

MODERN SLAVERY STATEMENT

21 February 2022

SEAGRASS
BOUTIQUE HOSPITALITY GROUP

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1. Introduction – Who We Are:

Seagrass Operations Pty Limited t/as Seagrass Boutique Hospitality Group ('Seagrass') (ACN 634 378 135), and all subsidiaries (together referred to as 'Seagrass') are based in Rhodes, NSW.

Seagrass specialises in creating innovative restaurant concepts across multiple market segments that attract customers by uniquely combining quality, taste and experience to create memorable dining occasions. An introduction into who we are and how we operate can be seen through this quick video: <https://www.youtube.com/watch?v=y7g6AonUkTI>

With over 50 venues across Australia and Dubai, our brands include The Meat and Wine Co and 6 Head (1788) in premium dining, Hunter & Barrel, Italian Street Kitchen and Butcher and the Farmer in casual dining, and Ribs & Burgers and Five Guys in the fast casual market. We employ in excess of 1,500 staff within our group.

We retain a philosophy that we source only the highest quality ingredients and locate and train competent staff to ensure we offer a premium experience to our customers.

Given the commitment we have to the quality of our products, we welcome the opportunity to report on the requirements recently established via the *Modern Slavery Act 2018* (Cth) (the 'Act') and, through this report, we will detail our approach and findings with respect to modern slavery risks within our business and across our supply chain.

2. OUR SUPPLY CHAIN & OPERATIONS:

At Seagrass, we have an established range of suppliers specifically in the meat, dairy and produce sectors of the market. We regularly source premium products with a focus of securing supplies from Australian based providers. These products are quality tested and established training guides are in place, governed by Seagrass, to ensure all products meet our standards and specifications prior to serving to our customers.

At Seagrass, we employ a commercial division devoted to the procurement of the abovenamed goods and services, both domestically and internationally. The main types of goods we procure on the day-to-day basis are:

- The '**Food Products**' defined as:
 - Raw Produce - such as meat, seafood and the like;
 - Cooked Produce – such as ribs, lasagne and readymade produce;
 - Fresh Produce – such as fruits and vegetables;
 - Poultry – such as chicken;
 - Dairy - such as cheeses, milk and the like;
- The '**Ancillary Products**' defined as
 - Beverages – including both alcoholic and non-alcoholic beverages
 - Consumables – such as packaging, oils and the like; and
- The '**Fitout Items**' defined as:
 - Restaurant furniture – such as booth seating, tables, chairs and the like; and
 - Restaurant equipment – such as mechanical exhaust systems, ovens, grills and the like; and
- The '**Services**' defined as:
 - Trades such as equipment repair, pest control, waste removal and the like.

More specifically, with regards to the procurement of these goods, 99% are from Australian operated and based companies. However, we are cognizant of the fact the full supply chain of our tier one suppliers and service providers extends beyond the Australian borders. The list of countries includes but not limited to:

- China
- India
- Malaysia
- Vietnam
- Thailand
- Indonesia
- Ireland
- Netherlands
- United States of America
- South Africa
- Italy
- New Zealand

With this in mind, we are committed to working with our supply and service partners to identify the key suppliers at all levels the supply chain to improve the visibility of the full supply chain and associated modern slavery risk for key products and services used by Seagrass.

3. OUR RISK ASSESSMENT OF OPERATIONS AND SUPPLY CHAIN

3.1. Operations:

Operating within the hospitality industry, we understand there is a high risk of exploitation within the workforce. With the outbreak of the recent COVID-19 pandemic, these risks have become more prevalent. Issues relating to working conditions, wage compliance and nature of work are important factors to consider when assessing modern slavery risk within our workforce. However, as a majority of the workforce undertakes their activities in Australia and are covered by a range of policies and procedures (outlined further below), the risk of modern slavery in Seagrass operations has been overall assessed as low.

3.2. Supply Chain:

Seagrass has been operating its business in Australia for approximately 15 years. In that time, we have sourced our Food Products and Ancillary Products predominately from domestic suppliers. As our suppliers are located in Australia, the risk of modern slavery in Seagrass' supply chain has been overall assessed as low.

However we need to consider the potential risks associated with our extended supply chain (tier two and three) due to our lack visibility as they operate in various countries which are considered high risk for modern slavery practices. This includes extended supply chain for products such as packaging, consumables, kitchen equipment, restaurant furniture and beverages where the products are manufactured and distributed from known high risk countries like China, Thailand, Malaysia and India before it gets to our tier one supplier.

In Seagrass' view, this is where the greatest risk of modern slavery exposure could exist. To mitigate this risk, we will be implementing supplier questionnaires to continually monitor and understand our full supply chain and where it operates, then assess, check and act if any risk is evident.

4. ACTIONS:

4.1. Current policies and procedures:

To minimise the risk of Modern Slavery within Seagrass' operations, the following policies and procedures are in place, readily accessible and provided to all staff:

- All staff are paid in accordance with the appropriate industry award taking into consideration all applicable legislation;
- Recruitment policies in place to ensure employees are of working age and choose to work without duress and at their free will;
- Employees have access to a thorough and compliant Orientation & induction program, in order to fully integrate into the business and their role;
- Training in accordance with their position is conducted prior to operating independently, with periodic training refreshers & procedural updates given through mediums such as pre-shift briefings, workshops, E Learning, and Nationally Recognised Qualifications; and
- Fair evaluation of skills takes place at time-appropriate intervals, which gives employees the opportunity to receive and provide feedback in regards to their training, employment experience, and ongoing development.

In addition to the above, Seagrass' HR team have created a number of policies and procedures in place to protect our staff from a range of employment related issued such as:

- Whistleblowing Standard;

- Appropriate Behaviour in the workplace standard;
- Recruitment Standard;
- Performance Management Standard;
- Disciplinary Action Standard;
- WHS Standard & Procedures;
- Sponsorship Standard;
- Employee Handbooks;
- HR & Payroll Standard;
- Long Service Leave Standard;
- Social Media Standard;
- Privacy Standard; and
- Company Culture Statement.

4.2. Further actions:

Since the release of the Act, we have engaged the services of SEDEX (Supplier Ethical Data Exchange) who operate as a non-for-profit ethical data exchange program who assist us in the process of ensuring our suppliers engage in best practise procedures across our supply chain.

As SEDEX focuses on inherent risks relating to human and environmental rights associated with the countries, industries and activities of each supplier, we are confident SEDEX will be able to bring to our attention any prevalent issues within our supply chain. SEDEX do so by creating solutions in the following categories:

- Mapping the supply chain;
- Supply chain assessment and auditing;
- Risk assessment;
- Ethical data exchange platform;
- Reporting;
- Consulting; and
- Training.

In addition to the engagement of SEDEX, Seagrass will also seek to develop its own models, and improve its policies and processes tailored to identifying then addressing modern slavery risks and

encouraging transparency and collaboration within the supply chain. Seagrass is developing a Supplier Questionnaire dedicated to Modern Slavery compliance which will form part of its annual Supplier Account and Evaluation policies.

Furthermore, Seagrass has a stringent Food Safety & Quality testing system to ensure hazards and risks are identified and ensure continual compliance with legislative requirements.

We will continue aim to develop policies and procedures in the short-term that will allow Seagrass to comply with relevant legislation as well as ensuring all risks in the supply chain are adequately addressed.

As there is a positive growth into stamping out modern slavery within the market, we continue to work with all our suppliers to raise awareness of these inherent risks to do our part in ensuring market compliance and fairness industry wide.

5. **ASSESSING EFFECTIVENESS OF ACTIONS:**

Whilst we are in the early stages of our engagement with SEDEX, we are beginning to see the benefits of reviewing the assessment reports provided as part of SEDEX's engagement. We are confident these actions allow us to ensure we remain compliant with the Act and assist us in identifying all relevant risks with respect to modern slavery within the market.

As an aside, as mentioned above, Seagrass recently enacted a Whistleblowing Policy which establishes a platform for Seagrass staff to speak up on concerning and confidential matters. We have recently amended the policy to allow for modern slavery risks to be brought to management's attention in the unlikely event it exists. We are pleased to confirm, to date, no such risks have been identified within our organisation.

With our established policies and procedures in place, together with our quality control standards, our engagement with SEDEX and the development of our own Modern Slavery self-assessment tools, we are confident we have the appropriate policies and procedures in place to effectively mitigate, identify and / or rectify all modern slavery risks within our business and throughout our supply chain. In saying this, we are committed to continually seeking new ways to make inroads into eliminating modern slavery risks, both domestically and internationally.

6. MOVING FORWARD:

Seagrass is committed to ensuring its continual compliance with the Act and empowering its staff to ensure modern slavery risks are mitigated throughout the business and its supply chain. Looking ahead, Seagrass is eager to continue its work with SEDEX and assess our hospitality colleagues approach to eliminating modern slavery to gauge further opportunities to increase our approach to eliminating modern slavery risk within our business.

We look forward to advancing our approaches and methodology and welcome feedback on further initiatives we can undertake.

7. CONSULTATION PROCESS:

Seagrass, being a management entity, ensures all its subsidiaries incorporate all the policies and procedures put in place at management level across all associates restaurant groups. Seagrass meets with the management team employed across all brands regularly and modern slavery risk are discussed frequently.

The related entities of Seagrass and all subsidiaries have the same Board of Directors, and therefore Directors of all related entities have been consulted with in preparing this Modern Slavery Statement. Bradley Martin Michael is the Company Secretary of all the Reporting Entities and has taken an active role in ensuring there has been engagement and consultation with each entity.

This statement is made pursuant to the Act and constitutes Seagrass' Modern Slavery statement in respect of the 30 June 2020 financial year and is approved by the principal governing body of Seagrass, being its board of directors.

This statement has been approved by the Seagrass Board of Members on 21 February 2022.



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