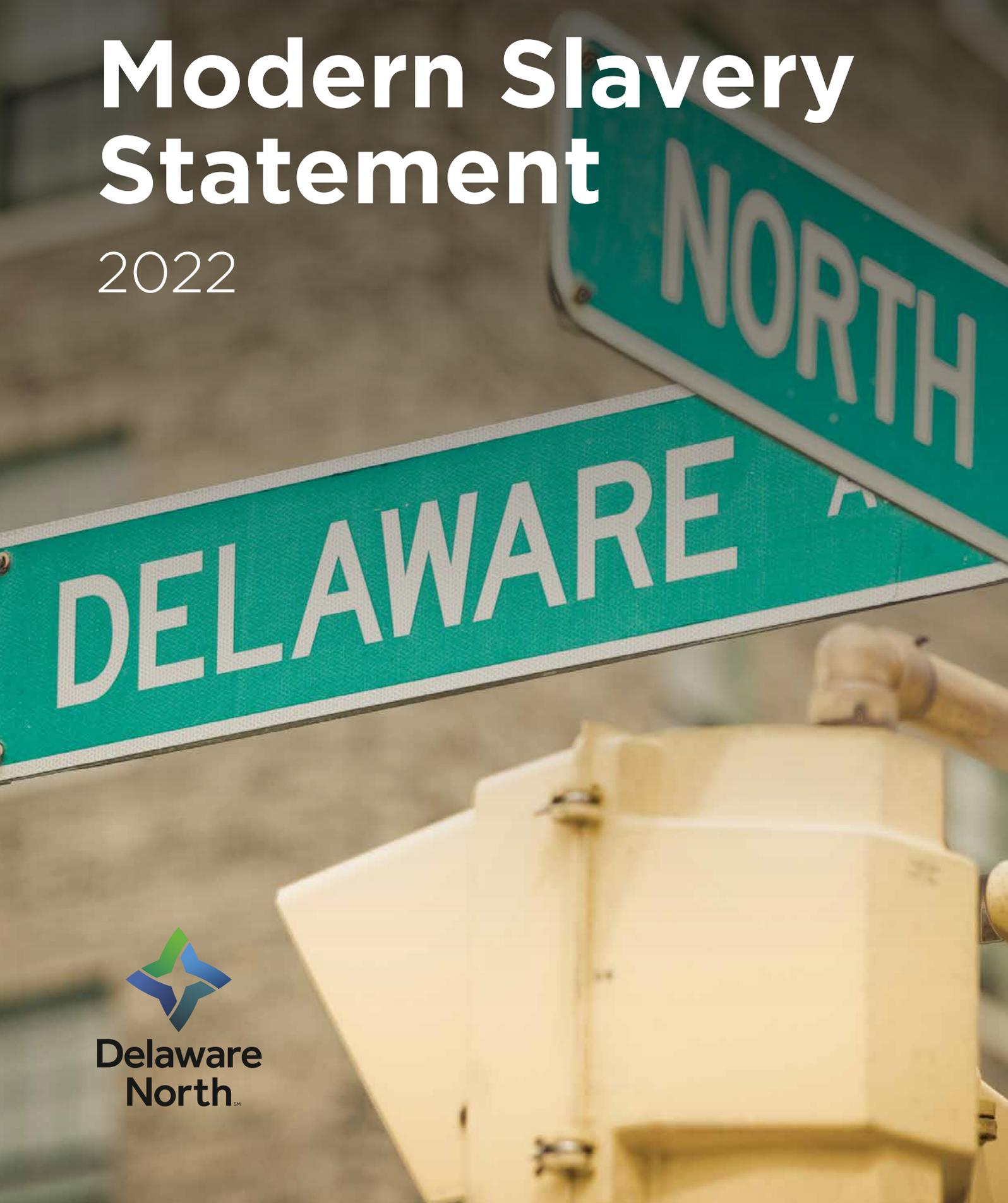


Delaware North Companies Australia Pty Ltd

Modern Slavery Statement

2022



Delaware
NorthSM

1. Introduction: Delaware North Companies Australia Pty Ltd

Delaware North Companies Australia Pty Ltd (**Delaware North**), ABN 92 003 435 345, was established in 1987. Delaware North is a foreign-owned private company, deriving revenue from the provision of catering and hospitality services in Australia and New Zealand. The company employs approximately 9,430 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 2022:

1. Delaware North Companies Australia Pty Ltd ABN 92 003 435 345; and
2. Delaware North Venue Services Pty Ltd ABN 67 006 682 113
3. Delaware North Darwin Casino Pty Ltd ABN 54 009 624 417

Delaware North Companies Australia, Delaware North Venue Services and Delaware North Darwin Casino Pty Ltd (**Australian Group**) had an annual consolidated revenue exceeding \$100 million in 2022.

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 means 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 minimise 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 2 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 in Darwin, Lizard Island and Queenstown, sports stadiums in Melbourne and Wellington and airports in Adelaide, Auckland, Melbourne and Perth. In respect of Northern Rise Village Services, Delaware North provides accommodation, catering, transport and facility management services to the region's resources, construction, tourism and government sectors, including remote parts of Australia (specifically in Western Australia, Northern Territory and Queensland).

Our operations and supply chain at Delaware North are centrally controlled and supply chain sources from a variety of locations, however the majority of our spend is sourced from local suppliers. There is full transparency over our supply chain, whilst our operations are covered by pay awards.

Approximately 75% of our suppliers provide food and beverages, and we further engage with labour hire companies to provide resources for our various sites. The indirect supply chain by our suppliers for food provisions, originate from 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.

We realise that there is a risk for modern slavery practices to have the potential to exist within our supply chain. Taking into consideration variables such as geographic location, product/service type, industry and possible workforce demographics, we consider that this risk may be inherently higher amongst food, beverage and related catering and hospitality products/services.

We provide further details of our global business below:

Sports

The Delaware North enterprise is a major player in several sectors of sports, including as one of the leading foodservice 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 100 years ago.

Major locations in Australia include Melbourne and Olympic Parks, (home of the Australian Open tennis championships), Marvel Stadium and Melbourne Cricket Ground.

Travel

The Delaware North enterprise 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, Great Britain and Australia. 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.

Resorts

The Delaware North enterprise portfolio of distinct luxury resorts in special places in Australia and the United States provide guests with world-class hospitality, the best local cuisine and spa and other amenities 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, we 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.

Our locations have won hundreds of awards because we offer the best available gaming and leverage Delaware North's global hospitality expertise and dedication to guest service.

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

Restaurants and Catering

Delaware North is one of the world's leading restaurant and catering companies -- it's culinary and hospitality staff provide extraordinary dining experiences for guests at unique locations, worldwide, every day.

Remote Services

Delaware North operates and manages a number of remote mining villages and camps where it provides food and beverage, cleaning, management, maintenance and lodging services for various sized workforces through its operating entity Northern Rise Village Services.

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. We operate in an industry that is covered by pay awards, which provides for minimum pay rates and conditions of employment, including leave and entitlements.

To further reduce any human capital risk, Delaware North requires all labour force agencies it engages with to agree to adhere to modern slavery laws. Failure to do so gives rise to a termination right in favour of Delaware North.

However, we appreciate the risks of potential modern slavery within the operations and supply chain of our suppliers abroad. This is particularly so when an 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 transaction are material. We are, however, 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 our use of external suppliers for the supply of fresh products. In particular, we are not able to determine with certainty the origin for the provision of seafood. All suppliers are required to complete our Delaware North, Supply of Goods and Service **Agreement**; being a formalised documented process which ensures supplier engagement uniformity and consistent standards, that suppliers are subject to on-going monitoring, review and improvement and ensure suppliers act in a manner in accordance with the Agreement.

Suppliers are carefully vetted to ensure they align with our legal and contractual obligations. Similarly, our high ethical standards are at the core of how we engage with our suppliers and is a reflection of how we work as an organisation at Delaware North.

During the course of addressing our modern slavery risks in both 2020 and 2021, we have considered the Modern Slavery List of Industries and List of High-Risk Countries, as provided for in The Global Slavery Index 2023, in determining our risks of modern slavery in our operations and supply chain. We have further considered information and resources made available through organisations including: Walkfree Tackling Modern Slavery in Supply Chains, the Transparency International Corruption Perceptions Index; Freedom House Country and Territory ratings and statuses, Global Estimates of Modern Slavery 2017; 'Hidden in Plain Sight', Report of the 2017 Parliamentary Inquiry into establishing a Modern Slavery Act in Australia; and the Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities.

The majority of our top 100 vendors in regard to spend, are locally based within Australia. Initial review of our supply chain indicates that majority of our vendors are low risk with regard to modern slavery.

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

In 2022, Delaware North conducted a modern slavery risk assessment of our operations and supply chain.

The assessment comprised two parts:

- Broadening existing risk management policies and procedures within Delaware North to include the risks of modern slavery, through ethical sourcing, quality standards or other compliance reporting.
- Conducting a risk assessment over our current suppliers in terms of our payment data, for the period January 2021 to June 2022.

In the previous financial year, Delaware North conducted a risk assessment of existing risk management policies and procedures, we reviewed all relevant policies including Code of Conduct, Supply of Goods and Service Agreement, Professional Services Agreement, Recruitment and Selection Policy and Whistleblower Policy. No further amendments have been made in the period applicable to this Statement.

Delaware North has a Modern Slavery Policy which:

- Exhibits our 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 our staff and suppliers in relation to risks associated with modern slavery.
- Demonstrates our commitment to implementing and maintaining effective systems and

controls, which will ensure we play a constructive role in helping to reduce the risk of modern slavery occurring within our business and supply chain.

In performing the risk assessment of our suppliers, we conducted a desk top review of our top 100 suppliers in terms of spend. 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), and evidence as to whether the supplier has submitted a Modern Slavery Statement.

The results of our desk top review identified that the 100 suppliers scored an overall modern slavery risk rating of low risk. This is based on what was determined by us using public available records and information we had previously obtained from our suppliers and recorded within our systems.

In the period applicable to this Statement, Delaware North implemented and required multiple key existing staff to complete an online course which explained what modern slavery is and gave practical examples on how to detect modern slavery in the workplace. The majority of employees selected for the training are involved in the onboarding and engagement of new suppliers and managing existing supplier relationships. A large range of position levels of the company were represented in this training. Every site that Delaware North operates in Australia and New Zealand had staff included in this training program. 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, our activities performed during the immediate assessment of modern slavery risk within our operations and supply chain. This includes policy review, a desk top risk assessment for our high spend suppliers and the introduction of modern slavery training for key staff..

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

To further improve the management of current risks, we will expand upon our supplier on-boarding process where new suppliers are set up in our system. Any identified medium and high-risk suppliers will be vetted for modern slavery risks through the completion of a questionnaire that incorporates modern slavery requirements and the provision of supporting documents where applicable.

We will review our policies that now incorporate and make provision for modern slavery compliance and ensure that Delaware North staff and suppliers where applicable, certify that they have read and understand these policies, on an annual basis. We will regularly review and improve our modern slavery internal controls and procedures in order to monitor their effectiveness and respond to areas that are not. This will include updating policies and procedures where deemed necessary.

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

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

Our supply chain and human resources are centrally controlled, however where required we have consulted with the other entities owned or controlled by Delaware North. This has occurred when commencing with our current modern slavery actions and during the implementation of actions taken during this reporting period by Delaware North, to assess and address modern slavery risks, including due diligence and remediation processes.

This included a consulting session with other stakeholders prior to finalising this statement and submission to the Board. The stakeholders comprised a cross section of employees from Delaware North, with representation from supply at the Darwin Casino and Delaware North's stadiums

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

Our modern slavery process is being driven by our Director Procurement and supported by other business streams including: Finance, Human Resources, Legal and Compliance, Internal Audit, Chief Operating Officer, 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 our supply chain and operations, and we expect all suppliers we engage with to do the same. In order to build on the modern slavery framework, we have established to date, we will be focusing on the following areas and the extent to which these are achievable:

- Require suppliers, identified as medium and high risk to complete a modern slavery questionnaire and declaration.
- Consideration will be given to providing additional modern slavery literature to our suppliers. This may be dependent on the results achieved in the completion of our required modern slavery questionnaire.
- Require new staff in positions identified as being relevant to the implementation of Delaware North's modern slavery policies and procedures to undertake online modern slavery training. In particular this includes employees involved in the selection and engagement of new suppliers.
- Developing internal accountability standards and procedures further, to hold our employees and contractors accountable for non-compliance with our 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 we have an extensive clause built into our agreements which require supplier 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 relevant 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 vetting and assessment of suppliers' process. We may consider including site visits and workplace analysis where required. This may result in the termination of contracts where necessary.

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

26 June 2023

Signed by:

A handwritten signature in black ink, appearing to read 'Gary Peter Brown', written in a cursive style.

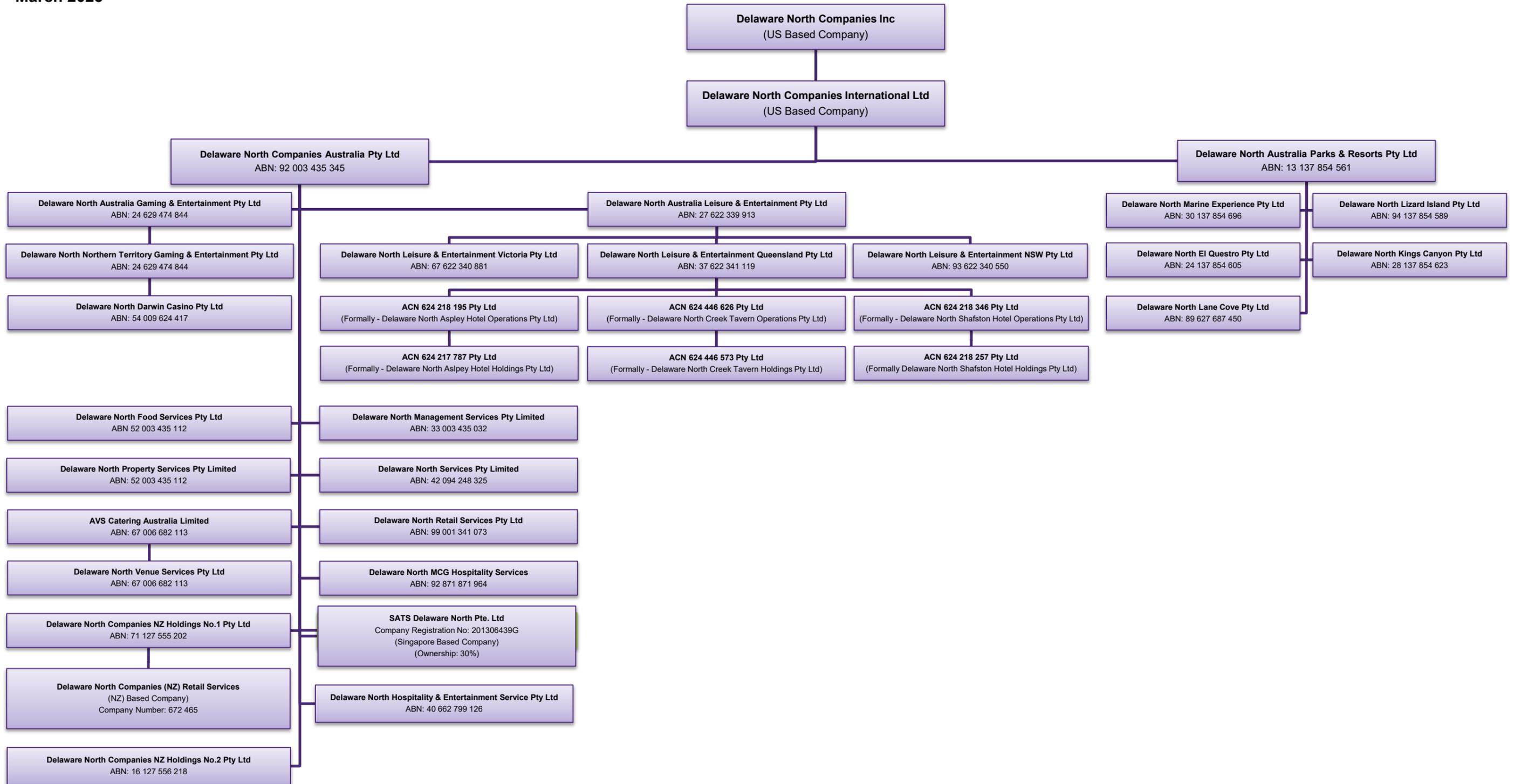
Gary Peter Brown

Director

Appendix A



COMPANY STRUCTURE
March 2023



Appendix B

