



DISCOVERY HOLIDAY PARKS

Modern Slavery Statement

July 2019-June 2020

DISCOVERY MODERN SLAVERY STATEMENT

About this Modern Slavery Statement

Discovery Holiday Parks Pty Limited (**Discovery Parks**) is committed to acting ethically and with integrity in our business dealings and relationships, and to implementing and enforcing systems and controls to address the risk of modern slavery practices in our own business operations or in any of our supply chains.

We endeavour to ensure that there is transparency in our business and in our approach to tackling modern slavery risk throughout our supply chains and operations consistent with our reporting obligations under the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**).

Discovery Parks and Discovery Parks Holdings Pty Ltd (together, '**Discovery**') are 'reporting entities' for the purposes of the Modern Slavery Act and this is their joint Modern Slavery Statement, made pursuant to section 14 of the Modern Slavery Act. As required under the Modern Slavery Act, this Modern Slavery Statement describes the actions Discovery has taken in the Australian Financial Year 2019-2020 (**reporting period**) to assess and address our risks of modern slavery practices in our operations and supply chains. It has been drafted to meet the mandatory criteria at section 16(1) of the Modern Slavery Act.

About Us

Discovery is Australia's largest accommodation park owner-operator, offering a vast array of accommodation across more than 70 properties nationally. From modest beginnings in 2004 with just 3 parks, Discovery has evolved to become a clear market leader, with a business portfolio incorporating work stay, corporate and tourism accommodation.

Discovery's core focus is discovering and delivering what matters, to both clients and guests. We make holidays, work stays and corporate events easy, through distinctly local and welcoming experiences in some of Australia's most beautiful locations.

As Australia's largest regional accommodation provider, we are committed to growing, supporting and protecting regional communities.

We are a major tourism employer and are committed to developing our people and providing career pathways for regional Australians. We work to raise awareness of the important leadership role women play in the holiday parks sector and the opportunities for corporate training and entrepreneurship for young people in regional areas.

We also invest significant capital into improving infrastructure in regional communities. Every Discovery holiday park is committed to their local community. Each park forms close ties with local businesses, suppliers and tourism industry peers to create sustainable communities that are great places to live, work and visit.

To support the local communities our parks strive to source produce, supplies and services from local businesses and assist local charities and volunteer groups by becoming actively involved in events, initiatives and fundraising.

Our Structure, Operations and Supply Chain

Structure & Operations

Discovery Parks Holdings Pty Ltd and Discovery Parks own and control a number of entities, including Australian Parks Licence Co Pty Ltd which manages the G'day Parks and G'day Rewards brands.

Headquartered in South Australia, our support office is located in Adelaide with a team of over 130 staff providing support in areas including finance, marketing, procurement, legal, operations, IT, Workplace Health & Safety and People & Culture.

In relation to our provision of accommodation services, we currently operate over 70 accommodation and holiday parks incorporating more than 3437 cabins and motel rooms; 5678 powered and unpowered caravan and camping sites and 1832 workforce accommodation rooms throughout 7 states and territories across Australia.

Operations snapshot

Over **70** properties operated.

accommodation provided in **7** states and territories.

1550+ employees

\$157,097,454 consolidated revenue (as at 30 June 2020)

Supply chain

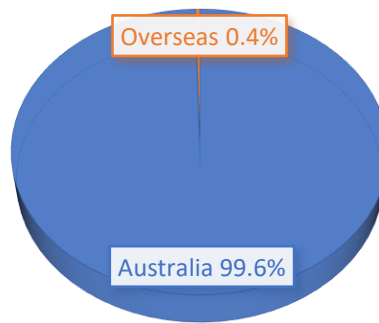
In the reporting period, we made payments to over 4,500 active suppliers. Discovery Parks is a proudly Australian owned business and over 99% of our own suppliers, in the reporting period, were based in Australia.

Supply chain snapshot

Discovery's supply chain consists of goods and services that support the operation and development of our parks and business, maintenance of our properties, and the provision of our accommodation services. Our key supply chain categories include:

- Utilities (including electricity and gas);
- Facilities management (including cleaning services, waste management, safety and gardening);
- Property management (including hardware and furnishings for our properties);
- Development initiatives (including cabins, swimming pools, waterparks and other facilities);
- Financial services (including banking services);
- Food & Beverage (including the provision of food and beverage to our work stay parks);
- Marketing (including digital marketing);
- Office consumables (including stationery);
- ICT (including telecommunications, IT hardware and software).

SUPPLIER COUNTRY OF ORIGIN



Assessing and Addressing Our Modern Slavery Risk

In identifying and assessing our risks of modern slavery practices we have consulted the Australian Government’s guidance and specifically, we have used the risk indicators from the *Modern Slavery Act 2018-Guidance for Reporting Entities (Australian Government guidance)*.

In preparing this Modern Slavery Statement, we have considered, as consistent with the Australian Government guidance, the risk that we may **cause, contribute** or be **directly linked** to modern slavery practices through our operations and our supply chain. For the 2019/20 reporting period, we have focused our supply chain risk assessment on our Tier 1 suppliers (meaning suppliers that provide goods or services to us directly).

Supply chain risk assessment and management

Some of our suppliers are in categories that have been identified by the Australian Government’s guidance as higher risk due to the sector and industry or product and services. The supplier categories that we have assessed as higher risk include building contractors and materials suppliers for our developments, ICT products and services and laundry services.

While almost all of our suppliers are based in Australia, some of our suppliers may source goods or services from overseas, including from locations that present a higher risk of modern slavery according to geographic risk indicators.

To assist with managing these risks in our supply chain, we take a number of due diligence steps, particularly at the supplier onboarding and tender evaluation stage. In particular, we conduct a risk assessment and undertake targeted risk management actions based on the risk level determined for specific suppliers by use of a set of ESG compliance checklist questions. For targeted higher risk suppliers and/or supplier agreements we continue to endeavour to ensure that we enter into agreements which contain provisions that contribute to mitigating the risk of modern slavery practices, such as specific clauses requiring ethical standards to be met by the supplier.

In the reporting period, in addition to taking due diligence steps in relation to our suppliers, we also undertook development of a draft Supplier Code of Conduct and draft Human Rights Policy. Once finalised, these documents, together with our Modern Slavery Policy (finalised in the 2020/21 reporting period), will assist in embedding our expectations of ethical standards across our supplier group and workforce.

The measures that we have undertaken in the reporting period were a proportionate response given our understanding of our low risk profile based on the key risk indicators in the Australian Government's guidance, particularly in the circumstances where our geographic risk is likely impacted by our relatively low number (less than 0.5 percent) of overseas based suppliers. We are committed, as part of our continuous improvement approach, to continuing to build on our understanding of modern slavery practices risks, and to further develop our risk mitigation measures in subsequent reporting periods.

Operations risk assessment and management

We directly employ 1550+ employees on a combination of full-time, part-time and casual contracts. We consider the risk of modern slavery practices occurring within our direct operations and workforce as low as our employees are working exclusively within Australia where employee-employer relations are strictly regulated by the *Fair Work Act 2009* (Cth) and relevant modern awards.

Modern slavery risks that relate to our operations and direct workforce are assessed in the context of our health and safety and human resources policies and practices, ethical standards and behavioural conduct requirements as per our Code of Conduct, and legal and contractual obligations such as employment conditions. We maintain internal policies, systems and processes to comply with our legal and contractual obligations and to manage entitlements relating to our people.

The health and wellbeing of our employees is of paramount importance to us. To this end, our People & Culture team drives programs to promote a diverse and inclusive workplace aimed at being free from discrimination, bullying and harassment. These programs also target workplace health and wellbeing including offering flexible working arrangements to support employee work-life balance. As part of our commitment to a culture of continuous learning, we encourage ongoing staff development and equal access to opportunities.

Additionally, our Safety & Compliance team implements a comprehensive Health and Safety Management System, supported by high levels of internal awareness and risk assessment, reporting on WHS trends and delivering a compliance program that fosters a strong safety culture across the business.

Our employees have access to a 24/7 Employee Assistance program, which is aimed at offering one to one confidential coaching and counselling. We also have an internal staff conflict resolution policy. This policy encourages employees to notify their manager, team members or human resources if they believe there is behaviour or actions within the business that do not align to our Code of Conduct. The human resources team are highly capable in undertaking confidential and comprehensive internal workplace investigations, in response to issues raised via our internal grievance reporting mechanisms.

We believe in a culture of continuous learning. A key project planned for reporting period 2020/21 is to design and roll out a specific modern slavery training eLearning module in our online learning portal to assist key

operational staff to identify and report on the risks of modern slavery practices. This learning module will also be incorporated into the onboarding of all new employees.

We engage third party labour-hire companies and professional services suppliers to temporarily boost our workforce capabilities and capacity when needed, in particular to manage or implement specific projects. These arrangements are generally short-term and, where practicable, we endeavour to ensure that staff are employed directly where their services are required longer term. We generally use licensed labour hire providers with long-standing relationships with us.

As an Australian based business with a domestic workforce and largely directly employed staff, we understand that our risk exposure to modern slavery practices in our operations is likely significantly reduced. However, given the prevalence of modern slavery globally, we recognise that there may be a risk of being linked, indirectly, to modern slavery practices in our operations. Specifically, we acknowledge that there may be a remote risk that third parties or individuals over which we have limited control may use our services while engaging in modern slavery practices. Accordingly, to assist in addressing these risks we have plans to increase training and awareness around identifying risks of modern slavery practices across the business.

As noted in our description of our supply chain risk assessment and management, in the 2019/20 reporting period, we undertook development of a draft Supplier Code of Conduct and draft Human Rights Policy. Once finalised, these documents, together with our Modern Slavery Policy (finalised in the 2020/21 reporting period), will assist in embedding our expectations of ethical standards across our supplier group and workforce.

Impact of COVID19

The COVID19 pandemic impact on our supply chain and implementation of our modern slavery compliance measures was minimal. To avoid potential disruption to our business, and ensure the safety of our guests and staff, it was necessary to procure additional core products (including Personal Protective Equipment and sanitiser) to mitigate against potential product shortages, but we continued to procure the majority of these goods from our preferred local suppliers.

Our modern slavery compliance measures (including policy development and training, awareness and capacity building) were somewhat impacted by the pandemic related workplace restrictions and our need to focus on our core business during lockdown restrictions. However, we have undertaken a number of key modern slavery compliance related tasks, that may have otherwise occurred in the 2019/20 reporting period (including the development of our Modern Slavery Policy) in the 2020/21 reporting period.

Our Performance

Discovery Parks continues to work to identify and address the risks of modern slavery practices across its operations and supply chain and to build our maturity and capacity in this area. We will continue to refine our

modern slavery compliance strategy, and the effectiveness of our actions, in subsequent reporting periods, including by executing key actions in the 2020/21 reporting period.

In preparing this Modern Slavery Statement we have focused on our actions to address modern slavery risks that relate to our supply chain; our workforce; and our policies.

Our key actions for the reporting period included:

Key actions in the reporting period

- Developed policies and procedures, including a Draft Human Rights Policy & Draft Supplier Code of Conduct.
- Undertook targeted risk management actions based on the risk level determined for specific suppliers by use of a set of ESG compliance checklist questions.
- Key relevant staff attended specific modern slavery compliance training.
- Obtained specialist advice from external consultants on modern slavery compliance measures.

Our Future Plans

Looking ahead, and in line with our commitment to continuous improvement, we are continuing to progress the following actions in our 2020/21 reporting period.

Policy development

- Finalising our Modern Slavery Policy, Human Rights Policy and Supplier Code of Conduct.

Training and awareness

- Developing a specific modern slavery training eLearning module in our online learning portal to assist key operational staff to identify and report on the risks of modern slavery practices.

Risk identification and assessment

- Undertaking a comprehensive risk scoping exercise to better understand the risks of modern slavery in our supply chain.

Assessing the effectiveness of our actions

- Establishing an internal modern slavery working group to drive and monitor our modern slavery compliance actions; and
- Developing our modern slavery strategy for the next reporting period.

Consultation

Our approach to consultation between and across both of our reporting entities reflects the nature of the relationship between the two and between the key internal business units. Relevant staff from Discovery Parks have been involved in the development of this Modern Slavery Statement, with input from many areas, including our Legal, Procurement and People & Culture teams. We have ensured that our Board and senior management are kept updated on activities in relation to our obligations under the reporting requirements in the Modern Slavery Act. The Discovery Parks executive team have been directly consulted on the preparation of this Modern Slavery Statement, with final approval provided by our Board.

Capacity Building

As part of our ongoing commitment to building our maturity in understanding our modern slavery compliance obligations, relevant senior staff have attended specific modern slavery training and obtained external specialist advice on our modern slavery compliance obligations. Our senior procurement staff are also accredited members of the Chartered Institute of Procurement and Supply (CIPS).

Reporting Requirements of the Modern Slavery Act

Our Modern Slavery Statement has been prepared to meet the mandatory criteria set out in the reporting requirement at section 16(1) of the Modern Slavery Act. The table below indicates where each mandatory criterion is addressed.

Modern Slavery Act Mandatory Criteria	Our Modern Slavery Statement	Page
1. Identify reporting entity	About this Modern Slavery Statement	2
2. Describe the reporting entity's structure, operations and supply chain	Our structure, operations and supply chain	3
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Assessing and addressing our modern slavery risk	4
4. Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	Assessing and addressing our modern slavery risk	4
	Our performance	7

Modern Slavery Act Mandatory Criteria	Our Modern Slavery Statement	Page
5. Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risk	Our performance	7
	Our future plans	7
6. Describe the process of consultation with any entities the reporting entity owns or controls	Consultation	8
7. Any other relevant information	Capacity building	8
	Impact of COVID19	6

This Modern Slavery Statement has been approved by the Board of Directors of Discovery Parks Holdings Pty Ltd on 26 March 2021.



Chief Executive Officer

Grant Wilckens