

MODERN SLAVERY STATEMENT

2021-2022



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ACKNOWLEDGEMENT OF COUNTRY

We acknowledge and pay our respects to Aboriginal and Torres Strait Islander peoples as the First Peoples of Australia whose ancestral lands and waters we work and live on. We honour the wisdom of, and pay respect to, Elders past, present and future.

We also acknowledge the historical lived experience of First Nations Peoples who have endured injustices and various forms of slavery in this country. This part of our shared history has impacted generations of First Nations Peoples and remains an area of unfinished business, and presents an opportunity for our nation to undertake a process of truth telling.



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INTRODUCTION AND IDENTITY OF REPORTING ENTITY

This is the third Modern Slavery Statement (**Statement**) issued by Tennis Australia Limited (ABN 61 006 281 125) (**Tennis Australia**), as a reporting entity pursuant to the *Modern Slavery Act 2018* (Cth) (**the Act**).

Tennis Australia's purpose is to grow, manage, promote, and showcase the game of tennis domestically and represent Australia's tennis interests internationally. The Australian Open is owned and organised by Tennis Australia each year at Melbourne Park, Victoria. Tennis Australia's members comprise six state and two territory tennis associations, also known as Member Associations.

The purpose of this Statement is to assess, address and demonstrate Tennis Australia's responsibility under the Act and more importantly, to assist in the promotion and preservation of human rights. Whilst confident its business operations and supply chain do not pose a high risk of exposure or opportunities for human rights abuses; Tennis Australia recognises its responsibility within these supply chains and is constantly seeking to enhance its corporate contribution. Tennis Australia has revisited several initial steps and actions that it considered when first setting up its modern slavery reporting during this last reporting period, to ensure that there is appropriate and timely consideration of Tennis Australia's participation in the global supply chain.

OUR FOUNDATIONS AND VALUES

Tennis Australia prides itself on making a genuine and positive impact on communities and lives across Australia and globally. We recognise the impact that sport can have on people's lives, and we want to ensure that we continue to make a positive difference to the lives of all that we come into contact with.

The Tennis Australia values are Excellence, Humility, Collaboration, and Imagination. We believe that these values naturally extend to respecting and upholding the human rights of our people and the people we work with. At Tennis Australia, our community is guided by our core values and our approach to human rights is guided by international frameworks and standards. We've modelled our internal policies upon best practice in our industry and ensure that they apply to our members and third-party stakeholders, including our Code of Conduct, Member Protection Policy and Third Party Code of Conduct.

TENNIS AUSTRALIA CODE OF CONDUCT

Our Code describes the standards of conduct expected of our people. It provides a clear framework of guiding principles to ensure that our people are aware of the manner and spirit in which they are expected to behave and conduct themselves. The Code is an essential bridge between the Tennis Australia values, our policies and our legal obligations. Whether we are working with our colleagues or others, the Code holds us accountable to our values and ethical responsibilities and it is the responsibility of all Tennis Australia team members to read and familiarise themselves with the Code.

TENNIS AUSTRALIA THIRD PARTY CODE OF CONDUCT (TPCOC)

We also have expectations of the people who work with us. Our TPCOC expressly forbids our suppliers from being involved in modern slavery: Third parties must *"not engage in or support human trafficking or modern slavery, including forced, bonded or involuntary labour, nor demand work or service from an individual under threat or coercion"*.

It also requires third parties and suppliers to maintain working conditions that meet internationally declared human rights and standards, including the *International Bill of Human Rights* and the *International Labour Organization's Declaration on Fundamental Principles and Rights at Work*.

TENNIS AUSTRALIA MEMBER PROTECTION POLICY (MPP)

Tennis Australia's MPP seeks to protect the most vulnerable individuals associated with our sport and community. Whilst it does not specifically incorporate modern slavery practices, it seeks to ensure protection, transparency, and protection of members of the tennis community whose voice may be diminished by circumstance or their personal situation.

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ORGANISATIONAL STRUCTURE, OPERATIONS AND TENNIS AUSTRALIA SUPPLY CHAIN

ORGANISATIONAL STRUCTURE

Tennis Australia is a not-for-profit company limited by guarantee and registered in Australia. It has subsidiaries as follows:

- a) The Australian Tennis Foundation Limited (ABN 98 138 906 797), a charitable organisation registered with the Australian Charities and Not-for-Profits Commission.
- b) Tennis Nxt Limited, a company incorporated and domiciled in Hong Kong. Tennis Nxt is currently dormant, with no statement of profit or loss or other comprehensive income and statement of changes in equity prepared for the last financial year to 30 June 2021, due to there being no income or changes in equity during that year.
- c) Wildcard Ventures 1 Pty Ltd (ACN 650152202) and Wildcard Ventures 1 Trusco Pty Ltd (ACN 650151812), a venture capital investment company incorporated in Australia. There are also two trusts (Wildcard Ventures 1 Trust ABN 64 501 829 721 and Wildcard Ventures TA Trust) sitting underneath Wildcard Ventures 1 Trusco Pty Limited.

None of the subsidiaries named above are considered reporting entities under the Act.

ABOUT US

As well as promoting tennis and participation, Tennis Australia facilitates player development, stages local and international events and invests in tennis facilities around Australia.

Our purpose is that we believe playing makes life better, and our vision is to create a playful world through tennis for everyone.

Our culture is grounded in a set of values that support and celebrate doing the right thing. Our values are part of our day-to-day conversations and the heartbeat of our business. They guide our decisions and determine our success. Our values are at the core of how we live, work and play.



TENNIS AUSTRALIA'S MISSION STATEMENT

VISION

To create a playful world through tennis for everybody

PURPOSE

We believe playing makes life better

VALUES

IMAGINATION

Dare to be different

COLLABORATION

Build trust through mutual respect

HUMILITY

Put others ahead of yourself

EXCELLENCE

Never stop striving to be the benchmark

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TENNIS AUSTRALIA OPERATIONS AND SUPPLY CHAIN

Tennis Australia is a national sporting organisation (NSO). Tennis Australia's head office is located at Melbourne Park, Melbourne, Victoria, with the majority of its workforce located within Victoria but some team members based in other locations, primarily in states and territories of Australia.

Tennis Australia's operations are primarily based in Australia, with a significant proportion of the company's revenue and expenses directly attributable to the Australian Open Grand Slam event held in Melbourne each year. A majority of suppliers continue to be domiciled within Australia, particularly given the company's desire to source locally, however, there are still a proportion of suppliers based offshore. Local suppliers are known to obtain their goods from third party, offshore suppliers. Tennis Australia believes that this local engagement and oversight continues to mitigate the risks commonly associated with modern slavery.

Front of house and back of house operations at Melbourne Park, the venue at which the Australian Open is held, are conducted by Melbourne and Olympic Parks Trust under an operational agreement.

GOODS AND SERVICES WE BUY

In FY22, we sourced goods and services from more than 2,000 tier-one suppliers. While over 88% of these suppliers operate in Australia, we also work with suppliers mainly in the United States and Asia. Some of these entities provide outsourced technology, broadcast and production equipment, branded merchandise and other professional services.

WHAT WE BUY



Marketing and Events



Office Services and Products



Professional Services



Merchandise



Travel



Catering

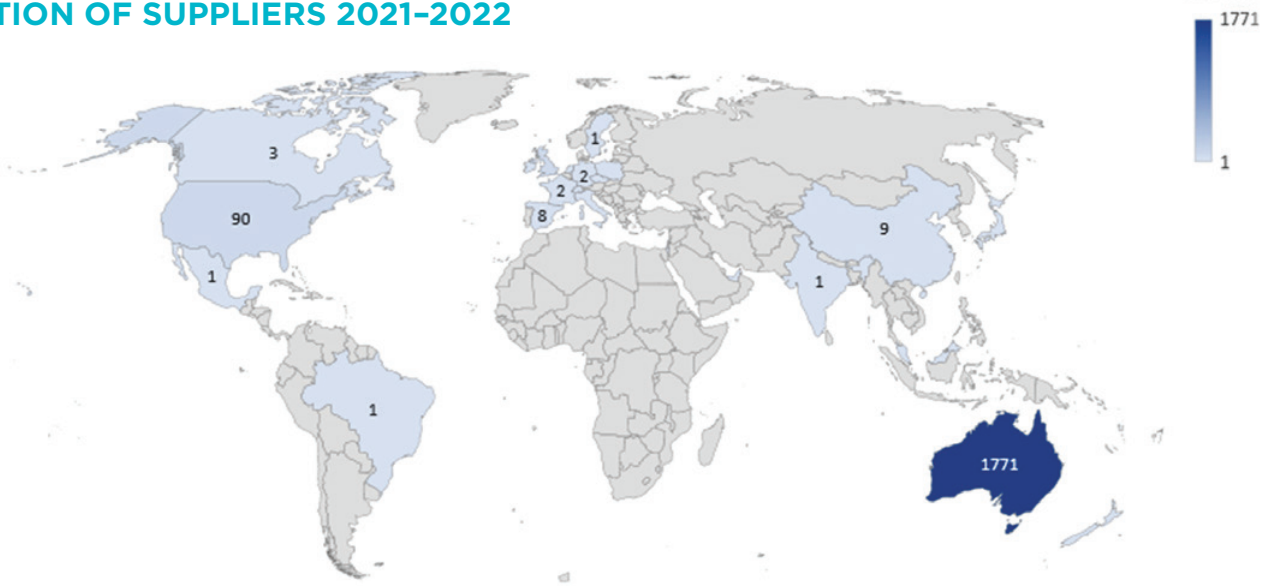


Building and Infrastructure



Technology Services and Products

LOCATION OF SUPPLIERS 2021-2022



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RISKS OF MODERN SLAVERY PRACTICES WITHIN TENNIS AUSTRALIA'S OPERATIONS AND SUPPLY CHAINS

For this statement, our assessment of modern slavery risks in our operations and supply chain considered four categories of risk: industry risks, supply risks, geographic risks and entity risks.



1. INDUSTRY RISKS

- Reliance on migrant, seasonal, base skilled or unskilled workers
- Reported occurrences of modern slavery or other unlawful labour practices
- Reliance on offshore labour agencies

2. SUPPLY RISKS

- Systemic excessive discounted pricing or shortened delivery times
- Known or reported association of labour exploitation with production/supply of goods/services

3. GEOGRAPHIC RISKS

- High prevalence of human rights violations or occurrences of modern slavery
- Reported weak rule of law, systemic corruption
- Inadequate worker protections or high prevalence of law enforcement hostility towards workers

4. ENTITY RISKS

- Reported non-compliance or convictions in connection with human rights or modern slavery laws
- Poor or inadequate policies, procedures, including candidate funded recruitment practices
- Poor reporting mechanisms or opaque and complex supply chains

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RESULTS OF OUR RISK IDENTIFICATION

SUPPLY CHAIN RISKS

Facilities cleaning and simple maintenance services



Tennis Australia engages service providers who supply facilities maintenance and cleaning services (including for COVID safe practices), across our offices.

Workers in the cleaning and maintenance industry may come from vulnerable communities within and outside of Australia.

This risk is heightened when workers perform base skilled tasks or work outside of business hours, and we have limited visibility of their management.

Stationery and branded merchandise products



We buy stationery and branded merchandise for use by our people and in relation to marketing campaigns or related initiatives. Tennis Australia buys these products from a limited number of suppliers.

A modern slavery risk exists when we use suppliers who rely on offshore supply chains as we have limited visibility of their operations and supply chains. This risk is heightened when goods are made by base skilled workers on a demand basis.

A modern slavery risk also exists when we engage our licensees to develop our branded merchandise clothing and accessories who rely on offshore supply chains.

IT hardware and peripherals



We use various technology hardware as part of our day-to-day work, including laptops, monitors, headsets, keyboards and other IT peripherals. We source laptops through a distributor.

We purchase all other IT peripheral products from a limited number of suppliers based in Australia with onshore and offshore supply chains.

There is a potential risk of being directly linked to modern slavery when we use suppliers that rely on offshore and/or complex supply chains over which we have limited visibility. This risk is heightened when goods are made by base-skilled workers on a demand basis.

Offshore suppliers



In FY22, we engaged 118 offshore suppliers, based in countries with a high prevalence of modern slavery risks. While we assess the risk of modern slavery occurring as low, we acknowledge that there is always a potential risk. We note that these entities are subject to heightened levels of risks, which increase where there is overlap with other risk factors.

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RESULTS OF OUR RISK IDENTIFICATION (CONT.)

SUPPLY CHAIN RISKS

Hotels and accommodation suppliers



We use various hotels across Australia and around the world for business-related travel. Primarily, the hotels we use are part of a “preferred hotel” list comprising approximately 30 hotels in Australia and 400 globally.

The preferred list is managed by a dedicated team within Tennis Australia and is reviewed by the Tennis Australia Procurement Team every three years. In most cases, the hotels we use are franchised under global hotel groups that do not own or control those individual hotels.

There is a potential risk of being directly linked to exploitation within the hotel accommodation industry due to its increased use of vulnerable workers, limited oversight from global hotel groups as franchisors, and limited view of guest activities within the booked accommodation.

Tennis Australia considers the risk of its operations directly resulting in modern slavery practices to be low. It also considers the risk of its supply chain contributing to any such practices to be small. However, Tennis Australia recognises that ongoing assessment of business operations is required to ensure the company is aware of its place within the supply chain and has made a point in this last reporting period to ensure that it has reassessed any existing relationships.

During the reporting period, Tennis Australia was able to further streamline its appointment and consideration of third-party suppliers, namely through:

- a) Development of the company’s online Strategic Sourcing portal via the company’s finance system
- b) Further and targeted application of the Victorian government’s Local Jobs First Policy under the Local Jobs First Act 2003 (VIC) to the award of major contracts within Victoria
- c) Working with our external due diligence supplier (Steele Compliance Solutions Inc) to enable them to provide more effective independent reports in relation to any third parties who may be from high-risk jurisdictions (in order to continue to give effect to our Guidelines for Selecting Third Parties to Represent Tennis Australia); and
- d) Considering updated guidance from the Australian Modern Slavery Register in relation to how to best deal with any modern slavery breaches uncovered by Tennis Australia in its supplier network.



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DUE DILIGENCE

Tennis Australia continues to embed due diligence activities and protocols in our day-to-day operations to tackle modern slavery risks.

REDEVELOPMENT OF TENNIS AUSTRALIA'S THIRD-PARTY CODE OF CONDUCT (TPCOC)

During the reporting period, Tennis Australia's Procurement Team and Legal Team commenced discussions and examined the requirements that should be included in a TPCOC for any third-party supplier engaged by the company. This will be shared widely with existing and new suppliers, to ensure universal standards of engagement are maintained.

The TPCOC sits within the Procurement Team as a tool for onboarding of suppliers. Broad consultation takes place across the company, including across the Operations and Commercial Teams to ensure risks are genuinely taken into account and addressed.

ENHANCING SUPPLIER CONTRACTUAL TERMS AND PRACTICES

We have amended our new supplier contracts to include responsible supply terms and conditions that require suppliers to implement reasonable controls to ensure they appropriately remediate any actual or perceived breach of the TPCOC or a modern slavery incident. The terms would allow us to suspend services or terminate the agreement if the breach or incident is not remedied within a reasonable time frame.

We take a risk-based approach for incumbent contracts, focusing on suppliers in modern slavery risk hotspots. We also include the responsible supply terms and conditions in our template Purchase Order terms, which we use for a broad cross section of our tier-one suppliers.

TRAINING

Our approach to modern slavery presents an opportunity to educate and contribute to real change in the lives of the people impacted. We are striving to reach a point where our people are asking how we can better support their understanding of modern slavery and broader human rights risks.

In this next reporting period, we will be focusing on training, raising awareness and upskilling our workforce. We aim to ensure our people understand their shared role and responsibility for managing and addressing modern slavery risks. We will train our people to identify the red flags of modern slavery and how to raise concerns effectively by providing them with the framework with which to deal with any actual or perceived breaches.

This training will dovetail into an overall refresh of Tennis Australia's onboarding and annual workforce training via online and/or in person training sessions and online modules.

REVISITING AND RETESTING THE MODERN SLAVERY COMPLIANCE OF MERCHANDISE SUPPLIERS

As noted above, Tennis Australia considers one of its highest risks of modern slavery breach lies within the sourcing of merchandise, particularly where goods are sourced from offshore.

Using guidance provided by the Modern Slavery Register, Tennis Australia has updated its supply chain questionnaire to ensure further compliance and transparency from its merchandise licensees. This document has been reissued to existing licensees for completion, along with any new licensees.

Whilst Tennis Australia does not engage directly with any third party housed in a high-risk jurisdiction as set out in the Global Slavery Index, there is an acknowledgement and concern that our direct supplier may have further engagements, so additional care was given in considering the farthest reaches of these supply chains.

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FURTHER CONSIDERATION OF TENNIS AUSTRALIA'S OBLIGATION IN UNCOVERING A MODERN SLAVERY BREACH IN ITS SUPPLY CHAIN

Tennis Australia recognises that where a business has not caused or contributed to the harm caused by a modern slavery breach, but is directly linked to it (i.e. through a supplier or business relationship), then the business should consider the guidance from the Modern Slavery Register in ensuring the breach is appropriately dealt with by the responsible and appropriately equipped authorities.

In order to discharge this responsibility, Tennis Australia will further review its Procurement Policy and training to ensure Tennis Australia team members are appropriately armed with the best way to deal with any instances they uncover in their daily operations.

ACTIONS TO ASSESS AND ADDRESS TENNIS AUSTRALIA'S MODERN SLAVERY RISKS

Tennis Australia believes that it has again appropriately identified the primary risks in its operations and supply chain in relation to modern slavery practices, as set out above. Tennis Australia's Procurement Team will continue to examine business streams and operations, particularly with new product lines and innovations being rolled out regularly and remains committed to ensuring there is a consistent approach across the business.

Tennis Australia is committed to maintaining its strong focus and oversight of third-party engagements by ensuring strong collaboration by all stakeholders within the business, to ensure ethical responsibility is understood and managed across the business by all team members.

GRIEVANCE AND REMEDIATION

Tennis Australia is committed to providing for, or cooperating in, remediation where we identify we have caused or contributed to human rights harm such as modern slavery, and we recognise that we may also choose to play a role in remediation where we identify we are directly linked to the harm.



SUPPLY CHAIN

Tennis Australia is committed to building a strong and sustainable supply chain by collaborating with our suppliers and sharing our knowledge and experience. We know that effectively engaging with suppliers promotes greater transparency and will allow us to assess our supply chain and reach beyond tier-one suppliers. It also helps us to mitigate risk and remediate any identified modern slavery incidents.

In FY23, Tennis Australia's Procurement Team will develop a remediation strategy process and approach that sets out the steps we will take if we become aware of a modern slavery incident in our supply chains.

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ASSESSING THE EFFECTIVENESS OF TENNIS AUSTRALIA'S ACTIONS

Assessing the effectiveness of our actions is critical for ensuring we understand the impacts of our business on modern slavery and broader human rights, and continually improve our approach.

We will use KPIs, and a range of measures to monitor and assess the effectiveness of our actions, including:

- Operational tracking of policies, processes and training initiatives;
- Tracking proactive engagement and communication with suppliers;
- Reports made through our grievance mechanisms involving modern slavery, and how these reports are handled;
- Benchmarking our progress against industry peers and other statements identified as best practice; and
- Collaboration with internal and external stakeholders to provide review and feedback.

We will continue to adapt and strengthen these, and other measures, over future reporting periods to allow us to continually improve the effectiveness of our approach to addressing modern slavery and will consider other qualitative KPIs going forward.

In the next reporting period, the primary focus will be on updating and applying the Third-Party Code of Conduct, refining modern slavery guidance and training within the business and also assessing Tennis Australia's action in circumstances where a modern slavery breach is uncovered.

This Statement is made pursuant to the *Modern Slavery Act 2018* (Cth) and has been approved by the Board of Tennis Australia Limited.

Signed



Janice van Reyk

Director

Tennis Australia Limited

March 2023

