

Redcape Hotel Group Modern Slavery Statement

1. Introduction

This is the first Modern Slavery Statement for the Redcape Hotel Group (“Redcape”, “We”, “Group”) (ACN 139 067 244). This statement is for the financial year 2020 reporting period and sets out steps to identify and address modern slavery risks in our operations and supply chains.

Redcape is committed to ensuring that there is no modern slavery in our supply chains or in any part of our business and acknowledge our role and responsibility in seeking to safeguard human rights through ethical and sustainable business practices.

We are committed to acting ethically and with integrity in all our business relationships and taking reasonable steps to ensure slavery is not taking place in any business or organisation that has any sort of business relationship with our organisation.

2. Structure and Operations

Redcape is an Australian ASX listed company with annual revenue that exceeds the mandatory reporting threshold of \$100 million.

Redcape is a leading hospitality group of 840+ dedicated people, who passionately serve different communities across Australia’s east coast.

Managed by MA Hotel Management, Redcape owns and operates 32 community-focused venues, as well as 22 bottle shops, 3 accommodation venues and the Australian Brewery.

We make it our mission to provide sociable, fun, friendly and safe pubs and hospitality offerings within the communities we operate. It’s this focus on people and communities that sets us apart from other hospitality groups, and we believe has helped make us the successful business we are today (and will continue to be).

Supported by a strong board and senior leadership team, with extensive experience in hospitality business management, our long-standing team has proudly grown and developed the Redcape Hotel Group into the growth business it is today. Established and ready to provide further successful investment opportunities, we continue to pioneer sustainable growth within the hospitality industry.

3. Risks of Modern Slavery

We source goods including beer, wine, agricultural raw materials, glassware, uniforms, gas and other materials necessary to operate a hotel. The majority of our materials are sourced from within Australia and we consider ourselves to be at low risk of involvement of modern slavery.

Due to the size of our business and geographic spread across venues, we have a need to outsource services such as security and cleaners. We recognise that the contract cleaning and security industries in general has been identified as high-focus industries.

We have mapped our supply chain and through an analysis of data have organised our suppliers into industry categories. Data will be continually analysed for each of the mandatory reporting periods.

With our suppliers grouped into categories, we can easily determine industries of greater risk than others. Overall, the potential exposure of Modern Slavery in our supply chains is considered to be low. Categories of suppliers that were flagged as potential high focus and scrutiny will be required to complete a modern slavery self-assessment questionnaire (SAQ) that can help with our due diligence.

Whilst not easily recognisable, once modern slavery has been identified, it can be addressed. Redcape is fully committed to operating responsibly and establishing and adhering to the highest ethical standards across our Group. We will not tolerate any forms of slavery or human trafficking.

4. Steps taken to assess and address modern slavery risks.

Redcape expects all those in our supply chain to comply with our zero tolerance to slavery. To identify and mitigate risk, Redcape has the following systems in place:

I. Policy Framework

Redcape is committed to ensuring ethical business practices throughout the business and this commitment is evident in our policies which are inclusive of:

- Anti-bribery and Corruption;
- Bullying and Appropriate Behaviour;
- Code of Conduct;
- Whistleblower; and
- Workplace Health and Safety policies.

We have developed a Modern Slavery Policy which sets clear objectives around our supplier engagement process, grievance mechanisms and supplier collaboration.

II. Employee Assistance Program

Redcape's Employee Assistance Program (EAP) provides employees and eligible immediate family members with a range of services and support. It is voluntary, confidential and easy to access, with support available for personal and work-related issues including performance, dealing with grief, stress management and career paths.

III. Risk Management Framework

To oversee and manage risk, the Board and its Audit and Risk Committee (ARC) provides guidance and direction on the management of risk related to the Group and states our commitment to the effective management of risk to reduce uncertainty in the Group's business outcomes.

We have implemented an online system which is designed to assess Redcape's supplier network and alert us to any supplier risks. Suppliers of high focus goods or services to Redcape are required to complete a self-assessment questionnaire (SAQ). The SAQ asks suppliers to disclose any modern slavery risks in their business and their supply chains.

Risk and Compliance monitors all responses from the SAQ and depending on the response, will initiate an engagement and escalation process to determine if remedial actions are required. We will investigate and work with that supplier to remediate as appropriate.

IV. Training and Communication

Redcape will ensure executive management, senior leaders and employees are aware of and understand the policies which reflect the Group's commitment to promote ethical and responsible behaviour within its operations.

New employees are required to complete compliance training covering the Group's Code of Conduct, Anti Bribery and Corruption, and Whistleblower policies and programs before commencing their employment.

Thereafter, employees are required to complete these training modules annually.

V. Supplier Contracts

We work continuously to update contracts for suppliers with a high risk of modern slavery practices to include relevant model modern slavery-mitigating clauses.

5. Assessing Effectiveness

Further, management has established an Operations Risk and Compliance group, which is responsible for overseeing and advising on:

- processes used to monitor, communicate and comply with the Group's policies, laws, regulations, ethical guidelines and other relevant requirements; and
- employee behaviour with respect to governance, risk and compliance.

6. Consultation and approval process

The policies, processes and systems described in this Statement apply to Redcape and the entities covered by this Statement. The Redcape Board, as well as its Audit and Risk Committee retain oversight of our human rights and modern slavery risks through our risk management framework.

7. Other Relevant Information

i. Managing COVID-19 Impacts

In 2020, there has been a focus on supporting the safety, health and wellbeing of employees and contractors given the health and economic impacts of the COVID-19 global pandemic. The Redcape Hotel Group implemented a COVID-19 management plan which included the introduction of additional paid leave, robust safety and hygiene practices, and enhanced mental health and wellbeing programs.

ii. Looking Ahead

Redcape is committed to continuously improving the practices, procedures and relevant education related to human rights and modern slavery to support its prevention.

Looking ahead we plan to progress the following in FY21 and beyond:

- Continue to update core policies and processes to reflect Redcape's commitment to upholding human rights;
- Continue to build expertise of our people through training and communication, especially those who work directly with third parties, so they can better identify and act on any indications of modern slavery; and
- Enhance our Supplier Management and Contractor Online Portal.

8. Approval

This modern slavery statement was approved by the Redcape Board of Directors on 19 March 2021.



Nicholas Collishaw
Chairman
19 March 2021