



## **MODERN SLAVERY STATEMENT**

### **Australian Venue Co**

**28 June 2021 to 26 June 2022**

#### **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 26 June 2022 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 was during the relevant reporting period 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 standalone pubs, bars or restaurants 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 200 pubs, bars and restaurants in Australia and New Zealand under a variety of brands.

Our operations are underpinned by a labour force of approximately 8,000 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. We seek to provide a first-rate hospitality experience and as such, seek to source our products from high quality and reputable producers.

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 risk assessments 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 may engage or employ vulnerable people.

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 the market to tender for the provision of these goods and services.

During our third reporting period being 28 June 2021 to 26 June 2022, our focus was on continued proactive engagement with our suppliers to enhance their knowledge and capabilities around modern slavery risks. We also undertook a risk assessment of lower tier suppliers in areas that were identified as being of potentially higher risk. No issues were identified as a result of the diligence activities undertaken in relation to these suppliers.

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 an 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 promptly remediate the situation including but not limited to, initiating contractual remedies and/or consulting with 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.

Prior to acquiring any new venue, Australian Venue Co undertakes a thorough due diligence process which includes, amongst other things, a review of the potential acquisition venues' key suppliers and employment conditions, to ensure compliance with modern slavery prevention practices.

Australian Venue Co implements a range of measures to ensure compliance with relevant employment instruments and obligations, including but not limited to:

- 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 also employs international workers and does so strictly in accordance with the international workers' visa conditions including, but not limited to, hours and pay rates. We actively encourage internal training and progression and have many international staff members that have progressed to a senior chef or venue manager level, and all form an important part of our workplace community.

Within Australian Venue Co, we encourage our employees to speak up and we are committed to ensuring the accessibility of our grievance and whistleblower reporting avenues. 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 is committed to a meaningful group-wide response to modern slavery and will be continuing 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 are regularly assessed as part of our governance and risk management processes including investigation of grievances and confidential whistleblower disclosures.

### **Covid-19**

Australian Venue Co acknowledges that the Covid-19 pandemic has had a significant impact on vulnerable populations within our society broadly in terms of economic stability, physical health and mental health. Australian Venue Co sought to combat these added challenges and risks by protecting its workers through providing, at Australian Venue Co's own cost, support payments equivalent to the JobKeeper payment for ineligible employer-sponsored visa workers and setting up a hardship allowance for other visa workers, running meal delivery services for impacted staff during lockdowns, paying casual workers sick leave if they caught Covid-19 or were close contacts, and providing mental health support.

## 6. Future Priorities

In FY23 Australian Venue Co will seek to progress the following initiatives:

- undertake further assessments in relation to Australian Venue Co's governance mechanisms in relation to payroll compliance to ensure that there are no vulnerabilities and risks of inadvertent non-compliance;
- provide modern slavery risk and policy training to relevant Australian Venue Co employees; and



- continue to work with our workforce and suppliers to drive improvements in addressing modern slavery risks.

## 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 18 November 2022.

DocuSigned by:  
  
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Paul Waterson  
Chief Executive Officer & Managing Director  
Australian Venue Co. Holdings Limited  
19 December 2022



## 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 assesses 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