

Anti-Slavery And Human Trafficking Policy

INTRODUCTION

Cater Care is an industry-leading contract catering, accommodation and facility management service proudly 100% Australian-owned and operated.

The Cater Care Way describes our commitment to do our best, every day. This is embodied in our standards, which:

- determine the quality of food we serve and the experience we give our clients and customers
- guide our client and customer interactions, and
- are built on our core values of **care, pride and community**.

These values are the key to how we do business and as such modern slavery and human trafficking are not acceptable activities.

Cater Care has a zero tolerance approach to all forms of modern slavery and human trafficking within its business and within its supply chain and is committed to acting ethically and with integrity in all its business dealings and relationships.

WHAT IS MODERN SLAVERY?

The *Modern Slavery Act 2018 (Cth)* applies to Cater Care's business. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as:

- child labour
- slavery, forced labour or servitude
- human trafficking (arranging or facilitating the travel or movement of a victim with a view to them being exploited)
- committing any offence with the intention to commit human trafficking
- aiding, abetting, counselling or procuring any of the above offences, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

WHAT WE DO TO ADDRESS MODERN SLAVERY

Cater Care has put measures in place that are designed to prevent modern slavery and human trafficking within its business and supply chain. These measures include the following elements:

- this Policy which articulates Cater Care's commitment to prevent violations of the *Modern Slavery Act 2018 (Cth)* within its operations and supply chain
- communication of this Policy to employees and our supply chain
- the assessment of modern slavery and human trafficking risks within Cater Care and its supply chain and the development of effective, efficient and transparent controls to reduce exposure to those risks
- communication of our expectations regarding modern slavery activities at the time of onboarding a supplier
- the adoption of anti-slavery wording in our terms and conditions with suppliers
- the adoption from 2023 of:
 - an ongoing annual assurance check with Cater Care's suppliers
 - modern slavery training for relevant Cater Care employees who deal with suppliers to Cater Care so that individuals can recognise modern slavery practices and take steps to avoid them.

In addition to these measures:

- Cater Care's policies, procedures and processes ensure that wages comply with relevant legislation
- Cater Care provides safe and fair working conditions for all its employees and ensures that no child labour is employed in line with minimum age laws throughout Australia.

REPORTING AND INVESTIGATION

The prevention, detection and reporting of modern slavery in any part of Cater Care's business and supply chain is the responsibility of all those working for it or under its control. Those working on Cater Care's behalf are required to avoid any activity that may lead to, or suggest, a breach of this Policy.

Cater Care encourages openness and will support anyone who raises a genuine concern in good faith under this Policy, even if it turns out to be mistaken.

In the first instance, employees should raise concerns with their direct manager and the Director - Legal & Risk. Alternatively the other mechanism to raise concerns is via the [Whistleblower Policy](#).

If the employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of Cater Care's supply chain constitutes any of the various forms of modern slavery, it should be raised with their manager and the Director - Legal & Risk.

All concerns raised in relation to matters that this Policy addresses, will be investigated.

Cater Care takes a breach of this Policy seriously and an employee who breaches this Policy by engaging in or conspiring to engage in any modern slavery conduct or human trafficking will be subject to disciplinary action. Cater Care may terminate its relationship with other individuals and organisations working on its behalf or engaged by it if they breach this Policy. It may also make a notification to relevant authorities.

Cater Care is committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of its business or in any part of its supply chain. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If any employee believes that they have suffered any such treatment, they should inform the Director - Legal & Risk, immediately.

A report of any incidents of modern slavery that are identified and how they have been dealt with, will be provided to Cater Care's board as well as any disclosures that come from any investigations of matters raised through the Whistleblower Policy.

If you have any questions about this Policy, please contact the Director - Legal & Risk.



Colin Redman

Chief Executive Officer

Date Approved: January 2022

