



## MODERN SLAVERY POLICY

TITLE	Modern Slavery Policy
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APPROVED BY:	Chief HR Officer
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RESPONSIBLE TEAM:	Human Resources
RELATED INTERNAL DOCUMENT(S):	Code of Conduct Grievance Policy Whistleblower Policy Work Health & Safety Policy Freedom of Association & Collective Bargaining Policy
SUPERSEDED DOCUMENT(S):	N/A
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### PURPOSE

The purpose of this policy is to ensure that the company and its partners act ethically and with integrity in all business relationships and to implement effective systems and controls to safeguard against modern slavery. Doltone Hospitality Group recognises its responsibility to uphold human rights, comply with the Modern Slavery Act 2018 (Cth), and act in alignment with the Fair Work Act 2009 (Cth).

### COMMENCEMENT OF POLICY

This policy will commence from 25/06/2025. It replaces all other policies regarding Modern Slavery (whether written or not).

### SCOPE

This policy applies to all Doltone Hospitality Group employees and volunteers.



## DEFINITIONS

**Child Labour:** Work that poses mental, physical, social, or moral risks to children is considered harmful and inappropriate. As there is no set legal working age in NSW, children under 18 must have a parent or guardian complete and sign the DHG Parental Consent form.

**Fair Work Act 2009 (Cth):** Governs minimum entitlements, employment terms, and protections for all workers in Australia.

**Forced Labour:** Work that is performed involuntarily and under the threat of penalty, including situations where a person is forced to work through violence or intimidation.

**Human Trafficking:** The recruitment, transportation, transfer, harbouring, or receipt of persons by means of threat, force, coercion, or deception for the purpose of exploitation.

**Modern Slavery:** A term encompassing slavery, servitude, forced or compulsory labour, and human trafficking, all of which involve the deprivation of a person's liberty by another for personal or commercial gain.

## POLICY

This policy sets out Doltone Hospitality Group's commitment to preventing modern slavery and human trafficking in all aspects of its operations and supply chains. Doltone Hospitality Group recognises the responsibility to uphold human rights and to take a zero-tolerance approach to any form of modern slavery, including forced labour, bonded labour, child labour, and human trafficking.

Doltone Hospitality Group strictly prohibits the use of modern slavery in its operations and supply chains. Doltone Hospitality Group is committed to upholding the highest standards of integrity by engaging only with suppliers who demonstrate transparency, follow ethical labour practices and actively manage modern slavery risks within their own operations and supply chains. Doltone Hospitality Group works cooperatively to identify and address these risks and is committed to sharing relevant information, where reasonably requested to support compliance with modern slavery laws and promote transparency and accountability.

## LABOUR POLICIES

Doltone Hospitality Group supports the strengthening of labour laws and internal policies to protect workers from exploitation and forced labour. Doltone Hospitality Group ensures all employment practices comply with the Fair Work Act 2009 (Cth).

Doltone Hospitality Group is committed to:

- Ensuring fair wages, in accordance with relevant Modern Awards and National Minimum Wage standards
- Providing reasonable working hours and ensuring adherence to maximum hour provisions under the Fair Work Act
- Providing safe and healthy working conditions in line with the Work Health and Safety Act 2011 (Cth)
- Prohibiting child labour and any form of forced or unpaid overtime
- Maintaining ethical employment practices
- These labour policies are a critical part of Doltone Hospitality Group's approach to preventing modern slavery across our organisation

## RESPONSIBILITIES

Doltone Hospitality Group management is responsible for:

- Providing leadership, resources, and a clear commitment to prevent modern slavery across all areas of the business and supply chain
- Ensuring the development and implementation of strategies, action plans, and measurable objectives to address modern slavery risks
- Complying with obligations under relevant legislation, including the Fair Work Act 2009 (Cth) and Modern Slavery Act 2018 (Cth)
- Embedding ethical labour practices into recruitment, procurement and performance management processes
- Promoting a respectful, safe, and inclusive workplace culture that actively rejects exploitation and forced labour
- Monitoring, reviewing, and continuously improving modern slavery prevention efforts and risk management frameworks

Doltone Hospitality Group employees are responsible for:

- Conducting their work in a manner that supports ethical labour practices, human rights, and mutual respect
- Adhering to policies, procedures, and training designed to prevent modern slavery and identify signs of exploitation
- Reporting any suspicions or concerns related to forced labour, human trafficking, or unethical labour conditions
- Supporting a workplace culture that values human dignity and proactively rejects any form of modern slavery
- Contributing to the ongoing improvement of modern slavery awareness, prevention, and remediation practices within their position

## PROCEDURE

### TRAINING & AWARENESS

- Train staff and management on Fair Work obligations, identifying risks of modern slavery, and lawful employment practices
- Promote awareness of modern slavery through this policy and our staff onboarding process

### GRIEVANCE POLICY

- Accessible reporting mechanisms: We provide safe, confidential and accessible channels for all employees, including vulnerable groups and third-party stakeholders, to raise concerns related to modern slavery without fear of retaliation. These mechanisms are detailed in our Grievance Policy
- Timely investigation and response: All grievances related to potential modern slavery practices are treated with urgency and investigated promptly and thoroughly. Our remediation process ensures that appropriate corrective actions are taken, including support for affected individuals.
- Victim-Centred Remediation: When modern slavery is identified, our response prioritises the well-being and rights of the affected individuals. We collaborate with relevant stakeholders, including local authorities to provide meaningful remedies, in line with our Grievance Policy.

### REPORTING A GRIEVANCE & WHISTLEBLOWING

- Ensure staff report a grievance, in writing, direct to the HR department and lodge it through the HR confidential email address – [hr@doltonehospitalitygroup.com.au](mailto:hr@doltonehospitalitygroup.com.au)
- HR will respond to the staff member to acknowledge receipt of the grievance



- The grievance may be in relation to a workplace grievance and/or a modern slavery grievance
- HR will inform the Board and management in relation to the grievance
- HR will investigate the grievance to find a suitable resolution that complies with legislation
- Staff can also report suspected modern slavery anonymously through our whistleblower policy
- Ensure reports are treated seriously, investigated thoroughly, and acted upon swiftly
- Protect whistleblowers from any form of retaliation

## **RELATED LEGISLATION**

- Modern Slavery Act 2018 (Cth)
- Fair Work Act 2009 (Cth)
- Criminal Code Act 1995 (Cth)
- Work Health and Safety Act 2011 (Cth)

## **VARIATION**

This policy may be changed, replaced or removed from time to time at the discretion of Doltone Hospitality Group. Employees are required to comply with this policy, but it does not impose any contractual obligations on Doltone Hospitality Group or provide the basis for any legal claims against it.

<b>Version:</b>	<b>Date:</b>	<b>Author/Reviewer:</b>	<b>Review / Completed: Y / N / Comment</b>
1	1/6/2024	Human Resources	Modern Slavery Statement
2	25/06/2025	Human Resources	Modern Slavery Policy



INTEGRITY



COURAGE



PASSION



TRUST



COMMITMENT



RESPECT