

19 January 2021

MODERN SLAVERY STATEMENT

This Modern Slavery Statement is made pursuant to the *Modern Slavery Act 2018* (Cth) by Merlin Entertainments (Australia) Pty Limited (ABN 51 147 624 557) (MEA) for the preceding financial year.

Introduction

Merlin Entertainments Australia (MEA) recognises its moral and legal responsibility with regard to modern slavery and will always endeavour to ensure that no such activities arise in the operation of its business. We expect all areas of our business and all suppliers and contractors to comply with internationally recognised codes of practice on human rights, employment practices and working conditions. For certain procurement categories, we undertake further reviews to assess suppliers against requirements as set out in international standards such as SA8000 or similar.

Business structure

MEA is part of the Merlin Entertainments Group, a global leader in location-based, family entertainment. As Europe's Number 1 and the world's second-largest visitor attraction operator, Merlin now operates 130 attractions, 20 hotels and 6 holiday villages in 25 countries and across 4 continents. Merlin's purpose is to deliver memorable experiences to its 67 million guests around the world, through its iconic brands and multiple attraction formats, and the commitment and passion of its c. 28,000 employees (peak season).

MEA's attraction portfolio includes the Sea Life brand of aquariums located at Darling Harbour, Melbourne, Mooloolaba, and Auckland, The Sydney Tower Eye in Sydney, Legoland Discovery Centre in Chadstone, and the Otway and Illawarra Fly's. Our Darling Harbour cluster is also home to Madame Tussauds and the Wildlife Sydney Zoo.

All attractions are supported by a central corporate team, including Finance, HR, IT, and the Senior Leadership Team.

Procurement policies and strategy are centrally led and locally implemented, with commitments to suppliers made by each attraction and operating company under the delegated authority principle.

Our stance against modern slavery

We are committed to conducting business responsibly and ethically and to ensuring that all aspects of our business practices, including our supply chains, are free from any form of slavery. We reject any and all forms of modern slavery which can take the form of unpaid or underpaid servitude, human trafficking and forced labour. We are committed to implementing effective systems and controls to ensure that it does not take place within our own business or through any of our supply chains.

Our policies

We are committed to ensuring that no modern slavery or human trafficking exists in any form within our business or our supply chains. As an organisation operating in multiple jurisdictions, we will always comply with local laws and regulations,



however where these fall short of our own global standards and policies, we will always aim to go above and beyond local legislation to maintain a high common ethical standard.

Our **Human Rights Policy** reflects our commitment to acting ethically and with integrity in all our business activity and relationships. We strive to prevent discrimination and to value diversity and inclusion throughout our business, and to provide a safe, secure and healthy environment within which to work.

In addition, and in line with our commitment to act with integrity in all our business dealings, we also operate the following policies and codes which have relevancy to the *Modern Slavery Act 2018* (Cth). Together these provide a policy framework that addresses the principal provisions within the Act.

- **Whistleblowing Policy.** MEA encourages all employees, workers and contractors to report any concerns relating to the direct activities, or supply chains of MEA. The policy is designed to make it easy for employees to make disclosures without fear of retaliation through using an independent externally hosted Whistleblowing Hotline that is available to all employees in all languages, regardless of where they are in the world. This service is also available to contractors employed to work on behalf of Merlin.
- **Employee Code of Conduct.** The Code of Conduct makes clear to employees the actions and behavior expected of them at all times when representing MEA. MEA strives to maintain the highest standards of employee conduct and ethical behavior in all its operations and the Code of Conduct makes clear that breach of any policy will not be tolerated. All employees are required to formally acknowledge that they have read, understood and will adhere to the content of the Code of Conduct. Their declaration also serves as formal acknowledgement of all MEA policies referred to within the Code (including policies in relation to modern slavery). Through the Code of Conduct employees are made fully aware that breach of any policy, or failure to raise concerns, may lead to disciplinary action and ultimately lead to dismissal.
- **Equal Opportunities Policy.** It states all employees should be treated with dignity, respect and consideration at work and does not discriminate against them because of sex, age, gender reassignment, marital or civil partner status, sexual orientation, disability, race, colour, nationality, religion or belief, ethnic or national origin, maternity or pregnancy. MEA aims to treat all employees, former employees, clients, suppliers and other members of the public with whom MEA comes into contact, with dignity and respect.
- **Recruitment Policy and Code of Practice.** These global policies uphold the Equal Opportunities and Human Rights policies through ensuring that all candidates are treated with dignity and respect, and that all applications are handled equally.
- **Protection of Children and Young Workers.** This global policy states our commitment to protecting children and younger workers under the age of 18. It clearly states MEA does not tolerate unfair treatment of children or young workers in the workplace and that maximum working hours, working conditions and fair treatment be adhered to at all times. Risk assessments are carried out before employing young workers, and MEA takes all measures to ensure that child welfare takes priority over business concerns.
- **Anti-Bribery and Fraud Policy.** MEA has zero tolerance towards fraud or bribery. Facilitation payments by anyone representing Merlin are prohibited anywhere in the world. This policy extends to anyone acting on behalf of MEA as well as to suppliers, consultants and contractors. Such third parties are required to agree in writing to comply with Merlin's Fraud Policy and Merlin conducts due diligence before establishing joint ventures and/or engaging consultants, contractors and suppliers. The application of the policy is underpinned by an ongoing employee training regime that provides a record of responses to a series of questions to demonstrate that a user has understood the policy and its application.
- **Retail Merchandise Code of Conduct.** The Code of Conduct and Global Sourcing Principles establish the standards for commercial retail suppliers working for Merlin. We expect suppliers to comply with internationally recognised codes of practice on Human Rights, employment practices and working conditions. These documents specifically require suppliers to achieve and maintain standards in relation to the following:
 - prevention of child labour;
 - prevention of forced labour;

- prevention of slave and trafficked labour;
- ensuring safety;
- health and hygiene;
- associations, discrimination and coercion;
- working hours and wages; and
- protection of the environment.

Suppliers

We assess the risk of modern slavery taking place in our business by identifying and managing any areas of concern within our business operations and any external suppliers. As an entertainment organisation, operating only in Australia, there is no risk of modern slavery occurring within our direct business operations. However, we recognise we could be indirectly exposed to the risk of modern slavery and human trafficking through our supply chains.

Our supply chains include local, national and international partners and MEA will not knowingly do business with parties who violate applicable laws and regulations, including local, environmental and employment laws. Due to the nature of our business, we do not make use of high-risk supply chains, which are susceptible to modern slavery risks. We have taken the following actions to manage that risk:

- Purchasing, where possible, fair trade certified consumables;
- Ensuring all contracted third-party suppliers adhere to MEA's Ethical Dealing Principals;
- Conducting due diligence on third party service providers; and
- Partnering with suppliers who share our stance on modern slavery.

Unless a higher standard is applied, suppliers are required to agree, as a condition of doing business with Merlin, that Merlin's standard conditions of purchase for goods and services (which contain our Ethical Dealing Principles) will apply. Our Ethical Dealing Principles require suppliers to be compliant with international conventions in relation to forced labour; freedom of association; right to organise and collective bargaining; equal remuneration; abolition of forced labour; discrimination; minimum age and child labour.

MEA has several systems in place to identify and assess potential risks in our supply chain, mitigate these risks and protect whistle-blowers. These include:

- binding suppliers to ethical dealing clauses in all contract terms and conditions;
- holding regular review meetings with all major commercial suppliers and brand partners which focus on the delivery of goods and services in line with the terms of our agreement;
- invoking strict sanctions on suppliers who do not meet our performance expectations or uphold the terms of our agreement (for example, any evidence of child labour results in the immediate delisting of a supplier);
- use of an independent externally hosted Whistleblowing Hotline which all employees, workers and contractors are made aware of upon induction and encouraged to use whenever appropriate, commissioned by the Company's Audit Committee which receives regular reports; and
- where MEA procures outsourced labour services, due diligence will be completed to ensure they are capable of meeting Merlin's own standards.

Furthermore, Merlin continually reviews its policies and practices based on lessons learned from the above initiatives in order to proactively maintain an informed approach to preventing modern slavery in our society. We are committed to undertaking our due diligence processes when contracting with external suppliers and to identifying and assessing any indications of suppliers being of high risk. We will not work with high-risk suppliers unless we have conducted the appropriate assessment that our standards will not be compromised.

Training

We are committed to training our employees and ensuring they have a healthy understanding and respect for how their choices can have far-reaching impacts upon basic human rights across the globe. We have made the training resources provided by Anti-Slavery Australia available to our employees.

All staff involved in the procurement of goods and services understand the detail of our Merlin Ethical Dealing Principles, which form part of our contractual terms and conditions of supply. In addition to the policies and procedures that underpin monitoring and compliance Merlin also operates an induction programme tailored to incorporate the Employee Code of Conduct and the relevant policies relating to specific roles.

As our business expands, we are mindful of the increased risks relating to modern slavery associated with new market entry and high-volume employment sectors such as accommodation and food and beverage operations. We ensure we abide by all local labour laws and that the policies that relate to modern slavery are an essential part of any induction programme.

Consultation with controlled entities

The legal entities covered by this statement operate collectively as Merlin, and the policies, approaches, and actions outlined in this statement apply to all.

Effectiveness/Performance Review

MEA understands that modern slavery risk is continually evolving and will remain vigilant to slavery and human trafficking in its supply chains. We will always comply with local legislation and adopt global standards in the way we work with our people and our suppliers. We will continue to identify and evaluate risks relating to human rights and develop our policies, procedures, and training to help combat modern slavery.

In particular, we are taking steps to:

- ensure we are alert to any new supplier and undertake the requisite above actions to negate any risk associated with slavery or trafficking;
- extend our risk profiling beyond centralised commercial suppliers, categorising risk levels within the supplier base based on territory, product type or service; and
- enhance training and awareness specific to modern slavery given to all staff involved in managing the supply chain, leveraging the development of Merlin's global HR platform, 'The People Portal'.

Merlin will always seek to do the right thing by its employees and its communities and operates within a framework of continuous self-assessment and improvement.

This statement is made pursuant to section 13(1) of the *Modern Slavery Act 2018* (Cth) and constitutes our statement for the financial year ending 26 December 2020. This statement also covers the subsidiaries that apply to the disclosure criteria of the Act, namely Sydney Attractions Group Limited (ABN 92 008 632 764), The Sydney Aquarium Company Pty. Limited (ABN 98 008 631 981), Sydney Wildlife World Pty. Limited (ABN 12 119 877 486), Sydney Tower Observatory Pty. Limited (ABN 29 103 232 748), Aqdev Pty. Limited (ABN 64 003 688 846), The Otway Fly Pty Ltd (ABN 48 099 502 833), Illawarra Tree Tops Pty Ltd (ABN 85 122 863 361), Living and Leisure Australia Limited (ABN 92 107 863 445), Oceanis



Australia Pty Ltd (ABN 68 006 744 109), Underwater World Sunshine Coast Pty Ltd (ABN 97 089 366 772), Oceanis Developments Pty Ltd (ABN 71 099 604 618), Melbourne Underwater World Trust (ABN 87 656 124 575), Living and Leisure Australia Trust (ARSN 092 701 589), Legoland Discovery Centre Melbourne Pty Ltd (ABN 28 601 100 869) It has been approved by the Board of Directors of Merlin Entertainments (Australia) Pty Limited.

A handwritten signature in black ink, appearing to read 'AV' with a stylized flourish.

Andrew Virgona
Director
Merlin Entertainments (Australia) Pty Limited