



ROCKPOOL
DINING ★ GROUP

**MODERN
SLAVERY
STATEMENT
2020**

This statement has been approved by the executive team
and the Rockpool Dining Group board of directors.

ROCKPOOL DINING ★ GROUP

Introduction:

This statement addresses the obligations and compliance of Rockpool Dining Group Pty Ltd and its subsidiaries in (“Rockpool Dining Group” or “the Group”) relation to the Modern Slavery Act 2018 (“The Act”) and applicable state legislation. It outlines the steps we take to ensure there is no slavery or human trafficking occurring within our organisation or its supply chains. The statement applies to all of the Group’s operating entities as they are in the same sector and share suppliers, policies, systems and processes.

Rockpool Dining Group is committed to conducting its business in a moral and ethical way and recognises the need to establish and maintain corporate governance policies and business practices which reflect and comply with Australia’s legal and regulatory framework. We operate under various policies, codes and practices to ensure that high standards of corporate governance and legal compliance are maintained. In addition to being set out in Rockpool Dining Group’s code of conduct and employee policy, we recognise the value of people and our corporate responsibility to comply with this act.

About Our Group:

Rockpool Dining Group is Australia’s leading restaurant group, featuring a best in category portfolio of premium and casual brands across the country.

Our group has over 70 award-winning restaurants and bars, revenues of ~\$300 million and employs >2,500 staff members across New South Wales, Queensland, Victoria, South Australia, Western Australia, the Australian Capital Territory, and Auckland, New Zealand.

Rockpool Dining Group’s portfolio includes premium restaurants Rockpool Bar & Grill, Spice Temple, Rosetta, and Saké Restaurant & Bar and casual venues Bar Patrón, Fratelli Fresh, El Camino Cantina, Munich Brauhaus, The Bavarian, Beerhäus, WingHAÜS by Bavarian and The Argyle.

We embrace a Philosophy of Care across our business, which begins with looking after each other, but extends to looking after our suppliers, our environment, our community and our customers.

Rockpool Dining Group is committed to providing hospitality with warmth, generosity and sustainability embedded in everything that we do. Maintaining our reputation for integrity within our industry is essential to our continued success.

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Supply chains & risks of modern slavery

In FY20 Rockpool Dining Group engaged with over 1,000 suppliers to provide goods or services to our Group, with a total spend of over \$195 million.

Of this ~\$195 million, only 1.33% is attributed to International suppliers:

Supplier	Total Spend	% of Spend
Local	\$193,570,552	98.67%
International	\$2,591,341	1.33%

Of the countries identified to be most prevalent for modern slavery by the Global Slavery Index, we currently engage with only one supplier from a high-risk country (China) making up approximately 9% of our total spend to international suppliers.

Country of Origin	Total Spend	% of Spend
Germany	\$2,261,959	87%
China	\$220,273	9%
United Kingdom	\$51,880	2%
Italy	\$36,968	1%
USA	\$20,261	1%

The Global Slavery Index lists Australia's top five imported products at risk of being produced utilising Modern Day Slavery:

1. Laptops, computers & mobile phones
2. Garments
3. Fish
4. Rice
5. Cocoa

Currently Rockpool Dining Group purchases products in each of these categories via domestic suppliers who in some cases may import from overseas. In addition to these risk categories, the Group has identified that domestic Construction is a category of significant spend which may represent higher risk.

Actions to assess and reduce potential risks

When The Act was introduced, Rockpool Dining Group updated our company Terms and Conditions to include specific clauses mandating our suppliers adhere to this legislation. Any supplier who engages with our Group is required to agree to these terms before being initially onboarded and we are seeking to increase awareness of this area with our supplier base.

We then reviewed all active suppliers and identified our major vendors with an annual spend of over \$1 million (this included all suppliers and not just those falling under a high-risk category per the Global Slavery Index). We developed a template outlining our company's stance on modern day slavery and the expectations we held as a Group from all our partners, then included a questionnaire to gain further insight into the risks of modern slavery practices occurring in our operations.

Through this exercise we identified that many of our key suppliers were already actively putting processes in place to manage their own modern slavery risks in their supply chain and have been satisfied with the responses received to date.

We have built into our procurement practices that a supplier's ability to comply with the Act be considered by us when making procurement decisions. Recently we engaged one new international supplier and using this experience, we are developing more detailed due diligence processes we can adopt moving forward. We are also continuing dialogue with our existing suppliers in higher risk categories using targeted questions around this important issue.

We are committed to continuing to these risk assessments and addressing any actual or potential instances of modern slavery identified during these reviews. We recognise that we are still in early stages of developing full capabilities in this area and will continue to develop and improve on this, working in partnership with our suppliers. In order to assess the effectiveness of our measures, we are implementing semi-annual reviews involving senior management, procurement and human resources representatives to review progress and any issues identified.

To further mitigate risk, Rockpool Dining Group has a whistleblower protection policy which promotes honest and ethical behaviour by providing a confidential avenue for the escalation of reportable conduct. This whistleblower protection policy applies to all employees, who can however also raise concerns about the working conditions for our suppliers and contractors, including third party vendors and goods and service providers. All staff are required to review this policy as part of our employee onboarding process.

Lastly, Rockpool Dining Group understands the impact of COVID-19 has increased the potential risk of modern slavery within our supply chains – both locally and internationally – and has taken the following additional steps when dealing with our suppliers:

1. Ongoing engagement with suppliers assessed as higher risk to consider options to support vulnerable workers.
2. Careful review and mutual discussion when varying contract terms during lockdown periods.
3. Special consideration around deadlines, timeframes and last-minute orders to minimise pressure on workers.
4. Protective wear options provided to all staff and ensuring major suppliers are offering the same to their workers to ensure safe working environments.
5. Raising awareness of hotlines and support services for everyone.

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Chief Executive Officer