



Modern Slavery Statement 2024



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Duxton Pubs Limited

Duxton Pubs Limited (ACN 644 781 162) is an Australian public unlisted company. The company’s registered office address is Duxton House, 7 Pomona Road, Stirling SA, Australia. References to Duxton Pubs, Duxton, ‘we’, ‘our’ or ‘us’ refer to Duxton Pubs Limited and its controlled entities. This statement has been produced in accordance with the Modern Slavery Act 2019 (Cth) (‘the Act’). The statement seeks to report on the progress made across Duxton, including its controlled entities for accounting purposes, during the period of 1 January 2023 – 30 June 2024 (referred to as ‘FY24’ or ‘the reporting period’ in this Statement) to identify, assess and respond to modern slavery risks throughout our operations and supply chains. Unless otherwise stated, information contained within this Statement is current as at 30 June 2024.

Disclaimer:

This Statement is intended only as a statement of facts and is for general information only. This Statement is not intended to influence any person in making a decision in relation to Duxton Pubs Limited. No representation or warranty, either expressed or implied, is provided in relation to the accuracy, completeness or reliability of the information contained herein, nor is it intended to be a complete statement or summary of the business, its operations and risk management practices as referred to in this Statement.

Any forward-looking statements or other statements of opinion provided are based upon Duxton Pubs’ outlook as at the date of this Statement and are subject to change. Any prediction, projection or forecast is not necessarily indicative of the future. Forward-looking statements are subject to risks.

Although the information was compiled from sources believed to be reliable, no liability for any error or omission is accepted by Duxton Pubs or its affiliates or any of their officers or employees. The information and opinions contained may also change. To the extent permitted by applicable law, none of Duxton Pubs or its affiliates, or any officer or employee of Duxton Pubs or its affiliates accepts any liability whatsoever for any direct or consequential loss arising from any use of this Statement or its contents, including for negligence

Modern Slavery

In accordance with the Modern Slavery Act 2018 (Cth) and the Criminal Code Act 1995 (Cth) we understand modern slavery as the severe exploitation of others for personal or commercial gain.

Practices that can constitute modern slavery include but are not limited to human trafficking, forced labour, debt bondage, child labour, visa exploitation and domestic servitude. Each of these forms of modern slavery are characterised by deception, coercion, force, threat and abuse. Each of these issues is an infringement upon a person’s human rights and punishable under the Criminal Code Act (1995).

Chairman's Message

By collaborating with our stakeholders, and promoting our values throughout our supply chain, we believe we can contribute to meaningful change.



Dear Reader,

I am very pleased to present our first Modern Slavery Statement.

People are at the core of our business. Across the Duxton Pubs Group, we aim to be employers of choice, and we extend this aim not just towards our directly employed staff, but those who we work with indirectly, throughout our supply chain.

As a key component of our broader sustainability ambitions, we have been developing our understanding and response towards the risks of modern slavery in today's interconnected world.

We are committed to ensuring that our ambition leads to action, and so have been developing our human rights due diligence initiatives in collaboration with industry expertise. Seeking where possible to go beyond industry standard human rights due diligence mechanisms, we have focused our efforts on our supply chain's highest risk areas.

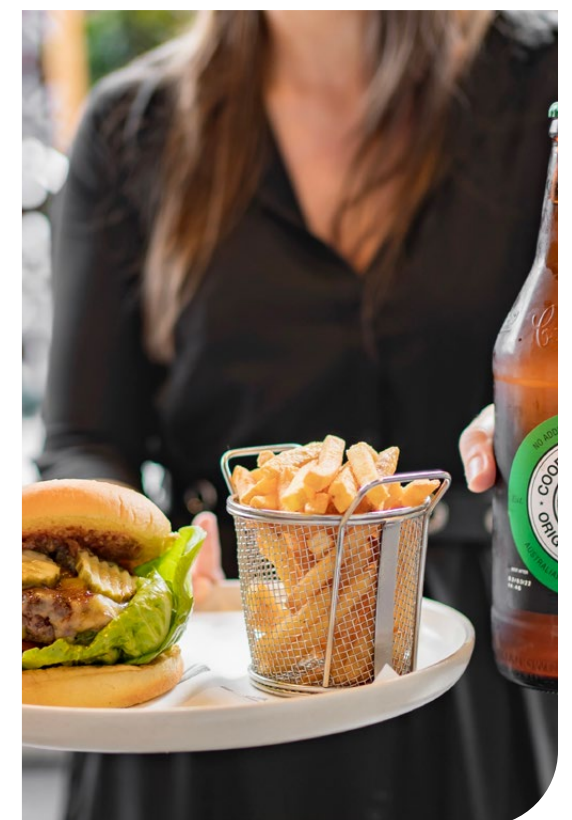
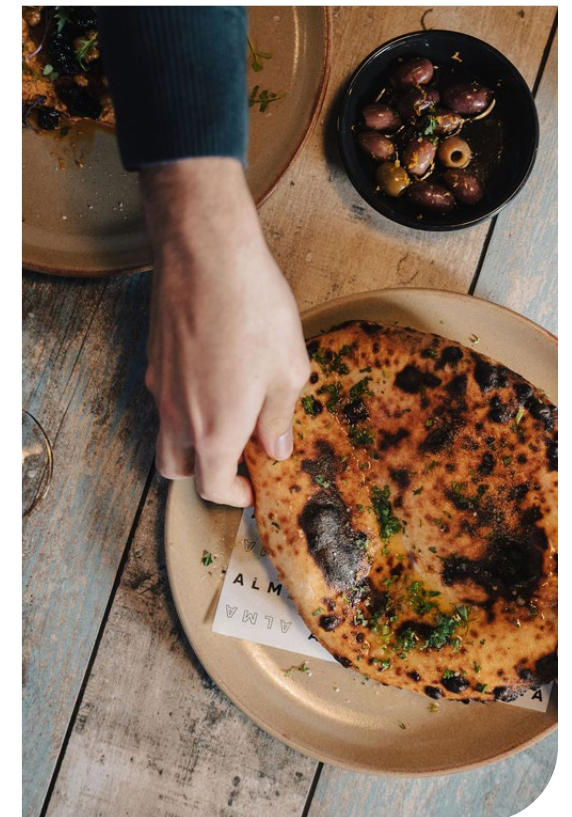
By collaborating with our stakeholders, and promoting our values throughout our supply chain, we believe we can contribute to meaningful change. We recognise that we are at the start of our journey, and there is much we can learn from our suppliers, industry peers, governmental bodies and non-governmental organisations, as we continue to shape our path forward.

We acknowledge that transparency is critical if businesses such as ours are to collectively make progress. As such, our first Modern Slavery Statement provides not only an overview of our progress made to date, it highlights the challenges we have faced and learnings we made along the way.

Whilst we are proud of our progress so far, we acknowledge that we are just getting started in effectively tackling this issue. Looking forward, we are focused on continuing to learn and incrementally improve upon the effectiveness of our actions.



Edouard Peter
Chairman
Duxton Pubs Limited
10 December 2024



About Duxton Pubs

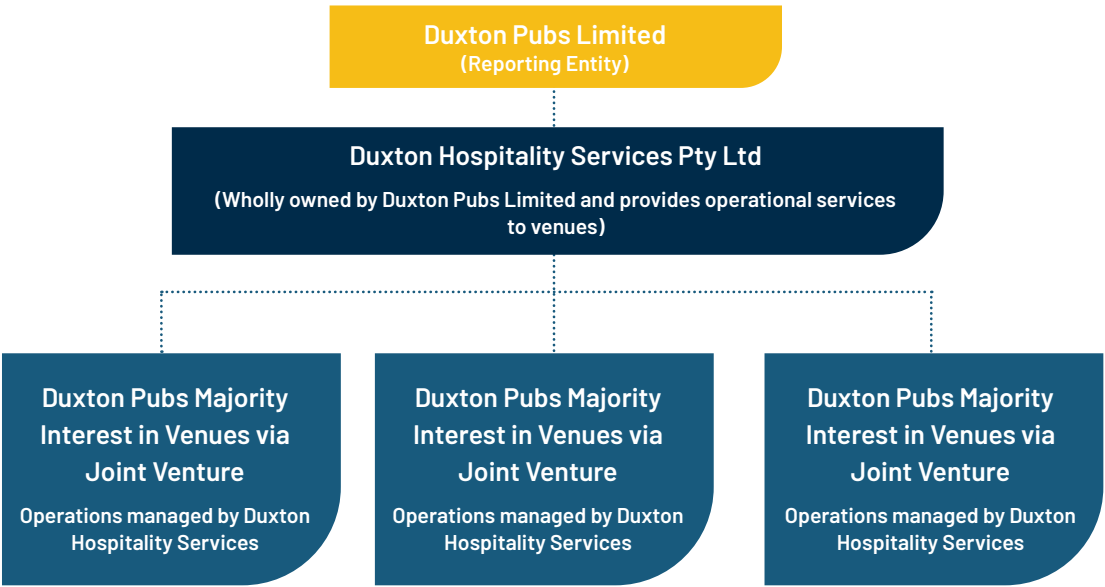
Entities Covered by this Statement

Duxton Pubs Limited is a public unlisted company based in Stirling, South Australia. Duxton Pubs owns and controls a number of non-reporting entities for the purpose of the Modern Slavery Act, that when consolidated, meet the reporting threshold of \$100 million in consolidated revenue.

This statement does not cover the reporting entity, Duxton Capital Holdings Pty Ltd (“Duxton Capital Holdings”), which exercises control over Duxton Pubs for the purpose of the Modern Slavery Act. Duxton Capital Holdings has its own Modern Slavery Statement, which is available on the Modern Slavery Statements Register.

Our Structure

We are committed to supporting the incremental development of our modern slavery risk management methods across the Duxton Pubs Group. The diagram below outlines our reporting entity structure, and the structure of the broader Duxton Pubs Group.



For example: An example of the structure in which we own and operate our venues is the Cremorne Hotel, which was awarded the Best Overall Hotel in Australia in November 2023 at the AHA National Awards. Located in the inner-southern suburb of Unley, South Australia, Duxton Pubs has a 65% ownership interest in the joint venture owning the hotel, with the operations of the venue managed by Duxton Hospitality Services Pty Ltd.

Our Operations

Hospitality

As at the date of this Statement, with majority joint venture investments in 28 hospitality assets across South Australia, Duxton Pubs has majority ownership in, and through Duxton Hospitality Services, operates one of South Australia’s largest hospitality networks across metropolitan and regional South Australia.

The Duxton Pubs Group portfolio has grown rapidly since its inception in December 2020, and now includes some of South Australia’s most prolific venues. Our venues provide high-quality food and beverage, accommodation and gaming services for our customers. We also operate the Little Bang Brewery in Stepney, and lease two venue assets to external operators.

Our Hospitality Operations by Location

A breakdown of the venues and assets comprising the Duxton Pubs Group as at the date of this Statement is presented below:





Our Supply Chain

We engage suppliers across many different industries, for a wide range of products and services. Collectively, across the Duxton Pubs Group, during the reporting period we directly engaged over approximately 1,250 Tier 1 suppliers for goods and services. We define Tier 1 suppliers as those whom we or a Duxton Pubs Group company or venue pay directly for goods and/or services.

Examples of products which we source from suppliers vary extensively. Products include the wide range of food ingredients used in our menu offerings, through to the various drinks we serve across each venue within the Duxton Pubs Group. The services which we receive from suppliers are also wide-ranging. These include the suppliers of cleaning and security services across our hotels, and the various maintenance providers which our venues utilise.

Our supply chain is complex and extends far beyond the direct relationships we have with our Tier 1 suppliers. It is often within the lower tiers of our supply chain where our oversight is limited, where modern slavery risks to workers are most present.



Identification & Prioritisation of Our Modern Slavery Risks

In identifying the areas of our supply chain which may present risks of modern slavery, we have considered the nature of our business relationships, the operating contexts of our businesses, and how the nature of each businesses' activities may contribute to heightened risks.

Seeking to align with the United Nations Guiding Principles, we have also sought to identify our most salient human rights issues, to help prioritise which risk areas of our supply chain to which we focus our risk mitigation efforts. As part of this process, we have considered:

- **Scale of Impacts** – We want to focus our risk mitigation efforts on the areas of our supply chain where the potential for negative human rights impacts to occur is the most serious.
- **Scope of Impacts** – We seek to prioritise any risk mitigation initiatives towards areas where the potential for impacts are the most widespread, or where the risks may impact the highest numbers of people.
- **Remediability of Impacts** – We aim to focus our efforts on where we have the greatest ability, if we identify actual or potential impacts to human rights, to remediate these impacts and create positive change.

Tools & Partnerships Used to Identify & Prioritise Risks

Third Party Human Rights Expertise

We have engaged external business and human rights expertise for internal training and to gather feedback and views on our key risk areas. This has supported us in identifying our risks and prioritising areas for action, alongside providing us guidance on methodologies through which we can mitigate our risks.

Collaboration with Investment Manager

The Duxton Pubs Group is supported by Duxton Capital (Australia) Pty Ltd as Investment Manager. Duxton Capital is a participating member of the United Nations Global Compact Network Australia. Through regular engagement with the UNGC events and educational resources on human rights, we have been supported by Duxton Capital to develop our approach towards identifying and mitigating our modern slavery risks in alignment with United Nations guidance.

Our Key Modern Slavery Risk Areas

We have identified and focused our efforts towards the highest risk areas of our business and supply chain. These areas of our supply chain are identified below:

Contract Cleaning and Security Services

Across the Duxton Pubs Group, external cleaning and security service providers are often utilised within venues. Factors that contribute towards outsourced cleaning and security services being a key risk area for us include:

- 1. Known Industry Reports of these Sectors as High Risk:**
There are various resources, such as industry reports from the Australasian Centre for Corporate Responsibility, and parliamentary inquiries which show that underpayment of workers in the cleaning and security sectors in Australia can be common and a high-risk area for worker exploitation.¹
- 2. Frequency of Subcontracting and Labour Hire Arrangements for Workers:**
The use of labour hire within the private security industry is regular, and often made through complex and informal subcontracting arrangements, increasing risks. Referred to as ‘sham contracting’, many security workers in Australia are improperly classified as independent contractors rather than employees, denying them of employment-related protections.
- 3. Base Skilled and often Migrant Workforce:**
Consisting more often of a migrant workforce, potentially with limited English language skills, this also contributes to workers in the private security and cleaning industries being more vulnerable to exploitation and less able to advocate for their employment entitlements.²

Imported Seafood from High-Risk Geographies in Duxton Pubs’ Menus

Across our menus, imported seafood products, particularly from Asia, have a heightened risk of coming from fishing vessels or from fishing processing factories which do not comply with international standards concerning human rights. Factors that contribute towards imported seafood products in Duxton Pubs’ menus representing a key risk area for us include:

- 1. Known Industry Reports of Exploitation**
Various reports are available, in particular those from The New Yorker Magazine and the Ocean Outlaw Project, demonstrating that imported seafood from countries such as Thailand, Vietnam and China have substantially heightened risks of coming from fisheries or processing factories non-compliant with international human rights standards.³ Approximately 62% of seafood consumed by Australians is imported, of which the majority is from Asia.⁴
- 2. Severity of Impacts**
Compared to other areas of our supply chain, the risk of negative human rights impacts to workers in the imported seafood supply chain is particularly severe. At both processing factory and fishing vessel level, the presence of forced labour, excessive working hours, wage theft and a lack of safety are examples of the modern slavery-like working conditions which workers are at heightened risks of facing.
- 3. Remote Location of Work**
Many of the risks associated with imported seafood take place at fishing vessel level on the high seas. Here, there is limited ability for effective enforcement and policing of working conditions, contributing to increased risks.

¹ Refers to Commonwealth Inquiries ‘Hidden in Plain Sight – an inquiry into establishing a Modern Slavery Act in Australia’ and ‘A National Disgrace: the exploitation of temporary work visa holders’.

² Cleaning Accountability Framework, 2020. *Cleaning Contractors Modern Slavery Guidance (V1.0)*; Australasian Centre for Corporate Responsibility, 2020. *Submission: Review of Victoria’s Private Security Industry*.

³ The New Yorker, 2023. ‘Squid Fleet: The Brutal Lives of China’s Industrial Fisherman’; and Urbina, I, 2024. ‘Inside North Korea’s Forced-Labor Program’.

⁴ Australian Government Department of Agriculture, Fisheries and Forestry, 2023. *Australia’s seafood trade*



Other Risks

Whilst we have prioritised the above areas as our priorities for action, we are aware that there are other areas of our supply chain which contain risks. These include but are not limited to:

Solar Panels

There are risks of modern slavery through the raw materials used in the manufacturing of the solar panels in place across the Duxton Pubs Group. This is due to the vast majority of solar panels within their manufacturing supply chain having exposure to the Uyghur region of China, where forced labour issues are prevalent. This region is where large portions of the world's polysilicon and metallurgical grade silicon is sourced from both of which are key components in solar panels.⁵

Transport and Logistics Services Across the Duxton Pubs Group

Delivery drivers and transport workers in the supply chain across our operations represent a potential heightened risk area. Delivery drivers that provide the goods that we use in our venues could be at risk due to excessive working hours, inadequate rest times, or poor facilities provided to them whilst working. Labour shortages for drivers may also heighten these risks.

Raw Materials Within Products

The raw materials within the various products we use within our business, and across the Duxton Pubs Group have risks of modern slavery occurring within the supply chains of these products. For example, cotton used in uniforms, chemicals used in cleaning products or metals in machinery equipment and our IT hardware.



⁵ Crawford, A. and Murphy, L.T. (2023), *Over-Exposed: Uyghur Region Exposure Assessment for Solar Industry Sourcing*, Sheffield, UK: Sheffield Hallam University Helena Kennedy Centre for International Justice.

Actions Taken to Assess and Address Our Risks

As a key component of our sustainability objectives, we are committed to supporting across the Duxton Pubs Group, the development of measures to respect and protect human rights and labour rights.

Modern Slavery Policy & Supplier Code of Conduct

Our approach towards managing and mitigating our modern slavery risks is governed under our Modern Slavery Policy and Supplier Code of Conduct. These policies jointly set out our procedures and expectations from suppliers in relation to:

- preventing, mitigating and where appropriate providing remedy to modern slavery in operations and supply chains
- encouraging employees to raise concerns and report instances of modern slavery or suspected modern slavery
- sourcing products and services in accordance with legal obligations, community expectations while working with suppliers
- ensuring that we continue to maintain high standards of ethical behavior and integrity

In pursuit of operationalising our policy commitments across our business, during the reporting period we made progress on the following actions:

Worker Voice Million Makers Platform Trial

We believe that direct engagement with the most at-risk stakeholders in our supply chain is a critical component in effectively assessing and mitigating the risks of modern slavery in our business and supply chain.

A primary initiative forming Duxton's modern slavery risk management approach during the reporting period was our trial of the MillionMakers™ platform ('Million Makers'). Million Makers is a worker voice led, human rights due diligence platform where workers are anonymously surveyed on their working conditions.

Through the platform, workers are paid to voluntarily and anonymously complete a survey set of questions measured against International Labour Organisation (ILO) standards for forced labour. Across the Duxton Pubs Group, our contract staff and casuals are often from a wide range of countries, speaking a diverse set of languages. Surveys were made available in any spoken language of our staff, provided the language was available in Google Translate.

The first in Australia's hospitality sector to trial the platform, we sought to get reliable data directly on working conditions from our permanent staff, casuals, and contractors, particularly those who provide us with cleaning and security services. Collecting the survey results from our staff sought to allow us to verify the quality of working conditions, and at the same time identify areas for improvement.



Our Trial & Learnings

Across February – April 2024, we trialed the Million Makers platform across one metropolitan venue location, the Saracen's Head Hotel. By engaging directly with workers at our venues, we sought to gain directly relevant insights from workers, allowing us to more effectively identify, assess and mitigate our risks.

However, through our first trial of the Million Makers worker voice platform, we have learnt that worker voice initiatives can be challenging to operationally implement. Whilst the responses that we received back from workers from the trial did not identify any issues, we did not receive a representative sample of responses from the venue for the data to be meaningful.

We attribute low engagement with the survey in our first trial to a combination of factors. These included challenges in introducing a new and unfamiliar survey platform to workers, finding the right financial incentive to encourage participation, and technical difficulties in implementing the mobile phone-based survey platform.

Whilst our trial had challenges, we are committed to incorporating worker voice as a component of the modern slavery risk mitigation efforts across the Duxton Pubs Group. Using the learnings from our FY24 trials, we are working with the platform providers to plan for more effective rollouts across the Duxton Pubs Group in future.



Supplier Engagement

Our suppliers are of various sizes, consisting of small family-run businesses through to large multinationals. As such, we understand that each of our suppliers is at a different stage in both their understanding of modern slavery and their resources available to mitigate risks.

Upon identifying a particular area of our supply chain as representing higher risk, where possible, we will seek to work collaboratively with the suppliers. Through open dialogue and cooperation, we believe that we can better support the raising of standards in respect to the collective management of modern slavery risks.

Engagement Case Study –Seafood Supply Chain Due Diligence

During the reporting period, upon identifying imported seafood from Asia as a priority area of our supply chain representing higher risk, we engaged directly with our supplier to better understand the risks in question.

As part of our engagement, we were able to confirm that our supplier does source some of its seafood from heightened-risk countries such as China, Taiwan and Thailand. Positively, in terms of the processing factories with whom our supplier engages directly with, we found that the supplier has various mechanisms in place to mitigate risks. These include social welfare certifications, independent audits, and staff employed in country who visit the processing factories and have some oversight of working conditions. However, in terms of working conditions on fishing vessels, whilst the supplier is aware of the risks, due to their relationship being primarily with processing factories, they currently have limited oversight and ability to mitigate risks at the fishing vessel tier of their seafood supply chain.

The introduction of mandatory country-of-origin labelling for seafood within the Australian hospitality industry will provide greater transparency to consumers. Given the introduction of these requirements, the modern slavery risks and other sustainability considerations associated with imported Asian seafood product, Duxton Pubs is considering transitioning more of its menus to an Australian-sourced seafood offering. Whilst this will reduce our direct risk exposure, we plan to continue to engage with this supplier in respect to the management of modern slavery risks, including in respect to seafood and other products.



Industry Collaboration

Due to the complexity of modern slavery in the hospitality sector, we believe industry partnerships are essential if we are to effectively combat its occurrence. Following our trial of Million Makers, we have sought to engage with our industry peers, both within and outside of the hospitality sector, to discuss ways we can share learnings and work together to improve modern slavery risk management. Following our trial of the Million Makers worker voice platform, we have met with other businesses to support their own trials of the platform at their sites in future.

Other Actions to Assess and Address Modern Slavery Risks

Awareness Training

Raising the collective awareness of the issue of modern slavery across our wider business is essential to building our capability to effectively address our risks and contribute towards positive change.

During the reporting period, senior managers and boards across the Duxton Pubs Group received live, in person/virtual modern slavery training from external human rights experts. This training was tailored to our specific business context, allowing us to better understand modern slavery risks specific to the hospitality sector in which we operate.

Adverse Media Check Screening of Suppliers

Across the Duxton Pubs Group, we screen our identified high-risk suppliers using the LSEG World Check One (formerly Refinitiv) screening tool. The tool allows us to screen suppliers against publicly available information and databases to identify potential associations that may raise concern. This tool screens against a range of online media sources, allowing us to better identify, track and monitor any information available about a supplier, including any allegations of modern slavery and other human rights violations.

Grievance Mechanisms

Duxton Pubs maintains a Whistleblower Policy through which concerns can be confidentially and anonymously raised with us, including in respect to modern slavery.



We understand that in alignment with the UNGPs, for grievance mechanisms to be effective they must be:

1. **Legitimate:** Enabling trust from the stakeholders for whose use the grievance mechanism is intended, and being accountable for the fair conduct of the process.
2. **Accessible:** Known by the stakeholders for whose use it is intended, with adequate assistance provided to those who may have barriers accessing it.
3. **Predictable:** Providing a clear procedure with indicative time frames, clarity on the process and outcomes available.
4. **Equitable:** Seeking to ensure that aggrieved parties have reasonable access to information, advice and expertise necessary to engage in the process on fair, informed and respectful terms.
5. **Transparent:** Keeping parties informed on progress, with sufficient information provided about the mechanism's performance to build confidence in its effectiveness.
6. **Rights-compatible:** Ensuring that outcomes and remedies align with internationally recognised human rights.
7. **A continuous source of learning:** Drawing on lessons to improve the mechanism and prevent future grievances.
8. **Based on engagement and dialogue:** Developed in consultation with the stakeholder groups for which its use is intended.

No grievances or complaints concerning modern slavery were raised with us through these channels over the reporting period. However, noting the UNGPs above, we understand that this is not in itself an indicator that our modern slavery risk management systems are maximally effective.

We are committed to reviewing across the Duxton Pubs Group, the effectiveness of grievance mechanisms, in particular how they are accessible, understood and trusted by those that may need to use them most.



Other Risks

Whilst we have prioritised the above areas as our priorities for action, we are aware that there are other areas of our supply chain which contain risks. These include but are not limited to:

Solar Panels

There are risks of modern slavery through the raw materials used in the manufacturing of the solar panels in place across the Duxton Pubs Group. This is due to the vast majority of solar panels within their manufacturing supply chain having exposure to the Uyghur region of China, where forced labour issues are prevalent. This region is where large portions of the world's polysilicon and metallurgical grade silicon is sourced from both of which are key components in solar panels.⁵

Transport and Logistics Services Across the Duxton Pubs Group

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⁵ Crawford, A. and Murphy, L.T. (2023), *Over-Exposed: Uyghur Region Exposure Assessment for Solar Industry Sourcing*, Sheffield, UK: Sheffield Hallam University Helena Kennedy Centre for International Justice.

Actions Taken to Assess and Address Our Risks

As a key component of our sustainability objectives, we are committed to supporting across the Duxton Pubs Group, the development of measures to respect and protect human rights and labour rights.

Modern Slavery Policy & Supplier Code of Conduct

Our approach towards managing and mitigating our modern slavery risks is governed under our Modern Slavery Policy and Supplier Code of Conduct. These policies jointly set out our procedures and expectations from suppliers in relation to:

- preventing, mitigating and where appropriate providing remedy to modern slavery in operations and supply chains
- encouraging employees to raise concerns and report instances of modern slavery or suspected modern slavery
- sourcing products and services in accordance with legal obligations, community expectations while working with suppliers
- ensuring that we continue to maintain high standards of ethical behavior and integrity

In pursuit of operationalising our policy commitments across our business, during the reporting period we made progress on the following actions:



Assessing the Effectiveness of Our Actions

Understanding the effectiveness of our response to our modern slavery risks is essential for us in fulfilling our commitment to respecting and protecting human rights and labour rights. Over the reporting period, our effectiveness was measured in several ways, using both quantitative and qualitative measures:

- **Staff Training Completions:** We measure and record the staff attendance of modern slavery training sessions, and the completion rates of modern slavery-related training by our staff.
- **Million Makers Worker Engagement Rates:** For the Duxton venues which have and are expected to participate in our Million Makers trials, the engagement rates with the survey allow us to assess the effectiveness of the trials of the platform.
- **Supplier Feedback on Engagements:** Qualitatively, feedback received from suppliers we have engaged with on modern slavery allowed us to assess the effectiveness of how to best approach the topic of modern slavery with our suppliers.

As we continue to develop our systems and processes, we are committed to ongoing learning and improvement.

Consultation with Associated Entities

During the reporting period we have consulted with our wholly owned and associated entities, and the companies comprising the Duxton Pubs Group, seeking to support collective progress towards the effective management of modern slavery risks.

During the reporting period, our consultations primarily consisted of support with our Modern Slavery Policy adoption and review, engagement on our trial of the Million Makers worker voice platform, and the roll-out of our policy to staff across the Group.

We are committed to continuing to work together with the companies which we own and control, and the companies within the Duxton Pubs Group, to continue incrementally improving the effectiveness of our actions.

Identification of Modern Slavery

We have not identified an actual instance of modern slavery within our supply chain. However, we are aware that this does not necessarily mean that we have not indirectly contributed toward negative impacts. As we seek to incrementally develop our approach, we are seeking to improve the effectiveness of risk mitigation methods to have a greater level of assurance in identifying cases in our supply chain where we potentially, or actually, are linked to modern slavery.

If in future we identify an instance of modern slavery in our supply chain, our primary focus is to seek where possible to work together with the supplier and remedy the conduct. Termination of contract we will aim to treat as a last resort. We understand that by terminating relationships with suppliers, the supplier is most likely to continue the business practice elsewhere, where we have limited ability to influence change.

Continuous Improvement & Future Commitments

In alignment with our commitment to continuous improvement, we are planning the following future actions:

Procurement Framework

We are planning to develop our procurement frameworks to formally incorporate environmental and social sustainability factors, including in respect to modern slavery risk management.

Expand Modern Slavery Awareness Training

We will continue seeking to upskill our collective capability and knowledge of modern slavery risks across our the Duxton Pubs Group, to improve our ability to affect change.

Continue Collaboration with Suppliers & Industry Peers

We will continue to pursue a collaborative approach, sharing knowledge, cooperating with and learning from our suppliers and industry peers to improve the effectiveness of industry-wide responses to modern slavery.

Continued Use of Worker Voice

We believe at the core of our ability to affect positive change within our management of modern slavery risks is the use of worker voice platforms. We are committed to continuing our trials of the Million Makers platform and using our learnings to improve its effectiveness in the future.

Review & Improve Accessibility to Grievance Mechanisms

Across the Duxton Pubs Group, we will continue to review the effectiveness of our grievance mechanisms, seeking to improve their accessibility not just by our direct staff, but by the most at-risk workers in our supply chain.

Supplier Engagements

We will continue to engage with our seafood supplier, alongside other suppliers where the products we source may represent heightened modern slavery risks.

Approval

This Modern Slavery Statement has been approved by the board of Duxton Pubs Limited.

This statement is made pursuant to section 13(1) of the Modern Slavery Act 2018 (Cth). It constitutes the statement of Duxton Pubs Limited for the year ended 30 June 2024 and has been approved by the Board of the reporting entity in 27 November 2024.



Reporting Criteria

This Modern Slavery Statement was prepared in accordance with the criteria set out in the Modern Slavery Act 2018. The table below outlines where the information related to each mandatory reporting criteria can be found.

Mandatory Criteria	Location of Information
Identify the reporting entity	Page 6
Describe the structure, operations and supply chains of the reporting entity	Pages 6-8
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Page 9-12
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Page 13-20
Describe how the reporting entity assesses the effectiveness of such actions	Page 21
Describe the process of consultation with any entities that the reporting entity owns or controls	Pages 21
Provide any other information that the reporting entity, or the entity giving the statement, considers relevant	Page 22

