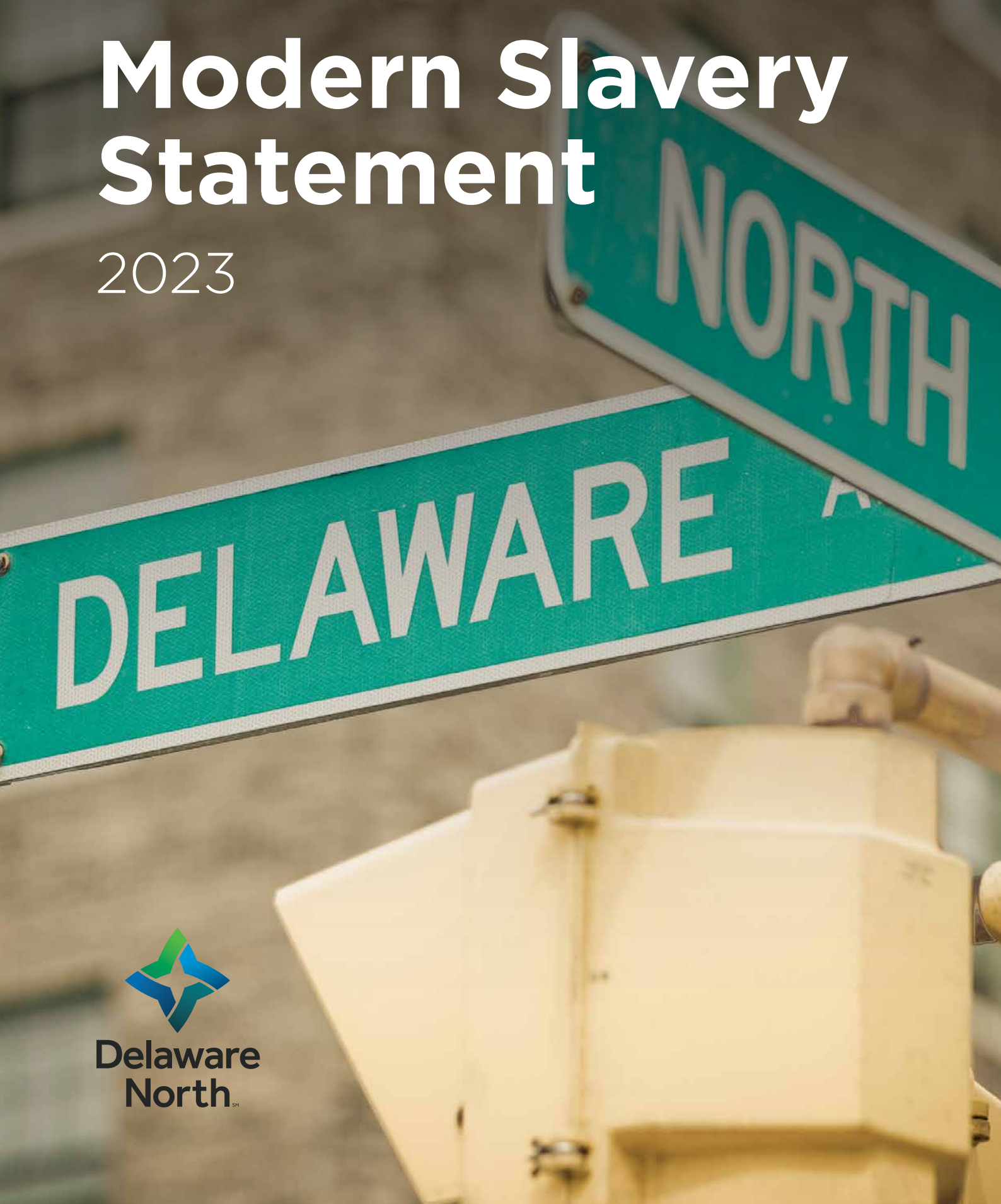


Delaware North Companies Australia Pty Ltd

Modern Slavery Statement

2023



Delaware
NorthSM

1. Introduction: Delaware North Companies Australia Pty Ltd

Delaware North Companies Australia Pty Ltd, ABN 92 003 435 345, Delaware North was established in 1987. Delaware North is a foreign-owned private company, deriving revenue from the provision of catering, hospitality and specialty retail services in Australia and New Zealand. The company employs approximately 9,350 people and is administered from its head office in Docklands, Victoria.

Delaware North is a wholly owned subsidiary of the US-based food service and hospitality company, Delaware North Companies Inc.

Delaware North manages and provides food and beverage concessions, premium dining, entertainment, lodging and retail at many large venues and special places. These include sports stadiums, entertainment complexes, airports and casinos.

Delaware North's success is grounded in our vision and value statements, which guide our every action.

Our Vision:

To delight guests by creating the world's best experiences today while reimagining tomorrow.

Our Values:

***Lean Forward:** We are innovative creators who continually reimagine what's next.*

***Come Together:** We work collaboratively with each other and believe in the power of partnership.*

***Stand Up:** We lead by example, own our decisions, and take initiative.*

***Do Right:** We value integrity and always do the right thing, especially when no one is looking.*

***Think Guest:** The guest experience is at the heart of everything we do.*

The Modern Slavery Act No.153, 2018

In 2018, the Australian Government passed the Modern Slavery Act 2018 (Cth) (Act), that requires large corporations in Australia with an annual consolidated revenue of more than \$100 million, to annually report on the risks of modern slavery in their operations and supply chains, and actions taken to address those risks.

For the purposes of the Act, this is a Joint Statement as provided for in Section 14 of the Act, submitted by Delaware North, on behalf of each of the Reporting Entities identified below for the period ended 31 December 2023:

1. Delaware North
2. Delaware North Venue Services Pty Ltd ABN 67 006 682 113 (DNVS); and
3. Delaware North Darwin Casino Pty Ltd ABN 54 009 624 417(DNDC).

Delaware North, DNVS and DNDC (Australian Group) had an annual consolidated revenue exceeding \$100 million in 2023.

Delaware North recognises that modern slavery happens at the most extreme end of the working spectrum, and that it involves the gravest abuses of human rights and serious crimes, having severe and often lifelong consequences for its victims. The term modern slavery is used to describe situations where there is coercion, threats or deception.

The Act defines modern slavery as including 8 types of serious exploitation:

Trafficking in persons;

- Slavery;
- Servitude;
- Forced marriage;
- Forced labour;
- Debt bondage;
- Deceptive recruiting for labour or services; and
- The worst forms of child labour. The worst forms of child labour mean situations where children are subjected to slavery or similar practices, or engaged in hazardous work.

Delaware North commits to ending all forms of modern slavery, both in Australia and overseas, by ensuring our own supply chains and operations don't contribute to modern slavery practices, and to take appropriate action to respond to the humanitarian impacts of modern slavery. Delaware North is further committed to consistently reviewing and strengthening our processes and systems to minimize the risk of human rights infringements anywhere in our operations and supply chain.

2. Delaware North's structure, operations, and supply chains

For ease of reference, we provide the Company Structure of Delaware North Companies Inc. as per attached Appendix A. As reported in Section 1 of this Statement, there are 3 Reporting Entities within the Australian Group; the other entities do not have annual consolidated revenue exceeding \$100 million.

Delaware North primarily comprises catering and hospitality services at a casino in Darwin, resorts, sports stadiums, and airports.

Delaware North's operations and supply chain are centrally controlled. The supply chain is sourced from a variety of locations; however, the majority of Delaware North's spend in food and beverage is sourced from Australian based suppliers. Delaware North strives for full transparency over its supply chain, whilst our operations is covered by pay awards.

Approximately 75% of Delaware North's suppliers provide food and beverages. Delaware North also engages with labour hire companies to provide resources for its various sites. Delaware North's indirect supply chain for food provisions, originates from Australian based farms and plantations on which raw materials are grown, the factories which process these raw materials, and the transportation services involved in the supply chain.

Delaware North realizes that there is a risk for modern slavery practices to have the potential to exist within its supply chain. Modern slavery variables considered by Delaware North relating to its food chain include (but are not limited to) geographic location product/service type, and possible workforce demographics.

Further details regarding Delaware North's business are provided below:

Sports

Delaware North is a major player in several sectors of sports, including as one of the leading hospitality and retail management companies at stadiums, arenas, and ballparks across the globe. Delaware North Sportservice, its flagship operating company, helped pioneer the sports concession industry more than 100 years ago.

Among the more than 50 sports and entertainment venues worldwide at which it operates premium dining, restaurants and food and beverage concessions, Delaware North is the hospitality partner at Marvel Stadium and the Melbourne Cricket Ground in Melbourne.

Travel

Delaware North is one of the world's leading airport food service and retail companies, operating at more than 30 airports and travel centres in the United States, UK, Australia and New Zealand. It manages more than 300 restaurants and retail stores, serving more than 350 million travelers each year. Major locations in Australia include a range of food and beverage outlets at Melbourne Airport, Adelaide Airport and Perth Airport.

2. Delaware North's structure, operations, and supply chains

Resorts

Delaware North's portfolio of resorts in Australia and the United States provide guests with world-class hospitality to complement the natural beauty of their locations. The company draws upon its deep culinary expertise and considerable experience in the resort management services arena to deliver incredible guest experiences.

In Australia, they own and operate the world-famous Lizard Island Resort located on the Great Barrier Reef in Queensland.

Gaming

Delaware North is one of the most innovative gaming operators in the United States and Australia, creating regional casino destinations with video gaming machines, table games, poker rooms, racing simulcast centres, restaurants, lounges, nightclubs, sports bars, event centres, retail shops and hotels.

In Australia, Delaware North owns and operates Mindil Beach Casino Resort in Darwin.

Restaurants and Catering

Delaware North is one of the world's leading restaurant and catering companies - its culinary and hospitality team members provide extraordinary dining experiences for guests at unique locations.

Specialty Retail

Delaware North operates more than 300 specialty retail outlets worldwide in airports, parks, gaming properties and sporting venues. In Australia, Delaware North operates the retail merchandise outlets at the Melbourne Cricket Ground in Melbourne, Victoria.

3. Risks of modern slavery practices in the operations and supply chains of Delaware North

Delaware North is committed to the highest standards of ethics and business integrity in our operations and supply chain. We aim to ensure our staff and suppliers are treated fairly, with respect and dignity, in order to uphold the said highest standards. This is also consistent with our vision and values.

There is a low risk of modern slavery in our operations as in terms of human capital. Delaware North operates in an industry that is covered by pay awards, which provide for minimum pay rates and conditions of employment, including leave and entitlements. However, Delaware North appreciates the risks of potential modern slavery within the operations and supply chain of our suppliers abroad. This is particularly so when the overseas supplier is based in a geographic region with known modern slavery concerns, the products/goods and/or industry involved are linked to modern slavery, and the amount involved in the transactions are material. Delaware North is not aware of any of our suppliers abroad having engaged in conduct or suspected conduct, which may amount to modern slavery.

Delaware North's primary risk of modern slavery in our supply chain, confers in the use of external suppliers for the supply of fresh products. Delaware North is not able to determine with certainty the origin for the provision of seafood that is sourced outside Australia. Additionally, some risks of modern slavery may be present in Delaware North's Specialty Retail supply chain. This new business stream commenced on 1 October 2023. It is a requirement that all merchandise suppliers complete a modern slavery questionnaire as part of the new supplier set up/onboarding process. In addition, suppliers are required to complete Delaware North's Supply of Goods and Services Agreement (Agreement); being a formalized documented process which ensures supplier engagement uniformity and consistent standards, that suppliers subject to on-going monitoring, review and improvement and ensures suppliers act in a manner in accordance with the Agreement.

Suppliers are carefully vetted to ensure they align with Delaware North's legal and contractual obligations. Similarly, Delaware North's high ethical standards are at the core of how it engages with suppliers.

The majority of Delaware North's top 50 vendors, in regard to spend, are locally based within Australia with the majority of our vendors being classified as medium to low risk of modern slavery.

4. Actions taken by Delaware to assess and address modern slavery risks, including due diligence and remediation processes

In 2023, Delaware North, conducted a modern slavery risk assessment of our operations and supply chain. The learnings gained through the risk assessment are reflected in this Modern Slavery Statement. In doing so, this assisted Delaware North in the preparation of the third Modern Slavery Statement. The risk assessment process was sponsored by Delaware North's Procurement team.

The assessment comprised two parts:

- Identifying existing risk management policies and procedures within Delaware North and whether further updating is required to include the risks of modern slavery, through ethical sourcing, quality standards or other compliance reporting; and
- Conducting a risk assessment over Delaware North's current suppliers in terms of payment data, for the period January 2023 to December 2023.

Delaware North conducted a review of the onboarding process for new suppliers resulting in the onboarding program being enhanced with the ability to assist with the assessment of supplier risk during the onboarding process.

A review of existing risk management policies and procedures was also conducted, including a review of Delaware North Supplier Code of Conduct, and Supply of Goods and Service Agreement.

Delaware North has a Modern Slavery Policy which:

- Exhibits its commitment to the right of all individuals to live and work freely, together with our opposition to all forms of modern slavery.
- Seeks to inform and educate staff and suppliers in relation to risks associated with modern slavery; and
- Demonstrates commitment to implementing and maintaining effective systems and controls, which ensure Delaware North plays a constructive role in helping to reduce the risk of modern slavery occurring within its business and supply chain.

4. Actions taken by Delaware to assess and address modern slavery risks, including due diligence and remediation processes

As part of its risk assessment process, Delaware North undertook a desk top review of its top 50 suppliers in terms of spend which comprises 48% of Delaware North's total spend to external suppliers. Delaware North considered risks that may potentially cause, contribute to or be directly participating in modern slavery practices, consistent with the Act and the Commonwealth Modern Slavery Act 2018 - Guidance for Reporting Entities. These risks areas included: Financial; Industry; Country (geographic location); Sub-Contractors; and evidence as to whether the supplier has submitted a Modern Slavery Statement.

The results of the desk top review identified that 49 of our 50 suppliers scored an overall modern slavery risk rating of low risk, whilst the remaining 1 supplier scored an overall risk rating of medium risk to modern slavery. This was based on what was determined by using publicly available records and information Delaware North had previously obtained from its suppliers and recorded within its systems.

Delaware North has created a modern slavery questionnaire, for distribution to its suppliers. The modern slavery questionnaire contains questions relevant to modern slavery with each response being allocated a corresponding risk rating. This risk rating is calculated from the answers provided by suppliers to 10 pertinent modern slavery questions, including consideration of any supporting documents provided. We believe this is a crucial step in identifying and where applicable, eradicating human trafficking and modern slavery, where there is any suggestion or the slightest suspicion that this may be occurring.

Questions included in the modern slavery questionnaire include:

1. Request for organisation information.
2. Have you prepared a Modern Slavery Statement? If yes, can you provide a copy?
3. Does your company operate or conduct business outside of Australia? If yes, does your organisation have operations in any of the countries listed on the Countries tab (countries listed)?
4. Do your suppliers operate or conduct business outside of Australia? If yes, do your suppliers have operations in any of the Countries listed on the "Countries tab" (countries listed)?
5. Total number of employees?
6. Does your organisation have any migrant employees?
7. Does your organisation have any employees under the age of 18 years?
8. Does your organisation have a policy and/or procedures in place to manage and mitigate risks of modern slavery in relation to the employees in your organisation? If yes, please provide details of your policies or procedures.
9. Do you have reporting procedures in place to alert us if, and when your organisation's answers to the above questions change, or when you detect instances of modern slavery in your organization or supply chain?
10. Does your organisation provide training on how to manage modern slavery risks? If yes, please provide details of the training.
11. Has your organisation taken actions to increase visibility and transparency of your supply chain?

4. Actions taken by Delaware to assess and address modern slavery risks, including due diligence and remediation processes

12. Does your organisation have any additional processes in place to ensure your modern slavery risk mitigation measures in relation to employees are effective? If yes, please provide details of additional processes.
13. Does your organisation engage the services of subcontractors, labour only companies or labour from employment businesses?
14. Does your organisation have procedures, controls in place, to ensure subcontractors, labour only companies or labour from employment businesses are not using workers illegally, or they are forced to work or are subject to bonded labour? If yes, please provide details of procedures or controls in place.

While a staff training program had been implemented in the previous 2022 statement year, in the period applicable to this Statement, Delaware North ensures that for all new staff members whose roles have been identified as critical to the detection of modern slavery risk, are required to complete the online modern slavery training course as part of their onboarding process. This course introduces what modern slavery is and gave practical examples on how to detect modern slavery in the workplace. The online course included an assessment which staff were required to pass.

5. Assessing the effectiveness of actions taken by us

We have described above, Delaware North's activities performed during the immediate assessment of modern slavery risks within its operations and supply chain. This includes working on updating a new supplier set up/onboarding program, the completion of a modern slavery questionnaire by suppliers, further online modern slavery training for new employees and a desk top risk assessment for high spend suppliers.

In completing the above, Delaware North has mapped out key parts of operations and supply chains to improve understanding and assist with identifying potential modern slavery risks.

To further improve the management of current risks, new suppliers will be vetted for modern slavery risks through an updated set-up/onboarding program, including initial determination of industry and geographical area to trigger a questionnaire to be completed and accompany the request for set up. All of these set up requests are reviewed by central Procurement team prior to approval. In addition, Delaware North has updated its Global Supplier Code of Conduct, which will become a mandatory requirement for all suppliers to complete as part of the updated set-up/onboarding program.

Delaware North aims to use the information obtained from its risk assessments, questionnaires, and onboarding program to build transparent and collaborative relationships with suppliers and enhance transparency of supply chains operations and by extension, assist with the identification of any potential modern slavery risks that may be present.

Delaware North is committed to continual review and where required, refinement and enhancement of its modern slavery policies, controls and procedures.

Whilst Delaware North is not aware of any modern slavery having occurred within its operations and supply chain, and that of its suppliers that can reasonably be determined at this stage, Delaware North appreciate that its visibility is still in its infancy and needs to be further developed. As such, the ability to assess the effectiveness of Delaware Norths response, is similarly in its early stages. Delaware North expects that the development of stronger modern slavery assessment processes will occur as initiatives are further integrated within its operations and supply chain, and more information becomes available for the actions which have taken and implemented to date.

6. Describe the process of consultation with any entities the reporting entity owns or controls

Delaware North's supply chain and human resources are centrally controlled, however where required Delaware North have consulted with its related entities, sites, and venues within Australia. Such consultation assists in Delaware North to identify risk, collect, and disseminate data and implement uniformed procedures and policies in its Australian Business, amongst other things.

The above consultation process was undertaken by Delaware North prior to finalising this statement and submission to the Board.

There has been agreement with the steps and actions to be taken on the way forward, as provided for in Section 7 below, and the need for regular roundtables to discuss and agree on modern slavery processes.

Delaware North's modern slavery process is being driven by its Head of Procurement and supported by other business streams including: Finance; Human Resources; Legal and Compliance; Internal Audit; Chief Operating Officer and Information Technology. For ease of reference, we provide our modern slavery Organogram as per attached *Appendix B*.

7. Other relevant information - the way forward Delaware North

Delaware North will work proactively to reduce modern slavery within its supply chain and operations, and expect all suppliers engaged with to do the same. In order to build on the modern slavery framework, Delaware North has created and implemented to date. Delaware North will be focusing on the following areas and the extent to which these are achievable: on the following areas and the extent to which these are achievable:

- Require as far as reasonably practicable, a requirement for current suppliers and new suppliers to complete a modern slavery questionnaire and declaration.
- All new suppliers will be required to complete Delaware North's new Global Supplier Code of Conduct document as part of the new set-up/onboarding process.
- Consideration will be given to providing additional modern slavery literature to suppliers. This may be dependent on the results achieved following completion of the Modern Slavery Questionnaire.
- Developing internal accountability standards and procedures further, to hold employees and contractors accountable for non-compliance with Delaware North's standards on modern slavery and human trafficking, including:
 - Promptly address any potential risks of modern slavery.
 - Managing and where required enforcing consequences for non-compliance. Currently Delaware North has an extensive clause built into its agreements which requires suppliers to comply and to self-report potential breaches and allow us to conduct audits or risk termination for non-compliance.
- Establishing a process to remediate such breaches.
- Encourage all suppliers to meet minimum standards and promote best practice and continuous improvement.
- Continue to monitor suppliers for compliance with the minimum standards through a supplier risk assessment process. Provide the Company with rights of termination if a supplier is unable or unwilling to work towards full compliance with the minimum standards.
- Continue to monitor and review the effectiveness of our Modern Slavery Policy and our procedures, taking into account the suitability, adequacy and effectiveness in reducing the risks of modern slavery.
- Continue to develop our procurement framework to have a vetting and assessment of suppliers' process.
- Establishment of an automated risks assessment process and supplier risk management system.

DELAWARE NORTH COMPANIES INTERNATIONAL LTD
(the "Company")

**CIRCULATING RESOLUTIONS OF THE DIRECTORS OF THE COMPANY
PURSUANT TO S248A OF THE CORPORATIONS ACT 2001**

Background

We, being all the directors of the Company entitled to receive notice of a board meeting and to vote on the 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 in Annexure A.

Resolution

That the Modern Slavery Statement in Annexure A be adopted by the Company.

SIGNED:



Signature of director

Christopher J. Feeney

Resolved on 9 September 2024 at Buffalo, New York (USA)

SIGNED:



Signature of director

Amy A. Latimer

Resolved on 9 September 2024 at Buffalo, New York (USA)

SIGNED:



Signature of director

Janice R. Trybus

Resolved on 9 September 2024 at Boston, Massachusetts (USA)

The Board of Delaware North Companies Australia Pty Ltd has approved this statement on

9 September 2024 (Date)

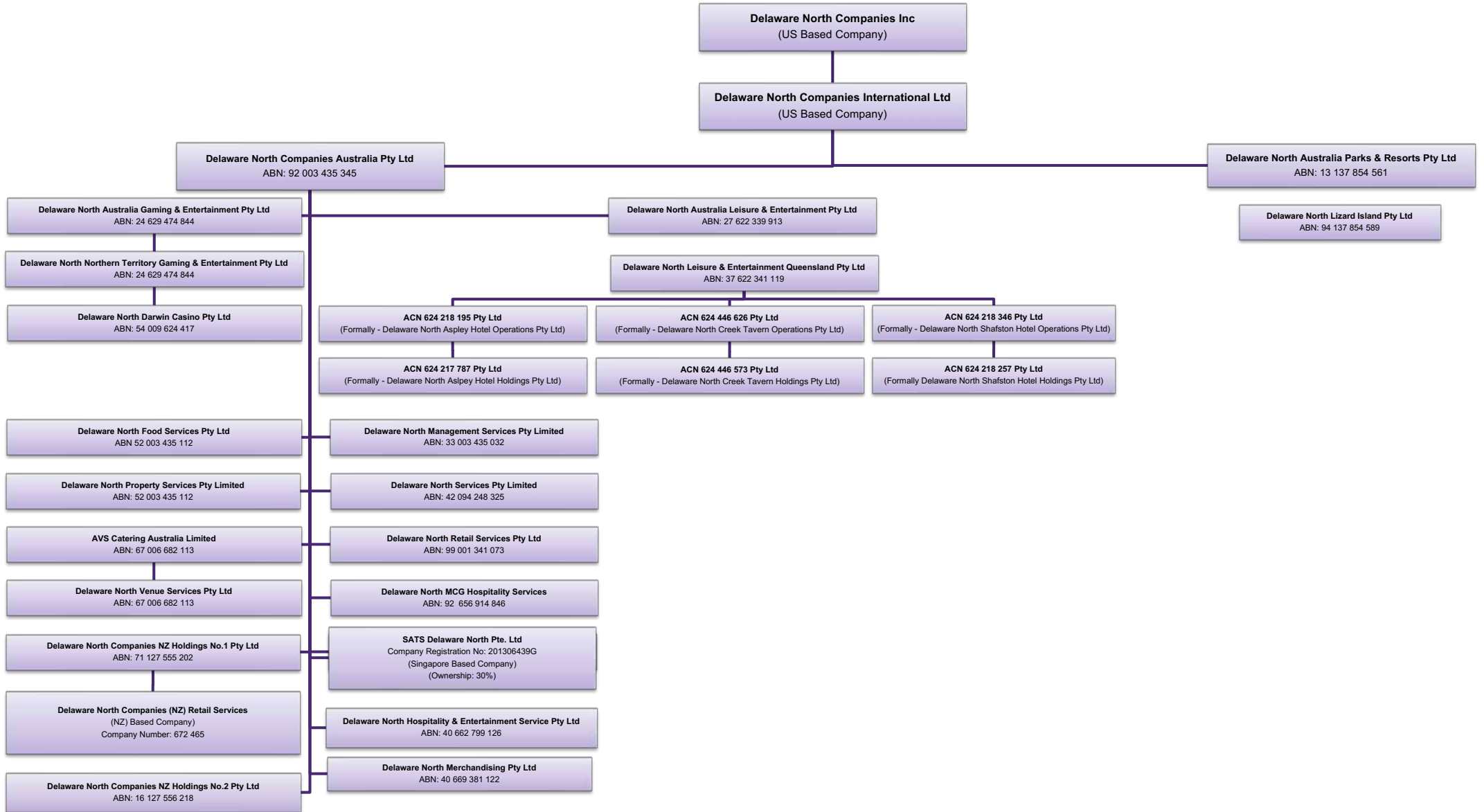
Signed by:

A handwritten signature in black ink, appearing to read 'Gary Brown', written over a horizontal line.

Gary Brown (Name)

Managing Director (Position)

Appendix A



Appendix B

