BLACK TRUFFLE CATERING

Modern Slavery & Labour Exploitation Policy

A proportionate policy framework for preventing labour exploitation in our operations and supply chain.

Organisation	Black Truffle Catering Pty Ltd
Approved by	Director
Effective date	1 September 2026
Review cycle	Every two years, or earlier where required

1. Purpose

Black Truffle Catering Pty Ltd ("Black Truffle Catering") is committed to conducting business ethically, lawfully and with integrity. We have zero tolerance for modern slavery and labour exploitation, including forced labour, bonded labour, human trafficking, servitude and exploitative child labour. This policy establishes our commitment to identifying, assessing, preventing and addressing modern slavery risks in our own operations and, where reasonably practicable, our supply chain.

2. Definition of modern slavery

For the purposes of this policy, modern slavery refers to serious forms of exploitation in which a person cannot refuse or leave work because of threats, coercion, deception, abuse of power or similar circumstances. It includes slavery, servitude, forced labour, debt bondage, human trafficking and the worst forms of child labour. The Australian Modern Slavery Act 2018 defines modern slavery by reference to relevant offences under the Criminal Code and specified international instruments.

3. Legal and labour standards

Black Truffle Catering recognises that slavery and related exploitation are unlawful. We are committed to complying with applicable Australian workplace and criminal laws, including the Fair Work Act 2009, applicable modern slavery legislation and relevant industrial instruments. Our employment practices are intended to support fair wages, lawful working arrangements, safe working conditions and the fundamental rights of workers.

4. Scope

This policy applies to Black Truffle Catering's directors, managers and employees, including permanent, part-time and casual employees. It also informs our expectations of contractors, temporary workers, labour hire providers, suppliers, service providers and other business partners. The policy covers our direct operations and our supply chain to the extent reasonably practicable and proportionate to our size, influence and risk exposure.

5. Our operations and supply-chain risk

Black Truffle Catering operates a commercial catering business in Melbourne, Victoria. Our direct workforce is employed in Australia under Australian workplace laws. We recognise that modern slavery risk can nevertheless

occur indirectly through extended supply chains, particularly where goods or raw materials originate in jurisdictions or industries with greater vulnerability to labour exploitation. Relevant categories may include imported food and ingredients, packaging, cleaning products, uniforms and other manufactured goods.

6. Employment safeguards

Black Truffle Catering seeks to reduce labour exploitation risk within its direct operations through fair and transparent employment practices.

- verification of employment eligibility and legal working rights before or as part of commencement processes;
- consideration of legal working-age requirements;
- written and transparent employment arrangements;
- payment through established payroll processes and compliance with applicable minimum employment entitlements;
- maintenance of employment and payroll records as required by law;
- commitment to safe working conditions and respectful treatment; and
- access to management for employees who wish to raise workplace concerns.

7. Identifying and assessing risk

Our approach is proportionate to the nature and scale of our business. We consider modern slavery and labour exploitation risk when engaging and reviewing suppliers and service providers, particularly where products or services may involve higher-risk labour practices or extended international supply chains. We favour reputable suppliers and reserve the right to seek further information or reconsider a commercial relationship where credible labour exploitation concerns arise.

8. Prevention and mitigation

Where a modern slavery or labour exploitation risk is identified, Black Truffle Catering will consider appropriate action having regard to the seriousness of the issue, our relationship with the relevant party and our ability to influence the outcome. Actions may include seeking information or corrective action, increasing oversight, changing procurement practices, suspending engagement or ending a supplier or contractor relationship where appropriate.

9. Grievance and reporting mechanism

Employees may raise human rights, labour exploitation or modern slavery concerns with the Director or an appropriate manager, verbally or in writing. Suppliers, contractors and other business partners may also raise concerns directly with management. Reports will be treated seriously and handled as confidentially as reasonably practicable. Black Truffle Catering does not tolerate retaliation against a person who raises a genuine concern in good faith.

10. Remediation

Where credible concerns are identified, Black Truffle Catering will assess the circumstances promptly and seek to avoid causing further harm to affected individuals. Depending on the circumstances, this may include investigating the concern, requiring corrective action, changing or suspending a business relationship, referring suspected criminal conduct to relevant authorities where appropriate, and taking steps intended to reduce the risk of recurrence. Decisions will take into account the potential impact on affected workers rather than relying solely on immediate termination of a supplier relationship.

11. Responsibility and governance

The Director has overall responsibility for this policy and for ensuring that modern slavery risks are considered at an appropriate level within the business. Managers involved in recruitment, employment, procurement and supplier relationships share responsibility for applying the relevant parts of this policy in their day-to-day activities.

12. Review

This policy will be reviewed at least every two years, or earlier where there are material changes to our operations, supply chain, legal obligations or identified risk profile. Black Truffle Catering will seek to improve its approach as its understanding of modern slavery risks and appropriate controls develops.

Policy approval

Approved by:	Director, Black Truffle Catering Pty Ltd
Signature:	
Date:	1 September 2026

Reference: Modern Slavery Act 2018 (Cth), including the definition of modern slavery in section 4. This policy is an internal governance document and is not represented as a statutory modern slavery statement.