

MODERN SLAVERY ACT STATEMENT FOR AUSTRALIA FY24 FOR TEG PTY LTD AND ITS SUBSIDIARIES

INTRODUCTION

This statement has been prepared in accordance with the *Modern Slavery Act 2018* (Cth) (**Act**) and sets out the steps taken by TEG Pty Ltd (ACN 604 938 534) (**TEG**) as the reporting entity to prevent modern slavery in our business and supply chain, and implement relevant controls, policies and practices, for the financial year ending 30 June 2024 (**Reporting Period**). Except where context requires otherwise, any reference to “TEG”, “we”, “us” and “our” in this statement includes TEG and all of its subsidiary companies. TEG has consulted with the relevant entities it owns or controls regarding the preparation of this statement.

TEG recognises that modern slavery, can take many forms and includes human trafficking, servitude, forced labour, debt bondage and the worst forms of child labour. TEG takes corporate social responsibility seriously and is committed to eliminating all forms of modern slavery and we have zero tolerance for any of these practices in our business or in our supply chain.

The Annexure to this Statement provides page numbers indicating where information addressing the reporting criteria required by the Act can be found in this Statement.

OUR STRUCTURE AND BUSINESS OPERATIONS

TEG has been at the heart of the live event experience for 50 years through our touring and ticketing operations. TEG operates in diverse markets and genres, and through our integrated operating model, we bring the best live content, ticketing and technology to our partners and customers, creating memories for fans that last a lifetime.

TEG is an Australian proprietary company with its registered office at Level 3, 175 Liverpool Street, Sydney. It also has Australian offices in Melbourne, Brisbane, Adelaide, Perth, and Canberra and international offices in New Zealand, Singapore, Malaysia, the Philippines, the United States of America and the United Kingdom.

Our operations are divided into four divisions:

Ticketing

TEG’s various ticketing entities including Ticketek in Australia, New Zealand and the United Kingdom; Ticketek Marketplace in Australia; TicketWorld in The Philippines and TicketCharge in Malaysia, as well as Softix and Eventopia globally, operate ticketing services platforms. These platforms facilitate the sale of tickets for and on behalf of venues, promoters, event organisers and consumers (in the case of Marketplace). Additionally, we supply the hardware, equipment and software needed for this purpose.

Touring and Events

TEG’s global touring and events businesses include TEG Live, TEG Dainty, TEG Sport, TEG Rugby Live, Handsome Tours, TEG Van Egmond, St Jerome’s Laneway, TEG Live Europe, The Entertainment Store, Life Like Touring and SXSW Sydney. These entities promote and produce live entertainment notably music tours, festivals & concerts, sporting events, conferences, musical theatre and children’s entertainment.

Venues

TEG owns Qudos Bank Arena in Sydney and operates or co-promotes content at eight venues across the United Kingdom.

Digital, Data & Insights

TEG also operates a leading analytics, data science and insights business which provides our partners with access to consumer market segmentation, behavioural data and insight generation.

TEG’s controlling shareholder is Silver Lake Partners, the global leader in technology investing headquartered in the USA, with more than US\$100 billion in combined assets under management and committed capital, and a team of more than 100 investment and operating professionals across the world.

Together with its subsidiaries, TEG employs over 954 permanent and casual staff across Australia, New Zealand, the United Kingdom, Singapore, Malaysia, the Philippines, and the United States of America. Approximately 60.2% of the workforce are permanent staff, while the other 39.8% are casual staff. Around 84% of employees are based in Australia, 5.5% in the Philippines, and 7% in the United

Kingdom, with the remainder located in New Zealand, Singapore, the United States of America, and Malaysia.

For more information about our businesses and operations please refer to our website at www.teg.com.au.

OUR SUPPLY CHAIN

TEG's supply chain encompasses the purchase and delivery of products and services needed for day-to-day operations.

While most of our supply chain expenditure is in Australia, we also source goods and services from global suppliers who have operations in the United Kingdom, the United States of America, New Zealand, Singapore, the Philippines and Malaysia.

Our supply chains and main spend categories include:

- Content suppliers to our touring division including artists, rights holders, rights creators, and management agencies.
- Equipment suppliers, ranging from turnstiles and scanners for events to staging and production hire at live events.
- Service suppliers across our breadth of businesses including:
 - Labour hire companies;
 - Marketing services and support companies;
 - IT infrastructure and support;
 - Software and support;
 - Communications services;
 - Banking services providers;
 - Audit, tax and legal services; and
 - General service providers (e.g. office printing and photocopying services).

MODERN SLAVERY RISK IN OUR BUSINESS OPERATIONS & SUPPLY CHAIN

At TEG we are dedicated to upholding the highest standards of conduct and ethical behaviour in all our business activities. We strive to foster a culture of integrity, corporate compliance and robust corporate governance. This is reflected in our policies, procedures, contracts of employment and Code of Conduct, which guide our interactions with each other, our customers, suppliers and partners. Modern slavery and human trafficking have no place in our business or our supply chain.

In conducting our modern slavery assessment, we considered risks that may possibly cause, contribute and/or be directly linked to modern slavery practices, in accordance with the Australian Attorney-General's Department Official Modern Slavery Act Guidance (2023). After a thorough review of our operations during the Reporting Period, TEG has determined that the risk of modern slavery in our supply chain practices remains low. As at the date of publication, we are not aware of any circumstances of modern slavery occurring either within our business or supply chains.

Our assessment considered:

- The nature of the work being undertaken by employees, with a majority of the workforce in professional roles with significant industry expertise
- The limited use of external suppliers for procuring items that might be more susceptible to modern slavery risks
- The nature of the industry in which we operate (e.g. the engagement of children is very limited within this industry)
- The source of the majority of our income which is derived from countries with a low prevalence of modern slavery, according to the Global Slavery Index.

Approximately 98% of our EBITDA comes from locations that rank in the top 20 of high standards and low prevalence per the Global Slavery Index. In markets with a higher prevalence, TEG has a policy of engaging a local General Manager who has professional international experience. These managers are thoroughly briefed on TEG's processes and procedures in relation to addressing modern slavery risk in TEG's business operations and supply chain.

Despite the above assessment, TEG takes its modern slavery compliance responsibilities seriously and implements a number of key mitigating controls to ensure that any modern slavery practices are identified and remediated. In addition, we, as a business, have continued to recognise the key risks that may arise in our business operations and supply chain, including:

- the recruitment of performers, crew, and other live event-related personnel;
- the use of sub-contractors and outsourced services;
- venue and event-related services (e.g. cleaning, security, catering, etc); and
- sale of merchandise.

In relation to the above risks, we have made continued efforts to engage with our suppliers, endeavouring to create more structure around our procurement procedures. We have made these efforts to engage with our suppliers to also gain further understanding across the various levels of our supply chain (where appropriate) to allow us to identify potential areas of risk.

ADDRESSING MODERN SLAVERY RISK

During the Reporting Period, we continued our stakeholder engagement with key labour-hire suppliers in the hope of having open and transparent dialogue with our suppliers regarding modern slavery risk in our supply chain. We continued to build upon our previous desktop review which identified the largest suppliers in order to align the program to the respective risk footprint. This review identified that the largest exposures to modern slavery compliance risk is within our Ticketing segment which uses a single third party labour hire company in Australia to provide box office labour and within Qudos Bank Arena which relies on various third-party security and cleaning service providers.

TEG has continued to request that these suppliers undertake a modern slavery due diligence review and to provide us with the outcome of that review along with details of relevant policies. We also requested smaller businesses to undertake a survey in order to assist TEG to identify any specific areas of risk that require further investigation. Our engagement with our smaller suppliers has been more challenging, as many do not meet the legislative threshold required of them to conduct modern slavery assessments. We will continue to engage with these suppliers in the coming year to improve the quality of response. During the upcoming reporting period, we intend to undertake a briefing session and online training with select suppliers in The Philippines. We will also consult our local General Manager to begin the process of rolling out additional training (if required) to this region and request for them to provide a list of local suppliers to assess (and if necessary, address) any modern slavery risk in this region.

TEG has zero tolerance for any form of slavery-like practices. Throughout the Reporting Period, TEG has reviewed, and where appropriate, updated its key business policies with a view to ensuring we have integrated modern slavery diligence into existing business processes.

Policies and Procedures

We have formal policies in place which are intended to promote ethical and legally compliant business conduct. Our policies contribute to our commitment to prevent violations of human rights such as modern forms of slavery in our business.

The key policies governing these areas are:

Whistleblower Policy

TEG's Whistleblower Policy aims to provide clarity on how TEG supports our workers so that they are:

- encouraged to express their concerns;
- know how to express their concerns;
- know what will happen when concerns are expressed; and
- feel safe in expressing their concerns.

Anyone in our business who suspects modern slavery, is encouraged to report it to their Line Manager or a member of the Senior Leadership team. Any reports are taken seriously, treated confidentially and investigated as appropriate. At the date of publication, we have not received any disclosures relating to suspected modern slavery.

Employment & Recruitment Policies

The majority of our staff (around 84%) are based in Australia. As an Australian employer, we adhere to Australian employment laws and have established robust practices and controls to mitigate the risk of modern slavery occurring in our business operations. These practices continuously reviewed for improvement, and we seek external counsel when necessary to ensure that we maintain the highest standards.

Permanent Employees:

All recruitment for permanent and fixed term employees is managed through a centralised function. Any new appointment is first validated by senior management and the independent People & Culture function. All candidates are vetted by our People and Culture team before they are onboarded as an employee. Further, People & Culture ensures that all employment contracts and Right to Work checks have been properly completed and that the candidate has been met in person before a role is offered.

Temporary Employees:

We use temporary labour in our operations as needed. To control any risk of modern slavery, (where possible) we channel temporary appointments through a single agency; a well-recognised global market leader in this field. The nominated agency has implemented robust recruitment processes to help ensure that there is no existence of modern slavery in any of our temporary/ agency appointments, including thorough vetting of a candidate's identity, Right to Work documents, bank account and employment history.

Procurement Policies

As dictated by our Procurement Policy, TEG's procurement practices operate in accordance with a number of risk mitigation and robust processes including:

- Operating under a Delegated Authority Matrix for material business commitments;
- The requirement that contracts are reviewed by an internal legal team member (with external legal support as required);
- Regular tendering of material contracts;
- Operating a centralised process for on-boarding and paying indirect suppliers; and
- Group CFO oversight of this process, including review of all material contracts.

Code of Conduct

Our Code of Conduct outlines the behaviours we expect from our employees, contractors, and casual workforce in their interactions with other employees, suppliers, customers, and stakeholders. It provides an overview of fundamental business values and summarises important standards that underpin business ethics and professional integrity. These standards apply in all TEG workplaces and when representing TEG.

During the Reporting Period, we reviewed our Code of Conduct and deemed it appropriate, making no changes. Through these arrangements, TEG believes it can address the risk of modern slavery and ensure that all workers are engaged freely and willingly, are free to leave as they wish, are paid fairly, and are provided with a safe workplace.

Governance

This statement has been reviewed and approved by the TEG board. TEG has a senior leadership team in place, all of whom have been briefed on relevant legislation. Additionally, TEG is a member of Live Performance Australia (LPA) and voluntarily adheres to the LPA Codes of Practice, which include commitments to prevent workplace discrimination, harassment, sexual harassment, and bullying, as well as to ensure child employment in live entertainment is conducted ethically.

TEG's Risk and Compliance Forum, which includes senior leaders from relevant functions, meets at least quarterly throughout the year. These meetings are dedicated to reviewing risk and compliance reports, updating policies, and addressing any related issues, including those concerning modern slavery policies and practices.

Contracting

TEG's standard form contracts continue to include, and enforce as key terms, provisions requiring counterparties to comply with all modern slavery laws, take reasonable steps to ensure that there is no modern slavery in its or its contractors' supply chains, and

implement appropriate due diligence procedures.

Training

TEG continues to provide online modern slavery training modules to employees. This training is mandatory for those employees who have a high level of involvement with the business' procurement processes, including members of our senior leadership team, compliance, legal, procurement and people and culture. TEG considers the appropriateness of these modules annually with a view to updating if required. During the Reporting Period, TEG considered whether the current training remains sufficient and whether additional categories of personnel should be included. The outcome of that assessment was that the current module is sufficient, and it is delivered to the appropriate cohorts of employees. We will continue to review this training and the recipients, on an annual basis.

Procurement

During the Reporting Period, TEG hired and onboarded a Head of Procurement, whose role includes identifying potential modern slavery risks and safeguarding against human rights violations within our supply chain. The Head of Procurement has worked closely with TEG's Legal & Compliance team to:

- Review and update TEG's Procurement Policy.
- Develop a suite of new template supply agreements incorporating clauses aimed at reducing the occurrence of modern slavery within our supply chains.
- Create a procurement framework that enhances our ability to request and receive supplier information, including details on their modern slavery compliance activities.

These agreements now apply across the TEG Group in Australia and New Zealand and assist in moving away from operating under suppliers' terms unless reviewed by TEG's Legal & Compliance team. This will reduce the occurrence of TEG entering into supplier provided agreements which do not adequately address modern slavery considerations. Additionally, reviews of labour hire agreements and contractors were conducted to assess employee type risks, with a focus on diversity, equity, inclusion, and sustainability. For event day labour, TEG leveraged its long-standing relationship with its key labour hire provider to ensure their protocols align with modern slavery prevention. Furthermore, a tender process was developed to identify companies with more mature practices and better compliance with modern slavery standards.

HOW WE ASSESS EFFECTIVENESS OF OUR PRACTICES

We are committed to ensuring that we utilise a holistic approach to measuring our effectiveness in relation to the actions being taken to assess and address modern slavery risks.

During the Reporting Period, TEG has assessed effectiveness on the following basis:

1. **Review of standard form contracts** – We have reviewed all of our standard contracts and note that 100% of our standard form Ticketing Services Agreements require adherence to modern slavery legislation and encourage the counterparty to conduct modern slavery-related due diligence enquiries. We also note that a number of our standard form supplier contracts include a modern slavery clause.
2. **Modern slavery-related complaints received** – We note that TEG has not received any complaints from staff or contractors relating to modern slavery.
3. **Review and assessment of actions** – We recognise that our review and assessment of our actions to identify and address modern slavery risks in our operations and across our supply chains will be an ongoing and evolving process. We are committed to building upon this into the future. To this end, we will set ourselves new goals to achieve and review/assess our actions, so that we can look back and assess the effectiveness of our approach and continue to inform our path forward.

LOOKING FORWARD

After reviewing the measures we have implemented to prevent slavery and human trafficking within our business and supply chains, we plan to take the following additional steps to further combat modern slavery and evaluate our effectiveness in the upcoming financial year:

- **Training:** Carry out an annual review of internal training modules to consider whether the training remains appropriate and whether the modules should be made mandatory for a broader range of TEG staff;
- **Supplier Due Diligence:** Continue to assess the risks within our supply chain by engaging with identified high risk suppliers in our business to better understand how those suppliers are addressing modern slavery risks in their business;
- **Procurement:** Continue to expand and develop the role of Procurement within modern slavery compliance including developing a framework which includes more robust RFP processes, potential supplier audits aimed at assessing modern slavery compliance, and the potential development of a 'Supplier Code of Conduct' which would include modern slavery risk mitigation;
- **Geographical focus:** we intend to target our modern slavery compliance efforts on our business operations which occur in higher risk geographical regions, including by undertaking a briefing session and online training with select suppliers in the Philippines. This includes consulting our local General Manager to begin the process of rolling out additional training (if required) to this region and request for them to provide a list of local suppliers to assess (and if necessary, address) any modern slavery risk in this region.
- **Contract management:** Continue to include modern slavery clauses in more of our standard form supplier contracts and review any master agreements that require renewal to scope the addition of a mandatory modern slavery clause.



Geoff Jones
CEO and Director
TEG Pty Ltd

13 December 2024

This statement was approved by the board of directors of TEG Pty Limited on 10 December 2024. It is made pursuant to *Modern Slavery Act 2018* (Cth) and constitutes TEG Pty Limited's and its relevant subsidiaries' modern slavery statement for the financial year ending 30 June 2024.

Annexure

Reporting Criteria	Page number
Identify the reporting entity	Page 1 of the Statement
Describe the reporting entity's structure, operations and supply chains	Pages 1-2 of the Statement
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Pages 2-3 of the Statement
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Pages 3-5 of the Statement
Describe how the reporting entity assesses the effectiveness of these actions	Page 5 of the Statement
Describe the process of consultation with any entities the reporting entity owns or controls	Pages 1 and 6 of the Statement
Provide any other relevant information	Pages 5-6 of the Statement