



AFL Modern Slavery Statement

1 November 2021 - 31 October 2022

AUSTRALIAN FOOTBALL LEAGUE
ABN 97 489 912 318

Modern Slavery Statement

This is the third Modern Slavery Statement (**Statement**) of the Australian Football League (ABN 97 489 912 318) (**AFL**), an Australian public company incorporated in Victoria, and its subsidiaries, made to address the requirements of the *Modern Slavery Act 2018* (Cth) (**Act**). In this Statement, the AFL reports on its continued actions to identify, manage and mitigate the risks of modern slavery in our business operations and supply chain.

The AFL recognises the importance of eradicating human rights abuses, including modern slavery, from society and is committed to playing its part to eliminate the risks of all forms of modern slavery from its operations and supply chains. The framework for the AFL's modern slavery response was established in its inaugural Modern Slavery Statement and supplemented by its second Modern Slavery Statement. This third Statement sets out the further actions taken to build on that framework and from previous statements to further our modern slavery risk mitigation commitment.

Australian Football League
ABN 97 489 912 318

Modern Slavery Statement
For the Reporting Period 1 November 2021
to 31 October 2022



About the AFL

The AFL is the governing body of the sport of Australian Football. It administers both the elite Men's and the Women's Australian Football competitions and talent pathways to reach those competitions and community football competitions.

The AFL was previously named the Victorian Football League. It changed its name to the Australian Football League in 1990 to reflect the expansion of the elite Men's competition, which now has a national footprint, with matches played each season in every State and Territory in Australia. The elite Men's competition is now made up of 18 Clubs (**AFL Clubs**).

The first season of the elite Women's Australian Football competition, also known as AFLW, was completed in 2017. The competition started with eight AFL Clubs and has since progressively expanded to include AFLW teams from all 18 AFL Clubs.

The AFL is the parent entity of AFL Stadia Pty Ltd (ABN 26 615 077 891) and its subsidiaries, including Melbourne Stadiums Limited (ABN 37 098 476 594) (**MSL**), and the AFL State Entities (see further under 'AFL Structure'). MSL manages Melbourne's premier sports and entertainment venue, Marvel Stadium, and the AFL State Entities manage community Australian Football and second tier Australian Football competitions in all Australian States and Territories excluding South Australia and Western Australia.

As well as the AFL's activities in relation to Australian Football competitions, talent pathways and Marvel Stadium, key AFL operations include:

- provision of programs aimed at engaging the Australian community in Australian Football with a focus on education and wellbeing;
- provision and management of facility grants to support community Australian Football;
- fan engagement strategies including memberships, events, corporate hospitality and a licensing program for official AFL merchandise; and
- production of media content that is distributed across various platforms.

For more information about the AFL please refer to the [AFL 2022 Annual Report](#).

AFL Structure

The AFL is a not-for-profit organisation incorporated under the *Corporations Act 2001* (Cth), and its income and property must be used and applied solely for the purpose of carrying out, furthering, and promoting the objectives of the organisation as set out in its Constitution. The AFL Commission is the governing body of the AFL and the Board of Commissioners are the directors of the AFL. The role of the Commission includes overseeing risk management and ensuring ethical standards and appropriate behaviours are adhered to. The members of the AFL are the 18 AFL Clubs.

The Board of Commissioners includes the AFL's Chief Executive Officer. The AFL Chief Executive Officer is appointed by the AFL Commission and is responsible for the operating performance of the AFL and the implementation of policy decided by the AFL Commission. Under the Chief Executive Officer, the AFL is divided into the following eight departments each led by an Executive General Manager: Game Development, Corporate Affairs, Customer and Commercial, People, Football Operations, Inclusion and Social Policy, Finance, AFL Clubs and Broadcast, and Strategy. The Executive General Managers of each of the departments form the AFL's executive leadership team.

Within the Game Development department sits the operation of the AFL State Entities. The AFL has a subsidiary based in each Australian

State and Territory, except for South Australia and Western Australia, that is responsible for the governance of Australian Football in that area as follows:

- Australian Football League (Victoria) Limited ABN 24 147 664 579
- Football Tasmania Limited ABN 93 085 213 350
- AFL Queensland Limited ABN 66 090 629 342
- AFL Northern Territory Limited ABN 81 097 620 525
- AFL (NSW/ACT) Commission Ltd ABN 53 086 839 385

The AFL's head office is located in Docklands, Melbourne and the operations of Australian Football League (Victoria) Ltd and MSL are also conducted out of head office.

The operations of the other AFL State Entities are conducted out of offices in each of the relevant States and Territories. The AFL and its subsidiaries employ approximately 870 (permanent, full time and part time) individuals nationally, who are all based in Australia. The AFL engages additional part time staff on a seasonal basis that have not been included in this number (e.g. coaches and medical personnel for talent pathway programs). This cohort of employees fluctuates regularly depending on the time of year.



The AFL Supply Chain

The AFL engages with suppliers to procure goods and services to support its operations. The AFL's supply chain encompasses the following key categories:

- **Licensing:** The AFL licenses intellectual property it owns to licensees who use our intellectual property on products that they manufacture and then either sell directly to consumers or to retailers. Licensed products include uniforms and footballs that the AFL purchases for use in our operations.
- **IT and Communications:** The AFL engages suppliers to provide IT and communication services including in relation to website management, data storage and communications to stakeholders.
- **Match Day Operations:** The AFL engages suppliers to provide services directly in relation to the conduct of Australian Football matches particularly in relation to match day technology.
- **Travel and Accommodation:** The AFL procures travel and accommodation services to facilitate the conduct of the AFL and AFLW matches and other competitions, as well as to support its business operations generally.



The AFL Supply Chain

- **Events and Catering:** The AFL uses suppliers to assist in staging events related to its operations and providing catering at those events.
- **Signage:** To meet its obligations under sponsorship agreements, the AFL engages suppliers to provide sponsor signage that is displayed at AFL and AFLW matches and other competitions.
- **Facilities Management:** The AFL manages a number of facilities across Australia, including Marvel Stadium, and requires services in relation to those facilities such as security and cleaning.

- **Player high performance support:** The AFL engages coaching and medical professionals to provide support in the talent pathway competitions and programs it administers.

For the most part, the AFL's relationships with its suppliers are long standing. We are committed to building trusted and transparent relationships with our suppliers to ensure an open dialogue in which any risks identified can be efficiently and effectively addressed.

A key project currently being undertaken by the AFL is the redevelopment of Marvel Stadium. The AFL has engaged John Holland Pty Ltd to carry out the build and it is anticipated that it will be completed by the end of 2023.



Risks of Modern Slavery

Risks of modern slavery practices in the operations and supply chains of the AFL and the entities it owns or controls are as follows.

RISKS IDENTIFIED IN OPERATIONS

As has been reported in previous Modern Slavery Statements, the AFL has identified that its operations carried out directly by AFL employees pose a low risk of causing, contributing or being linked to modern slavery.

All AFL employees continue to be based in Australia and, during the reporting period, all operations of the AFL carried out by AFL employees were carried out in Australia. During the AFL onboarding process, AFL employees are provided with copies of the AFL's key policies and are required to undertake "Healthy Workplace Training" with refresher training required on a regular basis.



The training covers the following key areas (being the same areas as those previously reported with the addition of Respect at Work for Team Members training):

- Sexual Harassment in the Workplace
- Respect at Work for Team Members
- Workplace Bullying
- Safeguarding Children & Young People
- Anti-discrimination and Equal Opportunity
- Work Health and Safety
- Aboriginal and Torres Strait Islander Inclusion and Cultural Safety
- Cyber Security



Risks of Modern Slavery

RISKS IDENTIFIED IN SUPPLY CHAINS

No modern slavery practices have been identified in the AFL's supply chains. However, the AFL recognises that there is an increased risk of modern slavery in certain industries and that we could be indirectly exposed to modern slavery risks through our supply chain. The key areas of risk that have been identified in our supply chain are:

- suppliers that engage large-scale temporary workforces, which is predominantly relevant to stadium operations, including suppliers that provide cleaning, security and hospitality services; and
- the geographical location of some suppliers that sit within the AFL supply chain and are outside of Australia. This is particularly relevant to suppliers of the AFL's official merchandise licensees, whose international supply chains are primarily based in China.

All AFL official merchandise licensees were contacted prior to the completion of this Statement and asked to report on their modern slavery practices and supply chains. This reporting process was automated for the first time, which enabled the AFL to more efficiently collate and more thoroughly analyse the data reported.

Three licensees reported to the AFL that they source products through their supply chain from a country identified as high risk for modern slavery as reported in *Walk Free Foundation – The Global Slavery Index 2018*. The countries identified by those licensees were Cambodia and Pakistan. The AFL will continue to review and undertake this reporting process with these licensees and all other official licensees on a regular basis.



Actions Taken

The action taken to assess and address modern slavery risks are as follows.

CONTRACTS

The AFL continues to implement provisions to specifically address modern slavery in its standard terms for engagement with official merchandise licensees and includes similar clauses in contracts for goods or services that are identified by the AFL Procurement team as being of a higher risk of modern slavery practices, such as cleaning and security contracts at Marvel Stadium.

The contractual provisions identified in our previous Modern Slavery Statements continue to be included in agreements with official merchandise licensees and the AFL has relied on these provisions to request all official AFL licensees to report on their modern slavery practices prior to the submission of this Statement.

PERSONNEL

In furtherance of the AFL's commitment to addressing the risks of modern slavery in its business operations, the AFL has further increased the number of personnel dedicated to the business area of risk by adding a person in the role of Occupational Health and Safety Lead dedicated to managing risk at Marvel Stadium.

Current key roles that service these business areas are:

- **Risk:** Risk and Compliance Manager, Risk and Compliance Lead, Occupational Health and Safety Manager and Occupational Health and Safety Lead; and
- **Procurement:** Head of Procurement, Procurement Lead and Procurement Coordinator.

The Risk and Compliance team sits within the broader Legal & Regulatory Team and the Procurement team sits within the broader Finance team.

Actions Taken

AFL PROCUREMENT - SUPPLIER DUE DILIGENCE

As set out in the AFL's previous modern slavery statement, the AFL Procurement team continues to implement a process for conducting due diligence on suppliers at the pre-contractual stage and throughout engagement. Pre-contractual due diligence enables the AFL to identify whether suppliers are able to meet the AFL's modern slavery risk mitigation expectations, whether additional controls are appropriate to assist in managing any risk associated with a particular supplier, and how to implement those controls.

AFL POLICIES

An extensive review of the AFL Procurement Policy was undertaken by relevant stakeholders in the reporting period and a new policy is now in effect. The Procurement Policy sets out guidance in relation to:

- Principles for AFL procurement;
- Roles, responsibilities and accountabilities;
- Approach to high-risk procurement activities;
- Processes for Requests for Quotations;
- Tendering processes; and
- Compliance monitoring and reporting.

The AFL Whistleblower Policy has also been retained with the whistleblower reporting mechanism available to the public on the AFL's policies page on its website.

Additional relevant policies identified in our inaugural statement that have been retained are the AFL's Indigenous Procurement Policy, People Code of Conduct, Equal Employment Opportunity Policy and Respect and Responsibility Policy.

The AFL has also implemented a new AFL Policy Structure and Management Policy. This Policy sets out a standardised approach on a set cadence to the review and update of AFL policies to ensure that AFL policies continue to reflect the AFL's position.

Actions Taken

AFL RESPONSIBLE BUSINESS POLICY

As part of the review of the AFL Procurement Policy, it was identified that an AFL Responsible Business Policy should be established. The AFL Responsible Business Policy was developed in consultation with key stakeholders of the business including the AFL's sustainability, social policy, legal, risk, licensing, partnerships, community football, clubs and integrity teams. This policy sets out the minimum standards of conduct expected of any organisation the AFL (or any wholly owned subsidiary or controlled entity of the AFL) does business with including in relation to:

- Labour and human rights;
- Raising concerns of unsafe, unethical or inappropriate behaviour in the supply of goods or services to the AFL or AFL business arrangements more broadly;
- Integrity and ethics – bribery, corruption and money laundering, conflicts of interest, provision of gifts, entertainment and hospitality, confidential information; and
- Environmental sustainability.

The AFL will require all consultants, licensees, IT providers, event and hospitality providers, corporate partners and other suppliers of goods and services to the AFL (AFL business partners), agree to and comply with this policy.



WORKING GROUP

The AFL Modern Slavery Working Group has continued its work with representation from the Procurement, Legal, Finance, Licensing and Risk business functions. The group is tasked with monitoring the effectiveness of the processes and systems implemented by the AFL to combat modern slavery risks and reporting on that effectiveness to senior management.



Looking Forward

The AFL has made significant progress on its modern slavery risk mitigation strategies, and particularly in relation to its capturing of data and reporting, but it is also committed to continued improvement.

As foreshadowed in the AFL's previous Modern Slavery Statement, the AFL has now implemented a digital solution through Eftsure that is embedded into our contracting and payment processes and requires all AFL business partners to provide certain information prior to being approved as an AFL business partner in our systems. In the future, AFL business partners will be required to agree to the AFL Responsible Business Policy through this digital solution.

Additional steps being undertaken by the AFL to further identify, manage and mitigate the risks of modern slavery in our business operations and supply chain include:

- Broadening the scope of the reporting process the AFL undertakes with its official merchandise licensees to other high-risk contractors identified by the AFL Procurement team now that the process is automated so that the AFL can process greater amounts of data.
- Tailoring existing training that is provided to AFL personnel to specifically address modern slavery. Additional training on modern slavery to be provided to AFL personnel who engage suppliers as part of their role. This will cover key strategies for identifying the risks of modern slavery.
- Considering the engagement of an independent Internal Audit provider to review the AFL's modern slavery management processes.

There is also further work to be done to embed the AFL Responsible Business Policy into the AFL's operations and educate the business on the Policy. The AFL intends to use the existing Eftsure digital solution to require all AFL business partners to agree to the AFL Responsible Business Policy.

The AFL has also started engaging AFL Clubs to encourage these organisations to focus on the risks of modern slavery in assessing their business operations, including through organising a series of Legal and Risk Industry Forums. The AFL will further engage with AFL Clubs and community football bodies to determine the assistance it can provide to these organisations in relation to modern slavery reporting.

Consultation

The AFL and its controlled subsidiaries covered by this Statement are centrally managed by the AFL. They operate under the same governance and risk management procedures and the policies and actions set out in this Statement apply to all AFL controlled subsidiaries covered by this Statement.

The AFL Commission have approved this Modern Slavery Statement on 17 May 2023.



Gillon McLachlan

Chief Executive Officer

Australian Football League

