

# Modern Slavery Statement

## E.CF Asia Pacific Pty Ltd

### Amendment History

Version No.	Date	Description	Appendix Version	Approved by
1	24/05/22	New Document	1	David Bull



**Authorised by:**

**David Bull**

**CEO**

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### Content

1. Introduction .....	3
2. Criteria 1: Our business.....	3
3. Criteria 2: Our structure, operations and supply chains.....	3
4. Criteria 3: Potential risks in our operations and supply chains .....	4
5. Criteria 4: Actions we have taken to address risks .....	4
6. Criteria 5: How we assess the effectiveness of our actions .....	5
7. Criteria 6: Our consultation process with entities we own or control .....	6
8. Criteria 7: Other Relevant Information .....	6

## 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
<b>ECF Asia Pacific Pty Ltd ACN 602 487 721</b>	<ul style="list-style-type: none"> <li>• Non-trading entity and local parent company to the below businesses</li> </ul>	<ul style="list-style-type: none"> <li>• Non-trading entity that does not directly trade or engage service providers</li> </ul>
<b>Reward Supply Co. Pty. Ltd. ACN 010 183 669</b>	<ul style="list-style-type: none"> <li>• Direct employment of workers</li> <li>• Distribution, purchasing, marketing and sales of hospitality products</li> <li>• Provision and delivery of products or services</li> </ul>	<ul style="list-style-type: none"> <li>• 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)</li> <li>• Raw material suppliers used by our suppliers (such as cotton and plastic used to make products)</li> <li>• Utilities and professional services consultants who provide a service directly to Reward Hospitality</li> </ul>

<p><b>Reward Newcastle Pty Ltd ACN 612 832 167</b></p>	<ul style="list-style-type: none"> <li>• Direct employment of workers</li> <li>• Distribution, purchasing, marketing and sales of hospitality products</li> <li>• Provision and delivery of products or services</li> </ul>	<ul style="list-style-type: none"> <li>• 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)</li> <li>• Raw material suppliers used by our suppliers (such as cotton and plastic used to make products)</li> <li>• Utilities and professional services consultants who provide a service directly to Reward Hospitality</li> </ul>
<p><b>Tas Hotel &amp; Catering Supplies Pty Ltd ACN 627 905 766</b></p>	<ul style="list-style-type: none"> <li>• Direct employment of workers</li> <li>• Distribution, purchasing, marketing and sales of hospitality products</li> <li>• Provision and delivery of products or services</li> </ul>	<ul style="list-style-type: none"> <li>• 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)</li> <li>• Raw material suppliers used by our suppliers (such as cotton and plastic used to make products)</li> <li>• Utilities and professional services consultants who provide a service directly to Reward Hospitality</li> </ul>

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

As we purchase and on sell hospitality products and commercial catering equipment which may be sourced from overseas locations, we have taken the position that there may be a risk within our direct supply chain and/ or an unmapped risk within our suppliers’ chain of production.

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

Reward Hospitality has a Modern Slavery Policy that we have developed to address the risks of Modern Slavery within our operations and supply chain. We request that all local and international suppliers, sub-contractors, manufacturers and agents, or other business partners sign an agreement to 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

In the past year, we have also developed a Supplier Questionnaire to ascertain the level of risk associated with suppliers and business partners across the organisations supply chain. The questionnaire is based upon the definitions outlined within the Australian Modern Slavery Act 2018 and suppliers are required to complete when updating our trading terms.

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 workers 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](http://www.unglobalcompact.org)

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

Reward Hospitality understands that this will be an ongoing process to review the effectiveness of our actions in identifying modern slavery risks in our operations and supply chain. From examination of the received supplier questionnaires, our suppliers have not identified any known risks within their supply chain, and we have not conducted external audits of supplier's operations within our direct supply chain.

If a potential risk was identified and a supplier is found not conforming to our Modern Slavery Policy, Reward Hospitality would take one or all the following actions in any order:

- Reward Hospitality would request a meeting to discuss with the supplier and seek to support the implementation of an improvement plan to aid the supplier in achieving compliance. This would occur within a designated time period.

- Request to perform an audit of a supplier's premises and reviews conditions if able. 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.
- Reward would move to terminate the agreement with the supplier immediately if any supplier, manufacturer or agent is not able to or willing to commit to the standards set out in the policy, and/or refuses to provide evidence.

## 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

As part of our commitment to continuous improvement, we intend to review and update our procurement practices and procedures to ensure that appropriate due diligence is being conducted in accordance with the level of risk. Another initiative will be to develop an online training module to ensure new employees responsible for managing procurement comprehend the Modern Slavery Act and our supporting policy.

## 9. Approval by Reporting Entities

This modern slavery statement is made on behalf of the following entities for the reporting period of 1st April 2021 - 31st March 2022.

- 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 24/05/2022 by David Bull, CEO.



**David Bull**

**CEO**