

Modern Slavery Statement

July 2023 – June 2024

Discovery Parks Holdings Pty Limited
Discovery Holiday Parks Pty Limited



G'day Group acknowledges the Aboriginal and Torres Strait Islander people of Australia and pay our respects to their Elders past, present and emerging.

We recognise their unique connections to the land and water and thank them for protecting and caring for Country across countless generations.



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Modern Slavery Act Mandatory Criteria

Identify reporting entity

Describe the reporting entity's structure, operations, and supply chain

Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls

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

Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risk

Describe the process of consultation with any entities the reporting entity owns or controls

Any other relevant information

Our Modern Slavery Statement

About this Modern Slavery Statement

Our structure, operations, and supply chain

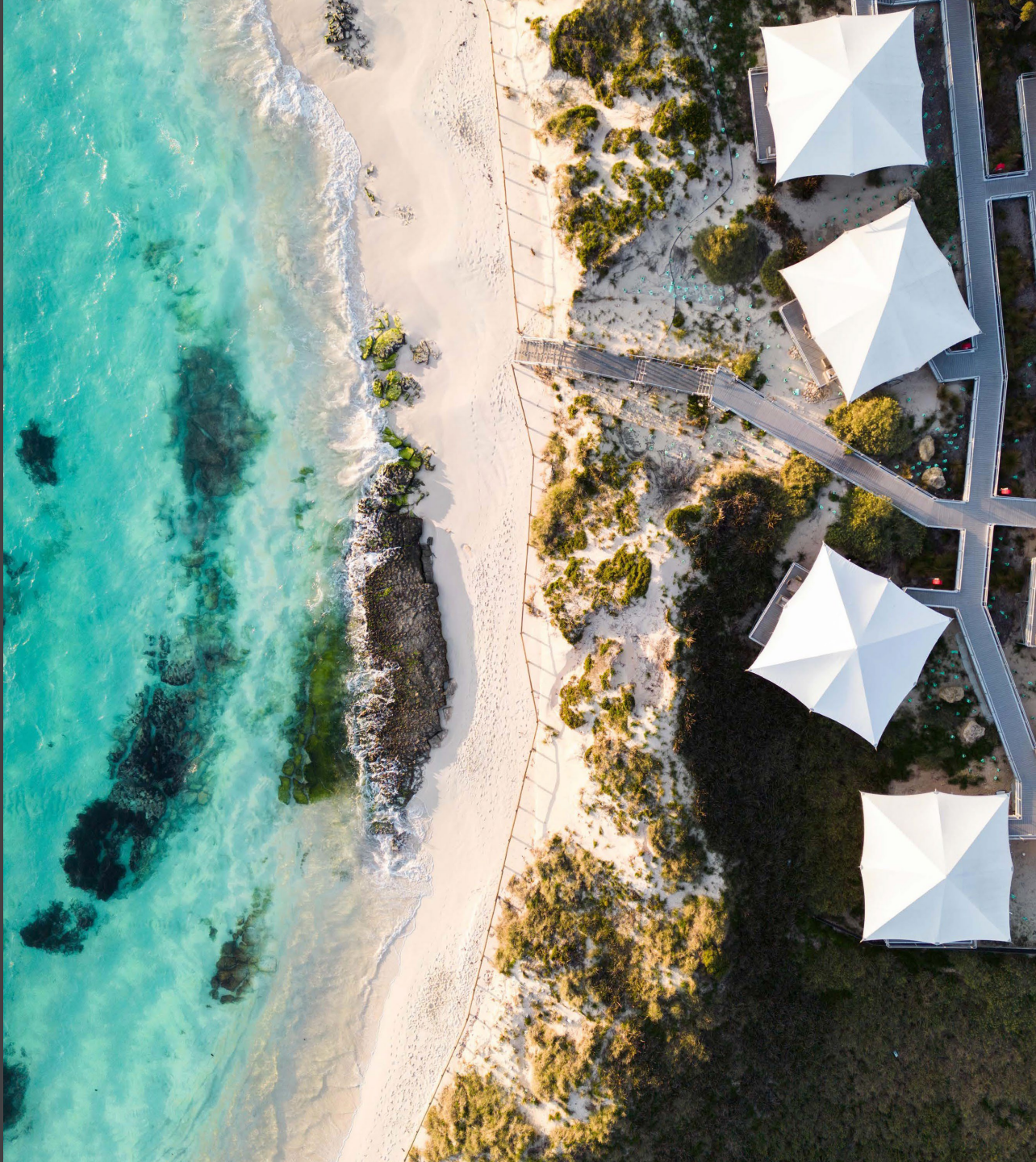
Assessing and addressing our modern slavery risk

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Our performance and future plans

Consultation

Capacity building



OUR 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 operations and supply chains.

We aim to ensure transparency throughout our business and approach to tackling modern slavery risks, 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.



Discovery owns and controls a number of entities, including Australian Parks Licence Co Pty Ltd which manages the G'day Parks and G'day Rewards brands and Wikicamps Pty Ltd, the administrator of 'Wikicamps', the number 1 paid application in Australia with the largest database of campgrounds, caravan parks and points of interest. Together, these entities and brands are referred to as **G'day Group**.

This Modern Slavery Statement describes the actions that Discovery, and the G'day Group more broadly, has taken in the Australian Financial Year 2023 – 2024 (**reporting period**). It has been drafted to meet the mandatory criteria at section 16(1) of the Modern Slavery Act.

This Modern Slavery Statement builds on the actions outlined in our previous Modern Slavery Statements, with a particular focus on reviewing and assessing our supply chain and developing key reporting metrics and control measures.

ABOUT US

The G'day Group is passionate about showcasing Australia to millions of guests each year. As Australia's largest regional tourism provider, we are custodians to some of Australia's most treasured places, directly operating more than 85 Discovery Parks and Resort properties across Australia and providing an online platform for more than 210 independently operated G'day Park properties. From modest beginnings in 2004 with just three parks, the G'day Group has evolved to become a clear market leader, with a business portfolio incorporating work stay, mid-range and high end tourism accommodation.

As a significant contributor to Australia's local and national tourism economy, we recognise that the way we manage our environmental and social responsibilities has a far-reaching impact. We invest substantial capital into improving infrastructure in regional communities and form 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, we 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 large number of domestic suppliers reflects our ongoing commitment to supporting local businesses.

Our Environmental, Social & Governance (**ESG**) Strategy strengthens our ongoing commitment to growing with care, with our initiatives separated into four strategic pillars: resilient and pristine environments, purposeful work, connection to nature and vibrant community and culture. We aim to deepen our connection to the land and community, creating experiences that matter.



Our
structure,
operations
and supply
chain



STRUCTURE AND OPERATIONS

Headquartered in South Australia, our support office is located in Adelaide with a team of over 290 staff providing support in areas including corporate services (finance, legal and procurement), marketing, operations (including work health and safety), information technology (including cyber security), development and investments and people and culture.

OPERATIONS SNAPSHOT



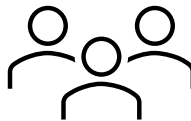
89

properties
operated



7

states and territories
where accommodation
is provided



2,400+

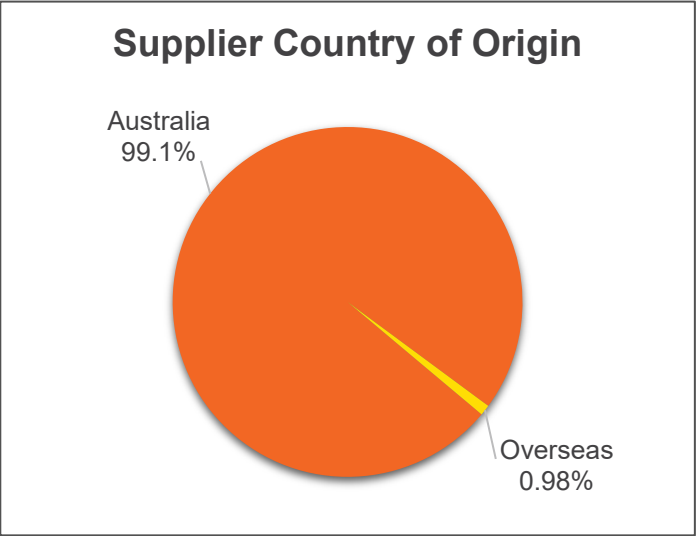
employees

**\$397,339,
052**

consolidated revenue (as at
30 June 2024)

SUPPLY CHAIN

In the reporting period, we made payments to over 5,300 active suppliers. Discovery is a proudly Australian owned and operated business and, in keeping with our ongoing commitment to support other local businesses like ours, 99.01% of our suppliers in the reporting period were based in Australia.



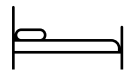
Discovery's supply chain consists of goods and services that support the operation and development of our business, maintenance of our properties, and the provision of our accommodation services.

KEY SUPPLY CHAIN CATEGORIES



Development Initiatives

swimming pools, waterparks, new cabins



Property Management

hardware and furnishings



Facilities Management

cleaning services, waste management, safety and gardening



Utilities

electricity and gas



Financial Services

banking services



Marketing

digital marketing



Food & Beverage

provision of F&B to our workstay parks



Office Consumables

stationary, printing



Information Technology

telecommunications, IT hardware and software

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 focused on the risk indicators from the Modern Slavery Act 2018 - Guidance for Reporting Entities (**Australian Government Guidance**).

To prepare this Modern Slavery Statement, we have considered the risk that we may **cause**, **contribute**, or be **directly linked** to modern slavery practices through our operations and supply chain. For this reporting period, we have continued to focus our supply chain risk assessment on our Tier 1 suppliers, meaning suppliers that provide goods or services to us directly.

FRAMEWORKS, POLICIES AND PROCEDURES

To support the implementation of our modern slavery compliance actions, Discovery has a number of policies, system procedures and frameworks. This key documentation includes our:

- Supplier Code of Conduct;
- Supplier Risk Management Framework;
- Ethical Sourcing Policy;
- Human Rights Policy;
- Delegation of Authority Policy and Procedure;
- Modern Slavery Policy; and
- Whistleblower Policy.

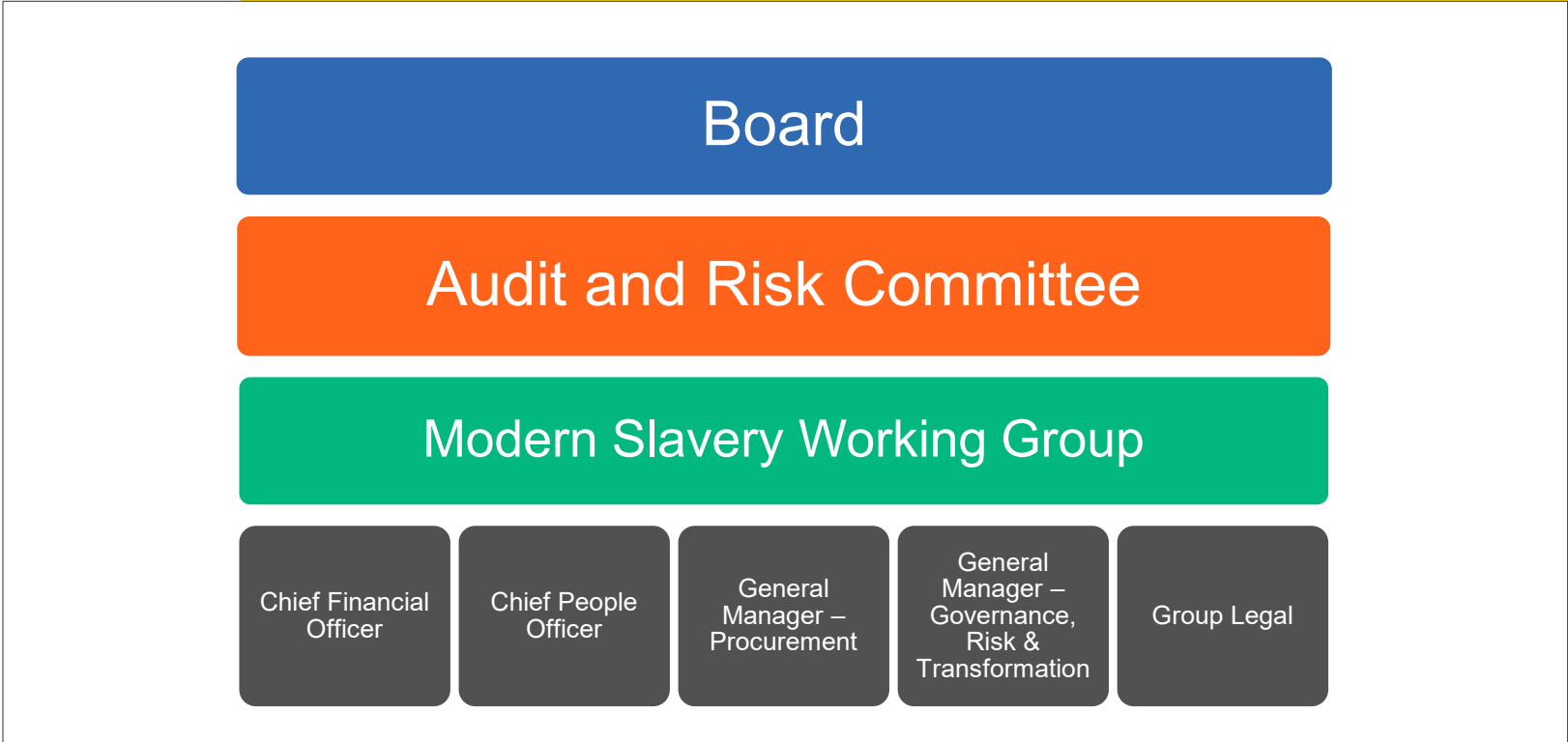


MODERN SLAVERY COMPLIANCE GOVERNANCE

Our Modern Slavery Working Group, consisting of a cross functional group of managers and members of key business units, has active oversight of our modern slavery compliance actions and drives our modern slavery actions each reporting period. Our Working Group has the responsibility to:

- develop, review and implement our modern slavery compliance strategy, which includes actions to monitor our own operations and supplier risk framework;
- review and assess internal and external policies and industry trends for modern slavery; and
- monitor and contribute to Discovery’s annual Modern Slavery Statement.

Discovery has a robust governance framework that supports the Working Group with monitoring, risk assessment and reporting processes.



SUPPLY CHAIN RISK ASSESSMENT AND MANAGEMENT

We recognise that the Australian Government Guidance classifies and labels some of our suppliers as higher risk due to their sector, industry or product and service. We have evaluated some categories, such as building and material suppliers for our projects, information technology products and services and laundry services, as higher risk according to this guidance.

To assist with managing these risks in our supply chain, we undertake a number of due diligence steps, particularly at the supplier onboarding and tender evaluation stage. Specifically, during the tender processes, we utilise our Supplier Risk Assessment Matrix to evaluate our Supplier Onboarding Forms, to determine a supplier's risk level. These tools assist us to complete an assessment against the key risk indicators (such as geographical factors and industry) and produce targeted risk management actions. We aim to ensure all our agreements contain specific modern slavery compliance clauses and to appoint suppliers with strong reputations and expertise in their respective fields.

During this reporting period, we continued to collaborate with external specialist procurement consultants to further develop our Strategic Supplier Program and Procurement Governance Guide. Through these processes, our suppliers are categorised into three groups based on estimated value of spend: preferred, approved, and transactional. Each category has specific mitigation actions and steps that ensure the correct procedures are followed for any new or revised procurement activities. We successfully onboarded five suppliers into our Program during this reporting period, and plan to expand this number in the next reporting period.





We continue to maintain the services of a team of financial and information technology service support staff through an agreement with an overseas service provider. This engagement is supported by due diligence activities, specific modern slavery risk assessments, and contractual clauses. During the reporting period, senior management visited the offshore offices to conduct a site tour, which included reviewing the office and work environment and inquiring about workers' travel arrangements. Our support office team also conducts regular virtual meetings with the offshore team members, facilitating personal connections. These regular site visits and virtual meetings are essential for fostering relationships with the offshore staff and are highly valuable.

Our actions continue to be guided by proportionality, given our understanding of our low risk profile based on the key risk indicators in the Australian Government Guidance. We consider our geographic risk is likely impacted by our relatively low number, less than 1%, of overseas based suppliers. We remain committed, as part of our continuous improvement approach, to further maturing our understanding of modern slavery supply chain risks, and to developing our supplier management approach.

OPERATIONS RISK ASSESSMENT AND MANAGEMENT

The G'day Group employs more than 2,400 staff nationally across both our support office and owned and operated properties. Our employees are directly employed on a combination of full-time, part-time, and casual contracts. 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, our operational risk profile 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. We specifically acknowledge that there may be a wider risk of third parties or individuals, over which we have limited control, using our services while engaging in modern slavery practices. To address these risks, we have taken a targeted approach to increase training and awareness to all business units to aid in the identification of modern slavery practices.

Discovery operates a health, safety, environment and quality management system that adopts a proactive approach and drives continuous improvement of employee, guest and contractor safety underpinned by a regulatory compliance framework. During the reporting period, we launched our first Wellbeing Policy in recognition of its critical importance to employees and long-term sustainability of our business.

We continue to work with third party labour-hire companies and professional service suppliers to temporarily increase our workforce skills and capacity when needed. These arrangements are usually short-term however, where a longer term is required, we aim to ensure that staff are employed directly. We use licensed labour hire providers that have an established relationship with us.





Given the remote geographic locations of some of our properties, there are significant workforce availability challenges. During the reporting period we were fortunate to be able to continue our partnership with the Pacific Australia Labour Mobility (PALM) scheme, an initiative run by the Commonwealth Government that enables Australian businesses to recruit workers from nine Pacific Island countries and Timor-Leste when there are insufficient local workers available to meet demand.

Through the PALM scheme, we have been able to source skilled workers to work at sites across the country, from our high-end resort property on Rottnest Island to our work stay property in Mount Isa. We employed 48 team members in the reporting period across our business. We have a high PALM employee return rate, allowing for continuity of service and highlighting strong commitment.

As the PALM scheme is overseen by the Department of Foreign Affairs and Trade, we are assured of the probity and integrity of recruitment, allowing us to focus on strategic decision making and streamline our processes. All participating workers, including our new team members, are afforded the same rights and protections as Australian workers and as the employer, we meet stringent criteria for participation in the scheme. The Australian Government also implements a range of measures to protect workers, including site visits and spot checks, regular reporting requirements and a support service phone line.

Relevantly, our Whistleblower Policy supports the raising of reports of modern slavery practices by any of our employees. The implementation of this policy is supported by an independent external provider, Stopline, to facilitate the reporting mechanism.

At Discovery, we aim to foster a culture of continuous learning. In the reporting period, we continued to embed our custom modern slavery and whistleblowing eLearning modules in our learning management system. These trainings have been designed to provide staff with an overview of the types of modern slavery and whistleblowing circumstances that can arise and associated key risk indicators. These eLearning modules build awareness and capacity of our key operational staff to assist them to identify and report on risks of modern slavery practices in our operations and supply chain. They are delivered to all operational and support office employees and are incorporated into the onboarding of all new employees.

Our performance and future plans



KEY ACTIONS FOR THE REPORTING PERIOD

Our actions for this reporting period have been driven by our Modern Slavery Working Group.

Policy development

- Finalised our Wellbeing Policy

Supplier due diligence

- Implemented robust processes to ensure that key suppliers receive our Ethical Sourcing Policy
- Reviewed and updated our supplier onboarding processes and questionnaire, including our Supplier Onboarding Form.
- Explored enhanced measures to create broader awareness in our supply chain of our modern slavery position and the strategies we are employing to improve and de-risk our supply chain.
- Attended on-site inspection of relevant offshore service providers by key senior management personnel.



Training, awareness and capacity building

- Delivered our Modern Slavery and Whistleblowing awareness eLearning modules via our online learning management system to all new staff.
- Increased awareness to our procurement team members to assist in due diligence processes.
- Explored opportunities for supplier onboarding training through our strategic supplier program.
- Participated in industry working groups, to help understand key factors addressing modern slavery supply chain risks.

Assessing the effectiveness of our actions

- Our internal Modern Slavery Working Group continued to drive and monitor our modern slavery compliance actions.
- Developed reporting metrics to highlight the application of modern slavery assessments and mitigations within our strategic supplier program.
- Formulated our modern slavery compliance strategy for the next reporting period (see 'Our future plans').



FUTURE PLANS

Looking ahead, and in line with our commitment to continuous improvement, we are continuing to progress the following actions in our 2024/2025 reporting period with our Modern Slavery Working Group overseeing the following program of work.

Supplier Due Diligence

- Conducting ongoing review of the effectiveness of our supplier due diligence actions.
- Conduct regular and independent site visits for local and offshore service providers in line with our strategic supplier program
- Investigate and review targeted supplier's modern slavery plans and policies to ensure they align with our business' expectations
- Explore opportunities to develop a dashboard and predictive modelling to assist in supplier evaluations

Industry engagement

- Continuing to collaborate and participate in continuing professional development seminars and explore opportunities to collaborate with industry peers to inform best practice.

Training, awareness and capacity building

- Review and assess our internal modern slavery training module
- Deliver targeted training and information sessions for key decision makers within our business
- Develop educational materials on our business' anti-bribery and anti-corruption policies to ensure all staff are aware of our position and best practice.

Assessing the effectiveness of our actions

- Determining our modern slavery strategy for the next reporting period.
- Explore the opportunity to develop an ESG Sub-Committee to incorporate into our governance structure.



CAPACITY BUILDING

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

During the reporting period, we were represented by a member of our Modern Slavery Working Group on the Lead Group of the South Australian Modern Slavery Research and Practitioner Network. Participation in this stakeholder network, facilitated by the University of South Australia's Centre for Enterprise Dynamics in Global Economies, enables us to collaborate with industry peers, researchers, and government representatives in this space to ensure that our approach to modern slavery compliance is informed by best practice. Our team also seek to regularly attend continuing professional development sessions on modern slavery and supply chain analysis to keep up to date with any changes to relevant laws and regulations.

CONSULTATION

Our approach to consultation between and across both of our reporting entities reflects the nature of the relationship between the two and between our internal business units. Relevant staff from Discovery have been involved in the development of this Modern Slavery Statement, with input from many areas, including key legal, procurement and people and culture personnel. Through the oversight provided by our internal Modern Slavery Working Group, we have ensured that our senior management are kept updated on activities in relation to our obligations under the reporting requirements in the Modern Slavery Act.

The Discovery Executive Team have been directly consulted on the preparation of this Modern Slavery Statement, with final approval provided by our Board.

This Modern Slavery Statement has been approved by the Board of Directors of Discovery Parks Holdings Pty Ltd, as its principal governing body, on 5 December 2024.



Grant Wilckens
Chief Executive Officer

