

GUZMAN Y GOMEZ GROUP
MODERN SLAVERY POLICY

CONTENTS

1	POLICY STATEMENT	1
2	RESPONSIBILITY FOR THE POLICY.....	2
3	COMPLIANCE WITH THE POLICY	3
4	COMMUNICATION, AWARENESS AND MONITORING OF THIS POLICY.....	4
5	BREACHES OF THIS POLICY	4

1 POLICY STATEMENT

- 1.1 Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, including:

Slavery	Exercising powers of ownership over a person.
Servitude	The obligation to provide services is imposed using coercion.
Forced or compulsory labour	Work or services are not undertaken voluntarily and are exacted from a person under the menace of threat or punishment.
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation, including for example, through deceptive recruitment or coercion.
Bonded labour or debt bondage	Work or services are demanded for repayment of a debt, often where the debt and the duration of the services may not have been defined.
Child labour	Where a child under the age of 18 years is exploited for labour.

- 1.2 The above range of rights abuses affect both adults and children. They all have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

- 1.3 It is important to understand that there is no typical victim and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a slavery or trafficking victim:

- 1.3.1 the person is not in possession of their own passport, identification or travel documents;
- 1.3.2 the person is acting as though they are being instructed or coached by someone else;
- 1.3.3 they allow others to speak for them when spoken to directly;
- 1.3.4 they are dropped off and collected from work;
- 1.3.5 the person is withdrawn or they appear frightened;
- 1.3.6 the person does not seem to be able to contact friends or family freely; or
- 1.3.7 the person has limited social interaction or contact with people outside their immediate environment.

- 1.4 This list is not exhaustive and provides examples only. Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right. If you have a suspicion, report it. Refer to the Compliance section below for further detail.

- 1.5 Guzman y Gomez (Holdings) Ltd and its related bodies corporate (collectively, **GYG**) is committed to acting ethically and with integrity in its business dealings and relationships, and to implementing and enforcing effective systems and controls to reduce the risk of modern slavery taking place in its own business or in its supply chains.
- 1.6 GYG is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains. GYG expects the same high standards from its franchisees, contractors, suppliers, and other business partners. As part of its contracting processes, GYG includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery, servitude, or debt bondage, whether adults or children. GYG expects that all of its business partners will act in accordance with the terms of this policy and will hold their own suppliers and other business partners to the same high standards.
- 1.7 All persons working for GYG or on its behalf in any capacity, including employees at all levels, directors, officers, franchisees, agency workers, seconded workers, volunteers, interns, and agents are required to comply with the terms of this policy.
- 1.8 This policy does not form part of an employee's contract of employment and GYG may amend it any time.

2 RESPONSIBILITY FOR THE POLICY

- 2.1 The board of directors has overall responsibility for ensuring this policy complies with GYG's legal and ethical obligations. The board of directors is also responsible for approving GYG's annual modern slavery statement.
- 2.2 The Chief Financial Officer (the **Modern Slavery Officer**) will have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, and dealing with any queries about it. The Modern Slavery Officer's responsibilities extend to:
- 2.2.1 monitoring, consulting and auditing internal controls and procedures to identify risks of modern slavery practices in GYG's operations, including in its subsidiary organisations;
 - 2.2.2 monitoring and consulting with the suppliers, contractors and business partners of GYG to identify risks of modern slavery practices in our supply chains;
 - 2.2.3 developing measures to assess and address any risks of modern slavery practices, including through due diligence in GYG's contractual relations;
 - 2.2.4 monitoring the effectiveness of those measures;
 - 2.2.5 developing appropriate training materials and programs for GYG's employees to comply with this policy and to communicate GYG's expectations to its franchisees, contractors, suppliers, and other business partners; and
 - 2.2.6 preparing GYG's annual modern slavery statement in accordance with our disclosure obligations under Australian modern slavery legislation.
- 2.3 Management at all levels will:
- 2.3.1 listen and be approachable to others within GYG's business;

- 2.3.2 respond appropriately if they are told something that might indicate an exploitative situation;
 - 2.3.3 remain alert to indicators of modern slavery;
 - 2.3.4 use their experience and professional judgment to gauge situations; and
 - 2.3.5 ensure those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains, including any areas of GYG's business and supply chains which are identified as at risk of modern slavery practices.
- 2.4 All those working for GYG (or under its control) have responsibilities under this policy regardless of the level of seniority - refer to the Compliance section below for further detail. You are also invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries are encouraged and should be addressed to the Modern Slavery Officer who you can:
- 2.4.1 speak to in person;
 - 2.4.2 email at legal@gyg.com.au; or
 - 2.4.3 telephone on 02 9191 0900.

3 COMPLIANCE WITH THE POLICY

- 3.1 You must ensure that you read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of GYG's business or supply chains is the responsibility of all those working for GYG or under its control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of GYG's business or supply chains of any supplier tier at the earliest possible stage.
- 3.4 You can raise your concern by speaking with the Modern Slavery Officer, or alternatively, you can raise your concern in accordance with GYG's Whistleblower Policy. Reports may be made on an anonymous basis.
- 3.5 The Modern Slavery Officer is also available to answer any questions you might have in respect of the operation of this policy.
- 3.6 GYG aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. GYG is committed to ensuring no one suffers any detrimental treatment as a result of reporting their genuine suspicion that modern slavery of whatever form is or may be taking place in any part of GYG's business or in any of its supply chains. GYG's Whistleblower Policy explains in further detail the protections that are available to anyone who raises a concern under that policy.

4 COMMUNICATION, AWARENESS AND MONITORING OF THIS POLICY

- 4.1 GYG will provide regular training to all of its employees on this policy. This will include training on how to identify modern slavery practices and the parts of GYG's business and supply chains which are subject to a greater risk of modern slavery practices. This training will also form part of the induction process for all individuals who work for GYG, whether as an employee or contractor.
- 4.2 GYG's commitment to addressing the issue of modern slavery in its business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of any business relationship with GYG and reinforced as appropriate thereafter.
- 4.3 GYG will review this policy regularly, at least every two years. GYG will provide information and/or training on any changes that may be made.

5 BREACHES OF THIS POLICY

- 5.1 Any employee, or other person working for GYG or on its behalf, who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.2 Similarly, GYG will consider and take appropriate steps including the possible termination of its relationship with a business partner if the business partner does not act in accordance with this Policy.