

# Modern Slavery Statement

July 2024 – June 2025

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 and present.

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

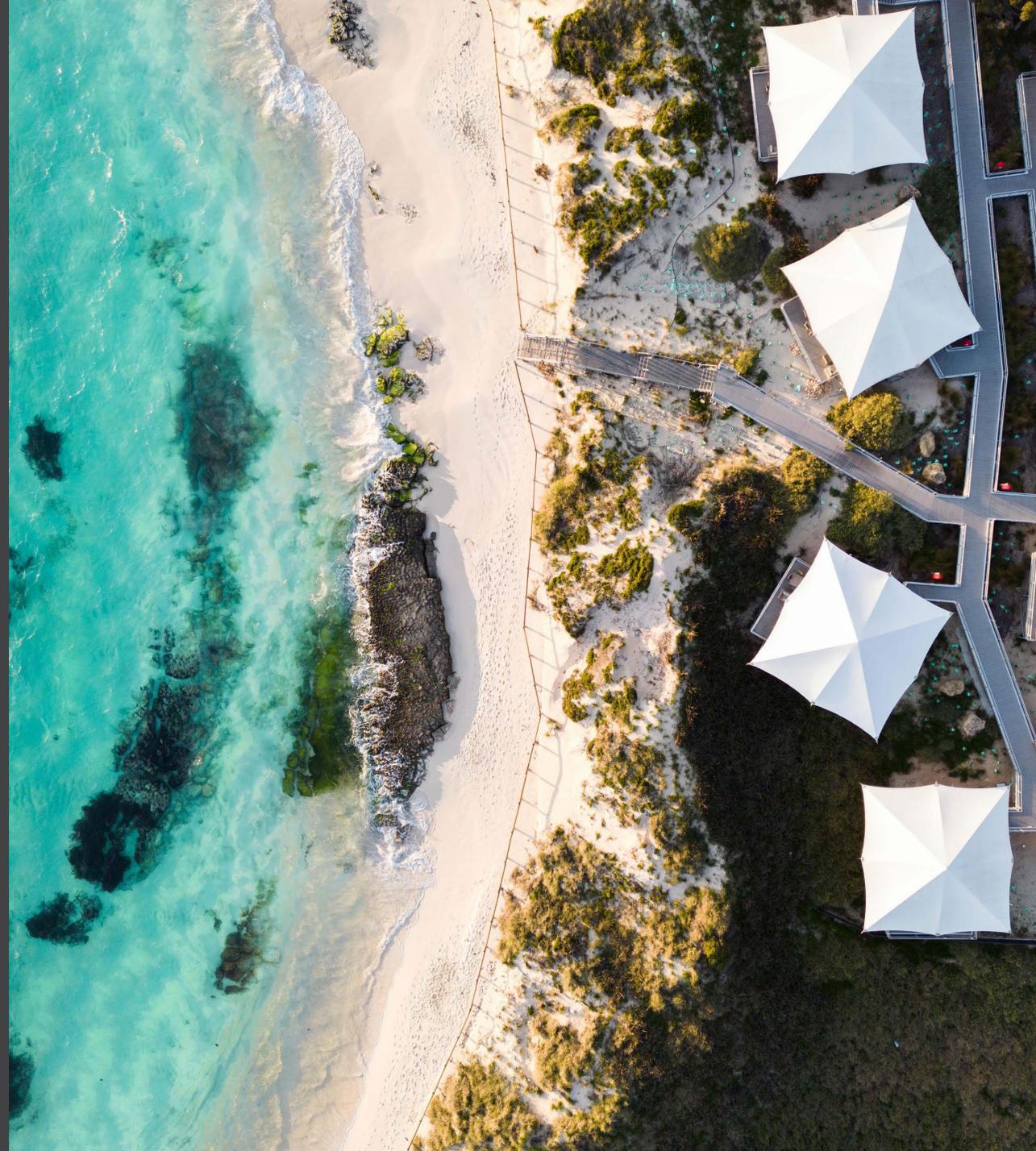
Assessing and addressing our modern slavery risk

Our performance and future plans

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;
- 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; and
- Bookeasy Australia Pty Ltd as the operator of 'Bookeasy', a reservations and bookings management system adopted by over 150 national parks, visitor centres and specialised tourism services across Australia and New Zealand.

Together, these entities and brands are referred to as **G'day Group**.

This Modern Slavery Statement describes the actions that Discovery, and G'day Group more broadly, have taken in the Australian Financial Year 2024 – 2025 (**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 improving our supplier awareness, enhancing our supplier risk assessment and developing our internal training tools.



# ABOUT US

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 90 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

Headquartered in South Australia, our main support office is located in Adelaide with a team of over 330 staff providing support in areas including corporate services (finance, governance and risk and procurement), marketing, operations, information technology (including cyber security), development and investments and people and culture.

Our Bookeasy office in Queensland hosts a team of over 25 staff providing support in customer service, technical assistance and destination management solutions for tourism operators.



**90+  
PROPERTIES  
OPERATED**



**2,500+  
EMPLOYEES**



**AUSTRALIA  
WIDE  
ACCOMMODATION  
OFFERINGS**



**\$435,403,260  
CONSOLIDATED  
REVENUE AT 30  
JUNE 2025**

In the reporting period, we made payments to over 5,600 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, **99.41%** 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, furnishings



## Facilities Management

cleaning services, waste management, plumbing, safety, gardening



## Utilities

electricity, fuel, gas



## Financial Services

banking services



## Marketing

digital marketing



## Food & Beverage

provision of F&B to our workstay parks and resorts



## Office Consumables

stationery, printing



## Information Technology

telecommunications, IT hardware, 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 have specifically focused on the risk indicators from the Commonwealth 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.

To support the implementation of our modern slavery compliance actions, G'day Group 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;
- Anti-Bribery and Anti-Corruption Policy;
- Modern Slavery Policy; and
- Whistleblower Policy.



# MODERN SLAVERY COMPLIANCE GOVERNANCE

Board

Audit and Risk Committee

Modern Slavery Working Group

Chief  
Financial  
Officer

Chief  
People  
Officer

GM –  
Procure-  
ment

GM–  
Governance,  
Risk &  
Transform-  
ation

Legal

ESG

Our Modern Slavery Working Group, consisting of a cross functional group of managers and members of key business units, has active oversight of modern slavery compliance actions and drives 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 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 & MANAGEMENT

We recognise that the Australian Government Guidance classifies and labels some of our suppliers as higher risk due to the sector, industry or product and service. We have evaluated some categories, such as building and material suppliers, 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 activities, 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.

Beyond our direct supply chain, during the reporting period, we developed and implemented a new ESG checklist for merger and acquisition activities. This checklist aims to ensure that ESG risks, including any modern slavery risks and broader ethical considerations, are systematically assessed when evaluating potential business acquisitions, embedding due diligence into our strategic growth decisions from the outset.

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. For targeted higher risk supplier agreements, we strive to enter into agreements which contain provisions that mitigate the risk of modern slavery practices. In the reporting period, we have further expanded on our template modern slavery compliance clauses for high-risk supplier agreements to facilitate for deeper investigation and reporting mechanisms for our overseas suppliers.





With a focus on supplier education and awareness, we launched a dedicated external facing supplier portal during the reporting period, providing our supply chain partners with direct access to our key policies and procedures. This platform enhances transparency and ensures our suppliers clearly understand our ethical expectations from the outset of our business relationship.

Contemporaneously, we refined our end-to-end supplier engagement framework as a key component of our accreditation processes. Our approach now includes engagement at multiple touchpoints throughout the supplier lifecycle: we provide our policies and standards at the start of each engagement to set clear expectations and then test suppliers' compliance and understanding again at the end of projects to ensuring ongoing commitment.

We continue to maintain the services of a team of 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. Senior management continue to visit offshore offices to conduct site tours, which include reviewing the office and work environment and inquiring about workers' travel arrangements. Our support office team also conduct 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. Our geographic risk remains low due to our strong commitment to local sourcing, with less than 1% of our suppliers located overseas. 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 & MANAGEMENT

G'day Group employs more than 2,500 staff nationally across both our support offices and owned and operated properties. Our employees are directly employed on a combination of full-time, part-time, and casual contracts. As a majority of our employees work 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 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. Our Wellbeing Policy is of critical importance to employees and the long-term sustainability of our business.

We continue to work with third party labour-hire companies and professional service suppliers in Australia 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 by us. 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. We continue to partner with the Pacific Australia Labour Mobility (**PALM**) scheme, an initiative run by the Commonwealth Government that enables Australian businesses to recruit workers from 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 Rottneest Island to our work stay property in Mount Isa. 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, Stoplevel, to facilitate the reporting mechanism.

At Discovery, we aim to foster a culture of continuous learning. During the reporting period, we developed and delivered a new anti-bribery and anti-corruption eLearning module through our learning management system. The training sits alongside our modern slavery and whistleblowing eLearning modules and is designed to provide staff with the knowledge and tools to recognise, prevent and appropriately respond to bribery and corruption risks in our supply chain.

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.





# KEY ACTIONS FOR THE REPORTING PERIOD

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

## *Policy development*

- Refreshed our key Modern Slavery policies, including our supplier code of conduct, human rights and anti-bribery and anti-corruption policies

## *Supplier due diligence*

- Implemented a new ESG due diligence checklist for merger and acquisition activities
- Expanded on our standard modern slavery clauses in high-risk procurement contracts to allow for deeper investigation and reporting for our overseas suppliers
- Launched an external facing supplier portal to allow ease of access to our key policies and procedures
- Refined our end-to-end supplier engagement as part of our accreditation processes, including reviewing targeted supplier's modern slavery plans and policies to ensure they align with our business' expectations

### *Training, awareness and capacity building*

- Developed and delivered an anti-bribery and anti-corruption eLearning module via our online learning management system to all staff
- Reviewed and refreshed our internal modern slavery eLearning module to ensure best practices are being observed
- 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
- Established an ESG Executive Sub-Committee into our governance structure, with the purpose to provide executive oversight of G'day Group's strategy and progress in relation to ESG matters
- Formulated our modern slavery compliance strategy for the next reporting period (see Our Future Plans)



# OUR FUTURE PLANS

Looking ahead, and in line with our commitment to continuous improvement, we are continuing to progress the following actions in our 2025/2026 reporting period with our Modern Slavery Working Group overseeing the following program of work.

## *Supplier Due Diligence*

- Explore opportunities to incorporate our supplier questionnaire into our procurement tender processes
- Update our standard contract documentation to include a reference to our supplier portal
- Investigate options to enhance transparency of our supplier base and payment times reporting

## *Industry engagement*

- Continuing to collaborate and participate in continuing professional development seminars to inform best practice

## *Training, awareness and capacity building*

- Explore opportunities to expand awareness of our Whistleblower Policy to our external supplier base
- Determine a suitable pathway to develop educational materials on our business' conflict of interest and gifts and benefits 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
- Develop formal reporting targets in relation to modern slavery, to be incorporated into our ESG dashboard

# CAPACITY BUILDING & CONSULTATION

As part of our ongoing commitment to building our maturity in understanding our modern slavery compliance obligations, relevant staff, attend 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. Members of our Modern Slavery Working Group 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.

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 G'day Group have been involved in the development of this Modern Slavery Statement, with input from many areas, including 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.

G'day Group 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 Limited, as its principal governing body, on 4 December 2025.



**Grant Wilckens**  
Chief Executive Officer

