



# Ardent Leisure Group Limited

## Modern Slavery Statement

FY21



The *Modern Slavery Act 2018* (Cth) requires Ardent Leisure Group Limited (**Ardent**) to prepare an annual Modern Slavery Statement setting out the actions we have taken to assess and address modern slavery risks in our operations and supply chains.

This Modern Slavery Statement follows our first statement for the FY20 year that we lodged in March 2021. Readers should note that, in addition to the content of this Modern Slavery Statement, our current Ethical Procurement and Modern Slavery Statement is available on our website at [www.ardentleisure.com](http://www.ardentleisure.com).

This Statement is primarily focussed on the activities of Ardent's Australian businesses, however it also addresses the management of modern slavery risks in our overseas operations.

Ardent recognises that slavery can occur in many forms, as outlined in the *Modern Slavery Act 2018* (Cth). This can include slavery, servitude, human trafficking, forced marriage, forced labour debt bondage and child labour.

We are fully committed to operating responsibly and establishing and adhering to the highest ethical standards across our businesses. We have zero tolerance for any forms of modern slavery in our businesses.

## **1. STRUCTURE, OPERATIONS AND SUPPLY CHAIN**

Ardent is a public company listed on the Australian Securities Exchange (ASX:ALG) and has operations in both Australia and the United States. Ardent is a tourism, leisure and family entertainment company which currently comprises the Theme Parks division located on the Gold Coast, Australia and incorporating Dreamworld, Whitewater World, SkyPoint Observation Deck and SkyPoint Climb, and Main Event Entertainment, a family entertainment business with 44 centres across 16 states in the United States. The US operations comprise the major part of Ardent's business.

Ardent's operating businesses are supported by a Head Office function located in Sydney, Australia.

In FY21, Ardent had in aggregate over 5,500 employees, with the vast majority based in the United States.

### ***Our suppliers and supply chain***

Globally, we work with thousands of suppliers, both direct and indirect.

For our Australian businesses, most of our suppliers are located in Australia or in countries that demonstrate a greater awareness of modern slavery and therefore represent a lower risk of unethical procurement practices.

The main types of goods and services that Ardent procures directly include:

- Food and beverage
- Apparel and retail merchandise
- IT related hardware, software, equipment and services
- Professional services including legal and taxation
- Operating consumables such as chemicals, cleaning and hospitality supplies, stationery
- Engineering trade services
- Advertising and marketing, media and design services
- Utilities and waste

Ardent’s businesses aim to procure most of their goods and services from suppliers based in the same country in which they operate. All qualified suppliers are given equal opportunity to compete for the business. Procurement decisions follow a due diligence process based on a reasonable assessment of quality, service, experience, competitive pricing, technical qualifications and ethical procurement policy and compliance. Our businesses are focused on appointing reputable suppliers who demonstrate an awareness of modern slavery risks and will be held to high standards of ethical business practices promoting integrity and transparency.

Ardent recognises that tackling the risk of modern slavery in our supply chains requires an ongoing commitment and we intend to continue to expand upon initiatives that are already in place. Many of the largest suppliers to our US business operate under their own mandated codes of conduct or our standard trading terms pursuant to which they undertake to respect and comply with all laws, rules and regulations around the world in the countries where they conduct business, including modern slavery and related laws.

Our visibility of modern slavery risks may be limited as a result of risks being deep within the supply chains of our direct suppliers. However, as we progressively develop our supply chain map, we will increase the engagement with our suppliers to identify risks further up the supply chain and promote appropriate action if and when necessary.

## **2. RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS**

We continue to progress our work to identify areas of greatest modern slavery risks in our operations and supply chains. We are not directly aware of any unethical practices in our supply chains, however we are cognisant that the assessment is an ongoing task and that systems are continuously improving.

All suppliers to our Australian business are ranked by us from tier 1 to tier 3, where tier 1 suppliers are those we engage directly who have factories or workers involved in the manufacture of retail merchandise which we then sell to guests throughout our operations. An area of ongoing focus continues to be identifying those suppliers who directly source products from known high-risk markets where modern slavery practices can be prevalent and engaging with them to understand how they manage the associated risks and concerns.

Based on our current procurement practices and due diligence of our suppliers, we consider the risk of modern slavery in our operations and supply chains to be low, largely due to the type of goods and services acquired and their country of origin.

### ***Policies and procedures***

Ardent’s key policies that set out our commitment to human rights and proactively identifying and addressing modern slavery practices in our operations and supply chains include:

Code of Conduct	<p>Outlines the basic principles and standards of behaviour to guide all employees in the way they conduct business on behalf of the Group. It is designed to assist employees to understand their individual responsibilities and obligations and provide guidance in the performance of their duties to conform to Ardent’s expectations of high moral and ethical standards.</p> <p>Our Code of Conduct is provided to all employees upon commencement of employment. All employees are required to</p>
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	acknowledge that they understand and will comply with the Code. Furthermore, all employees must undertake training on the Code as part of their induction process and every two years thereafter.
Ethical Sourcing and Modern Slavery Policy	<p>Outlines Ardent’s commitment to the highest standards of ethical and responsible conduct and the protection of human rights. Ardent has zero tolerance for all forms of modern slavery and human trafficking.</p> <p>Ardent expects that its suppliers share and demonstrate the same commitment and as such, it is our suppliers’ responsibility to achieve and maintain these standards and to enforce them within their supply chain involved in supplying goods and services to Ardent.</p> <p>Our current Ethical Procurement and Modern Slavery Statement is available on our website at <a href="http://www.ardentleisure.com">www.ardentleisure.com</a></p>
Procurement Policy	<p>Outlines our Theme Parks division’s commitment to behave within the local law and in accordance with the highest ethical standards.</p> <p>It is expected that we engage with our business partners to focus on our core procurement principles of: value add, collaboration, integrity, governance, safety, and ethical and sustainable supply.</p>

We are continuing to develop and enhance our modern slavery risk management practices and build a deeper understanding of our supply chains. In particular we have increased our due diligence processes, including but not limited to, reviewing our Supplier Self-Assessment Questionnaire, adopting a Supplier Code of Conduct for our US business and assessing the modern slavery statements and similar documents published by an increasing number of our suppliers.

### **3. ACTIONS TAKEN TO ASSESS AND ADDRESS THE RISKS OF MODERN SLAVERY PRACTICES**

Ardent manages the risks of modern slavery practices in its operations and supply chains by assessing and addressing the risks through a number of different processes including supplier due diligence upon engagement, regular review meetings with existing suppliers and remediation processes where necessary.

During FY21, we have undertaken the following:

*In respect of our Australian Theme Park operations*

- Continuing our supply chain mapping exercise to understand category spend, place of origin and risk levels across our suppliers.
- Requesting the inclusion in some supply contracts of contractual warranties from suppliers regarding modern slavery compliance, as well as expanded termination rights where concerns regarding non-compliance are identified (the scope and inclusion of contractual clauses regarding modern slavery compliance is developing in all industries).
- Seeking documentation from tier 1,2 and 3 suppliers such as their modern slavery statements which supports their commitments to address modern slavery.
- Ongoing training and awareness specific to modern slavery to all employees.

### *In respect of our US operations*

- Commenced supply chain mapping to understand category spend, place of origin and risk levels in our suppliers based on the risk associated with the nature of product supplied and magnitude of the relationship.
- Developed a Supplier Code of Conduct to be adopted for FY22 which addresses, amongst other things, forced labor, child labor, working hours, wages, health and safety.
- Analysed supplier roll up under our major wholesale food supplier (\$24m in aggregate annual spend).
- Reviewed suppliers under our Main Event form agreement (which requires compliance with all applicable laws).

Ardent will not support suppliers where we are aware of, or have reasonable grounds to believe that, modern slavery practices are taking place in their organisation or supply chain. After conducting an appropriate investigation, we may terminate supply or service contracts if necessary and/or appropriate.

## **4. ASSESSING THE EFFECTIVENESS OF OUR APPROACH AND PROCESSES RELATED TO MODERN SLAVERY RISKS**

Ardent recognises the importance of assessing the effectiveness of its actions in mitigating modern slavery risks. Given the lower risk of modern slavery practices in Ardent's businesses (which are service based entertainment offerings), Ardent will adopt a diligent but proportionate approach to all aspects of modern slavery and will continue to review this position from time to time.

### *Grievance and reporting*

We recognise the importance of our employees having access to easy and, if required, anonymous avenues of reporting concerns regarding modern slavery. Our employees can report concerns via internal reporting channels to their managers, executive management and human resources. Furthermore, our Whistleblowing Policy provides a mechanism which can be used by all employees to anonymously report misconduct, including modern slavery risks or practices.

In FY22 we will continue to increase awareness across our businesses of reporting any concerns regarding modern slavery in the supply chain, including advising and urging our suppliers to do the same, either directly or via the Ardent whistleblowing hotline.

### *Awareness and training*

During the year we rolled out our modern slavery training program to employees at all levels of the Australian business.

The training program describes the different types of modern slavery practices, risk indicators for modern slavery, identifying potential victims of modern slavery, understanding suppliers and supply chains, consequences for an organisation if they are found to have engaged in, or facilitated, modern slavery practices, and how employees can report modern slavery concerns.

It is intended that our modern slavery training will continue to be incorporated as part of every employee's induction program, with refresher training provided periodically.

## 5. CONSULTATION WITH OTHER ENTITIES

Ardent takes a Group approach to addressing modern slavery risk. In relation to Ardent's controlling interest in its US business, we liaised with the appropriate team members who have responsibility for supply chain management for that business. This consultation process involved a briefing on the requirements of the *Modern Slavery Act 2018* (Cth) including the reporting requirements under the Act. It also canvassed general awareness of modern slavery and the importance of the due diligence processes and selection of suppliers.

## 6. FUTURE COMMITMENTS

We recognise and understand the importance of the *Modern Slavery Act 2018* (Cth) and we are committed to continuing to improve our approach with the ongoing review and assessment of the risks in our operations and supply chains.

In the short term our key focus will be on:

- Further developing our communications within our workplaces to ensure all employees understand and remain alert to the risks of modern slavery.
- Continuing to promote and encourage reporting of instances, or suspected instances, of modern slavery practices.
- Enhancing the consultation process with our US based business in which we have a controlling interest to promote awareness of modern slavery risks.
- Communicating the newly adopted Main Event Supplier Code of Conduct to significant vendors and suppliers to our US business.
- In respect of the Australian operations, ensuring all new suppliers are subjected to our procurement due diligence process and appropriately ranked with respect to ethical procurement matters and, where necessary, taking steps to ensure adherence to our procurement policies.
- Reviewing our procurement policies to ensure they reflect the current modern slavery practices and principles.
- Facilitating supply chain mapping and related exercises in our US business, in particular in connection with the revamped food menu being rolled out in FY22.
- Seeking to impose a greater level of legal accountability on our suppliers through enhanced contractual provisions regarding modern slavery.

## 7. APPROVAL

This Modern Slavery Statement is made pursuant to the *Modern Slavery Act 2018* (Cth) for the reporting period 1 July 2020 – 30 June 2021.

This Statement was tabled at a meeting of the Ardent Leisure Group Board on 14 December 2021 and was approved by the Board accordingly.



**Dr Gary Weiss AM**  
Chairman  
Ardent Leisure Group Limited  
14 December 2021