

# STEDMANS



## 2024 Modern Slavery Statement

Stedmans Hospitality Personnel & Training Pty Limited ACN 076 913 605  
Reporting Period 1 July 2024 - 30 June 2025

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<https://stedmans.com.au/>

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# A MESSAGE FROM THE BOARD

At Stedmans we are increasingly aware of our obligations around environmental, social and governance (ESG) practices and policies. Respecting human rights forms part of our governance and is a key pillar of our values and culture.

We are committed to meeting both client, employee and community expectations, demonstrating the highest standards of business ethics and managing our relationships in a transparent and responsible manner.

At Stedmans, we welcome the Commonwealth and State Modern Slavery legislation and are committed to ensuring Modern Slavery does not form part of our organisation's supply chain. We recognise that whilst our sector & industry, geographic, entity, product & services risks are low, it is important to our organisation that we address modern slavery in our supply chain. This process is in its early stages.

Over this and the next reporting period, we will continue with the process of implementation and continuous improvement of our Modern Slavery framework by updating existing or introducing new policies, training staff to raise awareness and implementing a more robust supplier due diligence program.

To support increased corporate accountability, including greater transparency for the management of human rights within organisations, operations, supply chains and investments, the Board of Directors, on March 24<sup>th</sup> 2025, approved this, our first Modern Slavery Statement, outlining our strategy, actions taken to date and our plans for the next reporting period 2025/26.



Amanda Foley

Managing Director

A handwritten signature in black ink that reads "A J Foley".

March 2025



Nina Gravelis

Director

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March 2025



# 1 Overview

The Modern Slavery Act 2018 (Cth) mandates that organisations with consolidated annual revenues exceeding \$100 million submit an annual statement, known as the Modern Slavery Statement. However, entities below this threshold may report voluntarily.

Stedmans has chosen to voluntarily report and prepared this Modern Slavery Statement for this purpose. This is Stedmans first Modern Slavery Statement which covers the reporting period from 1 July 2024 to 30 June 2025 (Reporting Period).



Stedmans Hospitality Personnel & Training Pty Limited ACN 076 913 605 (**Stedmans**) is committed to the continuous work necessary to ensure that there are no modern slavery practices within our operations and supply chains.

We recognise the importance of ongoing due diligence in identifying and appropriately addressing the risks of modern slavery practices within our operations and supply chains.

After reviewing our business, we consider our direct impact regarding modern slavery practices is low. As a small entity with approximately 1,000 employees, the resources available to implement and monitor our management systems and controls is limited. Notwithstanding, we are committed to developing a robust, three-tiered framework which focuses on our human rights commitment, due diligence and remediation as illustrated in the in the image below.

Our developing modern slavery response is informed by the *United Nations Guiding Principles on Business and Human Rights*. While we are in the early stages of acting to address any identified modern slavery risks, we endeavour to implement management processes and controls to integrate our findings, track our progress and to provide effective remediation to individuals and communities impacted by modern slavery.



## 2 Our structure, operations and supply chain

### Who are we?

Stedmans is the reporting entity for this Modern Slavery Statement.

Stedmans is an Australian private company. It is a standalone entity and does not control any other entities.

For nearly 40 years Stedmans has been committed to providing recruitment, labour hire and event planning services to the hospitality industry. Stedmans has continuously thrived thanks to the collective efforts of creative hospitality professionals with diverse industry backgrounds.

### Our operations

Stedmans has its headquarters in Surry Hills, NSW and has additional offices in Collingwood in Victoria and Southport in Queensland.

All of Stedmans' operations are conducted in Australia, in NSW, Queensland and Victoria and are divided into two categories:



Direct employment of staff in Australia



Provision and delivery of services to the hospitality sector

### *Direct employment of workers in Australia*

As of 1 February 2025, Stedmans had a workforce of approximately 1,000 employees, all of whom were employed in Australia in accordance with Australian labour laws.

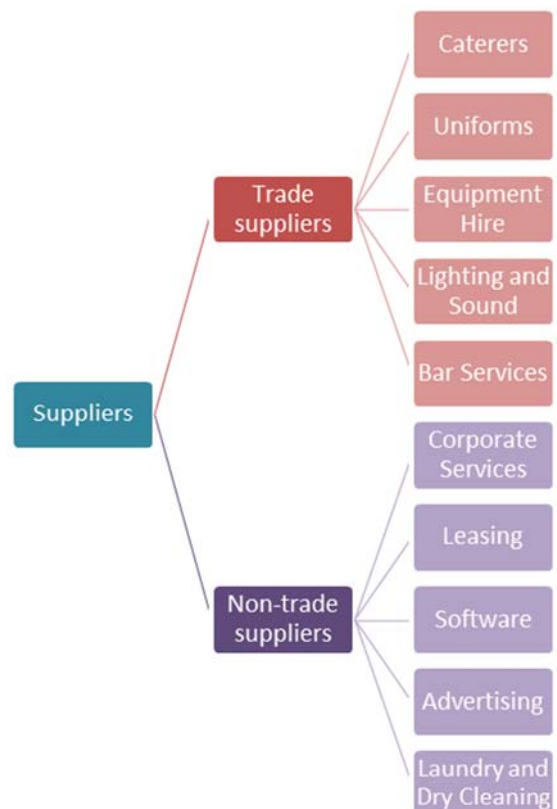
### Our supply chain

Stedmans procured goods and services from over 71 suppliers during the Reporting Period.

The geographic composition of Stedmans' suppliers in this Reporting Period were 99% based in Australia.

Stedmans' suppliers can be divided into two main categories: Trade Suppliers and Non-Trade Suppliers.

The main goods and services procured from our suppliers are set out in the following graphic:



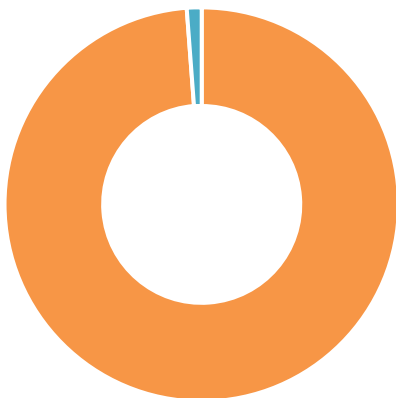
## Location of Stedmans' suppliers

### United States of America

IT products and services



In the Reporting Period, 99% of Stedmans' suppliers were based in Australia



■ Australia ■ United States of America

### Australia

- Consumables
- Laundry and dry-cleaning services
- Manufacturing
- Catering and Bar Services
- Advertising services
- Furniture and equipment
- Maintenance and repairs
- IT services
- Corporate services such as legal, accounting and finance
- Office operations such as cleaning and maintenance
- Recruitment services

### 3 Our modern slavery risks

Stedmans acknowledges the complexity of modern slavery risk and the ways it can manifest in operations and supply chains. In 2025 Stedmans undertook an assessment of the modern slavery risks within our operations and first-tier suppliers. We acknowledge modern slavery risks exist within our industry however, given Stedmans size and our extensive supplier base, we have limited resources to examine modern slavery risks beyond our first-tier suppliers. Notwithstanding this limitation, we are looking to do our best as we further improve our modern slavery processes and engagement with our suppliers.

We are focused on increasing supplier engagement to assist us and our suppliers in identifying modern slavery risks. In instances where our suppliers have published their own Modern Slavery Statement, we have considered these in undertaking our assessment.

99% of Stedmans’ suppliers are based in Australia and the provision and delivery of Stedmans services and the employment of our staff occur in Australia. We consider the risk of modern slavery within our operations and the first tier of our supply chain as low.

We recognise Stedmans may be directly linked to modern slavery practices through the various tiers of our supply chains. These risks are identified below:



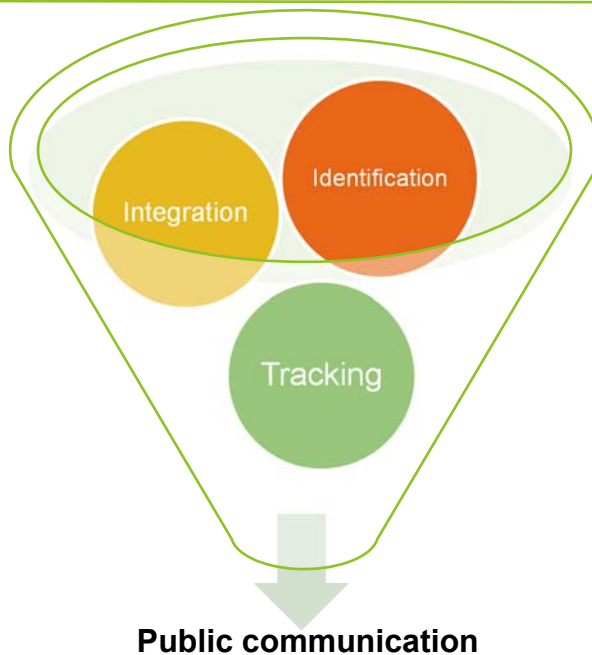
# 4 Our action

## Due diligence

Stedmans is committed to preventing modern slavery practices in its operations and supply chains. We recognise the importance of modern slavery due diligence as an ongoing process and as a vital part of our role to prevent modern slavery practices.

To identify and assess actual and potential human rights impacts within our operations and supply chains, Stedmans implemented a Modern Slavery policy, employee education and a supplier code of conduct during the Reporting Period. The supplier code of conduct is provided to all new suppliers and sets out terms on dealing with Modern Slavery. The terms of the supplier code of conduct require a new supplier to acknowledge that it has no knowledge of Modern Slavery in its own operations or supply chain and that it will take reasonable steps to identify the risk of and prevent the occurrence of Modern Slavery in its operations and supply chain.

All Stedmans' labour is sourced locally. We have internal policies in place that comply with Australian and international labour laws such as our *Inclusion and Diversity Policy*.



Stedmans does not yet have processes in place to integrate and track modern slavery risks within our operations and supply chains. We are putting into place management systems and controls to address impacts through internal training on modern slavery and incident reporting. Part of those processes include obtaining professional advice.

We are also in the process of implementing controls to monitor our progress of implementation actions on a regular basis.

<ul style="list-style-type: none"> <li>• Supplier Code of Conduct for existing and new suppliers addressing Modern Slavery</li> <li>• Internal policies</li> </ul>	<ul style="list-style-type: none"> <li>• We are in the process of implementing compulsory internal modern slavery training and processes for incident reporting</li> </ul>	<ul style="list-style-type: none"> <li>• We are working towards implementing an internal audit of our supplier screening processes to monitor our progress</li> </ul>	<ul style="list-style-type: none"> <li>• Publishing our FY2024 Modern Slavery Statement</li> </ul>
<p>Identification </p>	<p>Integration </p>	<p>Tracking </p>	<p>Public Communication </p>

## Remediation

Stedmans recognises that, while we do not directly cause or contribute to modern slavery, we may be linked to modern slavery practices by a business relationship.

We acknowledge that given the size of our business, Stedmans has limited leverage to influence some of our larger suppliers to change their behaviour. Notwithstanding, Stedmans is committed to using leverage we do have to work with suppliers that have caused adverse impacts to prevent or mitigate harm and its recurrence.



We recognise there are gaps within our current processes and as a result, Stedmans does not currently provide effective remediation for individuals and communities affected by modern slavery practices and other human rights abuses.

Stedmans commits to addressing human rights grievances. We are currently in the process of developing a robust modern slavery response framework to provide more effective grievance mechanisms and avenues for affected individuals and communities to come forward. Some of these mechanisms are listed in the diagram to the right.

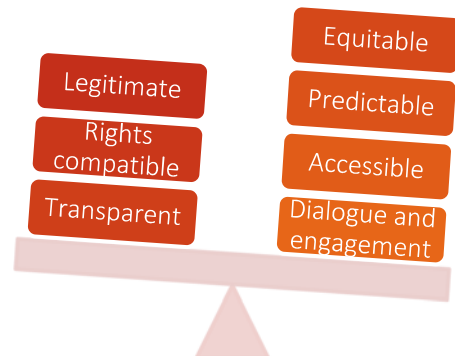


Remediation processes to be implemented under our response framework going forward



Our developing strategic approach to remediation is informed by Principle 31 of the *United Nations Guiding Principles on Business and Human Rights* and aims to provide grievance mechanisms that are 'effective' in so far as they can be characterised as being:

Our goal to implement remediation processes that are:





## 5 Assessing the effectiveness of our action

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Stedmans' monitoring and reporting program is currently under development. Our objective is to operationalize the fundamental human rights due diligence principles in line with the *United Nations Guiding Principles on Business and Human Rights*.

We recognise the process of developing a robust, effective, and sustainable monitoring program requires time and resources.

Our focus this year has been to understand where we are, implement a framework for awareness of modern slavery risks in the workplace and to identify and address the risks as best as we are able to. These initial steps will assist us in building a strong foundation to monitor the effectiveness of our actions.



## 6 Process of consultation

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Consultation was not necessary in the preparation of our Modern Slavery Statement as Stedmans is a standalone entity.



## 7 Any other relevant information

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### Continuous improvement: planned next steps

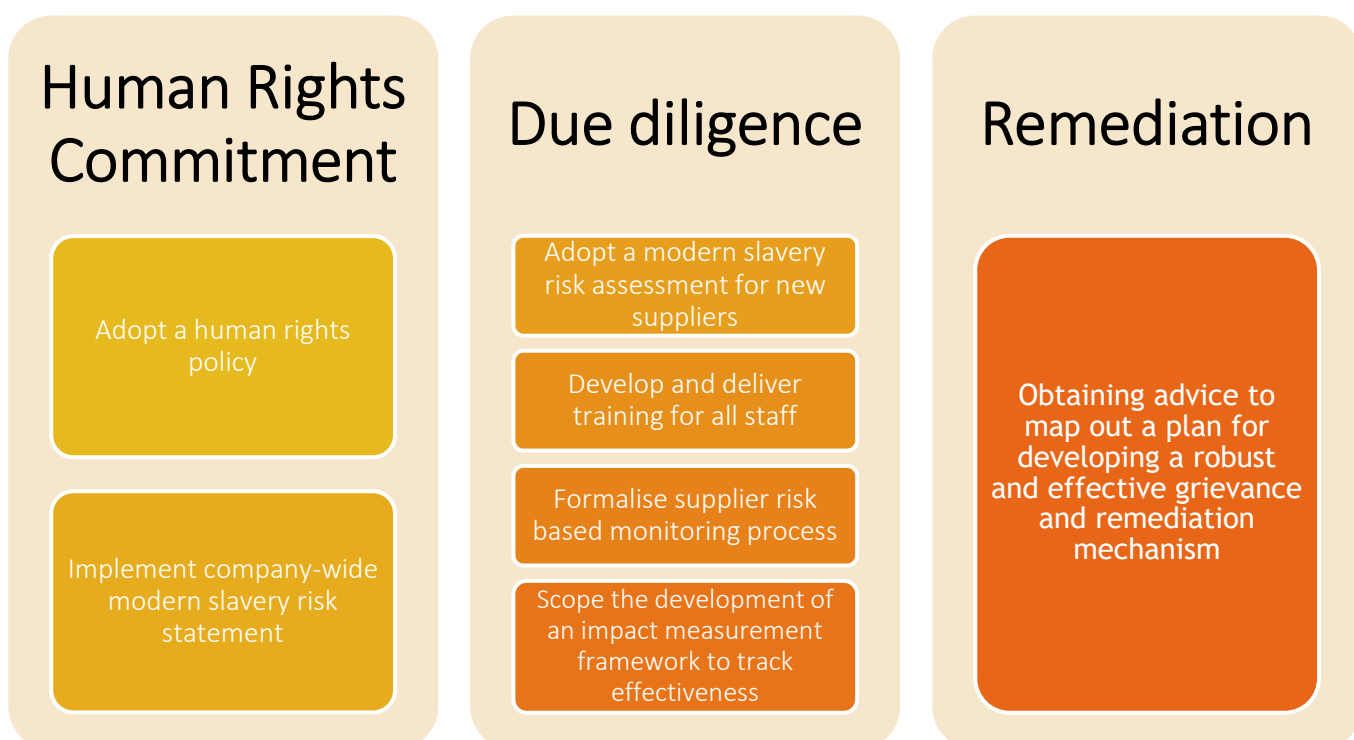
While Stedmans employees around 1000 employees, these are mostly engaged in Stedmans' labour hire activities. Stedmans' management and administration infrastructure is small. Given this, its primary focus and allocation of resources is to develop its frameworks and internal processes. As those frameworks and processes are implemented and consolidated, it is anticipated Stedmans will, in the future, be able to investigate other matters, such as a more detailed review of the downstream supply chains of its first-tier suppliers, to further assess and identify Modern Slavery risks. Stedmans is also limited in what pressure it can exert on suppliers as most of its significant suppliers are large entities.

Stedmans is seeking advice and developing its processes in a way which aligns with its resources and abilities. Stedmans is committed to managing Modern Slavery issues in an appropriate manner given the low level of risk assessed for Modern Slavery in its operations and supply chains.

Since 1 July 2024, Stedmans has taken numerous steps to improve its awareness of Modern Slavery risks and how to respond to those risks. There has been significant improvement in a short space of time and Stedmans is committing itself to implementing a Modern Slavery framework and a process of continuous improvement to address Modern Slavery issues in its operations and supply chains.

Over the next year, Stedmans will progress the implementation of its due diligence processes and its grievance mechanisms. Stedmans aims to commence developing processes to assess the effectiveness of its actions.

The table below provides an overview of Stedmans' priorities for FY25.





# STEDMANS

For queries relating to this statement:

**Amanda Foley**  
Managing Director  
mandy@stedmans.com.au



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March 2025.