

RETAIL FOOD GROUP

Policy Regarding Modern Slavery Practices

Owner	Board of Directors
Policy (including changes) approved by	Board of Directors
Direct questions on Policy to	Company Secretary and/or Chief Human Resources Officer
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RFG reserves the right to modify, replace or cancel this Policy at any time. All location specific policies, procedures, statements and forms should be read in conjunction with all policies available on the RGF intranet or equivalent communication tool. Please contact your HR representative for further information or if you have queries about this Policy at any point in time. This document will subsist if not updated by the review date and is uncontrolled when copied.

1. Purpose

We support every individual's right to live and work freely.

We also recognise the important role all businesses can play in positively contributing to the reduction and ultimate elimination of *Modern Slavery* practices.

The purpose of this *Policy* is to demonstrate *Our* commitment to playing *Our* part in achieving this goal, to provide guidance about minimising the risks of *Modern Slavery* occurring in *Our* business and supply chain, and to better ensure that *We* are compliant with laws and community expectations that apply to *Our* business.

2. Scope & Application

This *Policy* applies to all *Workplace Participants*, *Franchise Partners*, *Master Franchise Partners* and *Supply Partners*.

This *Policy* operates in conjunction with other policies or codes adopted by *RFG* relating to standards of behaviour and conduct. It is subject to change at *Our* discretion and does not form part of any contract of employment, industrial instrument or commercial contract or agreement.

In the case of inconsistency between this *Policy* and the law, the law prevails. If local laws, codes of conduct or other regulations in a particular country or jurisdiction are more restrictive than this *Policy*, then *Workplace Participants*, *Franchise Partners*, *Master Franchise Partners* and *Supply Partners* operating in that country or jurisdiction must fully comply with those more restrictive requirements. In the case of *Workplace Participants*, where there is any inconsistency between this *Policy*, other policies or individual agreements, then the terms of this *Policy* prevail.

3. Definitions

In this *Policy*, words in italics have the following meanings:

<i>Board</i>	The board of <i>Directors</i> of <i>RFG</i> from time to time.
<i>CEO</i>	<i>RFG</i> 's top ranking executive officer, regardless of title, from time to time.
<i>Company Secretary</i>	<i>RFG</i> 's Company Secretary from time to time.
<i>Director</i>	A director of a <i>Group</i> member.
<i>Employee</i>	Full-time, part-time, casual and temporary employees of the <i>Group</i> .
<i>Franchise</i>	Means the right to operate a business identified by or associated with a brand or other intellectual property owned by the <i>Group</i> .
<i>Franchise Partner</i>	Means a person or entity who has been granted a <i>Franchise</i> by a member of the <i>Group</i> .
<i>Group</i>	<i>RFG</i> , its controlled entities and related bodies corporate.
<i>Master Franchise</i>	Means the right, within a designated territory or region, to: <ul style="list-style-type: none">• manage or operate a network of outlets; and or• grant <i>Franchises</i> to others; associated with a brand or other intellectual property owned by a member of the <i>Group</i> .

<i>Master Franchise Partner</i>	Means a person or entity who has been granted a <i>Master Franchise</i> by a member of the <i>Group</i> .
<i>Modern Slavery</i>	Has the meaning provided in Clause 4 of this <i>Policy</i> .
<i>Policy</i>	This Policy Regarding Modern Slavery Practices.
<i>RFG</i>	Retail Food Group Limited.
<i>Supply Partner</i>	Any person or entity which is the source of goods or services, or is otherwise involved or participating in <i>Our</i> supply chain, including their employees, agents, contractors and subcontractors.
<i>Supply Partner Code</i>	Means the Supply Partner Code of Conduct <i>We</i> have adopted which <i>We</i> ask <i>Our Supply Partners</i> to comply with.
<i>We or Our</i>	Means a reference to the <i>Group</i> .
<i>Workplace Participants</i>	All officers, <i>Employees</i> and contractors of <i>RFG</i> , its controlled entities, and related bodies corporate.
<i>You</i>	'You' and 'Your' refers to a <i>Workplace Participant</i> , <i>Supply Partner</i> , <i>Franchise Partner</i> or <i>Master Franchise Partner</i> (as the case requires).

4. What is Modern Slavery?

Modern slavery describes various situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. It contemplates serious exploitation, but excludes some practices which might be unlawful for other reasons, such as substandard working conditions or underpayment of workers.

Modern Slavery can take many forms including:

<i>Slavery</i>	Exercising powers of ownership over a victim, including sale or purchase and using their labour in an unrestricted way.
<i>Servitude</i>	Restricting a victim's freedoms so that they are not free to stop working or to leave their place of work.
<i>Human Trafficking</i>	The recruitment, harbouring and movement of people for exploitation through <i>Modern Slavery</i> .
<i>Forced Labour</i>	Forcing people to work by coercion or threats.
<i>Forced Marriage</i>	Where coercion, threats or deception are used to make a victim marry, or where the victim does not understand the nature and effect of the marriage ceremony.
<i>Debt Bondage</i>	Where the victim's services are pledged as security for a debt which is manifestly excessive, the victim's services are not applied to reduce the debt, or the length and nature of the debt are unlimited or undefined.
<i>The worst forms of child labour</i>	Where children are exploited through slavery or similar practices, engaged in hazardous work which may harm their health, safety or morals, or are used to produce or traffic drugs.

Modern Slavery can be complex, multi-faceted and difficult to identify. Indicators may include where a person:

- Is not in possession of their own passport, identification or travel documents;
- Is acting as though they are being instructed or coached by someone else;
- Allows others to speak for them when spoken to directly;
- Is dropped off and collected from work;
- Is withdrawn, appears frightened, or has physical indicators of slavery, such as injuries;
- Is unable to contact friends or family freely;
- Has limited social interaction or contact with people outside their immediate environment;
- Tells a story that contains obvious errors;
- Acts with hostility or has difficulty in concentrating due to trauma;
- Has few possessions;
- Has little or no control over their finances or no access to a bank account, or they are being significantly overcharged for their accommodation; or
- Is living in a very poorly maintained and overcrowded place.

These indicators are not exhaustive and do not necessarily mean that *Modern Slavery* practices are occurring. Sometimes there may be other reasons or circumstance that indicate that something is not right.

5. Addressing Modern Slavery

We oppose all forms of *Modern Slavery* and are committed to reducing the risk of *Modern Slavery* occurring within *Our* business and supply chain. We expect our *Supply Partners*, *Franchise Partners* and *Master Franchise Partners* to share this position.

We are committed to implementing and maintaining effective systems and controls to ensure the foregoing outcomes are achieved. This will include:

- Conducting risks assessments of our supply chain to determine areas with high risks of *Modern Slavery* occurring;
- Engaging directly with key *Supply Partners* to assess the risks of *Modern Slavery* in their business and supply chain;
- Requiring our *Supply Partners*, *Franchise Partners* and *Master Franchise Partners* to comply with this *Policy* and, in the case of *Supply Partners*, the *Supply Partner Code*, and encouraging them to promote best practice and continuous improvement in their businesses; and
- Ensuring, as far as is practicable, that our agreements with *Supply Partners*, *Franchise Partners* and *Master Franchise Partners* provide us with rights of termination if the *Supply Partner*, *Franchise Partner* or *Master Franchise Partner* is engaging in *Modern Slavery*, or is unable or unwilling to work towards compliance with this *Policy* or, in the case of *Supply Partners*, the *Supply Partner Code*.

Additionally, our *Workplace Participants* must not engage in *Modern Slavery*, and have a responsibility to:

- Read, be aware of, and to comply with this *Policy*;
- Be vigilant, and to report any breaches or suspected breaches of this *Policy*; and, to
- Participate in all training which may be provided in connection with this *Policy* or *Modern Slavery* more generally.

6. Reporting Violations or Suspected Violations

All *Workplace Participants* have a responsibility to promptly report any violation of law or policy.

We are committed to ensuring *Workplace Participants*, *Supply Partners*, *Franchise Partners* and *Master Franchise Partners* have a safe, reliable and confidential way of reporting suspicious activity. All *Workplace Participants*, *Supply Partners*, *Franchise Partners* and *Master Franchise Partners* who believe that a violation of this *Policy* or any applicable laws has been committed or is being planned, are encouraged to immediately report the matter to the *CEO* or *Company Secretary*, or to take advantage of the procedures and protections provided for in *RFG's Whistleblower Policy*.

All material breaches of this *Policy* shall be promptly advised to the *Board*.

If there is an immediate danger to health and safety, We encourage *You* to contact the police or other relevant law enforcement agencies (*You* should not attempt to tackle suspected *Modern Slavery* practices on your own as there may be dangerous criminals involved).

7. Consequences of Breach

Modern Slavery and related improper conduct addressed by this *Policy* are very serious matters.

Breach of this *Policy* will be regarded as serious misconduct, leading to disciplinary action which may include termination of employment or engagement, or in the case of *Supply Partners*, *Franchise Partners* or *Master Franchise Partners*, possible termination of our relationship with them. We also reserve the right to report any breach to the police or other appropriate authorities where warranted.

8. Distribution & Training

This *Policy* will be distributed to all *Workplace Participants* and be posted on *Our* intranet.

We will also provide a copy of this *Policy* to *Supply Partners*, *Franchise Partners* and *Master Franchise Partners*, and in the case of *Supply Partners*, will also provide them a copy of the *Supply Partners Code*.

To the extent that it may be applicable to their roles, *Workplace Participants* will be provided training in connection with this *Policy* or any change or update of it.

9. Links with Other Documents

This *Policy* has been adopted in addition to (without limitation) the following policies, procedures and forms:

- *RFG's Code of Conduct*;

- The *Supply Partners Code*;
- *RFG's Anti-Bribery & Corruption Policy*; and
- *RFG's Whistleblower Policy*.

10. Review

The *Board* is committed to regularly reviewing this *Policy* for effectiveness. This *Policy* may only be amended with the approval of the *Board*.