
Modern Slavery Statement FY24

TRIPPAS WHITE GROUP

Modern Slavery Statement

Introduction

The Modern Slavery Act 2018 ('Act') commenced operation on 1st January 2019. The Act aims to combat modern slavery in global supply chains. The United Nations and Walk Free Foundation estimate there are over 50 million victims of modern slavery around the world. The Act creates reporting obligations for Trippas White Group [TWG] (defined in Structure below) including producing an annual Modern Slavery Statement ('Statement') and examining modern slavery risks within TWG's supply chain.

Modern slavery encompasses practices such as human trafficking, forced labour, debt bondage, and other exploitative activities. The Global Slavery Index (GSI) highlights that modern slavery is prevalent across industries and geographies, with 15,000 individuals estimated to be living in conditions of modern slavery in Australia alone. This underscores the importance of ongoing vigilance and proactive measures.

Commitment

This statement is made pursuant to sections 14 and 16 of the Act and outlines the steps TWG is taking to ensure modern slavery and human trafficking does not form part of its organisation or supply chain and outlines TWG's efforts to mitigate modern slavery risks within its operations and supply chain. TWG is committed to continuous improvement to meet its responsibilities under the Act.

Organisation Structure, Operations & Supply Chain

TWG adheres to high ethical standards which are at the centre of its operations. Decisions and processes in its supply chain are made with careful consideration of these ethical standards. As such, TWG aims to partner with people and companies that align with these standards.

Structure

This statement covers the activities of TWG Pty Ltd and its subsidiaries (refer to Appendix A)

Direct Operations

Founded in 1990, TWG is an Australian-owned company with over 3,000 employees across 150 sites. Our services span diverse sectors, including education, retail, commercial, and government facilities. All employees operate within Australia, a low-risk geography for modern slavery due to robust labour laws and regulatory frameworks.

Supply Chain

TWG supply chain involves the procurement of food and beverage products, facilities management services, office consumables, and other operational necessities. Our supplier network comprises over 250 active suppliers, primarily located in Australia. By engaging local suppliers, TWG minimises exposure to high-risk geographies where modern slavery practices may be more prevalent.

Despite this low-risk environment, TWG recognises the potential for modern slavery to occur in the secondary or tertiary tiers of our suppliers' supply chains, especially in sectors such as agriculture and manufacturing. TWG proactive approach to supply chain management includes rigorous due diligence processes and ongoing engagement with suppliers to ensure alignment with our ethical standards.

Identified Risks of Modern Slavery

While TWG operates in a low-risk geography, modern slavery risks may arise in:

- Secondary and tertiary supplier tiers: Products sourced from international manufacturers through Australian distributors may involve exploitative practices.
- Labour arrangements: Migrant workers engaged by suppliers or agencies may face vulnerabilities, including underpayment and poor working conditions.
- Specific sectors: Agriculture, textiles, and electronics, which are known to involve higher modern slavery risks globally.

Risk Management

TWG is committed to ensuring that its operation and supply chain are free of any human rights violation and where potential risks are identified, that these are quickly addressed.

The appropriate action will depend on whether TWG has caused the impact, contributed to the impact, or is linked to the impact through its business relationships. In instances where TWG has caused the impact, actions will be taken to cease or prevent the risk. In instances where TWG has contributed to the impact or is linked to the impact through our business relationships, TWG will act and leverage our position to mitigate the remaining risk as much as possible.

Direct Operations

TWG operates in a regulated environment and has robust employee policies and procedures in place. As part of TWG's, employment controls including right-to-work, are tested, and confirmed by auditors. TWG's employees are a mix of skilled white-collar professionals and skilled blue-collar employees in front of house hospitality and kitchen orientated roles such as chefs, with the former recognised as presenting risks of modern slavery. TWG's employees are based and living in Australia.

TWG has policies, extensive online training and guidance for employees including, but not limited to:

- Modern Slavery Policy, identification and actions to mitigate its presence
- Whistle-blower Policy
- Employee Code of Conduct
- Leadership Training
- Corporate Social Responsibility Policy
- Anti-bribery and anti-corruption Policy

Supply Chain

TWG's ongoing assessment of its supply chain considers there to be minor exposure to areas of risk. TWG's food & beverage spend, being core to its business, is derived 100% from Australian suppliers.

If a modern slavery event was to occur, it would not be found within TWG, though potentially within a supplier's own supply chain at a second or third tier, rather than the supplier themselves.

To mitigate any risk, TWG's due diligence includes an audit of all active suppliers, involving the following steps:

1. Classification of all suppliers into three risk categories – higher, medium and lower risk. Factors considered in risk classification include geographic location, sector and probability of continued use or re-engagement.
2. Online search of suppliers for relevant modern slavery statements and disclosures.
3. Higher risk category suppliers are sent a TWG questionnaire and declaration requesting information on their compliance within the requirements of the Act, whilst also requesting their own Modern Slavery policy and statement. Trippas White currently does this action for all suppliers that are being onboarded.

The results of this questionnaire are outlined in the table below.

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- 1 57 suppliers (representing 92% of TWG's spend universe) rated as 'higher' and 'medium' risk were issued Modern Slavery Declaration and asked to provide their organisation's Modern Slavery Policy / Statement
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- 2 Over 75% of 'higher' risk suppliers and 56% of 'medium' risk suppliers completed this requirement.
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- 3 100% of respondents have processes in place to identify, investigate and address risks and any incidents of Modern Slavery.
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- 4 100% of respondents confirmed that there are no signs of Modern Slavery within their own supply chains, including forced, bonded or child labour.
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It is noted that these questionnaires and processes represent an ongoing commitment, and our target response rates are 100%.

Assessing Effectiveness of our Risk Management

The effectiveness of the modern slavery process is measured by a few key metrics.

Direct Operations

TWG conducts annual benchmarking of staff salary packages to ensure staff are fairly and appropriately remunerated as per industry standards and regulation. Numerous additional employee benefits are provided to all employees and regularly assessed by management.

Supply Chain

As part of the due diligence process TWG conducted an audit of all active suppliers. TWG continues to engage with suppliers directly to ensure their supply chains are free of modern slavery risks. TWG monitors the active supplier listing, and correspondence / results of questionnaires, ensuring an increasing number of suppliers are deemed low risk for modern slavery.

Reporting to the TWG Executive team of any incidents of Modern Slavery present within TWG supply chain and actions taken, along with statistics of Modern Slavery declarations and responses from all suppliers.

If no incidents of Modern Slavery are reported, TWG will continue to assess its supply chain and look for further opportunities to implement further actions for any potential risks.

To date, for FY24, there have been no incidents of Modern Slavery found or reported with the TWG supply chain. For all suppliers categorised as a higher risk, responses for TWG Modern Slavery declaration, Modern Slavery Statements or Modern Slavery Policies received have satisfied TWG that these suppliers are aware of their obligations and commitments to mitigating and ensuring that Modern Slavery is not present within their own supply chains.

Grievance & Remediation

TWG has committed to providing avenues for affected employees to safely raise concerns about modern slavery in TWG's operations and supply chain as referred to in TWG Whistleblower Policy.

TWG will continue to revise procedures for responding to potential modern slavery incidents.

Future Commitments & Next Steps

TWG will continue work to increase collaboration with internal and external stakeholders to prevent and address any contribution that TWG may have to the global issue of modern slavery.

TWG will achieve this by focusing on raising awareness of the forms of Modern Slavery among its employees and suppliers, continuing to evolve its due diligence processes to aid in the identification of risks, expanding the scope of its supply chain risk assessment, reviewing existing processes and exploring ways to improve identification and action on risks throughout its supply chain.

Further initiatives planned include:

- Monitor and continue to target a 100% compliance rate with potential high-risk suppliers within TWG's supply chain for responses and actions on Modern Slavery.
- Review and assessment of medium risk rated suppliers.
- Further review/update of our Modern Slavery Declaration for our suppliers and extending our Modern Slavery Declaration to a larger percentage of suppliers.
- Continued development of the framework for remediation of Modern Slavery incidents.
- Provide ongoing training and education to TWG employees on Modern Slavery.

Approval

This statement is made pursuant to sections 14 and 16 of the Act.

This statement was approved by the board of each of the five reporting entities covered by this statement.

The board of Trippas White Group approved this statement on 15th January 2024.



Kevin Zajax

Chief Executive Officer

Appendix A

TWG and its subsidiaries

- Trippas White Catering Pty Ltd
ABN: 21 003 968 492
- Trippas White Group Pty Ltd
ABN: 42 119 225 026
- STR Operations Pty Ltd
ABN: 886 119 225 213
- Watt Operations Pty Ltd
ABN: 33 125 518 318
- Alliance Opco Pty Ltd
ABN: 87 654 268 390

Appendix A

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