

MODERN SLAVERY STATEMENT

Australian Venue Co

27 June 2022 to 2 July 2023

1. Introduction

This Modern Slavery Statement covers the activities of Australian Venue Co. Holdings Limited (ABN 90 619 977 070) and our controlled entities (**Australian Venue Co**) in respect of the financial year ended 2 July 2023 in identifying and addressing the potential risk of modern slavery for our operations and supply chain.

Refer to section 6 for the list of entities that are considered reporting entities under the *Modern Slavery Act 2018* (Cth).

2. About Australian Venue Co

Australian Venue Co was during the relevant reporting period the second largest pub group in Australia and New Zealand. The group was created in 2014 with the vision of becoming a leading pub operator in Australia and New Zealand, combining a high-quality portfolio of venues with a strong corporate platform, systems and controls.

Australian Venue Co operates a portfolio of highly differentiated venues rich in tradition and tailored to local markets across metropolitan, suburban and select regional locations in Australia and New Zealand. Through our venues, Australian Venue Co aims to become a part of the fabric of communities in which we operate. Australian Venue Co's success relies on the confidence that customers and the community have in the way we conduct our business, and we are committed to ensuring that we operate and source our products ethically, sustainably and responsibly.

3. Structure, Operations and Supply Chains

Australian Venue Co operates in excess of 200 pubs, bars and restaurants in Australia and New Zealand under a variety of brands.

Our operations are underpinned by a labour force of approximately 8,000 employees (full-time, part-time and casual). Our direct supply chains are comprised of approximately 2,500 suppliers, with 95% of our procurement spend with suppliers operating in Australia and New Zealand. We seek to provide a first-rate hospitality experience and as such, seek to source our products from high quality and reputable producers.

Our largest category of supplier spend is on food and beverage direct to our pubs, bars and restaurants. Our second largest category of supplier spend is on goods and services such as maintenance, waste and cleaning, security, rent and utilities.

4. Risks of Modern Slavery Practices in our Operations and Supply Chains

Australian Venue Co has a relatively large workforce and supplier base, and we undertake ongoing risk assessments to understand and prevent modern slavery risks within our operations and our supply chains.

Supply Chains

We have conducted an extensive analysis of the modern slavery risks inherent in the hospitality industry which serves as a foundation for gaining a deeper understanding of areas where risks may be present. We acknowledge that specific supply chains and operations within Australian Venue Co may face increased vulnerability to modern slavery risks. This vulnerability arises from factors such as the geographical origin of goods from lower-socioeconomic regions, high risk business models, the labour-intensive nature of certain service lines or production processes. Although our interaction with international suppliers is limited, with less than 5% of our expenditure allocated to products sourced from businesses outside Australia and New Zealand, we understand that our visibility in certain international markets is restricted. Additionally, our Australian suppliers may source component materials globally, which introduces additional modern slavery risks in the lower tiers of our supply chain.

Our supply chain risk assessment process is underpinned by a risk mapping of our supply chains to identify areas which may face increased vulnerability to modern slavery risks. In undertaking this risk profiling, we consider the category of the product or service being procured, the geographic location of the supplier, high risk business models, and suppliers that may engage or employ vulnerable people.

Australian Venue Co considers that it has good mitigation measures in place to address the potential modern slavery risks in our supply chains due to the procurement procedures that are in place for supplier pre-qualification, contracting, monitoring and contract management.

As part of our procurement procedures, modern slavery due diligence and risk assessments are undertaken as part of pre-qualification for potential suppliers. This process includes an assessment of modern slavery policies and procedures, labour practices including whistleblower procedures, internal audit procedures and licensing and compliance requirements. For areas that have been identified as being of potentially higher risk based on Australian Venue Co's supply chain risk mapping, Australian Venue Co requires suppliers to address an enhanced risk assessment procedure which includes the provision of documented evidence of the steps undertaken to mitigate modern slavery risks in their operations and supply chains.

Australian Venue Co's procurement contractual requirements include compliance with applicable laws relating to modern slavery and ongoing compliance reporting. In the event Australian Venue Co were to identify a modern slavery risk with a supplier, Australian Venue Co would seek further supplier information and reporting, including through contractual mechanisms to audit suppliers, and seek to collaborate to resolve the risk. In the event of an unresolved risk, Australian Venue Co would look to promptly remediate the situation including

but not limited to, initiating contractual remedies and/or consulting with appropriate law enforcement authorities.

Operations

Australian Venue Co recognises that labour exploitation can occur in the hospitality industry and is committed to an employment framework that protects its workforce. All venues and employing entities are subject to Australian Venue Co's corporate compliance framework including Australian Venue Co's Code of Conduct. Australian Venue Co implements a range of measures to ensure compliance with relevant employment instruments and obligations, including but not limited to:

- Use of time and attendance systems with industry award and enterprise agreement interpretation across all venues. This system also includes a self-service portal to enable staff visibility on rosters, payslips including rates and hours worked.
- Central management of employment contracts by the Australian Venue Co Human Resources department to manage compliance with applicable employment entitlements.
- Maintenance of a detailed suite of employment policies including whistleblower and grievance policies and procedures (with Board oversight).
- Central oversight of venue management.
- A dedicated centralised Safety department.

Australian Venue Co is committed to continuous improvement in our payroll processes, systems and operation and we periodically engage external specialist consultants to verify compliance. During the current reporting period, Australian Venue Co engaged external specialists to undertake an end-to-end review of Australian Venue Co's governance framework, systems and controls in relation to payroll compliance. The review included a vulnerability assessment and sample testing in relation to Australian Venue Co's payroll compliance. No material issues were identified by the review.

Australian Venue Co's workforce includes international workers who are employed by Australian Venue Co strictly in accordance with visa conditions and relevant employment laws. Australian Venue Co actively encourages internal training and progression of our workforce and many international employees have progressed to senior roles at Australian Venue Co and all form an important part of our workplace community.

Australian Venue Co applies additional measures when engaging suppliers who may assist with international recruitment of labour including verifying overseas recruitment practices to ensure that practices, even if they are common and legal in the country of origin, align with the high standards and commitment upheld by Australian Venue Co.

Within Australian Venue Co, we encourage our employees to speak up and we are committed to ensuring the accessibility of our grievance and whistleblower reporting avenues.

Due to our framework of employment policies and procedures, and internal controls including grievance and whistleblower channels, we have assessed the risk of modern slavery in our operations as low. Notwithstanding this assessment, Australian Venue Co is committed to a meaningful group-wide response to modern slavery and will be continuing to monitor risk across our operations.

5. Assessing Effectiveness

To ensure continuous improvement, Australian Venue Co continually reviews the effectiveness of the actions we have taken to address the modern slavery risks in our operations and supply chains.

Supplier vetting

Australian Venue Co's supplier pre-qualification process provides transparency on modern slavery risks in our supply chains and enables us to partner with suppliers to improve practices, the effectiveness of which is assessed through contract compliance KPIs.

Conducting regular internal governance and assurance processes

Australian Venue Co's initiatives to manage modern slavery risks in our operations are regularly assessed as part of our governance and risk management processes including investigation of grievances and confidential whistleblower disclosures to validate the effectiveness of our efforts. To enhance our knowledge of the evolving landscape of modern slavery risks we also regularly engage external expert advisers to provide training and to facilitate collaboration among key stakeholders of Australian Venue Co to support our continued effort to address modern slavery risks.

Collaborating with suppliers and external partners

Australian Venue Co continues to foster partnerships with our suppliers and other external stakeholders to jointly address modern slavery risks and share best practices.

Based on the insights gained from these processes, Australian Venue Co will adapt and strengthen our actions to continually enhance our response to modern slavery. Our commitment remains focused on continual improvement in combatting modern slavery and promoting responsible practices throughout our operations.

6. Future Priorities

In FY24 Australian Venue Co will seek to progress the following initiatives:

- we are committed to further expanding our human rights due diligence efforts, particularly in areas where inherent risks exist – our aim is to increase the scope and intensity of our activities to ensure the protection of human rights;
- continuing to expand our visibility over our suppliers' inputs and their supply chains; and
- continue to work with our workforce and suppliers to drive improvements in addressing modern slavery risks.


7. Reporting Entities

The following Australian Venue Co entities are considered reporting entities under the *Modern Slavery Act 2018* (Cth) and are covered by this Statement: Australian Venue Co. Holdings Limited, Canoe Mezzco Pty Limited, Canoe Midco Pty Limited, Canoe Bidco Pty Limited, Australian Venue Co Limited, AVC Operations Pty Limited, Queensland Venue Co Pty Ltd and AVC Sapphire Holdings Pty Ltd.

8. Consultation

A process of consultation across Australian Venue Co and its reporting entities helped to guide the preparation of this Statement. This included engagement with each relevant function within Australian Venue Co including Human Resources, Safety, Procurement, Legal, Licensing and Compliance.

This statement for Australian Venue Co. Holdings Limited and its controlled entities was approved by the Board of Australian Venue Co. Holdings Limited as the parent entity on 19 December 2023.



Paul Waterson
Chief Executive Officer & Managing Director
Australian Venue Co. Holdings Limited

Acknowledgement of Country

In the spirit of reconciliation, Australian Venue Co acknowledges the Traditional Custodians of country throughout Australia and their connections to land, sea and community. We pay our respect to their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today.

APPENDIX

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

Mandatory criteria for modern slavery statements	Location of information
Identify the reporting entity	Section 7
Describe the structure, operations and supply chains of the reporting entity	Section 3
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	Section 4
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	Section 4
Describe how the reporting entity assesses the effectiveness of such actions	Section 5
Describe the process of consultation with any entities that the reporting entity owns or controls	Section 8
Provide any other information that the reporting entity, or the entity giving the statement, considers relevant	Section 2