



MODERN SLAVERY POLICY

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1. WHAT IS MODERN SLAVERY?

Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as servitude, forced and compulsory labour, forced marriage, debt bondage and human trafficking, all of which deprive a person of their liberty in order to exploit them for personal or commercial gain (**Modern Slavery**). Guzman y Gomez (**GYG**) is committed to ensuring Modern Slavery is not taking place anywhere in its business or in any of its supply chains, business dealings, or relationships. Modern Slavery is a global problem, so it's up to all of us to work toward eliminating it.

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| 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 exacted 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 reduce the risk of Modern Slavery taking place in its own business and supply chains. Team members are encouraged to report any concerns or suspicions about Modern Slavery to their manager or HR department. Concerns could include:

- Workers who are not allowed to take breaks or who 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 not allowed to leave the workplace unaccompanied or who are not allowed to leave the premises.
- Workers who are not paid the national minimum wage or who have deductions taken from their pay without explanation.

- Workers who are housed in accommodation that is not suitable or who are charged excessive rent for their accommodation.
- Workers who are subject to physical, verbal or psychological abuse, or who are not allowed to communicate with their family or friends.

By being vigilant and reporting any concerns, everyone can play an important role in identifying and preventing Modern Slavery within the workplace or supply chain.

3. SCOPE

This policy applies to all persons working for us or on our behalf in any capacity, including but not limited to, employees, franchisees and contractors (**Stakeholders**) with the intent to extend this to suppliers and other business partners throughout our value chain in the future. We expect that all Stakeholders 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, as we are committed to ensuring transparency across our business and supply chain.

In particular, all Stakeholders are expected to:

- Familiarise themselves with GYG's policy on Modern Slavery and understand what Modern Slavery is and how it can manifest in different forms.
- Be aware of the indicators of Modern Slavery and report any concerns or suspicions about Modern Slavery to their manager or HR department.
- Comply with all relevant legislation and regulations relating to Modern Slavery, including the *Modern Slavery Act 2018*, and any other legislation or regulations that may apply to the GYG's operations.
- Ensure that their actions do not contribute to or facilitate Modern Slavery in any way, and that they are not complicit in any form of Modern Slavery, whether within the workplace or in the supply chain.
- Participate in any training or awareness-raising activities provided by GYG on Modern Slavery, to ensure that they have the necessary knowledge and skills to identify and prevent Modern Slavery within the workplace or supply chain.
- Support GYG's efforts to identify and address any instances of Modern Slavery within the workplace or supply chain and contribute to the development and implementation of effective policies and practices to prevent and address Modern Slavery.

The Modern Slavery Working Group includes members from the legal, people, supply chain, information technology, marketing, development, finance and operations teams. The Head of Sustainability (the **Modern Slavery Officer**) leads the Modern Slavery Working Group.

4. COMPLIANCE WITH THE POLICY

All Stakeholders must ensure that they read, understand and comply with this policy. The prevention, detection and reporting of Modern Slavery in any part of GYG's business or supply chain is the responsibility of all those working for GYG or under its control. All Stakeholders are required to avoid any activity that might lead to, or suggest, a breach of this policy and must take all reasonable steps to ensure our business and supply chain is free of Modern Slavery practices.



Everyone is encouraged to raise concerns about any issue or suspicion of Modern Slavery in any part of GYG's business or supply chain of any supplier tier at the earliest possible stage. Concerns can be raised through the Modern Slavery Officer or through GYG's Whistleblower Policy, where concerns can be made anonymously.

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.

You can reach the Modern Slavery Officer by sending an email to humanrights@gyg.com.au.

If you have a concern to raise anonymously, send an email to tellusgyg@deloitte.com.au.

5. COMMUNICATION, AWARENESS AND MONITORING OF THIS POLICY

GYG will provide regular training to Stakeholders on this policy. This will include training on how to identify Modern Slavery practices and the specific areas of the business and supply chain that have 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.

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.

GYG will review this policy regularly, at least every two years and provide information and/or training on any changes that may be made.

6. RESPONSIBILITIES

| ROLE | RESPONSIBILITIES |
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| All GYG employees | <ul style="list-style-type: none"> • Comply with the policy • Understand Modern Slavery and where risks may arise • Raise any suspected instances of Modern Slavery |
| Modern Slavery Working Group | <ul style="list-style-type: none"> • Monitor, consult and audit internal controls and procedures to identify risks of Modern Slavery practices in GYG's operations, including in its subsidiary organisations • Monitor and consult with the suppliers, contractors and business partners of GYG to identify risks of Modern Slavery practices in our supply chains • Develop measures to assess and address any risks of Modern Slavery practices, including through due diligence in GYG's contractual relations • Develop appropriate training materials and programs for GYG's employees to comply with this policy and to communicate GYG's |



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| | <p>expectations to its franchisees, contractors, suppliers, and other business partners</p> <ul style="list-style-type: none"> • prepare GYG's annual Modern Slavery statement in accordance with our disclosure obligations under Australian Modern Slavery legislation |
| Modern Slavery Officer | <ul style="list-style-type: none"> • Primary and day-to-day responsibility to implement this policy • Monitor the policy use and effectiveness • Deal with any queries about the policy • Lead the Modern Slavery Working Group |
| Modern Slavery Steering Committee | <ul style="list-style-type: none"> • Oversight of the work produced by the Modern Slavery Working Group, including: <ul style="list-style-type: none"> ○ Monitoring metrics to understand progress ○ Assessing effectiveness of mitigating actions and identifying areas for improvement ○ Supporting the working group to develop processes for improvement |
| The Board | <ul style="list-style-type: none"> • Ensure this policy complies with GYG's legal and ethical obligations • Approve GYG's annual Modern Slavery statement |

7. ADHERENCE

Any Stakeholder who breaches this policy will face disciplinary action, including dismissal for misconduct or gross misconduct.

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.

8. RELATED DOCUMENTS

This policy takes into consideration the following GYG policies:

- Code of Conduct
- Whistleblower Policy
- Grievance Policy



INFORMATION

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