

Modern Slavery Statement - 2022

 **CATER CARE**



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1. INTRODUCTION

This Modern Slavery Statement (**Statement**) is given by Cater Care Holdings Pty Limited ACN 603 124 812 (**CCH**) as the ultimate holding company of the Cater Care group of companies (**Group** or **Cater Care Group**) in accordance with the *Modern Slavery Act 2018 (Cth)* (**Act**).

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

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 and clients. We currently manage in excess of 230 sites across Australia, providing employment for more than 2,500 employees.

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

- determine the quality of food we serve and the experience we give our clients and customers.
- guide our client and customer interactions; and
- are built on our core values of **care**, **pride** and **community**.

These values are the key to how we do business and as such modern slavery and human trafficking are not acceptable activities.

Cater Care has a zero tolerance approach to all forms of modern slavery and human trafficking within its business and within its supply chain and is committed to acting ethically and with integrity in all its business dealings and relationships.

2. IDENTITY OF REPORTING ENTITIES

This is a joint Statement for all reporting entities within the Cater Care Group as shown on this corporate structure:



3. ORGANISATION STRUCTURE & SUPPLY CHAIN

3.1. Organisation

There are 4 principal trading companies in the Cater Care Group which are ultimately owned by Cater Care Holdings Pty Ltd. The Group's operations are entirely in Australia. The Group has an annual turnover in excess of \$250 million dollars and over 2,500 employees.

The 4 principal business divisions are

- **Urban** - conducted by Cater Care Australia Operations Pty Ltd. The division operates a catering business to the residential aged care, retirement, education and business & industry sectors. There are nearly 150 Urban sites and the division employs approximately 1,500 people.
- **Remote** - conducted by Cater Care Services Pty Ltd. The division has in excess of 30 sites where a range of activities are performed for mining and construction camp clients. These activities include a mix of cleaning, catering and facilities management. This division employs around 600 employees.
- **Retail** - conducted by Cater Care Retail Pty Ltd. The division operates primarily from airports with some hospital sites, providing retail eateries and bars including some franchises. It has approximately 400 staff.
- **Supply Chain** - conducted by Cater Care Procurement Pty Ltd which utilises the buying power of the other parts of the business to provide cost effective supply to its customers.

The Group functions include finance, legal & risk, OHSE, food safety and food as well as marketing, business development, procurement, HR and training. These functions employ approximately 200 employees through Cater Care Group Pty Ltd and operate from 5 sites.

The Group's employees are all located in Australia.

3.2. Supply Chain

The goods and services used in the Group's business are sourced from suppliers and contractors in Australia. The Group does not directly import any goods or services. The Group sources these goods and services from over 1,000 suppliers and contractors who provide small to significant amounts of goods and services to the Cater Care businesses.

Other than where locally-sourced goods are required, the Group wholesale buys its goods for all sites. In the case of the retail franchises, goods will be sourced in accordance with the relevant franchise agreements.

Services required for sites - for eg contractors for maintenance and repairs - are usually contracted locally to the site.

4. RISKS OF MODERN SLAVERY IN THE OPERATIONS AND SUPPLY CHAIN

Given that the Group does not import any goods or services directly, we believe that the risk of modern slavery would, if it exists, arise:

- in the supply chain of the suppliers we deal with
- in relation to workers hired in the Group's businesses under visa programs (in relation to their relationship with the agency, not in their work with Cater Care).

In our supply chain:

- approximately 78% of total food & beverage spend is for product sourced from manufacturers in Australia and of non-food & beverage spend, the percentage is approximately 35%

- food & beverage spend accounts for approximately 62% of total spend; non-food & beverage (for eg, cigarettes, disposable packaging, linen and vehicles) accounts for less than 17% of total spend and the balance of the total spend is considered a low risk of modern slavery due to what it comprises (for eg, professional and trade services and rent).

5. PROPOSED ACTIONS TO IDENTIFY AND CONTROL RISKS

The Cater Care Group takes the following actions to identify and address any risks of modern slavery in 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
 - Whistleblower Policy.
- **Training** - the introduction of modern slavery training for relevant employees - for eg involved in procurement, recruitment, business development, maintenance and senior management - to raise awareness within the business of the risks of human trafficking, modern slavery and human rights abuse as well as educating our people on how to identify and report any concerns about any potential incidents of those activities.
- **Informing employees** - making this Statement and the Anti-Slavery and Human Trafficking Policy available to our employees to inform them of our commitments.
- **Informing suppliers** - when new suppliers and contractors are onboarded with the Group:
 - they are required to provide confirmations regarding there being no modern slavery in their activities
 - if Group purchase terms are applied, accept terms and conditions which include a requirement to comply with the Act.
- **Reinforcing** - providing this Statement to suppliers and contractors and 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 in the supply chain for Cater Care a due diligence process was undertaken. The suppliers with which the Group spent \$1m or more in the previous 12 months (which in aggregate represents approximately 75% of the overall spend with suppliers) were requested to complete a questionnaire about their actions in relation to modern slavery in their business and the risks in their supply chain.
- **Due diligence (employees)** - the COOs of each business division review salaries of employees on an annual basis to ensure that they are consistent with awards and EBAs which apply to the employees. The Director - People & Culture will also be consulted to ensure that employees' salaries are not below their entitlement.
- **Action** - if a case of modern slavery is identified, appropriate investigations and remedial action are 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 will be referred to the Director - People & Culture, the CFO and the CEO.
- **Reporting** - a report of any incidents of modern slavery that are identified and how they have been dealt with, is to be provided to the CCH board.

No instances of modern slavery have been identified through the above actions.

6. ASSESSING THE EFFECTIVENESS OF THE ACTIONS TAKEN

The CCH board will be advised of any incidents of modern slavery that are identified in the Group's business or in the activities of its suppliers and contractors.

These will be considered by the CCH board and appropriate action will be taken to deal with any such incidents.

By reporting on such incidents of modern slavery, the Group 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 absent of any incidents, the Group will continue to consider whether it can improve on the actions it has in place to identify and control the risk of modern slavery in its business.

7. PROCESS OF CONSULTATION FOR REPORTING ENTITIES

This Statement has been reviewed by the directors of the boards of the operating companies within the Group. Those directors are familiar with the operations of the Group's business and where the risks of modern slavery may arise.

This Statement has also been reviewed, and approved, by the board of CCH which comprises directors also familiar with the areas of the Group's business in which the risks of modern slavery may arise.

8. APPROVAL

This Statement was approved by the board of Cater Care Holdings Pty Ltd as the ultimate holding company of the Cater Care Group on 30 November 2022.



Colin Redman

CCH Director and Chief Executive Officer

28 December 2022