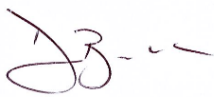


Modern Slavery Statement

E.CF Asia Pacific Pty Ltd

Amendment History

Version No.	Date	Description	Appendix Version	Approved by
1	17/12/20	New Document	1	David Bull
2	1/04/21	Edited Document	1	David Bull
3	29/09/21	Edited Document	1	David Bull



Authorised by:

David Bull

CEO

Copy number: 1

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1. Introduction

This statement (**Statement**) has been prepared in accordance with the requirements under the *Modern Slavery Act 2018* (Cth) (**Act**).

The Act 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 or services; and the worst forms of child labour. The worst forms of child labour mean situations where children are subjected to slavery or similar practices or engaged in hazardous work. This Statement sets out how Reward Hospitality is monitoring and addressing the risks of Modern Slavery in our business. Reward Hospitality is committed to delivering value to our customers while maintaining the highest standards of ethical conduct. We are committed to operating a strict zero tolerance towards Modern Slavery in all forms and have an expectation that our supply partners comply with the principles outlined within this statement.

2. Criteria 1: Our business

ECF Asia Pacific Pty Ltd ACN 602 487 721 (trading under its subsidiary Reward Supply Co. Pty Ltd. as Reward Hospitality) is one of Australia's leading distributors of hospitality products and commercial catering equipment. The Reward Group has over 400 employees servicing the hospitality, aged care, healthcare, school and mining industries in over 30 locations dedicated to serving Australia, New Zealand and the Pacific Islands. Reward Hospitality is proudly owned by the E.CF Group - the European leader in hospitality, catering and general food service supply with key markets in Europe, the Middle East & North Africa. Paired with market leaders in Europe, Reward Hospitality offers customers access to products and trends from around the globe.

3. Criteria 2: Our structure, operations and supply chains

As outlined above, Reward Hospitality is owned by the E.CF Group - the European leader in hospitality, catering and general food service supply with key markets in Europe, the Middle East & North Africa. ECF Asia Pacific Pty Ltd is the local parent company, holding 100% of the issued shares, of Reward Supply Co Pty. Ltd. as well as 70% of the issued shares in Tas Hotel & Catering Supplies Pty Ltd. Reward Supply Co. Pty. Ltd. holds 70% of the issued shares in Reward Newcastle Pty Ltd.

Please find table below outlining operations and Supply Chains of Reward Hospitality.

Entity	Operations	Supply Chain
ECF Asia Pacific Pty Ltd ACN 602 487 721	<ul style="list-style-type: none"> Non-trading entity and local parent company to the below businesses 	<ul style="list-style-type: none"> Non-trading entity that does not directly trade or engage service providers
Reward Supply Co. Pty. Ltd. ACN 010 183 669	<ul style="list-style-type: none"> Direct employment of workers Distribution, purchasing, marketing and sales of hospitality products Provision and delivery of products or services 	<ul style="list-style-type: none"> Products that we purchase and then on sell to our customers (such as hospitality products and commercial catering equipment which may be sourced from overseas locations such as the People's Republic of China) Raw material suppliers used by our suppliers (such as cotton and plastic used to make products) Utilities and professional services consultants who provide a service directly to Reward Hospitality

<p>Reward Newcastle Pty Ltd ACN 612 832 167</p>	<ul style="list-style-type: none"> • Direct employment of workers • Distribution, purchasing, marketing and sales of hospitality products • Provision and delivery of products or services 	<ul style="list-style-type: none"> • Products that we purchase and then on sell to our customers (such as hospitality products and commercial catering equipment which may be sourced from overseas locations such as the People’s Republic of China) • Raw material suppliers used by our suppliers (such as cotton and plastic used to make products) • Utilities and professional services consultants who provide a service directly to Reward Hospitality
<p>Tas Hotel & Catering Supplies Pty Ltd ACN 627 905 766</p>	<ul style="list-style-type: none"> • Direct employment of workers • Distribution, purchasing, marketing and sales of hospitality products • Provision and delivery of products or services 	<ul style="list-style-type: none"> • Products that we purchase and then on sell to our customers (such as hospitality products and commercial catering equipment which may be sourced from overseas locations such as the People’s Republic of China) • Raw material suppliers used by our suppliers (such as cotton and plastic used to make products) • Utilities and professional services consultants who provide a service directly to Reward Hospitality

4. Criteria 3: Potential risks in our operations and supply chains

Reward Hospitality has a zero tolerance approach to any form of Modern Slavery within its supply chain. In 2020, Reward Hospitality commenced the process of developing a Modern Slavery policy and initiating a review process to identify and manage potential risks within the Supply Chain. The review process was paused due to the unprecedented situation the COVID19 Pandemic presented to Reward Hospitality, details are outlined in **Criteria 7. Other relevant information.**

During the initial scoping of the review process, we identified that Reward Hospitality’s direct operations are at a no/low risk of directly contributing to Modern Slavery. The initial review however identified that as the majority of its goods are sourced through overseas manufacturers, there may be a low/moderate risk of indirect contribution to Modern Slavery through the actions of our suppliers. For example, cotton production, cutlery and textile manufacturing used to create products we sell are considered risk industries for Modern Slavery.

Reward Hospitality will complete the internal and external review into the potential risks of Modern Slavery across its operations and supply chain during the calendar year of 2021. This will incorporate our Australian based and Overseas Suppliers and manufacturers.

5. Criteria 4: Actions we have taken to address risks

Reward Hospitality has a detailed Modern Slavery Policy that we have developed to address the risks of Modern Slavery within our operations and supply chain. We require that all local and international suppliers, sub-contractors, manufacturers and agents, or other business partners conform to and operate in accordance with the following minimum standards:

- The supplier must guarantee the business has no forced or compulsory labour, or engage in such practices, in any form whatsoever
- The supplier does not employ, or make use of, children under the age of 14 for production, manufacturing or assembly tasks
- The supplier respects the freedom of workers to join trade unions or civil society body's and allows them to be represented by the organisations of their choice with no consequences on this choice
- The supplier is to make certain worker are paid sufficiently in line with appropriate awards applicable to the country, and/or so that they can meet their basic needs
- The supplier must ensure appropriate working conditions, with regards to the length of working time, are in place for their staff.
- The supplier demonstrates equal opportunities in employment and pay by ensuring that no discrimination occurs on the grounds of race, colour, gender, political affiliation or religious belief

Suppliers are also required to provide relevant evidence and documentation to confirm compliance if requested. Where a potential risk has been identified, and when practicable, Reward Hospitality performs an audit of a supplier's premises and reviews conditions in line with our standards. If a physical visit to a supplier's premise is unachievable, we may enlist a third party to provide an independent audit of the supplier's premises and conditions.

If a supplier is found not conforming to our Modern Slavery Policy, we seek to support the supplier to implement improvement plans and aid the supplier to achieve compliance.

If any supplier, manufacturer or agent is not able to or willing to maintain the standards set out in this policy, and/or refuses to provide evidence, Reward will move to review the supplier's contract and terminate the agreement with the supplier.

As part of the E.CF Group, Reward Hospitality also adheres to the United Nation's "Global Compact" charter (see below excerpt). E.CF requires that all products purchased are to be manufactured in compliance with the charter and requires that Suppliers adhere to and commit to an approach intended to ensure compliance with the charter.



CHARTRE FOURNISSEUR

E.CF a adhéré à la charte de développement durable des Nations Unies. Aussi nous souhaitons que nos fournisseurs respectent ou tendent rapidement vers le respect des 7 principes de notre Charte.

- ⇒ Supprimer l'esclavage, le travail forcé ou obligatoire et à n'y recourir sous aucune forme.
- ⇒ Ne pas employer ou faire travailler des enfants de moins de 14 ans pour des tâches pénibles de production, fabrication ou encore d'assemblage.
- ⇒ Assurer aux travailleurs le droit de s'organiser librement en syndicats ou autre organe de représentation.
- ⇒ Accorder aux travailleurs une rémunération satisfaisant leurs besoins fondamentaux et ceux des membres de leurs familles qui dépendent directement d'eux.
- ⇒ Garantir aux travailleurs des conditions de travail, notamment en ce qui concerne la durée du travail, permettant d'assurer leur santé, leur sécurité et leur intégrité morale.
- ⇒ Respecter l'égalité des chances en matière d'embauche et de rémunération en ne pratiquant aucune discrimination basée sur l'appartenance ethnique, la couleur, le sexe, les convictions politiques ou religieuses.
- ⇒ Respecter l'environnement en s'assurant de ne pas rejeter dans la nature des produits ou substances dangereuses.

SUPPLIER'S CHARTER

E.CF has complied with the U.N.O. durable development charter. Also, we look forward our supplier to complying with the 7 Charter's principles.

- ⇒ Stop slavery, forced or compulsory labour, and never again use such practices, in any form whatsoever.
- ⇒ Do not employ, or make use of, children under the age of 14 for production, manufacturing or assembly tasks.
- ⇒ Respect the freedom of worker to join unions and to be represented by the organizations of their choice.
- ⇒ Pay workers sufficiently, so that they can meet their basic needs and those of dependent family members.
- ⇒ Ensure proper working conditions, especially regarding length of working time, and their physical and psychological well being.
- ⇒ Offer equal opportunities in employment and pay by ensuring that no discrimination is done on the grounds of race, colour, gender, political affiliation, religious belief, or membership of a trade union or civil society body.
- ⇒ Protect environment, by ensuring that no dangerous products or substance are rejected.

We encourage our supplier and their under contractor to comply with the U.N.O durable development charter on www.unglobalcompact.org

6. Criteria 5: How we assess the effectiveness of our actions

Reward Hospitality will be undertaking regular reviews of our supply chains and suppliers' operations to monitor the effectiveness of our Modern Slavery Policy. Having commenced, but not concluded the first review in 2020, we will be recommencing in 2021 and will be using the benchmarks we identify in future reviews to monitor progress in addressing the risks of Modern Slavery.

7. Criteria 6: Our consultation process with entities we own or control

This report was prepared in consultation with our subsidiaries, Reward Supply Co. Pty Ltd, Reward Newcastle Pty Ltd, and Tas Hotel & Catering Supplies Pty. Due to the overlapping nature of the supply chain for both businesses, and the identification that there is a no/low risk of Modern Slavery in the direct operations of the Reward Hospitality Group, our entities worked together to prepare this statement. ECF Asia Pacific Pty Ltd undertakes reviews of the supply chain on behalf of Reward Supply Co. Pty Ltd, Reward Newcastle Pty Ltd, and Tas Hotel & Catering Supplies Pty.

8. Criteria 7: Other Relevant Information

Uncompleted Review Process.

On the 23rd of March 2020, the Australian Government mandated closures to the hospitality sector due to the Covid19 Pandemic that has impacted the world and is still affecting the rest of the world.

This dramatically affected many of our customers' businesses and many closed their doors and stood their staff down during this period. Reward Hospitality was also impacted and unable to operate in the normal manner. We made the difficult decision to stand down a portion of our workforce for an indefinite period of time as this

decision was made in response to an unexpected stoppage of work and demand within the hospitality sector of our business.

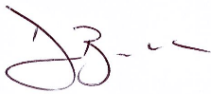
All projects were reviewed based on resources and risk to the business as Reward Hospitality moved into a maintenance mode of operations. The outcome was the Modern Slavery Review process was suspended for 2020 as Reward Hospitality employees were also unable to travel overseas or interstate to review supplier premises. The review process has been postponed until 2021 and this will be re-enacted once it is safe for employees to travel again and when the business has full resources available.

9. Approval by Reporting Entities

This modern slavery statement is made on behalf of the following entities for the reporting period of 1st April 2020 - 31st March 2021.

- ECF Asia Pacific Pty Ltd, ACN 602 487 721
- Reward Supply Co Pty Ltd ACN 010 183 669
- Reward Newcastle Pty Ltd ACN 612 832 167
- Tas Hotels & Catering Supplies Pty Ltd ACN 627905 766

This statement was approved on behalf of the reporting entities covered by this statement by the board of directors of E.CF Asia Pacific Pty Ltd, as the parent entity on 28/9/2021 by David Bull, CEO.



David Bull

CEO