

MODERN SLAVERY STATEMENT

Seagrass Holdco Pty Limited (ABN 91 634 224 936)

Reporting Period: 1 July 2024 – 30 June 2025

1. Reporting Entity

This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth) and describes the actions taken by Seagrass Holdco Pty Limited and its controlled entities (together, Seagrass or the Group) to identify, assess and address modern slavery risks in its operations and supply chains.

Seagrass is committed to conducting its business ethically and responsibly, and to respecting human rights across all aspects of its operations.

2. Structure, Operations and Supply Chains

Seagrass Holdco Pty Limited is the parent entity and ultimate beneficiary of all operating entities within the Group. Each restaurant operates as a separate legal entity under a shared governance framework.

As at 30 June 2025, Seagrass employed approximately:

- 1,464 employees in Australia; and
- 100 employees in the United Arab Emirates.

The Group operates 19 full-service hospitality venues, trading as:

- 6Head (1788) – 2 venues in Australia
- The Meat & Wine Co – 12 venues in Australia
- Hunter & Barrel – 3 venues in Australia and 2 venues in the UAE

Seagrass' operations include the procurement of food, beverages, services and labour required to operate premium restaurant venues.

The Group sources the majority of goods and services from Australian-based suppliers, including meat, dairy, fresh produce, beverages and professional services. Where international products are offered (such as imported wines), these are procured through Australian importers and wholesalers. Seagrass does not directly source goods from overseas manufacturers.

3. Modern Slavery Risks in Operations and Supply Chains

The hospitality industry is recognised as having an elevated risk of modern slavery due to:

- Reliance on low-skilled and migrant labour
- Labour-intensive supply chains
- Use of subcontractors and casual workforce models

Although Seagrass' supplier base is predominantly domestic, the Group recognises that modern slavery risks may exist in upstream supply chains, including through imported goods and subcontracted labour arrangements.

4. Actions Taken to Assess and Address Risks

Supplier Due Diligence

Seagrass conducts annual modern slavery risk assessments of its suppliers through a Modern Slavery Self-Assessment Questionnaire (SAQ).

In FY25, the SAQ was refined to:

- Improve clarity and relevance of questions
- Reflect feedback from prior reporting periods
- Align with evolving legislative expectations and best practice
- Better accommodate the differing capabilities of suppliers, including small businesses

The SAQ assesses suppliers across five key risk areas:

1. Regulatory compliance
2. Internal policies
3. Supply chain management
4. Previous violations
5. Worker treatment

The SAQ was issued to approximately 250 active suppliers and service providers, with clear communication regarding participation expectations.

Participation and Assessment

- 109 suppliers submitted responses (including late responses following escalation)
- 96 suppliers were formally assessed
- 13 suppliers were excluded due to inactivity or no transactions during the reporting period
- 141 suppliers did not respond despite multiple follow-ups

5. Risk Assessment Outcomes

Based on SAQ responses, assessed suppliers were categorised as follows:

- Satisfactory – 66 suppliers
- Risk – Low – 21 suppliers
- Risk – Incomplete – 6 suppliers
- Risk – Assess – 3 suppliers

No confirmed instances of modern slavery were identified within Seagrass' operations or Tier-1 suppliers during the reporting period.

6. Remediation and Ongoing Actions

Seagrass adopts a risk-based approach to supplier engagement:

- Satisfactory and Risk-Low suppliers
 - Continued engagement and periodic monitoring
- Risk-Low suppliers
 - Direct engagement to address minor gaps
 - Support to complete outstanding information
- Risk-Incomplete suppliers
 - Simplified assessment tools and additional guidance
 - Provision of education and training resources
- Risk-Assess suppliers
 - Active dialogue and further review
 - Clear communication of expectations and potential consequences, including termination of supplier arrangements where necessary

For suppliers who failed to respond to the SAQ, Seagrass communicated that ongoing non-engagement may impact future commercial arrangements.

To support supplier capability uplift, Seagrass shared redacted versions of relevant internal policies, including whistleblowing, WHS, HR, payroll and code of conduct materials.

7. Assessing Effectiveness

Seagrass measures the effectiveness of its actions through:

- Annual supplier risk assessments and comparative year-on-year analysis
- Monitoring response rates and engagement levels
- Tracking risk classifications and remediation progress
- Continuous refinement of assessment tools and escalation processes

8. Consultation

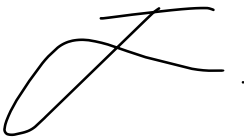
This Statement was prepared in consultation with the Directors and senior management of Seagrass Holdco Pty Limited and its controlled entities through the Group's shared governance framework.

9. Approval

This Statement is made in accordance with the Modern Slavery Act 2018 (Cth) and constitutes Seagrass' Modern Slavery Statement for the 2025 financial year.

This Statement has been approved by the Board of Directors of Seagrass Holdco Pty Limited.

Signed:



Joanne Cicchini
Seagrass Holdco Pty Ltd
Director