard hourly rate, overtime hours and premiums, bonus and all deductions, etc. The information may be provided electronically.
- EWH pays workers in a timely manner within the time frame specified on the Letter of engagement, generally weekly and not more than monthly.
- EWH provides all legally required benefits, including all forms of paid leave (including but not limited public holidays and sick leave), to all workers.
- EWH forwards all withholdings to appropriate government authorities as required by law.
- EWH does not take deductions from workers' wages as a disciplinary measure or any deductions from wages not provided for by law, without written consent from the worker.
- Workers are paid correctly for all paid time off (e.g. breaks and leaves) and work stoppages, if any, as required by law.
- EWH does not provide goods and services, such as housing and meals for which the cost is deducted from wages.
- EWH provides workers with all the necessary tools, personal protective equipment (PPE), and uniforms to perform work at no charge.
- Benefits, including but not limited to social insurance, superannuation, retirement benefits, severance, maternity, etc, are paid correctly and on time, as required by law.
- Wages for probationary workers are not less than the lowest wage for the equivalent job within the company.
- EWH does not change or terminate worker contracts for purposes of avoiding wage and benefit requirements.

14. Working hours

- EWH keeps complete time attendance records for each worker for at least 12 months, or longer if required by law.
- EWH maintains and communicates the standard working hours and overtime policy to all workers when they commence employment. Workers may refuse overtime work without any fear of retaliation, disciplinary actions, or punishments.
- Regular working hours shall not exceed 48 hours per week or allowable limits

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under applicable laws or CBA, whichever is stricter.

- Overtime hours shall not exceed the legal limits or 12 hours per week (total of 60 hours), whichever is lesser. The following exceptions are allowed, if:
 - Allowed by national law or CBA
 - Appropriate safety measures are implemented to protect workers
 - Suppliers can demonstrate and prove exceptional circumstances (e.g. production peaks, accidents, or emergencies)
- EWH has a management system in place to monitor, determine and remediate excessive working hours to demonstrate management and control of working hours.
- Workers are provided with at least 1 rest day for every 6 days consecutive work period or required by applicable law or CBA, whichever is stricter.
- EWH provides workers with reasonable meal and rest breaks in accordance with Australian Fair Work legislation.
- EWH complies with the legislation for workers' entitlements to public and annual holidays.
- EWH has a reliable system to keep accurate and complete time records.
- EWH provides a functioning and reliable timekeeping system that allows workers to record their own hours (e.g. sign in, fingerprint or code scanner, etc.).

15. Health and Safety (WH&S)

- EWH complies with all applicable laws regarding working conditions, good housekeeping, and provide workers with a safe and hygienic workplace. Health and safety procedures shall comply with all national and local laws.
- EWH has a health and safety policy and provide regular health and safety training to all workers. Training records are maintained.
- EWH has work health and safety committees with documented regular meetings.
- The Managing Director has ultimate responsibility for work health and safety.
- EWH provides adequate and effective ventilation to allow proper circulation of air in the workplace and maintains temperature control. Windows and ventilation systems comply with legal requirements.
- EWH provides appropriate and sufficient lighting to allow workers to see potential barriers or obstacles on their way to nearest exits, perform their jobs, and stay alert of their surroundings.
- The surrounding grounds are well lit.
- All exit routes, including but not limited to stairways, are well lit and have handrails.
- Production floors have proper construction, drainage, and maintenance to prevent workers from slipping.
- There are sufficient functional and sanitary toilets in accordance with local law per floor and gender.
- All workers have access to potable drinking water and clean water for washing.
- Smoking is prohibited within the building and in areas where there may be fire risks.
- Workers are provided with personal protective equipment (PPE) including but not limited to masks, gloves, goggles, ear plugs, guards, and boots at no cost.
- Workers have been trained on how to properly use PPEs and their benefits, and training records are maintained.
- EWH supervisors monitor to ensure that workers are correctly using the provided

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PPEs.

- EWH complies with all laws regarding machine safety and take all steps to ensure machine safety with operational safety devices or guards.
- Machines and equipment are inspected and maintained on a regular basis with records kept.
- Specialised equipment or machinery have all required and valid licenses/permits (e.g. forklifts, cargo lifts, boilers, compressors, etc.)
- Specialised equipment or machinery operators are licensed where legally required and trained in safety operating procedures.
- First-aid kits and medical care is always provided and available onsite.
 - First aid kits contain, at a minimum: bandages, cotton balls, scissors, gloves, and antiseptic wipes.
 - If required by law, EWH will conduct and pay for regular occupational health checks for workers.
 - There is access to running water in areas where cleaning chemicals are handled to allow eye or other washing to remove chemicals if there is an emergency. There are eye wash materials in the first aid kit.
- EWH has a system to identify, evaluate, and minimise risk from physically demanding work to prevent work-related injuries or health impacts on workers.
- EWH maintains a procedure for handling worker injury and incidents. All incidents are reported and recorded for at least 7 years and incidents are reported to local authorities where required.
 - EWH maintains structural and building safety and maintain all legally required building or construction certificates/reports/permits.
 - EWH conducts building inspections on a regular basis, or as required by local law or standard practice.
 - If the building is approaching maximum capacity, maximum occupancy signage is visibly posted in each room of the building, near each entrance. Maximum occupancy shall be within building permit requirements.
- EWH complies with all applicable laws regarding fire safety and take measures to plan for emergencies and prevent injuries and accidents.
 - EWH maintains all valid and legally required fire safety certificates, licenses, and inspections.
 - EWH designates an emergency response team with defined responsibilities.
 - EWH maintains a suitable fire detection and emergency alarm system that covers all areas of the production premise.
 - The emergency alarm system is audible, functional, inspected, and tested regularly.
 - Fire extinguishers are sufficient in numbers as required by local law and adequately labelled according to the types of fire emergencies that they are used for.
 - Fire extinguishers and/or fire hoses are functional and properly mounted and secured through the workplace.
 - All fire-fighting equipment, including fire extinguishers and fire hoses, is clearly marked and easily accessible with operating instructions labelled. The fire-fighting equipment is checked routinely with relevant logs maintained and Bayside council notified of compliance.
 - Sprinkler systems meet legal requirements and are regularly maintained by

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licensed professional.

- There are sufficient emergency exits in the workplace per floor, warehouse, office, etc.
- Emergency lighting is provided with backup power and included along all exit routes, including stairways. The lighting is industrial grade and inspected regularly. Anti-explosive lights are installed in areas in which flammable and combustible materials are stored.
- Emergency exits are kept clear, unlocked, and accessible at all times and open in the direction of emergency egress. Emergency exit doors meet legal requirements.
- Fire and emergency evacuation plans are posted on every floor. Evacuation plans reflect floor layout, including a “you are here” sign, and are in a language understood by workers.
- Evacuation drills are conducted regularly, at least once a year or more as required by local law, whichever higher. Evacuation drills are conducted to cover all shifts, floors and buildings, and are recorded with photos and attendee list.
- Designated emergency assembly points are large enough to safely accommodate all workers during emergency evacuations.
- Exit routes are marked and visible during fire emergencies and kept unobstructed and clear at all times.
- Workers and supervisors are trained at regular intervals in fire safety, use of fire extinguishers, and other fire prevention procedures and emergency evacuation plans. Trainings are recorded and documented.
- EWH complies with legal requirements regarding electrical safety. Electrical panels, wiring, circuits, outlets etc. shall be routinely checked for integrity and marked with appropriate safety warning labels.

16. Health and Safety: Dormitories and Canteens

- EWH does not provide dormitories and canteens.
- EWH provides hygienic equipment for food storage and preparation (e.g. refrigerators and microwaves) in the lunchroom.

16. Environment

- There is a separate Environmental Policy and Procedure PRP 18 which includes additional information.
- EWH complies with national and local environmental laws and regulations.
- EWH maintains an effective environmental management system that identifies environmental impacts including and not limited to water, wastewater, energy, air emissions, waste, hazardous materials, and other significant environmental risks.
- EWH maintains all legally required and valid environmental permits, licenses, approvals, and other certifications.
- EWH has a response plan for environmental accidents or emergencies. The Emergency Preparedness and Response Procedure PRP 16 includes notifying local authorities.
- EWH has trained personnel to handle environmental accidents or emergencies.
- Workers are trained on first aid and emergency actions in case of environmental

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accidents or emergencies.

- EWH maintains a record of environmental emergencies or accidents, along with corrective and preventative plans.
- All monitoring reports including but not limited to air, water, and noise shall be maintained regularly as required by local legislation.
- EWH handles waste appropriately. There is no requirement for wastewater treatment.
- EWH maintains an Approved Chemicals Schedule that lists all chemicals used onsite in conjunction with Safety Data Sheets (SDS) for each chemical in the inventory. There are copies of the SDSs in the Chemical Storage room.
- EWH does not use any hazardous substances listed in Zero Discharge of Hazardous Substances - Manufacturing Restricted Substances List (ZDHC MRSL).
- EWH complies with legal requirements regarding chemical management and handling, particularly hazardous substances used in the workplace.
- Chemicals and hazardous substances are properly stored in the Chemical Store area (e.g. away from ignition or combustible sources and sealed properly) and labelled with appropriate identification and safety handling precautions.
- The chemical storage area is inside the building and suitable and equipped with appropriate equipment, proper ventilation and suitable PPE for workers handling chemicals.
- There are not large quantities of chemicals kept on site and there are no hazardous substances. The primary containers are well sealed and contain a maximum of 20L and as such there is no requirement for secondary containment. If there is a spill of large quantities of water is used to suitably dilute the spill into the Sydney Water sewerage system, so that the spill is similar to the standard usage.
- There is no hazardous waste material that needs separation from non-hazardous materials. There are no flammable or combustible materials and chemicals that need to be safely stored away from sources of ignition.
- Workers are trained regularly to handle, clean up, and dispose of chemicals and hazardous substances. Training records are maintained.
- There are not gas cylinders on site, if there are in future, they will be properly marked, used, inspected, stored, and secured.
- If there are expired or deregistered chemicals and used chemicals, they are properly and safely disposed of by certified third party professionals.
- EWH complies with all local laws for pest management, including large vertebrate birds or other pests according to environmental standards.
- EWH has proper waste management procedures in place to carefully dispose and handle waste materials on site according to local law and ensures that there is no illegal dumping of waste to the local environment.

17. Overseas or Foreign Migrant Workers

EWH may employ overseas or foreign migrant workers (i.e. workers who are not a citizen or permanent residents of Australian and have additional requirements before being allowed to work in Australia).

- EWH directly employs workers. It does not use a third party or agency.
- EWH does not recruit workers from overseas.
- The same requirements previously outlined in this procedure apply to overseas

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or foreign migrant workers.

- The Letter of Engagement accurately reflects the agreed payment, the agreed terms and are written in a language understood and signed by workers.
- Workers do not have their passports, identity papers, or ATM cards retained for employment.
- All workers have basic English literacy. If there is a grievance or an issue that requires a higher level of language skills, another worker who has the required language skills will be used or a translator who speaks the language of the workers will be used to ensure there is full understanding and resolution.

18. Subcontracting and Homeworkers

- There is no subcontracted or home-based work done for EWH.

19. Responsible Sourcing of Minerals

- There is no sourcing of minerals by EWH.

20. Supply chain

- EWH intend to implement processes to determine what procedures their suppliers have in place to ensure there is compliance with social responsibility and modern slavery requirements.

Approval and Signing for the Australian Modern Slavery Act 2018

Principal Governing Body Approval

This modern slavery statement was approved by the Managing Director of Epic Wright Heaton Pty Ltd on 11th of June 2025



Name: William Yee
Title: Managing Director
Date: 11 June 2025