

Modern Slavery Statement

FY2024

 **CATER CARE**



- 1. Introduction & Identity of the Reporting Entity**
- 2. Organisational Structure & Supply Chain**
- 3. The Risks of Modern Slavery in the Supply Chain - Identified**
- 4. Proposed Actions to Identify and Control Risks**
- 5. Internal Procedures to Address & Rectify the Areas of Risk**
- 6. Methodology to Assess the Success of Identifying & Controlling Risks**
- 7. Future Controls for Risk**
- 8. Process of Consultation for Reporting Entities**
- 9. Approval**

1. INTRODUCTION & IDENTITY OF THE REPORTING ENTITY

Cater Care is an industry leading contract catering, accommodation and facility management service provider to a range of clients across Australia.

Cater Care is proudly 100% Australian owned and operated. We are passionate about fresh, quality food, and pride ourselves on providing the best hospitality and service to our customers/clients.

We currently manage more than 250 sites across Australia and employ more than 2,700 people nationally.

The Cater Care way describes our commitment to do our best every day. This is embodied in our standards, which:

- Determine the quality of the food we serve and the experience we give to our clients and customers;
- Guide our client and customer interactions and
- Build on our core values of **Care, Pride** and **Community**.

CATER CARE'S VALUES OF CARE, PRIDE & COMMUNITY

- **Care** - We take *care* in our food to ensure that it looks good, tastes good and is classic and contemporary as required.
- **Pride** - We take *pride* in everything we do and do the right things at the right time. We listen and communicate openly at all times and are proactive, adaptive, and solutions-focused.
- **Community** - We empower and support our people to care for and deliver their best every day.

Cater Care additionally supports the community with its **CARING IN THE COMMUNITY** program:

- **Wellbeing and support** for people with mental health issues, the disadvantaged and/or vulnerable;
- **Improving the environment** through protecting and restoring native habitats, recycling, reducing emissions and waste; and
- **Providing education and training** opportunities to people from disadvantaged backgrounds, understanding the impact of societal or community influence.

This also sees Cater Care partnering with two amazing national charities [Lifeline](#) and [Foodbank](#) to support vulnerable Australians in the communities in which we work and live.

Our values are the key to how we do business. As such, Modern Slavery and Human Trafficking are not acceptable activities and definitely are not consistent with them. The actions of Modern Slavery and Human Trafficking have no place in the world, let alone in our supply chain and/or within the operation of our business.

2. ORGANISED STRUCTURE & SUPPLY CHAIN

This Modern Slavery Statement has been prepared by Cater Care Australia Pty Ltd and covers all fully owned, and operational, subsidiaries within the Cater Care group of companies (the **Cater Care Group**) which are ultimately owned by Cater Care Holdings Pty Ltd, an Australian registered company.

Refer to **Appendix A** for a list of the operational subsidiaries covered by this Modern Slavery Statement.

The companies listed below fall within the Cater Care Group and operate one of the main business units or one of the functions within Cater Care. These in turn are consolidated into one entity being Cater Care Holdings Pty Ltd. Cater Care Group has an annual turnover in excess of \$400 million dollars and where the number of employees nationally are in excess of 2,700.

The main business units within the Cater Care Group (listed below) are as follows:

- **Urban** business is conducted by Cater Care Australia Operations Pty Ltd and it operates a purely catering business to Residential Aged Care, the Health sector, Government sectors, Education and Business & Industry (canteens) Sectors. Cater Care has upwards of 143 sites within the Urban function and employs approximately 1,450 people within this business unit.
- **Remote** business is conducted by Cater Care Services Pty Ltd and has in excess of 38 sites where a range of activities are performed for our Mining, Oil, Gas, Construction and Renewable Energy clients. These activities include a mix of Site Management, Maintenance services, Janitorial, Housekeeping and Industrial cleaning, catering, various facilities management activities and employs approximately 645 employees.
- **Retail** business is conducted by Cater Care Retail Pty Ltd and operates primarily from Airports with some hospitals and High Street sites, providing retail eateries and bars using well known trading names as it is a franchisee and also has some of its own brands and employs approximately 500 people nationally.
- **Supply Chain** operates through Cater Care Procurement Pty Ltd and utilises the buying power of the other parts of the business to provide cost effective supply to its customers. The employees within this arm of the business are largely located within the Cater Care Group's Sydney headquarters.

The Cater Care Group functions include finance, risk, OHSE, food safety and food, as well as marketing, business development, HR and training. These functions employ approximately 300 employees nationally through Cater Care Group Pty Ltd and operate from 5 offices across Australia.

Our employment procedures ensure careful identification of all current and potential employees, as well as checking residency or visa status. Our employment conditions meet/exceed community standards and laws and the living conditions for remote workers are of a high standard.

Additionally, the goods and services used in the relevant business units are sourced from suppliers and contractors that are all located within Australia. Cater Care does not directly import any goods and/or services.

Cater Care does import skilled workers from overseas using reputable services in times of local skill shortages.

Other than where locally-sourced goods are required, Cater Care wholesale buys its goods for its sites. In the cases of its retail franchises, the goods are sourced in accordance with the relevant franchise agreement.

In the event that any Modern Slavery was to occur, it would not be within the Cater Care Group. There may be a possibility that it could occur within the supply chain of our suppliers, as opposed to the suppliers themselves.

However, all our suppliers are Australian based organisations of varying sizes, as the Cater Care Group does not deal with any suppliers located outside of Australia.

Our [Corporate Social Responsibility Policy](#) categorically opposes any involvement in Human Trafficking and/or Modern Slavery.

3. THE RISKS OF MODERN SLAVERY IN THE SUPPLY CHAIN - IDENTIFIED

As Cater Care does not import any goods or services directly, we are of the view that the risk of modern slavery (if it was to exist) would arise either:

- Within the supply chain of the suppliers that we deal with; and/or
- In relation to workers hired within Cater Cares businesses under visa programs (in respect to their

relationship with the applicable agency and not within their work with Cater Care).

Within our supply chain:

- 100% of Food & Beverage spend is from Australian suppliers, 77% of the food and beverage products are sourced from manufacturers in Australia.
- 100% of Non Food & Beverage spend is from Australian suppliers, 78% of this spend comes from goods that are imported.

4. PROPOSED ACTIONS TO IDENTIFY & CONTROL RISKS

Cater Care takes the following actions to identify and address risks of Modern Slavery within its business:

- **Compliance** - The adoption of a Code of Conduct and the following policies:
 - Anti-Slavery and Human Trafficking Policy;
 - Corporate Social Responsibility Policy;
 - Ethical Procurement Management Plan;
 - Procurement Management Plan;
 - Subcontractor and Contractor Management Procedure; and
 - Whistleblower Policy.
- **Training** - Modern Slavery training has been added to Cater Cares online portal and is available to all employees. This is to raise awareness within the business of the risks of human trafficking, modern slavery and human rights abuse, and educating our people on how to identify and report any concerns about any potential incidents in those activities.
- **Informing Employees** - Making this Modern Slavery Statement and the Anti-Slavery and Human Trafficking Policy available to our employees to inform them of Cater Cares commitments.
- **Informing suppliers** - When new suppliers and/or contractors are onboarded:
 - They are required to provide confirmations regarding there being no modern slavery in their activities;
 - If Cater Care purchase terms are applied, acceptance of the terms and conditions which include a requirement to comply with the Act.
- **Reinforcing** - Providing this Modern Slavery Statement to suppliers and contractors, while reminding them of our expectations regarding there being no modern slavery in their activities.
- **Due Diligence (Suppliers)** - As part of the process to identify and control the risks of modern slavery within the Cater Care supply chain, a yearly due diligence process is undertaken. The suppliers in aggregate represent approximately >95% of the overall spend and are requested to complete a questionnaire about their actions in relation to modern slavery in their business and the risks in their supply chain (this is identified in further detail below).
- **Due Diligence (Employees)** - The COO's of each business division review salaries of employees on an annual basis to ensure that they are consistent with awards and EBA's which apply to the employees. The Director - People & Culture will also be consulted to ensure employees' salaries are not below their entitlement.
- **Action** - In the event that a case of Modern Slavery was identified, appropriate investigations and

remedial action would be undertaken. If such a case is related to:

- A supplier: Action could include remediation, notification to the relevant authorities and/or the potential termination of the relevant supply contract;
 - An employee of Cater Care: This would be referred to the Director - People & Culture, the CFO and the CEO.
 - An external party: The relevant authorities would be notified.
- **Reporting** - A report of any incidents of Modern Slavery that are identified and how they have been dealt with, would be provided to the Cater Cares Holdings board.
 - **External Auditors** (in the preparation of accounts) - Conduct random checks and seek confirmation from the board, through the management letter that the Cater Care Group is complying with the laws with respect to the payment of staff and compliance with awards.
 - **Compliance of Laws** - All contracts with suppliers have requirements to comply with the law, with some specifically referring to Modern Slavery.

To date there have been no instances of Modern Slavery detected. However, that is not to say they do not exist, none have been discovered and if they were to be discovered, they would immediately be acted upon. Our [Ethical Procurement Plan](#) explains this in further detail.

5. INTERNAL PROCEDURES TO ADDRESS & RECTIFY THE AREAS OF RISK

Policies are key to creating the right focus for the Cater Care Group and from these stem the procedures that are utilised to address the areas of risk and then to rectify such areas.

Ethical Procurement Procedure (incorporating the Ethical Procurement Policy) is one such procedure. Similarly, the Contractor & Supplier Management Procedure is another.

The [Whistleblower Policy](#) similarly enables internal and external parties to lodge complaints and information which will enable Cater Care to investigate and address any Modern Slavery concerns which may be identified.

All key suppliers are required to be under contract and our contract requires them to comply with all applicable laws and to notify Cater Care in the event that there was a suspected and/or actual breach of Modern Slavery in their supply chain and/or within their operations.

Additionally, any new contracts with key suppliers have a positive obligation on the supplier to comply with all applicable laws. In particular, refers to the Modern Slavery Act and going forward this will be followed up with auditing through questionnaires sent to key suppliers.

We are committed to making ongoing improvements in human rights around both our people and supply chain. This includes raising awareness within the business of the risks of Human Trafficking, Modern Slavery and human rights abuse.

6. METHODOLOGY TO ASSESS THE SUCCESS OF IDENTIFYING & CONTROLLING RISKS

The Cater Care Holdings Board will be advised of any incidents of Modern Slavery that are identified within the Cater Care business and/or within the activities of its suppliers and contractors.

These will be considered by the Cater Care Holdings Board and appropriate action will be taken to deal with any such incidents.

By reporting on such incidents of Modern Slavery, Cater Care will be able to assess whether the actions it has taken are effective, how often instances of Modern Slavery arise and identify opportunities to implement further actions as required.

Even with the absence of any incidents, Cater Care will continue to consider whether it can improve on the policies and procedures it has in place to identify and control the risk of modern slavery in its business.

SUPPLY CHAIN DUE DILIGENCE

As part of the process to identify and control the risks of Modern Slavery within the supply chain for the Cater Care Group, a yearly due diligence process is undertaken.

This financial year, the process entailed us reaching out to our top suppliers, which represents >95% of the spend total with all suppliers within the Cater Care business.

This process was carried out by Procurement and Legal & Risk by directing the above-mentioned suppliers to complete an online questionnaire which specifically relates to Modern Slavery.

Results of the Cater Care Modern Slavery Online Questionnaire

1.	Suppliers were sent the online questionnaire (the suppliers sent the questionnaire represents >95% of total spend).
2.	<p>In respect to the Modern Slavery Questionnaire, our suppliers provided a response which fell into one of the following:</p> <p>(a) Approx. 20% of suppliers completed the Modern Slavery Questionnaire.</p> <p>(b) Approx. 44% of the suppliers either referred us to their corporate website where they address Modern Slavery and/or provided us with a copy of their own Modern Slavery Statement.</p> <p>(c) The remaining suppliers are yet to complete the Modern Slavery Questionnaire. Note that these suppliers are all located within Australia and are not situated in a high-risk territory.</p>
3.	100% of respondents have not been convicted for breaching any human rights regulation (including in relation to modern slavery and/or labour standards) or had any notice served upon it by any regulator and/or authority.
4.	<p>4% of respondents stated their operations/supply chains present risks to human rights (which includes modern slavery and labour standards).</p> <p>However, all respondents stated that their organisation takes additional actions if modern slavery practices are suspected.</p>

5.	57% of respondents stated that their workers have mechanisms to anonymously raise concerns related to labour conditions and/or workplace grievances.
6.	55% of respondents stated their organisation ongoingly assesses the effectiveness of its actions/controls being taken to assess and address risks in respect to modern slavery.

Upon reviewing the Modern Slavery Statements filed by some of our suppliers, and also the responses to the questionnaire (for those that had not filed a Modern Slavery Statement), we identified that the statements/responses received satisfied us that those providers were aware of their obligation to not engage in Modern Slavery and confirmed that they had not done so.

7. FUTURE CONTROLS FOR RISK

Moving into FY2025, the Cater Care Group will look to:


- Further review/update our Modern Slavery Questionnaire for our suppliers and extend our Modern Slavery Questionnaire to a larger percentage of suppliers.
- Regularly review current business practices and other parts of the Cater Care Group supply chain.
- Listen and respond to any concerns that may be raised by customers and/or other stakeholders on a wide range of issues in a responsible manner.
- Monitor and verify compliance through engagement meetings with our suppliers.
- Further review the role of training for key executives in supporting this program in future periods, as well as making our Modern Slavery training module compulsory for all senior leaders and members within the procurement team.

8. PROCESS OF CONSULTATION FOR REPORTING ENTITIES

This is a joint statement submitted by Cater Care Australia Pty Ltd, on behalf of the Cater Care Group. The Cater Care Group is headquartered in Sydney, Australia. The Cater Care Group operating entities work closely together and share many of the same suppliers/contractors and are subject to the same policies and procedures. There has been consultation between the Cater Care Groups Executive Team, Operations team and Legal team to prepare this statement.

9. APPROVAL

This Modern Slavery Statement was approved on behalf of Cater Care Holdings Pty Ltd as the ultimate holding company of the Cater Care Group on 27 November 2024.



Neil East
Director - CEO

Date Approved: December 2024

Appendix A

Operational Cater Care Group Companies

COMPANY	REGISTERED OFFICE
Cater Care Holdings Pty Ltd	Level 1, 20 Charles Street, Parramatta NSW 2150
Cater Care Investments Pty Ltd	
Cater Care Australia Pty Ltd	
Cater Care Retail Pty Ltd	
Cater Care Group Pty Ltd	
Cater Care Australia Operations Pty Ltd	
Cater Care Procurement Pty Ltd	
Cater Care Services Pty Ltd	
ABN 152 238 661 Pty Ltd	
Care Food Co Pty Ltd (Cater Care having 74% share ownership)	