



## Southern Hospitality Ltd. Modern Slavery Workplace Policy

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| <b>Department</b>            | People (Human Resources)    |
| <b>Version</b>               | 1.0                         |
| <b>Effective Date</b>        | 1 <sup>st</sup> August 2025 |
| <b>Last Review/amendment</b> |                             |
| <b>Next Review</b>           | 1 <sup>st</sup> August 2027 |
| <b>Approval</b>              | Leadership Team             |

### Purpose

While there is currently no legal requirement in New Zealand to maintain a Modern Slavery Policy, Southern Hospitality recognises our ethical responsibility to respect and uphold human rights. We are committed to taking proactive steps to prevent modern slavery, including forced labour, human trafficking, debt bondage, and exploitation, within our operations and supply chains.

This policy sets the foundation for our efforts to identify, assess, and respond to potential risks, promote transparency, and foster responsible business practices.

The objective of this policy is to limit the risk of modern slavery impacting the business through taking active steps to minimise, or eliminate practices associated with modern slavery occurring within our business, supply chain network, business partnerships and relationships, or those that may otherwise occur in the course of doing business.

### 1: Policy Summary

This policy sets out Southern Hospitality's commitment to identifying, mitigating, and addressing the risk of modern slavery across our operations and supply chains. It establishes clear expectations for ethical conduct, supplier engagement, and internal awareness.

We aim to:

- Maintain fair and transparent labour practices.
- Engage suppliers who meet our ethical standards.
- Conduct regular risk assessments and due diligence.
- Provide staff training and promote internal accountability.
- Enable safe reporting and commit to appropriate remediation.

This policy supports our parent company ECF Group's alignment with the United Nations Global Compact and our shared responsibility to uphold human rights.

## 2: Risk Assessment & Due Diligence

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This policy applies to all employees, contractors and suppliers of Southern Hospitality Limited, both domestically and internationally.

This policy is applicable to all employees who are employed by the company.

Where relevant this policy also applies to other contractors, other entities or third parties who are engaged by the company, or that are otherwise involved in doing business with it, including but not limited to suppliers.

## 3: Definition

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Modern slavery is a term used to define a range of exploitive and unlawful practices including but not limited to:

- Human trafficking;
- Slavery;
- Servitude;
- Forced marriage;
- Exploitation of children and child labour;
- Deliberate and serious breaches of minimum Employment Law standards;
- Debt bondage.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, as listed above, 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.

The company has a zero-tolerance approach to any imposition of, or connection to, modern slavery and/or human trafficking.

## 4: Our Business

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Southern Hospitality is New Zealand's leading distributor of hospitality products and commercial catering equipment. We have over 200 employees servicing the hospitality, healthcare, quick-service restaurant, accommodation, education, and catering sectors, across 13 locations in New Zealand and the Pacific Islands.

Southern Hospitality is proudly owned by the E.CF Group, the European leader in hospitality, catering, and food service supply, with key markets in Europe, the Middle East, and North Africa, Australia & New Zealand.

## 5: Our Commitment

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We are committed to:

- Preventing modern slavery, human trafficking, forced labour, and child labour in our operations and supply chains.
- Conducting business ethically and transparently.
- Promoting fair employment practices, including safe working conditions and fair wages.
- Working only with suppliers and partners who share our values.

We support New Zealand's Plan of Action against Forced Labor, People Trafficking and Slavery and any future legislative regimes targeting these issues.

As part of the ECF Group, Southern Hospitality adheres to the United Nations Global Compact. ECF requires that all products be manufactured in compliance with this charter, and that suppliers adhere to its principles, particularly those relating to human rights and labor practices.

## 6: Supplier Expectations

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We expect our suppliers to:

- Where applicable, sign and comply with our Responsible Purchasing Charter, which includes labour rights and ethical sourcing clauses.
- Conduct their own due diligence on human rights risks within their supply chains.
- Report any suspected cases of modern slavery immediately.
- Cooperate fully in any investigations related to human rights concerns.
- Commit to timely and transparent remediation in the event of non-compliance.

We reserve the right to audit supplier compliance and to discontinue business with any supplier found to be in breach of this policy.

## 7: Risk Assessment & Due Diligence

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We will:

- Assess and identify high-risk areas within our supply chain.
- Evaluate supplier practices during onboarding and through periodic reviews.
- Maintain a register of suppliers and categorise them based on risk exposure.
- Prioritise supplier engagement and support in high-risk regions or industries.

## 8: Training & Awareness

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We will:

- Provide regular training to relevant employees to identify and respond to modern slavery risks.

- Raise awareness across the business through sustainability communications, resources, and updates.
- Foster a culture of ethical responsibility and transparency throughout the organisation.

## 9: Reporting & Remediation

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Employees are encouraged to report any concerns related to modern slavery to the Head of People and Culture via email at: [people@southernhospitality.co.nz](mailto:people@southernhospitality.co.nz)

Alternatively, concerns can be reported anonymously through the ECF Group's reporting platform: <https://ecfgroup.integrityline.app/>

External parties, i.e. suppliers, customers, distributors, agents, etc., can report a Violation to the following generic e-mail address: [compliance@ecfgroup.com](mailto:compliance@ecfgroup.com)

All reports will be treated seriously and investigated promptly. If modern slavery is identified, we will:

- Engage with the supplier or party involved to remediate the issue immediately.
- Terminate relationships with suppliers or partners that fail to take appropriate corrective action.

Any employee who breaches this policy may face disciplinary action up to and including summary dismissal on ground of serious misconduct.

The company may require reports, risk assessments and/or audits to be completed and presented to the Board, or Executive Management Team on a regular basis to ensure that the business has greater oversight of issues regarding modern slavery that may need to be addressed and responded to accordingly.

## 10: Training

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The company will take active steps to ensure that modern slavery training is promoted to applicable staff within its business to help foster greater understanding and awareness regarding this issue in the workplace, including strengthening awareness in procurement activities and areas that may affect our respective supply chains.

## 11: Governance & Review

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The Executive Management Team have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries regarding the policy and auditing internal procedures.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

This policy will be reviewed annually or in response to significant changes in law, operations, or supply chain structure. Updates will be communicated to relevant stakeholders.

## 12: Disclaimer

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The company reserves the right to change or replace this policy at any time.

Where there is a dispute with regards to the interpretation of this policy or any part thereof, the company reserves the right to clarify the intention and meaning of this policy.

The clarification provided by the company will be seen as the final decision on the interpretation of this policy.

## Modern Slavery Workplace Policy Acknowledgement Form

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I acknowledge that I have received and read the Modern Slavery Workplace Policy document and agree to act in accordance with the terms and conditions of that policy document.

I have had the opportunity to raise any queries in relation to the policy with my manager and understand the policy and its effect. If any matters arise in relation to this policy, I will contact my manager.

I acknowledge that the Modern Slavery Workplace policy document.

I also acknowledge that the terms of this policy document form part of my Individual Employment Agreement (IEA), and that Southern Hospitality Ltd has the right to vary this policy from time to time at Southern Hospitality Ltd's discretion.

Employee Name

Employee Signature

Date

\*Please return a scanned copy of the signed Modern Slavery Workplace Policy Acknowledgement Form to the People Team ([people@southernhospitality.co.nz](mailto:people@southernhospitality.co.nz)) for your employee file.