

HT HoldCo Pty. Ltd.

Modern Slavery Statement

December 2023

1. Identify the reporting entity.

HT HoldCo Pty. Ltd. (the "Company") is providing this statement in compliance with the Australia Modern Slavery Act 2018 (No. 153, 2018). The Company is incorporated in Australia as a private company with an ACN 645 356 903, and oversees the provision of commercial textile supply, laundry services and associated operations across Australia and New Zealand, through separate financing and operating entities in each country.

2. Describe the reporting entity's structure, operations and supply chains.

a) Structure

The Company was formed to acquire and manage the operations of the business of the Laundries previously owned by Spotless through the Downer Group in Australia and New Zealand. It took over these assets in April 2021 and the Company's Board is represented by its key Shareholders and from October 2022 has operated fully on its own systems and procedures. For completeness and compliance with the Modern Slavery Act, where our structure, operations and supply chain have remained the same since the last reporting period, we have re-stated the same information in this statement.

The Company as the parent holding entity incorporates a number of direct subsidiaries within the structure. The subsidiaries, all 100% owned are HT MezzCo Pty Ltd (ACN 645 356 903), HT MidCo Pty Ltd (ACN 645 357 937), HT BidCo Pty Ltd (ACN 645 358 292), NZ BidCo Limited, Taylors Laundries Limited (NZBN 9429047831964), Ensign Services (Aust) Pty Ltd (ACN 006 254 306), HT PropCo1 Pty Ltd (ACN 645 958 407), HT PropCo2 Pty Ltd (ACN 645 958 550) and HT PropCo3 Pty Ltd (ACN 645 985 747).

Financing is managed through a direct subsidiary of the Company, being HT MidCo Pty Ltd (ACN 645 357 937). This company employs no staff and serves no function other than providing finance security for the operations.

This reporting entity is the ultimate parent company of the operating company of Ensign Services (Aust) Pty Ltd ("Ensign") in Australia and Taylors Laundries Limited ("Taylors") in New Zealand. These are the two legal entities that are the trading operational entities, employ staff for operations, hold contracts with our customers, supply the services to our customers and manage and procure products through the Supply Chains. Both have been operating in their respective countries for over 90 years.

Ensign trades under the trading names of Linen Services Australia for linen and Ensign Services for garments. Taylors trades across all segments under the one trading name, Taylors. The Executive works across these two entities to drive and pursue the business objectives and strategy and oversee the governance and compliance of modern slavery and other human rights risks.

Specifically, the day to day responsibility of Modern Slavery reporting and actions is managed by the Group's Procurement Manager and reports through the Chief Financial Officer to the Executive on a regular basis or as necessity requires. The Procurement Manager is also involved in our Risk Register reviews to ensure Modern Slavery issues are included.

b) Operations

Ensign and Taylors are the leaders in Australia and New Zealand in providing textile management and laundry services to the Health, Hospitality, Commercial, Airlines and Industrial segments.

The COVID-19 pandemic imposed significant challenges on the business operations, but while the business has returned to more normal operations, the Company still monitors the varying State and Country regulations and customers rules to ensure compliance with applicable government requirements and the associated safety guidance. The Company has adapted its operation to allow employees not required to be in an office environment full time to work in part remotely.

Ensign employs over 2,000 people in Australia and Taylors over 400 people in New Zealand. Most staff are employed directly in laundry processing facilities. The Company operates 10 laundry facilities in Australia and 2 in New Zealand.

The staff in the business are traditionally long serving employees, with any permanent vacancies being filled through directly hiring new staff from applications received in response to vacancy advertisements. The business does through periods of growth and expansion utilize agency staff in some locations, but this is only as a short-term measure. Staff across Australia and New Zealand are employed under a variety of awards and agreements, with all but 2 sites having formal enterprise agreements in place.

c) Supply Chains:

The major input for Ensign and Taylors is its labour that is locally employed and managed at its laundry operating facilities, which primarily washes and manages the textile products owned by the Company or supplied by its customers. This labour is directly employed by the Company and managed by the Company's Policy and Procedures.

In addition to direct labour, the Company across Australia and New Zealand has over 900 suppliers with a total spend per annum of around \$125 million (excluding labour and associated costs, contract drivers and financing associated costs). The main suppliers for the raw materials purchased in the laundry business operations are in four categories, which are:

- i) Utility services such as gas, electricity and water (18 suppliers)
- ii) Chemicals (2 suppliers)
- iii) Laundry equipment associated parts and expertise, primarily from international laundry suppliers, Jensen and Kannegiesser (19 suppliers)
- iv) Textiles being linen or garments, with the majority being from Simba (linen) and NCC (garments) (7 suppliers)

In aggregate the above four supplier categories represent a spend of \$75 million, which is 60% of our total external supplier spend. The Company spends less than \$50k per annum on average with over 800 of our suppliers.

The above four key categories are purchased from suppliers within either Australia or New Zealand that abide by the ethical and sustainability goals set forth by the Company, including our Modern Slavery Policy. The only exception is the purchase of major new laundry equipment, where purchase orders are negotiated directly with the overseas parent supplier.

Our purchasing decisions are based on safety, quality, service and price; opting to purchase on secure local contracts to minimize emissions from shipping materials overseas and support local economies.

The Company has analysed its Suppliers by risk category and spend level based on a risk matrix and adopted different strategies of management and interaction with the Suppliers depending on the identified risk. As an example, financial services such as Tax, Insurance or Workers Compensation were identified as minimal Supply Chain risk and no action was taken, however, suppliers of chemical and textiles were identified as high risk and a detailed interaction with these supplier categories was undertaken.

A summary of the risk matrix used is detailed below:

Category	Type of Services
Nil	<ul style="list-style-type: none"> • Federal or state government departments • Small supplier with annual invoice value below \$300k • Companies providing one-off services e.g. equipment installation
Low	<ul style="list-style-type: none"> • Australian companies providing in-direct services, utilities to Ensign Services • Companies Supplying Laundry equipment for one-off project work or general off-the-shelf products to Ensign Services
Medium	<ul style="list-style-type: none"> • Companies with staff working at Ensign sites or processing Ensign products in Australia.
High	<ul style="list-style-type: none"> • Companies having overseas manufacturing facilities (own or subcontractor) producing speciality products for Ensign services

3. Describe the risks of modern slavery practices in operations and supply chains.

a) Overview of modern slavery and the anti-slavery effort

An estimated 50 million people worldwide were living in modern slavery on any given day in 2021, an increase of 10 million people since 2016 (Walk Free Global Slavery Index), with the Asia and the Pacific having the largest number in modern slavery estimated at 29.3 million people. The Walk Free Foundation, the United Nations' International Labour Organization ("ILO") and other non-profit and governmental entities have, through research over the past decade, identified countries and industries with elevated risks of modern slavery.

They have found that the risks of modern slavery are higher in countries where there is political instability, violent conflict or war, lack of basic needs, disenfranchised groups of people, and high levels of inequality among people, and they have published rankings identifying the highest risk countries and regions as well as the highest risk products and industries. The research completed by these organization has enabled companies worldwide to conduct more targeted assessment of their operations and global supply chains in support of the effort to eliminate modern slavery.

b) Risks of modern slavery in Ensign and Taylors industry sector and operational locations

Ensign and Taylors operate directly only in Australia and New Zealand and comply with all rules and regulations of the respective countries. There is minimal risk associated with our industry sector and operational locations.

Ensign and Taylors main operational business lines have not been identified by the ILO, Walk Free or other organizations as high-risk industries (the five highest risk industries are identified as the computer/ mobile phone industry, the retail garment industry, and the fishing, cocoa and sugarcane industries).

c) Risks based on our suppliers' industries and locations

Ensign and Taylors have analyzed their suppliers and identified potential suppliers where there may be areas of concern as outlined above in our risk matrix applied across our suppliers.

The highest identified supply chain risk is the potential risk of the supply chains of our contracted Australian based Textile Suppliers in both Linen and Garments whose products are made overseas.

The textile suppliers supply chains are likely to procure from direct and indirect suppliers operating in industries and countries where the risk of modern slavery is higher. In addition, labour supply within our Transport Suppliers is considered a potential high risk. As such additional precautions, such audits of the operations, demonstration of rate of remuneration being paid and declarations of compliance, have been taken associated with these suppliers to ensure compliance.

4. Describe the actions taken to assess and address these risks.

a) Modern Slavery Policy

The Company and its two operating entities, Ensign and Taylors, reviewed and maintained through the year a Modern Slavery Policy (the "Policy") that forms the basis of the business' approach to combatting human trafficking and slavery. The Policy applies to all personnel, including Directors, Officers, and employees. The Policy applies equally to our agents, subcontractors, product suppliers, distributors, vendors, and other firms that furnish supplies or services to or for Ensign or Taylors ("Suppliers"). As has occurred in previous years, the policy is annually reviewed to ensure it remains current and this policy is presented to the Board for approval.

Under the Policy, as previously identified to minimise the risk of Modern Slavery, Ensign, Taylors and its Suppliers shall not:

- Engage in trafficking in persons or the recruitment, harboring, transportation, provision, or obtaining of a person for labour or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery;
- Procure commercial sex acts;
- Use forced labour in the performance of any contract;
- Destroy, conceal, confiscate, or otherwise deny access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- Use misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work;
- Use recruiters that do not comply with local labour laws of Australia or New Zealand as applicable where the recruiting takes place;
- Charge any employee the cost of recruitment fees in their subsequent employment;
- If required by law or contract, fail to provide an employment contract, recruitment agreement, or other required work document in writing.

The Directors, Officers, employees, and Suppliers of the Company and its subsidiaries are responsible for complying with this Policy, and including the substance of this Policy in applicable contracts with Suppliers.

As in the prior years, the Company takes any violation of the Policy very seriously and will result in disciplinary action, up to and including removal from a contract, reduction in benefits, termination of a business relationship, or termination of employment. Any credible information regarding a potential violation of this Policy, whether discovered by an employee or a Covered Entity, must be promptly reported to a Senior Manager and the General Manager of Human Resources.

Alternatively, violations may be reported anonymously through the Company's Whistleblower

pathway. Any Senior Manager receiving notification of a potential violation of this Policy must immediately report the matter to the Chief Executive Officer. The Policy also prohibits retaliation against those who make reports of misconduct and prohibit interfering with employees' cooperation with Government authorities investigating allegations of prohibited activity.

b) Verification of Supplier Practices.

To evaluate and address risks of human trafficking and slavery in its supply chains, Ensign and Taylors undertake formal and ethical assessment of Suppliers in parts of the business where there is an elevated risk of slavery and human trafficking in order to verify compliance with ethical sourcing requirements. This year a new more detailed approach was undertaken.

This year the Company reviewed and introduced a new risk-based assessment of suppliers based on the perceived potential risk of the product/services supplied to the Company and the level of expenditure by the Company with the Supplier. This multi-level risk management approach will be continuously reviewed to ensure that the highest identified risk suppliers are targeted effectively to minimise the likelihood of any risk. Each Supplier allocated to a specific risk category was subjected this year to a specific risk mitigation response.

As part of the Company's commitment to continuous improvement to mitigate identified risks, these risk-based initiatives along with the utilization of an external contractor to independently assess our actions and assist with suggestions for continual improvement was implemented.

The Company this year required the identified high-risk suppliers in the chemical and textile manufacturing categories to comply with a detailed questionnaire and review assessment. This assessment involved direct contact and interaction with these suppliers, including the requirement that they complete a detailed assessment questionnaire, provide us copies and details of their policies and audit reports from their suppliers and sub-contractors.

The Company has continued to actively monitor these suppliers through the year and adapt and expand the number and scope of suppliers required to comply with this assessment as required. These assessments are now introduced for any supplier that is new and identified as a high-risk provider.

The Company as part of this updated focus this year, have questioned these suppliers not only on their policies, but on management practices and specific performance related to protection of employees' human rights and prevention and elimination of trafficking and slavery. They have all been required to supply a copy of their Modern Slavery Policy and confirm compliance with such policy. The high-risk suppliers in the Chemical and Textile categories have responded to such questions and supplied copies of their modern slavery statements. This includes presentation of the independent audits of the supply chain at specific review meetings.

The next level of suppliers on the risk matrix, which are primarily in the transport, cleaning, staffing services or engineering contractor categories (approximately 40 suppliers) were for the first time this year also forwarded questionnaires on their business practices regarding modern slavery which they are required to return along with their modern slavery policy. The also need

to confirm in writing that they are following all Australian regulations and requirements.

The Company's Procurement Team continues to analyze the business suppliers and the potential supply chains to identify purchases that may be at risk. It has mapped out a plan for the coming 12 months to ensure on-going and review actions are completed in a timely manner.

c) Supplier, Contractor and Employee Accountability

Ensign and Taylors' employees continue to be as in past years held internally accountable for ensuring that the business meets its set standards regarding slavery and trafficking through our Code of Conduct and associated Policies. The Code of Conduct requires employees and contractors to act ethically with a sustainable source selection. It also makes clear that compliance with applicable government regulations and Company policies and procedures is required of all suppliers, agents and consultants.

In addition, this year, the Company has introduced a review of its payroll system focusing on ensuring that all employees are correctly paid, ensuring independent accountability. This was undertaken by one of the big four accounting firms and confirmed that employees are all paid correctly.

All at risk Contractors are required to provide responses to our Modern Slavery Questionnaires, their Modern Slavery Policy and confirmation that they are meeting all Australian regulations annually. The Company has systems in place in the Procurement Team to ensure this accountability is measured and maintained.

d) Training

In the past year the Company introduced a new business wide training on all the core items of its Modern Slavery Statement and Policy. This training was rolled out to all the Ensign and Taylors Senior Management Team. As part of this new detailed training a presentation, video and question and answer session was undertaken by the Company. At the end of this Training Session all the Senior Management Team were required to complete a self-assessment questionnaire on Modern Slavery for assessment.

This training included definitions and examples of Modern Slavery, Suppliers that have area potential risk, actions to be called out and how to respond if Modern Slavery is identified. Participants were also advised on what the business is doing to minimise any risk associated with Modern Slavery.

In another new addition to broaden the reach of information and to capture all of our employees, details of Modern Slavery, the Company's Policy and the associated risks and details of the Company's code of conduct were publicised in detail in the Company's internal Newsletter to all staff. Staff were encouraged to call out any known or potential Modern Slavery risks through the Company's whistleblower line.

5. Describe how the reporting entity assesses the effectiveness of these actions.

The Company has in the last 12 months significantly raised the awareness of Modern Slavery amongst its Staff and across its Suppliers. Legislation like the Australia Modern Slavery Act has focused needed attention on this topic.

During the past year, Ensign and Taylors have sought outside independent external consultants to assist in assessing the effectiveness of its actions. The consultants have reviewed not only the Company's Policy and Statement, but the actions in identifying supplier risk and the actions being undertaken to mitigate and educate about any risks. As part of the independent analysis the consultants have benchmarked the Company's response and actions against the requirements in the Act and with similar sized businesses.

This review confirmed that the Company was meeting its obligations with regards to Modern Slavery requirements.

The Company has also measured the response rate of the questionnaire and the level of responses provided to assess the awareness and effectiveness of our Suppliers. It has also monitored the level of responses in meeting the requirements. All suppliers with overseas manufacturing have responded and fully complied.

It has also specifically measured any calls to the Whistleblower line or any feedback to any Senior Manager relating to Modern Slavery. No incidents or reports were recorded.

In addition, the Company this year has benchmarked itself against other businesses associated with its primary shareholder to ensure that it is undertaking all actions appropriate to ensure its policy, procedures and the plan are covering all aspects required under the Act to minimise its risks.

6. Describe the process of consultation with any owned or controlled entities.

The Company has worked closely with its Senior Executives, Senior Management Team and its majority shareholder in developing this Statement. The detail associated in the Statement has been widely reviewed and considered and approved by the Board of HT HoldCo Pty Ltd.

This Statement will be continually reviewed throughout the year as circumstances require, and will be presented to the Board for review and discussion on an annual basis, with formal ratification at the November Board Meeting.

All entities in the Company Group are 100% owned subsidiaries and are controlled by the same shareholders and have appointed the same directors who have prepared, reviewed and adopted this Statement, as have the Management of the trading entities of Ensign and Taylors.

The entities owned or controlled by HT HoldCo Pty. Ltd., other than Ensign and Taylors, are non-operational and thus do not have any independent supply chains to which the Modern Slavery Act would apply.

7. Provide any other relevant information

HT HoldCo Pty Ltd and its Australian and New Zealand subsidiaries are committed to combatting modern slavery and look forward to working with our suppliers, customers and governmental authorities worldwide to enhance the effectiveness of our efforts and, ultimately, to eradicate modern slavery.

This Australia Modern Slavery Act Statement was approved by the Board of Directors of HT HoldCo Pty. Ltd, in their capacity as principal governing body of HT HoldCo Pty. Ltd. on Thursday 23 November 2023.

Signed:



Name:

Vita Pepe

Position:

Chairperson of HT HoldCO Pty. Ltd.