HUMAN RIGHTS POLICY

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1. WHAT IS MODERN SLAVERY?

Modern slavery refers to various forms of exploitation and coercive practices that deprive individuals of their freedom, rights and dignity. It encompasses situations where individuals are forced or coerced into labour, servitude, or human trafficking against their will. Modern slavery can take different forms, including forced labour, debt bondage, forced marriage, human trafficking, and child labour.

The International Labour Organisation estimates that over 50 million people around the world are victims of modern slavery. In recent years, supply chain transparency is a key policy strategy used by governments to identify and prevent business practices that lead to modern slavery.

GYG has a zero-tolerance approach to Modern Slavery in any of its forms, and is actively working to assess, address and monitor current and potential suppliers to minimise risk and avoid these unacceptable practices.

Definitions

Slavery	Exercising powers of ownership over a person.
Servitude	Forcing someone to work against their will, often through threats or coercion.
Forced or compulsory labour	Work or services are not undertaken voluntarily and are extracted from a person under the menace of threat or punishment.
Forced marriage	A marriage without free and full consent involving physical or emotional pressure, including threats of violence.
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 in unsafe conditions and deprived of education.

2. OVERVIEW

GYG is committed to implementing and enforcing effective systems and controls to minimise the risk of Modern Slavery within our operations and supply chains. We strongly encourage our team members to report any concerns or suspicions about Modern Slavery to their manager or the People department. Potential indicators of Modern Slavery may include:

- Workers who are denied breaks or required to work long hours without rest.
- Workers who appear to be under the control of another person, or who are accompanied by someone else at all times.
- Workers who are not provided with a contract of employment or whose terms and conditions of employment are not clearly explained.

- Workers who are restricted from leaving the workplace unaccompanied or from freely exiting the premises.
- Workers who are exposed to unsafe working environments due to a lack of protective equipment, exposure to harmful chemicals, or unsafe equipment and machinery.
- Workers who are exposed to abusive behaviors such as threats, punishment or restricted communication.
- Workers who receive less than the national minimum wage or experiencing unexplained deductions from their pay.
- Workers who are housed in accommodation that is not suitable or who are charged excessive rent for their accommodation.
- Through vigilance and proactive reporting, we can collectively help identify and prevent Modern Slavery within our workplace or supply chain.

3. SCOPE

This policy applies to all individuals working for or on behalf of GYG in any capacity, including but not limited to, employees and contractors, and to GYG's franchisees (collectively referred to as **Stakeholders**). We expect all Stakeholders to adhere to the principles outlined in this policy to ensure their own suppliers and partners uphold the same high standards, as GYG is committed to maintaining transparency throughout its business and supply chain.

4. STAKEHOLDERS RESPONSIBILITIES AND COMMITMENTS

All Stakeholders are required to:

- **Understand GYG's Policy on Human Rights:** Familiarise themselves with the policy and gain a clear understanding of what Modern Slavery is and how it can manifest in various forms.
- **Recognise Key Indicators:** Be vigilant about the signs of Modern Slavery and promptly report any concerns or suspicions to their manager or HR department.
- **Comply with Legislation:** Adhere to all applicable laws and regulations related to Modern Slavery, including the *Modern Slavery Act 2018* (Cth) and any other relevant legislation.
- **Act Responsibly:** Ensure their actions neither contribute to nor facilitate any form of Modern Slavery within the workplace or supply chain.
- **Participate in Training:** Engage in the targeted training or awareness programs provided by GYG to acquire the necessary knowledge and skills to identify and prevent Modern Slavery.
- **Support GYG's Efforts:** Collaborate with GYG to identify and address instances of Modern Slavery and contribute to the development and implementation of effective measures to combat it.

Leadership and Governance

The Risk Strategy Forum, led by the Head of Legal, oversees the implementation and management of this policy. This multidisciplinary team comprises members from legal & compliance, people, supply chain, IT, finance, and

operations, ensuring a comprehensive approach to tackling Modern Slavery risks. The Head of Sustainability is designated as the Modern Slavery Officer.

Reporting and Accountability

GYG's Board of Directors and the Audit and Risk Committee are actively involved in overseeing GYG's Modern Slavery compliance. This includes regular updates on risk assessments and supplier compliance through the Risk Strategy Forum. The leadership's commitment underscores GYG's dedication to ethical practices and human rights across our operations and supply chain.

5. COMPLIANCE WITH THE POLICY

All Stakeholders are required to read, understand and comply with this policy. The responsibility for preventing, detecting and reporting Modern Slavery within GYG's operations or supply chain is the responsibility of every individual working for or on behalf of GYG. Stakeholders must actively avoid any actions that could lead to, or imply, a violation of this policy and are expected to take all reasonable measures to ensure that GYG's operations and supply chain remain free from Modern Slavery practices.

All individuals are strongly encouraged to promptly report any concerns or suspicions of Modern Slavery within GYG's business operations or supply chain, at any supplier tier. Concerns can be directed to the Modern Slavery Officer or submitted anonymously through the channels detailed in GYG's Whistleblower Policy.

GYG fosters a culture of openness and will fully support anyone who raises genuine concerns in good faith, even if the concern proves to be unfounded. The organisation is firmly committed to protecting individuals from any form of retaliation or adverse treatment as a result of reporting suspicions of Modern Slavery. For further details on the protections available, please refer to GYG's Whistleblower Policy.

To contact the Modern Slavery Officer, send an email to **humanrights@gyg.com.au**. For anonymous reporting, you can email **tellusgyg@deloitte.com.au**.

6. POLICY ALIGNMENT TO CODE OF CONDUCT

The GYG Code of Conduct is the policy that governs behaviour at GYG. This Policy adds to the GYG values and promotes behaviours and mindsets that will embed those values and continue to promote our culture. The table below summarises some of the key areas of alignment for this Policy.

Value	Alignment
Be real	**Prescribes key requirements for:** • the open communication of concerns or suspicions of Modern Slavery indicators • the training and supervision of all employees regarding Modern Slavery risk factors
Got your back	**Prescribes key requirements for:** • identification and control of risks arising in relation to Modern Slavery

	• implementation of reporting procedures and a speak up culture which empowers employees to report all instances of behaviours which could suggest Modern Slavery • support of Stakeholders who are subjected to Modern Slavery risks
It's up to us	**Prescribes key requirements for:** • leadership and commitment to eliminating Modern Slavery as far as possible • behaviours that promote a culture of accountability, effectiveness and continuous improvement

7. TRAINING, COMMUNICATION CONTINUOUS IMPROVEMENT IN MODERN SLAVERY MITIGATION

Training and Awareness Initiatives

GYG will provide targeted annual training and awareness initiatives on Modern Slavery for employees, franchisees, and suppliers. This includes an induction program covering Modern Slavery risks, as well as resources for franchisees and suppliers to improve awareness and recognition of Modern Slavery indicators. We also conduct regular supplier review forums and business contract renewal discussions to maintain adherence to GYG's ethical standards.

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.

Commitment to Continuous Improvement

GYG is committed to evolving our policies and procedures on modern slavery and human rights. We will review this policy as necessary to incorporate emerging insights and best practices, ensuring that our approach to Modern Slavery mitigation remains robust and effective.

KPIs for Measuring Effectiveness

To measure the effectiveness of our strategies to mitigate the risks of Modern Slavery, GYG uses Key Performance Indicators, such as aggregated risk scores from supplier assessments. These scores are used to monitor the effectiveness of actions taken to address Modern Slavery risks within our network. Continuous improvement of these scores is a priority for GYG.

Supplier Assessment and Risk Management

GYG has integrated the iPRO Modern Slavery Assessment Tool to enhance our supplier assessment processes. We conduct assessments across suppliers, assigning risk categories based on inherent and unmitigated risk scores. This annual assessment enables GYG to continuously monitor and address Modern Slavery risks across our supply chain.

8. RESPONSIBILITIES

Role	Responsibilities

All GYG Stakeholders	• Ensure full compliance with the Human Rights Policy • Develop an understanding of Modern Slavery, including identifying potential risks within their area of responsibility • Promptly report any suspected instances of Modern Slavery
Risk Strategy Forum	• Monitor, review, consult and audit internal controls and procedures to identify risks of Modern Slavery practices across the GYG group of companies and across our franchise operations • Collaborate with suppliers, contractors and business partners to identify risks of Modern Slavery practices within our supply chains • Develop and implement measures to assess and mitigate Modern Slavery risks, incorporating due diligence into contractual relationships • Create and deliver appropriate training programs for GYG's Stakeholders to ensure that Stakeholders align with GYG's ethical standards • Prepare GYG's annual Modern Slavery Statement to fulfil disclosure obligations under Australian Modern Slavery legislation
Modern Slavery Officer	• Hold primary responsibility for the implementation and management of this Human Rights policy • Regularly monitor this Human Rights policy's usage and effectiveness, ensuring its relevant and impact • Address queries and concerns related to this policy • Provide oversight of the Risk Strategy Forum's initiatives and outputs. Monitor key metrics to evaluate progress and effectiveness in mitigating Modern Slavery risks • Identify areas for improvement and support the development of processes and practices for improvement
The Board	• Ensure that this policy aligns with GYG's legal and ethical obligations • Approve GYG's annual Modern Slavery Statement

9. ADHERENCE

Any Stakeholder found to be in violation of this policy will be subject to disciplinary action, up to and including termination of employment, termination of their Franchise Agreement or termination of their supply contract, in accordance with the relevant agreement.

10. RELATED DOCUMENTS

This policy takes into consideration the following GYG policies:

- Code of Conduct
- Whistleblower Policy
- Grievance Policy
- Respect at GYG

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Approving authority	Head of Legal