



FY2025 Modern Slavery Statement

Delaware North Companies Australia Pty Ltd

Released: 26 June 2026

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1. Reporting Entities

The Modern Slavery Act 2018 (Cth) (Act) requires large corporations with an annual revenue exceeding \$100 million to report annually on the risks of modern slavery in their operations and supply chains and what actions are taken to address those risks.

This Modern Slavery Statement is a joint statement under Section 14 of the Act and is submitted by:

- a) Delaware North Companies Australia Pty Ltd, ABN 92 003 435 345
- b) Delaware North Venue Services Pty Ltd, ABN 67 006 682 113, and
- c) Delaware North Darwin Casino Pty Ltd, ABN 54 009 624 417.

Collectively referred to as “DNCA” within this Modern Slavery Statement.

This Modern Slavery Statement is for the period of 1 January 2025 to the 31 December 2025.

2. Consultation Process

Supply chain and human resources at DNCA are centrally managed and consultation with related entities, sites, and venues across Australia occur when necessary. This collaborative approach helps to identify risks, gather and distribute data, and implement standardised procedures and policies within DNCA operations.

Before finalising this statement, a comprehensive consultation process occurred with the Risk Management Committee, which consists of members of the executive and senior management and meets quarterly.

Through this engagement, the Risk Management Committee endorsed the establishment of the Ethical Supply Chain Working Group, which meets monthly to support the continuous improvement of modern slavery practices and other ethical supply chain matters.

The Ethical Supply Chain Working Group is chaired by the Manager of Sustainability and includes representatives from Procurement, Compliance, Finance, and Legal DNCA teams.

3. Structure, Operations and Supply Chains

DNCA was established in 1987 as a foreign-owned private company. DNCA generates revenue through catering, hospitality, and specialty retail services across Australia and New Zealand. The company operates from its head office in Docklands, Victoria and has approximately 6,790 employees.

DNCA provide services across diverse sectors, including casinos, resorts, sports stadiums, merchandise, and airports. Committed to full transparency, DNCA endeavours to ensure its supply chain is governed by pay awards. In Australia, approximately 75% of its suppliers focus on food and beverage, with the balance made up of merchandise, a relatively small component of labour hire, equipment and services companies that support staffing across its various locations.

Due to the nature of its business, DNCA operates in an environment with inherent modern slavery risk. These risks may appear within the DNCA supply chain. Such risks are generally related to geographic locations, product types, and workforce demographics.

3.1. DNCA Sports Service Operations

DNCA operates sports hospitality services including premium dining and concessions at notable locations including Marvel Stadium, Melbourne Cricket Ground, Victorian Racing Club, and Blacktown Exercise Sports and Technology Hub.

3.2. DNCA Travel Service Operations

DNCA operates food and beverage outlets at Melbourne, Adelaide, and Perth airports in Australia, and Auckland airport in New Zealand.

3.3. DNCA Resort Operations

DNCA operates Lizard Island Resort on the Great Barrier Reef, Australia and Pinewood Lodge in Queenstown, New Zealand.

3.4. DNCA Gaming Operations

DNCA owns and operates Mindil Beach Casino Resort in Darwin, Australia.

3.5. DNCA Specialty Retail Operations

DNCA operates retail merchandise outlets at the Melbourne Cricket Ground and Collingwood Football Club.

4. Risks of Modern Slavery

The DNCA supply chain is categorised into:

1. Food and Beverage including fresh produce, dry goods, meats and poultry, beverages including alcohol
2. Merchandise including sporting apparel
3. Indirects including equipment, machinery, service providers, and transportation
4. Employees and agency staff

In 2025, investment in researching and evaluating third-party modern slavery risk management software for implementation in 2026 was undertaken.

This strategic shift is intended to enable DNCA to conduct comprehensive supplier assessments across its entire supplier base, rather than a limited subset, thereby enhancing visibility, consistency, and rigour in identifying and managing modern slavery risks.

By leveraging technology, DNCA expects to significantly strengthen ability to monitor, track, and proactively address modern slavery risks across operations and supply chain, support continuous improvement in future reporting periods, and deliver a substantial uplift in capability across its modern slavery risk management framework.

No instances of modern slavery have been identified or reported within DNCA operations or supply chain during the reporting period.

5. DNCA's Actions

In 2025, the following actions were taken to ensure ongoing identification, assessment, and mitigation of modern slavery risks at DNCA.

5.1. Reviewed Modern Slavery Policy

The DNCA Modern Slavery Policy was reviewed and is considered to remain fit for purpose to achieve its intended outcomes to: Affirm the company's commitment to the fundamental right of all individuals to live and work freely, while opposing all forms of modern slavery; Educate staff and suppliers about the risks of modern slavery; and Commit to the implementation of systems and controls to prevent modern slavery within DNCA's business and supply chain.

5.2. Invested in Modern Slavery software for 2026 implementation

In 2025, DNCA prioritised investment in modern slavery risk management software, enabling future assessments across the full supplier base and strengthening visibility, risk management, and overall capability.

5.3. Expanded the Modern Slavery training program

Previously DNCA Modern Slavery training was mandatory for any identified high-risk roles. In 2025, this training was expanded and now is a requirement for all permanent employees as well as any casual employees who work in high risk areas of the business such as procurement and finance.

DNCA Modern Slavery training is provided through a third party training platform. The Modern Slavery training content has been reviewed and approved by the DNCA Sustainability Manager. To ensure that participants understand the Modern Slavery training provided, participants are required to complete a short evaluation at the end of the training.

5.4. Reviewed Whistleblower Policy

The DNCA Whistleblower Policy was reviewed and found to continue to be fit for purpose in allowing an eligible whistleblower to disclose any activity or conduct that is unlawful, unethical, or that falls within the definition of Modern Slavery.

DNCA employees are encouraged to report any suspected misconduct or impropriety relating to operations or practices. The policy is developed and implemented having regard to the protections afforded to eligible whistleblowers as prescribed in the Australian Corporations Act 2001.

5.5. Reviewed Approved Suppliers Program

DNCA's Approved Suppliers Program was reviewed and continues to provide a structured, transparent, and accountable framework for the selection, approval and ongoing management of suppliers who provide goods and services critical to operations. The program is designed to ensure that all suppliers consistently meet DNCA's business standards, customer expectations and legal obligations.

5.6. *Reviewed Supplier Agreement*

DNCA's Supplier Agreement includes a requirement that all parties to the Supplier Agreement represent, warrant and undertake that while operating any of its business (including performance under the Supplier Agreement), the party and its operations will comply with the Act. A party may request the completion of periodical questionnaires relating to the sources of products, materials, and business practices in addition to conducting social accountability audits to verify that the other party's business practices comply with the Act.

6. Effectiveness of Actions and Moving Forward

The review and reinforcement of key policies, supplier review technology, and training programs have contributed to a more consistent and organisation-wide approach to identifying and addressing modern slavery risks.

In particular, the expansion of mandatory training has improved awareness and capability across the workforce, while enhanced supplier expectations and onboarding processes have supported more robust risk identification at the point of engagement.

Importantly, investment in modern slavery risk management technology represents a significant step change in better Modern Slavery risk management at DNCA. This will enable the organisation to move from targeted, sample-based assessments to comprehensive, data-driven analysis across the full supplier base, improving visibility and consistency in risk management.

Over time, this capability is expected to support the measurement of trends, provide greater transparency, and allow DNCA to demonstrate year-on-year improvements in identifying, managing, and mitigating modern slavery risks.

DNCA remains committed to continuously reviewing, refining, and enhancing its policies, controls, and procedures related to modern slavery.

7. Statement Approval

We, being all of the Directors of the Company entitled to received notice of a board meeting and to vote on a resolution, are in favour of the resolution set out below. The resolution is passed by the directors without a board meeting on the date and at the time when the last director signs. In passing the resolution the directors note that they have reviewed the Modern Slavery Statement (the "Statement").

Resolution

The board of **Delaware North Companies Australia Pty Ltd**, (ABN 92 003 435 345) has approved this statement on 26 June 2026.

Signed  _____

Date: 26 June 2026

Name: Gary Brown

Position: Managing Director

The board of **Delaware North Venue Services Pty Ltd**, (ABN 67 006 682 113) has approved this statement on 26 June 2026.

Signed  _____

Date: 26 June 2026

Name: Gary Brown

Position: Managing Director

The board of **Delaware North Darwin Casino Pty Ltd**, (ABN 54 009 624 417) has approved this statement on 26 June 2026.

Signed  _____

Date: 26 June 2026

Name: Gary Brown

Position: Managing Director