

# Comcater Modern Slavery Statement

This Modern Slavery Statement (**Statement**) is made pursuant to the *Modern Slavery Act 2018* (Cth) and sets out Comcater Pty Ltd's (ACN 005 974 185) (**Comcater**) commitments to assess and eliminate risks of modern slavery.

Throughout this Statement, Comcater is collectively referred to as "we" or "our" or "us".

This is our first Statement, which outlines the steps we have taken to understand and address the modern slavery risks in our operations and supply chains.

Comcater is committed to upholding fundamental human rights and assessing and eliminating the risks of modern slavery at all stages of its business activities.

## Structure, operations and supply chain

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### Structure

Comcater, first incorporated in 1979, is a family owned business that provides commercial foodservice equipment and aftersales technical service to customers throughout Australia. We believe that great food enriches lives, so our vision is to make better food available to more people. We do this by providing smarter food service solutions to our customers.

Comcater is not part of a larger group of entities and does not own or control other entities.

### Operations

Comcater's registered and head office is at 191 Salmon Street, Port Melbourne, Victoria, and also operates showrooms, warehouses and offices in other locations throughout Victoria, New South Wales, South Australia, Queensland and Western Australia.

As at the time of preparing this Statement, Comcater employs approximately 200 permanent employees, along with temporary staff from time to time, all based in Australia. Comcater's employees are employed to perform sales, administrative, managerial, client service, warehousing, delivery, installation, maintenance, warranty management and related functions.

### Supply Chain

The overwhelming majority of our products sold to customers (approximately 99%) are third party brand products imported from overseas suppliers. Specifically, our suppliers are from the USA, Canada, France, Italy, Germany, India and China. Commercial food service kitchen equipment (e.g. ovens, griddle plates, fryers and combi ovens) are sourced from reputable, prominent global brands, such as Rational, Cambro and Frymaster, who are primarily based in the USA, France, Italy, Germany, Singapore and China.

The remainder of our products sold to customers (approximately 1%) are our "own brand" range which are manufactured for Comcater by a third-party supplier located in China.

Raw materials and components for the equipment supplied to us (e.g. spare parts for machinery) are often manufactured by suppliers in countries such as China and India.

We aim to ensure that our international supply chain has appropriate security measures, with written contracts in place where possible.

To support our day-to-day operations, we engage approximately 40 local suppliers for the procurement of goods such as office supplies, vehicles, warehouse supplies, or services such as IT

infrastructure and other support services. We ensure that all supplier contracts for goods and services include modern slavery provisions which are part of their agreements with their suppliers.

All suppliers are assessed based on merit, quality of goods and services, and commitment to ethical practices.

## Our modern slavery risks

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Our dependence on international suppliers (including one manufacturer) for products sold to customers subjects us to risks relating to forced labour and modern slavery. Generally, whilst our international supply chain partners have appropriate, secure, supply chain measures, where this is not explicitly apparent, we are committed to identifying and implementing a procedure with those suppliers to enhance the integrity of the supply chain in moving forward.

There is also a very limited risk of modern slavery associated with the engagement of labour hire workers locally, in that Comcater is aware that one such worker is currently the holder of a tourist visa.

As this is our first Statement, we will continue to undertake a thorough assessment of modern slavery risks in our business operations and our supply chain to better understand the risks of causing, contributing, or and directly linked to modern slavery.

## Actions taken to assess and address modern slavery risks

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We are committed to maintaining the highest levels of integrity and honesty throughout all aspects of our business, and we expect our business partners including suppliers to respect and adhere to such practices in the operation and management of their businesses.

### Supplier engagement

As outlined above, we consider that our modern slavery risks substantially lie in our international supply chain. Comcater has the following internal processes in place to address such risks:

- **Evaluation of suppliers** – a procedural document which aims to ensure our suppliers provide reliable, secure and high quality goods and services.
- **Product lifecycle management** – a product management process which ensures consistency for the introduction, review and exit of any Comcater inventory equipment.
- **Quality Policy Manual** – a manual consisting of 27 policies which includes a robust quality management process and an environmental policy.

Comcater also has a Risk Register, which in moving forward, will include a provision for the reporting of any modern slavery risks. The Risk Register is managed by our Executive team and circulates to the Board of Directors bi-monthly.

We consider that the risks of modern slavery in our operations and supply chains are low. We are aiming to ensure that our international suppliers are bound by strict contractual obligations and operate within frameworks designed to prevent labour exploitation.

While there is a minimal theoretical risk of labour exploitation further down the supply chain, any such issues would be effectively mitigated through our robust due diligence processes. If any concerns were to arise, they would be promptly identified and addressed.

Notwithstanding that our assessment of modern slavery risks in our operations and supply chains is that risks are low, we acknowledge that ongoing vigilance is required, and we are committed to continually improve our management of these risks.

## The Comcater workforce

As outlined above, all our employees are based in Australia, with more than 95% of employees employed by Comcater on a permanent basis. Employees are subject to written employment terms and conditions, which are in many cases further governed by modern awards as applicable to an employee's role.

As at the time of preparing this Statement, 5 workers are engaged via a labour hire agency to work at Comcater's head office. We also engage various contractors locally to provide services including service technicians, service delivery coordination and operations, and customer service operations. All contractors are engaged through specialist recruitment agencies via an incorporated entity on written terms, and we do not engage any individuals/sole traders as independent contractors.

We have written agreements in place with contractors and labour hire agencies to ensure that the workers are remunerated in compliance with Australian legislation and where relevant, that they are being engaged lawfully in compliance with any visa requirements. We also ensure labour hire agencies have a licence where required in that state / territory.

Additionally, Comcater has various policies and procedures in place, including:

- **Code of Conduct** – our code of conduct sets out our expectations of behaviour and conduct by our employees, officers, contractors, and other individuals performing work for us or on our behalf.
- **Equal Opportunity & Workplace Bullying** - this policy aims to take positive steps towards creating a work environment that is safe and respectful, for all employees, contractors, consultants, and other individuals performing work for or on behalf of Comcater.
- **Whistleblower Policy** - this policy is designed to promote and support a culture of honesty, integrity, corporate compliance, and ethical behaviour. We encourage the reporting of actual or suspected misconduct by eligible whistleblowers, without fear of intimidation, disadvantage or reprisal.
- **Healthy, Safety and Wellbeing Policy** - this policy promotes the creation and maintenance a safe and healthy work environment, throughout all parts of the organisation in which the physical, psychological, and social well-being of everyone in the workplace is protected.

## Assessing the effectiveness of our actions

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As this is our first Statement, moving forward we will monitor the effectiveness of our governance structure and will consider the need to adopt further relevant policies and procedures, or update existing ones, to address modern slavery risks in our operations and supply chains.

We will assess the effectiveness of our actions by tracking our actions and outcomes, partnering with suppliers, providing training and support to our employees, and undertaking internal governance processes. Based on the results of these processes we will adapt and strengthen our actions to improve our response to modern slavery risks.

We currently partner with BSI Group, a global leader in ISO standards, who assists us with ISO accreditation for quality management.

We further set out Comcater's actions and commitments in moving forward.

## Suppliers

In respect to our suppliers, in particular our international suppliers, we will:

- evaluate relationships with suppliers on an ongoing basis;
- develop a robust procedure with respect to international suppliers, and improve our 'Evaluation of suppliers' procedure with respect to those suppliers who pose a greater modern slavery risk; and
- require any suppliers we directly engage with through commercial contractual clauses to be compliant with modern slavery practices and laws of the country in which they operate to prevent risks.

## Employees

Comcater holds its employees to the highest standards of integrity and honesty in business practices.

Relevant employees working on our behalf (including those whose roles involve dealings with Comcater's suppliers) will in future be provided with training on modern slavery risks and encouraged to report to Comcater any suspected modern slavery risks or breach of our contractual arrangements dealing with modern slavery.

## Consultation

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Comcater does not own or control any other entities and therefore this criteria is not applicable.

This Statement was approved by the Board of Comcater Pty Ltd on 20 December 2024



**Robert Wood**  
**Managing Director of Comcater Pty Ltd**