

## **MODERN SLAVERY STATEMENT**

**Australian Venue Co**  
**29 June 2020 to 27 June 2021**

### **1. Introduction**

This Modern Slavery Statement covers the activities of Australian Venue Co. Holdings Limited (ABN 90 619 977 070) and its controlled entities (**Australian Venue Co**) in respect of the financial year ended 27 June 2021 in identifying and addressing the potential risk of modern slavery for our operations and supply chain.

Refer to section 6 for the list of entities that are considered reporting entities under the *Modern Slavery Act 2018* (Cth).

### **2. About Australian Venue Co**

Australian Venue Co is the second largest pub group in Australia and New Zealand. The group was created in 2014 with the vision of becoming a leading pub operator.

Australian Venue Co is a large group but aims to feel like a small one with the majority of venues operating as a standalone pub, bar or restaurant with their own defined brand and service proposition. Many of Australian Venue Co's venues are rich in heritage, with some having been in operation for more than 100 years.

Through its venues, Australian Venue Co aims to become a part of the fabric of communities in which it operates. Australian Venue Co's success relies on the confidence that customers and the community have in the way we conduct our business, and we are committed to ensuring that we operate and source our products ethically, sustainably and responsibly.

### **3. Structure, Operations and Supply Chains**

Australian Venue Co operates in excess of 175 pubs, bars and restaurants in Australia and New Zealand under a variety of brands.

Our operations are underpinned by a labour force of approximately 5,800 employees (full-time, part-time and casual).

Our direct supply chains are comprised of approximately 2,500 suppliers, with 95% of our procurement spend with suppliers operating in Australia and New Zealand. Due to the localised nature of our direct supply chain, we experienced limited to no supply chain impact associated with Covid-19.

Our largest category of supplier spend is on food and beverage direct to our pubs, bars and restaurants. Our second largest category of supplier spend is on goods and services such as maintenance, waste and cleaning, security, rent and utilities.

#### **4. Risks of Modern Slavery Practices in our Operations and Supply Chains**

Australian Venue Co has a relatively large workforce and supplier base, and we have undertaken a risk assessment to understand the modern slavery risks within our operations and our supply chains.

##### ***Supply Chains***

During the first reporting period being 1 July 2019 to 28 June 2020, our focus was on conducting a supply chain risk assessment. This process included a risk mapping of our supply chains to identify priority risk areas where there may be a higher risk of modern slavery practices. In undertaking this risk profiling, we considered the category of the product or service being procured, the geographic location of the supplier, high risk business models, and suppliers that engage or employ vulnerable people.

The outcome of the risk mapping has enabled Australian Venue Co to identify potential risks in the cleaning services and fruit & vegetable farming sectors of our supply chains due to their potential reliance on migrant and undocumented workers.

During our second reporting period being 29 June 2020 to 27 June 2021, our focus was acting on the learnings gained from our risk mapping initiative. Areas that were identified as being potentially higher risk underwent a thorough review and further risk assessment process. Suppliers were required to produce documented evidence of what they were doing to manage modern slavery risks and to provide additional information, notably relating to labour rates, which was compliance cross-checked against the relevant industry awards or enterprise agreements. Further, where appropriate, Australian Venue Co went to market to tender for the provision of these goods and services.

Australian Venue Co considers that it has good mitigation measures in place to address the potential modern slavery risks in our supply chains due to the centralised procurement procedures that are in place for supplier pre-qualification, contracting, monitoring and contract management.

Due diligence and risk assessments are undertaken as part of pre-qualification for potential suppliers. This process includes assessment of modern slavery policies and procedures, labour practices including whistleblower procedures, internal audit procedures and labour licensing status.

Australian Venue Co's procurement contractual requirements include compliance with applicable laws relating to modern slavery and ongoing compliance reporting. In the event Australian Venue Co were to identify a modern slavery risk with a supplier, Australian Venue Co would seek further supplier information and reporting, including through contractual mechanisms to audit suppliers, and seek to collaborate to resolve the risk. In the event of an unresolved risk, Australian Venue Co would look to initiate contractual remedies and/or consult appropriate law enforcement authorities.

Australian Venue Co did not find any instances of modern slavery in the supplier assessments undertaken during this reporting period.

## ***Operations***

Australian Venue Co recognises that labour exploitation can occur in the hospitality industry and is committed to an employment framework that protects its workforce. All venues and employing entities are subject to Australian Venue Co's corporate compliance framework as it relates to labour.

Australian Venue Co implements a range of measures to ensure compliance with relevant employment instruments and obligations, including:

- Use of Human Force, a time and attendance system with Award and enterprise agreement interpretations across all venues. This system also includes a self-service portal to enable staff visibility on rosters, payslips including rates and hours worked, and updating personal details.
- Central issuance of employment contracts by the Australian Venue Co HR department to manage compliance with applicable employment entitlements.
- Maintenance of a detailed suite of employment policies.
- Periodic engagement with independent specialist consultants to verify compliance and reporting on key employment metrics.
- Whistleblower and grievance policies and procedures (with Board oversight).
- Central oversight of venue management.
- A dedicated centralised Safety department.

Australian Venue Co did not receive any grievance disclosures or whistleblower alerts related to modern slavery during the relevant reporting period.

Due to our framework of employment policies and procedures, and internal controls including grievance and whistleblower channels, we have assessed the risk of modern slavery in our direct operations as low. Notwithstanding this assessment, Australian Venue Co will continue to monitor risk across our operations.

## 5. **Assessing Effectiveness**

Australian Venue Co continually reviews the effectiveness of the actions we have taken to address the modern slavery risks in our operations and supply chains.

Australian Venue Co's supplier pre-qualification process provides transparency on modern slavery risks in our supply chains and enables us to partner with suppliers to improve practices, the effectiveness of which is assessed through contract compliance KPIs.

Australian Venue Co's initiatives to manage modern slavery risks in our operations is regularly assessed as part of our governance and risk management processes including investigation of grievances and confidential whistleblower disclosures.

## 6. **Future Priorities**

Australian Venue Co will seek to progress the following initiatives:

- continue to enhance the knowledge of our workforce and suppliers about modern slavery risks;
- undertake further diligence procedures by expanding our review of our supply chains to further risk map any potential subcontractors and tier 2 suppliers; and
- seek out and utilise new technology to improve our supplier monitoring.

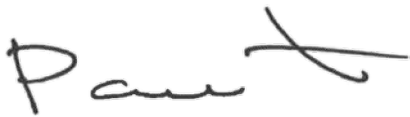
## 7. **Reporting Entities**

The following Australian Venue Co entities are considered reporting entities under the *Modern Slavery Act 2018* (Cth) and are covered by this Statement: Australian Venue Co. Holdings Limited, Canoe Mezzco Pty Limited, Canoe Midco Pty Limited, Canoe Bidco Pty Limited, Australian Venue Co Limited, AVC Operations Pty Limited, Queensland Venue Co Pty Ltd and AVC Sapphire Holdings Pty Ltd.

## 8. **Consultation**

A process of consultation across Australian Venue Co and its reporting entities helped to guide the preparation of this Statement. This included engagement with each relevant function within Australian Venue Co including Human Resources, Safety, Procurement, Legal, Licensing and Compliance.

This statement for Australian Venue Co. Holdings Limited and its controlled entities was approved by the Board of Australian Venue Co. Holdings Limited as the parent entity on 21 December 2021.



Paul Waterson  
Chief Executive Officer & Managing Director  
Australian Venue Co. Holdings Limited  
22 December 2021

**APPENDIX**

This Modern Slavery Statement was prepared in accordance with the criteria set out in the *Modern Slavery Act 2018*. The table below outlines where information related to each mandatory reporting criteria can be found.

<b>Mandatory criteria for modern slavery statements</b>	<b>Location of information</b>
Identify the reporting entity	Section 7
Describe the structure, operations and supply chains of the reporting entity	Section 3
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Section 4
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Section 4
Describe how the reporting entity assess the effectiveness of such actions	Section 5
Describe the process of consultation with any entities that the reporting entity owns or controls	Section 8
Provide any other information that the reporting entity, or the entity giving the statement, considers relevant	Section 2