



## MODERN SLAVERY ACT STATEMENT FOR AUSTRALIA FY21 FOR TEG PTY LTD AND ITS SUBSIDIARIES

### INTRODUCTION

This statement has been prepared in accordance with the Modern Slavery Act 2018 (Cth) and sets out the steps taken by TEG to prevent modern slavery in our business and supply chain, and implement relevant controls, policies and practices, for the financial year ending 30 June 2021.

Except where context requires otherwise, any reference to TEG in this statement includes TEG and all of its subsidiary companies. TEG has consulted with the relevant entities it owns or controls regarding the preparation of this statement.

TEG Pty Ltd (ACN 604 938 534) is an Australian proprietary company with its registered office at Level 3, 175 Liverpool Street, Sydney. Together with its subsidiaries, TEG employs more than 350 employees, contractors and casual staff across Australia, New Zealand, United Kingdom, Singapore, Malaysia, The Philippines and United States of America.

TEG recognises that modern slavery, which seeks to take away personal freedoms, can take many forms and includes human trafficking, servitude, forced labour, debt bondage and worst forms of child labour. TEG is committed to eliminating all forms of modern slavery and we have zero tolerance for any of these practices in our business or in our supply chain. As at the date of publication, we are not aware of any circumstances of modern slavery occurring either within our business or supply chains.

### OUR STRUCTURE AND BUSINESS OPERATIONS

TEG has been at the heart of the live event experience for 50 years through our touring and ticketing operations. In recent years we have welcomed many new members to the TEG family of businesses by expanding into new markets, genres and capabilities including musical theatre, children's entertainment and data & insights. Through our integrated operating model we bring the best live content, ticketing and technology to our partners, creating memories for fans that last a lifetime.

TEG operates through 4 divisions:

- (i) **Ticketing:** TEG's various ticketing entities (Ticketek in Australia, NZ and UK; Ticketek Marketplace in Australia; TicketWorld in The Philippines and TicketCharge in Malaysia, as well as Softix and Eventopia globally) operate ticketing services platforms which allow the inventory of venues, promoters, event organisers and consumers (in the case of Marketplace) to be sold. We also supply the hardware, equipment and software needed for this purpose;
- (ii) **Touring:** the TEG entities involved in the touring business around the globe include TEG Live, TEG Dainty, Handsome Touring, TEG Van Egmond, TEG Live Europe, The Entertainment Store and Life Like Touring. These entities promote and produce live entertainment notably music tours, festivals & concerts, musical theatre and children's entertainment;
- (iii) **Venues:** TEG owns Qudos Bank Arena in Sydney and operates or co promotes content at 8 venues in the UK;
- (iv) **Digital, Data & Insights:** TEG also operates a leading analytics, data science and insights business providing access to consumers for market segmentation, behavioural data and insight generation.

TEG's controlling shareholder is Silver Lake Partners, the global leader in technology investing headquartered in the USA, with approximately US\$90 billion in combined assets under management and committed capital and a team of more than 100 investment and operating professionals across the world.

For more information about our businesses and operations please refer to our website at [www.teg.com.au](http://www.teg.com.au).

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## OUR SUPPLY CHAIN

TEG's supply chain includes the purchase and delivery of products and services needed for day-to-day operations.

While most of our supply chain expenditure is in Australia, we also source goods and services from global suppliers who have operations in places such as the United Kingdom, the United States of America, New Zealand, Singapore, The Philippines and Malaysia.

Our supply chains include:

- Content suppliers to our live touring business including artists, rights holders, rights creators, management agencies
- Equipment suppliers ranging from turnstiles and scanners for events to staging and production hire at live events
- Service suppliers across our breadth of businesses including:
  - Labour hire companies
  - Marketing services and support companies
  - IT infrastructure and support
  - Communications services
  - Banking services providers
  - Audit, tax and legal services
  - General service providers (e.g. office printing and photocopying services).

## MODERN SLAVERY RISK IN OUR BUSINESS OPERATIONS & SUPPLY CHAIN

TEG is committed to the highest standards of conduct and ethical behaviour in all our business activities, and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance and strong corporate governance. This is underpinned by our policies, procedures, contracts of employment and Code of Conduct. These are the foundations of how we behave and interact with each other, our customers, suppliers, and partners. To that end, one of our aims is to ensure that there is no modern slavery or human trafficking in our business or in any part of our supply chain.

During the assessment process, we considered risks that may possibly cause, contribute and/or be directly linked to modern slavery practices, in accordance with the Australian Government's Department of Home Affairs draft guidance document (2018). TEG has reviewed its operations in detail and has deemed the risk of modern slavery in its supply chain practices to be low.

Our assessment has considered:

- The nature of the work being undertaken by employees, with over 84% of the workforce in professional roles with significant industry expertise
- The limited use of external suppliers for procuring items that might be more susceptible to Modern Slavery risks
- The nature of the industry in which we operate (e.g. the engagement of children is very limited within this industry)
- The locations where the majority of income is derived, or where the work occurs, are in countries with a low prevalence rating on the Global Slavery Index. We note that ~98% of our EBITDA is generated from locations that rank as having high standards (ranking of 163 or above) and low prevalence per the Global Slavery Index. We further note, as detailed below, that where we operate in markets with a higher prevalence, TEG has a policy of engaging a local General Manager that has professional international experience..

Despite the above assessment, TEG takes its responsibilities in this area very seriously and in the next section of our statement we have laid out our key mitigating controls to ensure that any Modern Slavery practices are identified and remediated.

## ADDRESSING MODERN SLAVERY RISK

During the year, we commenced our stakeholder engagement with key labour-hire suppliers in the hope of having open and transparent dialogue with our suppliers regarding modern slavery risk in our supply chain. To commence this workstream an initial desktop review was undertaken which identified the largest suppliers in order to align the program to the respective risk footprint. This review identified that the largest single exposure to Modern Slavery compliance risk is within our Ticketing segment which uses a single third party labour hire company in Australia. Further, we identified the decentralized area of Touring had a high volume of small suppliers in this area.

Over the next 12 months the business will be requesting these suppliers to provide details of their policies, and requesting smaller businesses to undertake a high level survey which should assist TEG in identifying any specific areas of risk that require further investigation.

TEG has zero tolerance for any form of slavery-like practices. Rather than create new processes however, TEG has reviewed its key business policies with a view to ensuring we have integrated Modern Slavery diligence into existing business processes.

### **Policies and Procedures**

We have formal policies in place that are intended to promote ethical and legally compliant business conduct. Our policies contribute to our commitment to prevent violations of human rights such as modern forms of slavery in our business. The key policies that govern these areas are:

#### **Whistleblower Policy**

TEG's Whistleblower Policy aims to provide clarity on how TEG supports our workers so that they are:

- are encouraged to express their concerns;
- know how to express their concerns;
- know what will happen when concerns are expressed; and
- feel safe in expressing their concerns.

Anybody within our business who has a suspicion of modern slavery is encouraged to speak to their Line Manager and/or Senior Leadership team member. All reported incidents are taken seriously, treated confidentially and investigated as appropriate. At the date of publication, we have not received any disclosures relating to modern slavery.

#### **Employment & Recruitment Policies**

The majority of our staff (75%) are based in Australia. We are an Australian employer subject to Australian employment laws and have well developed practices and controls in place to prevent the risk of modern slavery occurring in our business operations; these practices are under constant review to ensure continuous improvement and where we feel further advice is needed, we seek external legal counsel.

##### **Permanent Employees:**

All recruitment for permanent and fixed term employees is managed through a centralised function. Any new appointment is first validated by senior management and the independent HR function. All candidates are vetted by our Human Resource team before they are onboarded as an employee. Further, HR ensures that all employment contracts and Right to Work checks have been properly completed and that the candidate has been met in person before a role is offered.

##### **Temporary Employees:**

We use temporary labour in our operations as needed. To control any risk of modern slavery, (where possible) we channel temporary appointments through a single agency; a well-recognised global market leader in this field. The nominated agency has implemented robust recruitment processes to help ensure that there is no existence of modern slavery in any of our temporary/ agency appointments, including thorough vetting of a candidate's identity, Right to Work documents, bank account and employment history.

#### **Procurement Policies**

Our Procurement team have a number of risk mitigation and robust procurement processes in place including:

- Operating under a Delegated Authority Matrix for material business commitments
- Contract Reviews via an internal legal team, and external legal support as required
- Regular tendering of material contracts
- Operating a centralised process for on-boarding and paying indirect suppliers
- Group CFO oversight of this process, including review of all material contracts.

In the next 12 months, we intend to review these processes and move to document a group wide Procurement Policy.

## **Governance**

This statement has been reviewed and approved by the TEG board.

TEG has a senior leadership team in place and all members of that team have been briefed on relevant legislation. In addition, TEG is a member of Live Performance Australia and as such is also voluntarily bound by the LPA Codes of Practice which includes a commitment to 'To Prevent Workplace Discrimination, Harassment, Sexual Harassment and Bullying' and 'Child Employment in Live Entertainment'.

During the year, TEG established a Risk and Compliance Forum comprised of senior leaders across relevant functions. This Forum meets quarterly to consider risk and compliance reports, review policies and discuss any related issues raised, including as related to Modern Slavery policies and practice.

## **Contracting**

During the year, TEG reviewed its suite of contract templates with a view to highlighting to counterparties TEG's commitment to reducing modern slavery. TEG's standard form contracts now include provisions requiring counterparties to comply with all modern slavery laws, take reasonable steps to ensure that there is no modern slavery in its or its contractors' supply chains, and implement appropriate due diligence procedures.

## **Training**

During the year, we undertook broad stakeholder engagement on Modern Slavery, including delivering appropriate awareness training sessions on modern slavery principles to relevant TEG personnel.

## **Code of Conduct**

Our Code of Conduct was reviewed and updated during the year. Our Code of Conduct outlines the behaviours we expect our employees, contractors and casual workforce to exhibit with all other employees, suppliers, customers and stakeholders. Our code provides an overview of fundamental business values and summarises some important standards that underlie business ethics and professional integrity. These standards apply in all TEG workplaces and when representing TEG.

Through these arrangements TEG believes it can address modern slavery risk and ensure that all workers are engaged freely and willingly, that they are free to leave as they wish, are paid fairly and provided with a safe workplace.

## **LOOKING FORWARD**

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our business or supply chains we intend to take the following steps to further combat modern slavery:

- Deliver regular awareness training sessions on modern slavery principles to relevant TEG staff
- Undertake further analysis of the risks in our supply chain by engaging with identified high risk suppliers in our Ticketing and Touring segments to understand better how they are addressing modern slavery risks in their business
- Ensure ongoing review and updates to our suite of risk-related policies and governance control measures including documenting a group wide Procurement Policy.



**Geoff Jones**  
**CEO and Director**  
**TEG Pty Ltd**

**7 December 2022**

This statement was approved by the board of directors of TEG Pty Limited on 7 December 2022. It is made pursuant to Modern Slavery Act 2018 (Cth) and constitutes TEG Pty Limited's and its relevant subsidiaries' modern slavery statement for the financial year ending 30 June 2021.