

Contents

Introduction	2
Actions taken	3
Strategy, structure and operations	4
Modern slavery risks in our operations	6
Case study	7
Modern slavery risks in our supply chain	8
Our governance framework	10
Risk management and due diligence	11
Reporting and measuring effectiveness	12
Looking forward	13
Consultation and approval	14

Introduction

This Modern Slavery Statement is made on behalf of EVT Limited (“EVT” or the “Group”) and the reporting entities listed below:

- The Greater Union Organisation Limited;
- Birch, Carroll & Coyle Limited;
- Rydges Hotels Limited; and
- QT Hotels and Resorts Limited.

This is EVT’s third Modern Slavery Statement, which outlines the steps we have taken during the reporting year ended 30 June 2022 to continue to understand and address the Modern Slavery risks in our operations and supply chain.

In this third Modern Slavery Statement, we continued working and improving our processes to ensure that we help eliminate modern slavery where possible.

Modern Slavery can have a significant impact within any community and EVT opposes slavery in all its forms which is why we endeavour to use reputable suppliers.

EVT’s human rights strategy is underpinned by our purpose: to make the day better for ourselves, our customers, our team and our community. We are constantly considering new and better ways to achieve this purpose.

We recognise that the decisions we make within the EVT Group and how we choose to provide our experiences to customers can impact the livelihoods of people and communities in which we operate. We appreciate that we have a responsibility and opportunity to help eliminate modern slavery through our own actions and by working with our reputable suppliers.

Responsible procurement is vital and we understand the importance of ensuring that environmental, social and ethical considerations are taken into account when making procurement decisions and as such, we endeavour to interact with suppliers that also share that common understanding.

Actions taken

For our third report, we:

- Continued to apply our Supplier Code of Conduct and our Procurement Policy.
- Became a Sedex Buyer Member in March of 2022. Supplier Sedex membership and Self-Assessment Questionnaire (SAQ) requirements have also been integrated into EVT's new purchase agreements.
- Rolled out a modern slavery online training module which was completed between February – April 2022 by approximately 500 managers and senior leaders within EVT.
- Leveraged Coupa to improve visibility to EVT's current supplier base, allowing for the consolidation of suppliers and their associated entities.

Strategy, structure and operations

The Group’s business is comprised of:

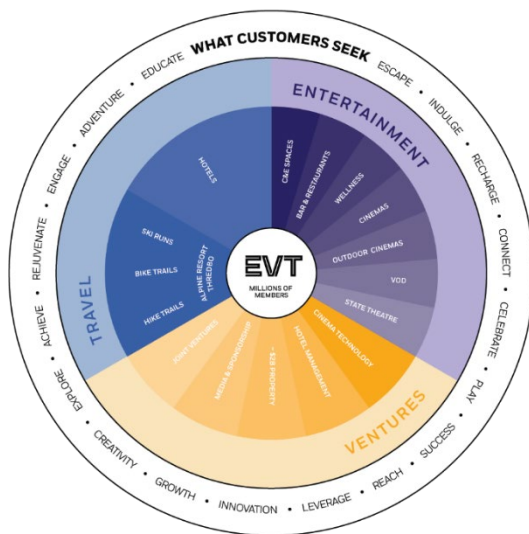
- Entertainment – including cinema operations in Australia, New Zealand and Germany, restaurants, bars and wellness offerings such as spas and golf courses.
- Ventures – including the management and development of the Group’s property portfolio, valued at around \$2 billion, hotel management solutions, joint venture partnerships, and business customers for media and entertainment technology.
- Travel – including the Group’s hotel operations, from luxury to budget accommodation, and Thredbo Alpine Resort for year-round recreation and adventure activities.

The Group’s values of empowerment, possibilities and community enable it to drive positive employee engagement and fulfil its purpose, which is to be leaders in creating experiences that escape the ordinary. Measuring and improving customer sentiment, having a positive social impact in the communities in which the Group operates, and creating a better tomorrow through environmental sustainability initiatives are at the core of how the Group operates and creates value for its stakeholders.

The Group’s strategy is visually represented below:

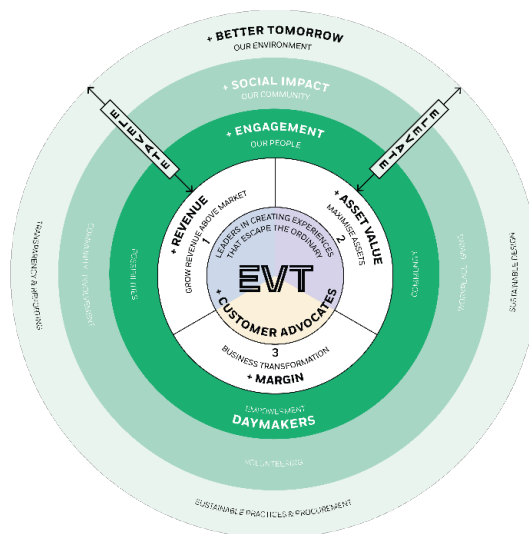
WHAT we do

EVT Experiences



HOW we do it

EVT Way



Modern Slavery Statement 2022



EVT is a public company listed on the Australian Securities Exchange with over 100 subsidiaries based in Australia, New Zealand and Germany. Further details for the entities in the EVT Group are disclosed in the [2022 Annual Report](#).

More information regarding EVT is available at www.evt.com.

Modern slavery risks in our operations

EVT's employee numbers vary significantly throughout the year due to the seasonality of some of the divisions within the EVT Group. During this reporting period, certain divisions were still impacted by COVID lockdown closures and limited trading to ensure compliance with State and Federal Government requirements. However, the impact was not as significant as shown in our Second Modern Slavery Statement

As of 30 June 2022, we had a total of approximately **10,000 employees** across Australia (approximately 7,000), New Zealand (approximately 1,200) and Germany (approximately 1,800). This was a steady incline as the hospitality and entertainment divisions grew during the current reporting period.

We work closely with our joint venture partners by way of regular meetings and communications to ensure that compliance with employment law and regulations is appropriately managed.

In Australia, EVT's employees can be engaged on any of the following employment types: full-time, part-time or casual work. Our employees are engaged under common law contracts, Modern Awards or Enterprise Agreements depending on what division within EVT they work. The majority of our younger workers (for e.g. under 18 years of age) work in our Cinema businesses but their roles are limited to customer service and other low-risk activities.

In New Zealand, the Group has both part time and full-time employees and engage employees under either Collective Agreements or Individual Agreements. Our operations in Germany engages both temporary and permanent employees under applicable German employment laws.

EVT regularly reviews the composition of its workforce, including the controls implements to manage compliance with employment laws and regulations and we consider that the risk of modern slavery in our operations is low. Specific assessments on EVT's supply chains are considered on the following pages.

Case study – Outsourcing Arrangements

EVT will generally have direct control over the sourcing and employing of personnel however, there are often functions or tasks that are outsourced via third party contracting arrangements. An example of an outsourcing arrangement can include housekeeping and cleaning services and these types of outsourcing arrangements can occur for a number of EVT locations (including the head office).

We take our obligations seriously in relation to outsourcing arrangements to ensure that the outsourcing employees are receiving the appropriate pay in accordance with applicable legislation and industrial instruments, including the *Fair Work Act 2009* (Cth). As part of the contractual obligations relating to outsourced arrangements, EVT requires the outsourcing party to allow an external review of their internal processes and payment functions relating to those outsourcing employees who undertake tasks for any of the EVT businesses.

During the year EVT engaged a professional services firm to conduct an agreed-upon procedures engagement for two EVT locations in relation to the outsourcing services. The agreed-upon procedures included sampling, testing, and reviewing the employment arrangements for a number of outsourcing employees who undertake the outsourcing tasks at EVT. The reviews were focussed on ensuring that:

- the approved outsourcing employee's timesheet had been used on an appropriate basis for payment purposes;
- the outsourcing employees had been appropriately classified under an applicable and relevant award;
- the outsourcing employees had received payment at the correct and appropriate award rates; and
- the outsourced employee's payslip reflected the correct information and payment arrangements.

For the two locations tested during the year there were no areas of concern or significant findings and EVT has committed to maintain focus on regular testing and analysis of outsourcing arrangements.

In addition to the abovementioned review, the EVT external confidential whistleblowing helpline is available to all outsourced employees. EVT promotes and encourages employees and other stakeholders, including outsourced employees, to use the confidential whistleblowing helpline to report any anomalies or concerns. A poster containing contact details are displayed at each EVT location.

Modern slavery risks in our supply chain

EVT works with approximately 4,800 suppliers across its operating divisions in Australia and New Zealand.

Key supplier categories include the following: Food & Beverage, Property and Facilities, Film Hire, Utilities, Information Technology, Professional Services, Sales and Marketing, Consumable and Print Media, Travel.

EVT's supply chain is diverse, complex, and geographically widespread. It encompasses a broad spectrum of very large global companies (for example, major Hollywood film studios), large local companies (for example, our cinema landlords; design and build firms), and local family businesses (for example, food and beverage suppliers; property services suppliers).

Our Group Procurement Team is primarily focused on purchasing goods and services within the Food and Beverage, Information Technology, Facilities, and Consumables and Print Media categories. Whilst our operating divisions directly manage purchasing decisions in the corporate spend categories, which includes Utilities, Travel and Sales and Marketing, Film Hire and Property, contracts will transition to be overseen by the Procurement Team. Coupa, EVT's new Business Spend Management System, has been rolled out to our operating divisions and has provided enhanced visibility to our Tier 1 supplier spend, allowing for the consolidation of suppliers and their related entities. EVT plans to continue leveraging Coupa to assist in centralizing our procurement activities. As a Buyer Member of Sedex EVT has also begun to embed supplier Sedex membership and self-reporting requirements into our Group Procurement process. Moving forward, we plan to leverage Sedex to evaluate the Modern Slavery risks and control measures of our contracted Tier1 suppliers.

For this reporting year, EVT evaluated our spend across approximately 4,800 primary Tier 1 suppliers. These suppliers' range in size from large public and private businesses based in Australia and abroad to small local family run businesses. Of these suppliers, 14 reside in countries that rank as moderate on the Walk Free Global Slavery Index (GSI). EVT did not have any suppliers based in a country considered a high risk on the GSI.

Modern Slavery risks in our supply chain (continued)

GSI Risk	Country	Supplier Count	Percentage of Spend
Low	Australia	3,775	91.4%
	New Zealand	943	6.2%
	United States	57	0.7%
	European Union ¹	26	1.0%
	United Kingdom	23	0.1%
	Other ²	13	0.4%
Moderate	China ³	5	0.1%
	Singapore	6	<0.1%
	Israel	1	<0.1%
	Estonia	1	<0.1%
	Cyprus	1	<0.1%

¹ Includes: Netherlands, Ireland, Austria, Germany, Sweden, France, Spain, Belgium

² Includes: Switzerland, Norway, Republic of Korea, Japan, UAE, Canada, Taiwan

³ Includes: China, Hong Kong, Macau

While EVT and our suppliers operate primarily in lower risk countries, we have identified the following areas as carrying a higher potential risk of modern slavery. Enhanced due diligence is applied when dealing with suppliers in these categories:

Industry risks	Product and services risks	
Cleaning	Cleaning services*	Grains
Hospitality	Produce	Flatware and glassware
Food and agriculture	Coffee	Electronics
Construction	Construction materials	Merchandise
Information & Communications Technology	Fish	Textiles
Electronics	Carpets and flooring	Packaging
Textiles	Linen	Consumables
Manufacturing	Furniture	Stationary
Forestry	Garments	Amenities
Shipping and transport	IT/programming services	Window coverings
	Maintenance*	Edible oils

Note: products and services marked with an asterisk (*) may be outsourced.

Our governance framework

EVT’s [2022 Corporate Governance Statement](#) sets out the key corporate governance principles adopted by the Board in governing the Group.

EVT has a robust corporate governance framework in place, with the Board overseeing the Group’s risk management framework, including in respect of Modern Slavery risks, through the Audit and Risk Committee.



The EVT Board has established a formal risk management framework for monitoring and managing material risks, including any material risks associated with Modern Slavery in the Group’s operations and supply chains. The Group applies a ‘three lines of defence’ methodology to risk management, including in respect of Modern Slavery risks, where it identifies higher levels of risk associated with a relevant supplier. This methodology is illustrated as follows:

1 st Line	2 nd Line	3 rd Line
<p>Management controls and internal control measures</p> <p>For example, supplier due diligence conducted by the Group Procurement team</p>	<p>Internal risk management specialist support</p> <p>For example, supplier surveys conducted by the Group Procurement team</p>	<p>Independent assurance activities</p> <p>For example, independent external audits of identified higher risk suppliers</p>

Risk management and due diligence

Our governance framework for managing Modern Slavery risks includes the following Group level policies, which are approved by the Board:

Code of Ethics & Business Conduct	Provides standards of behaviour and corporate conduct which are expected to be applied within EVT and its operations.
Whistleblower Protection Policy	Provides a mechanism for all current and former employees, associates, and suppliers to anonymously report unethical or illegal concerns, including in relation to modern slavery.
Procurement Policy	Outlines EVT’s approved principles and processes for the procurement of goods and services from suppliers. Ensures the Group obtains value for money from suppliers, while also upholding ethical procurement standards.
Supplier Code of Conduct	Outlines the minimum ethical business standards that EVT expects our suppliers and their employees and contractors to uphold in relation to compliance with laws, bribery and corruption, labour and human rights, modern slavery, health and safety, diversity and equality, and environmental sustainability.
Human Rights Policy	Communicates EVT’s commitment to human rights issues and addressing the human rights impact of our business.

Our standard contractual terms include a requirement to comply with these policies, and we have further strengthened our Modern Slavery governance by embedding supplier Sedex membership and Self-Assessment Questionnaire (SAQ) requirements into our contracts and supply agreements.

Moving forward our Group Procurement team is focused on connecting with our contracted Tier 1 suppliers via the Sedex platform which will enable us to provide better visibility to the Modern Slavery risk.

Reporting and measuring effectiveness

EVT's [Whistleblower Protection Policy](#) provides a mechanism for the escalation of any concerns or grievances, including in relation to Modern Slavery. The policy is available on EVT's website and reports may be made by employees, associates, and suppliers.

Reports received under the Group's Whistleblower Protection Policy are reported to the Board, including the results of any investigation and actions taken in response to the investigation.

During the year ended 30 June 2022, no whistleblowing reports were received which alleged or related to instances of Modern Slavery. Any future claims will be managed in accordance with our established governance framework to ensure suitable action is taken to address and that the proper authorities are notified.

Looking forward

Continuous improvement is a critical part of EVT's risk management framework. With that in mind, the Group has a Modern Slavery risk management roadmap to enhance its risk management activities in this area.

Activities planned for future years include:

- continue to work with key stakeholders across our industries to develop a coordinated response to Modern Slavery risk;
- reviewing of Tier 1 suppliers to identify Modern slavery risk and consider appropriate actions in response;
- continuing to build strong, long-term relationships with key suppliers;
- an enhanced independent assurance program, including Internal Audit and external assurance, including in respect of key suppliers with an identified Modern Slavery risk factor; and
- development of a Modern Slavery effectiveness reporting framework and key performance indicators (KPIs), against which the performance of the Group can be measured and reported on.

Consultation and approval

This Statement is made pursuant to section 14 of the Australian *Modern Slavery Act 2018* (Cth). It covers the reporting year ended 30 June 2022 and is a joint statement on behalf of EVT Limited and our named reporting entities.

In preparing this Modern Slavery Statement, consultation was undertaken with representatives from EVT's Group Finance, Head of Operational Divisions, Legal, Procurement, and Risk functions who have oversight of the reporting entities and their controlled entities.

The statement was circulated to the Directors of each reporting entity prior to being reviewed and approved by the Board of EVT Limited on 7 December 2022.



Jane Hastings, CEO
EVT Limited