



FOOTBALL
AUSTRALIA

Modern Slavery Statement

2023-2024

MODERN SLAVERY STATEMENT

2023-2024

IDENTITY OF REPORTING ENTITIES & REPORTING PERIOD

This modern slavery statement is submitted in accordance with section 13 of the *Modern Slavery Act 2018* (Cth) (the **Act**) for the reporting entity Football Australia Limited (ACN 106 478 068) (**Football Australia**). This modern slavery statement is submitted for the reporting period 1 January 2024 to 31 December 2024.

Football Australia is a reporting entity for the purposes of the Act as it had a consolidated revenue greater than \$100 million during the reporting period and is an Australian entity.

Football Australia is the parent company and owns and controls the following entities:

- (a) Canberra United FC Pty Limited (ACN 133 939 616) (**Canberra United**); and
- (b) Local Organising Committee AFC Women's Asian Cup 2026 Pty Ltd (ACN 681 496006) (**WAC LOC**).

The WAC LOC was established to facilitate the Asian Football Confederation (**AFC**) Women's Asian Cup, a major football tournament which will be hosted across various states in Australia during 2026. The WAC LOC was incorporated in October 2024, towards the end of the reporting period. The WAC LOC had no revenue and very minimal suppliers during the reporting period. Additionally, Canberra United is a dormant company.



MODERN SLAVERY STATEMENT

2023-2024

ABOUT US – STRUCTURE, OPERATIONS AND SUPPLY CHAINS OF THE REPORTING ENTITY

Football Australia's purpose is to "bring communities together through football – connecting Australia to the world". Australian football is a melting pot of 2 million participants represented by over 200 different cultures. As one of the most diverse and globally connected sports in the Australian sporting landscape, Football Australia is working towards a vision of becoming a leading football nation where everyone is inspired to live and love the game.

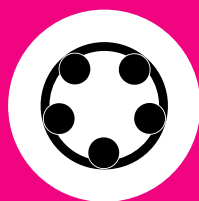
Football Australia's culture is grounded in its values:



IMPACT
ON AND OFF THE FIELD

1. Impact on and off the field

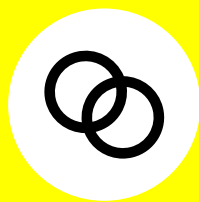
- We challenge how we think and what we do
- We seek ways to grow the vast impact football can have on our communities and people's lives
- We strive to influence as industry thought leaders



**INCLUSIVE
& DIVERSE FOOTBALL
FOR ALL**

2. Inclusive and diverse football for all

- Our strength is our diversity
- We celebrate that football is embedded in the nation's social fabric – it follows the story of Australia
- We strive to be accessible for all



UNITED
A UNITED TEAM

3. A united team

- We bring people together to unleash the power of football and to deliver our shared vision
- We are each other's advocates and care about everyone's wellbeing
- We bring our team spirit to the game



TRUST
WE ACT WITH INTEGRITY

4. Trust

- We seek to build trust across the whole football community, with all who take part, for the good of the game
- We are trusted custodians of the Australian game – we act with integrity and objectivity

MODERN SLAVERY STATEMENT

2023-2024

STRUCTURE

Football Australia is the national federation and peak governing body for football in Australia. Football Australia is a company limited by guarantee, incorporated and registered under the *Corporations Act 2001* (Cth). Football Australia's members are listed below.

Description	Member
State Body Members	Football Queensland Ltd
	Football Northern Territory Incorporated
	Football NSW Limited
	Northern NSW Football Limited
	Football Federation Tasmania Ltd
	Football Federation SA Incorporated
	Football West Limited
	Football Victoria Limited
	ACT Football Federation
Professional League Club Members	Adelaide United Football Club Pty Ltd
	Brisbane Roar Football Club Pty Limited
	CC Mariners Pty Ltd
	Melbourne City FC Pty Ltd
	Melbourne Victory Ltd
	Sydney Football Club Pty Ltd
	Western Sydney Wanderers FC Pty Ltd
	WMG Football Club Ltd
Players Member	Professional Footballers Australia Inc
Women's Football Members	Each of the Women's Football Council Members as appointed from time to time.

Football Australia works in tandem with its nine State Body Members, which administer the game at a state and territory level. Some of these State Body Members also have affiliated zone associations which represent geographic regions within their boundaries. Together, these entities play a vital role in Australia's football ecosystem.

Football Australia is also part of the global football community and is the Australian member of Federation Internationale de Football Association (**FIFA**), the international governing body for football. Football Australia is also a member of the AFC, one of the six confederations that make up FIFA. Some other members of the AFC include Japan, South Korea, Indonesia, Saudi Arabia, China and India.



MODERN SLAVERY STATEMENT

2023-2024

OPERATIONS

Football Australia has over 200 employees, with most staff based out of Football Australia's registered office at Level 2, 4 Driver Avenue, Moore Park NSW 2021.

As the national governing body for football in Australia, most of Football Australia's operations occur in Australia. Football Australia's operations are vast and varied, including:

1. National Teams

Football Australia runs a National Teams program to develop and promote exceptional Australian football talent. A key aspect of this program is facilitating opportunities for national teams to play football at an international level. Football Australia national teams currently include:

- CommBank Matildas
- Subway Socceroos
- Australian Women's U-23 team
- Australian Men's U-23 team
- CommBank Young Matildas (Women's U-20 national team)
- Subway Young Socceroos (Men's U-20 national team)
- CommBank Junor Matildas (Women's U-17 national team)
- Subway Joeys (Men's U17 national team)
- CommBank ParaMatildas
- CommBank Pararoos
- Australian Women's national futsal team
- Futsalroos (Men's national futsal team)

2. Competitions

Football Australia runs major football competitions, including the Australia Cup and the National Futsal Championships. Football Australia also runs the National Youth Championships. A key competition for Football Australia, the National Youth Championships, features teams from all State Body Members and allows young footballers to showcase their talent and skills to national team staff.

3. Major Tournaments and Events

Football Australia also bids for, and if successful, hosts major football events such as the 2023 FIFA Women's World Cup and the 2026 AFC Women's Asian Cup. In between these major events, Football Australia will organise, administer and host international friendly matches with other national football organising bodies around the globe.

4. Community Football & Community Programs

At the heart of the Australian football community is grassroots community football. In 2024, there were over 1.9 million participants nationwide. Football Australia works with the State Body Members to facilitate the registration for, and running of, these competitions. Additionally, Football Australia runs numerous community programs such as Club Changer, the Multicultural Settlement Program, MiniRoos Club and School programs, the Growing First Nations Football Participation Program, and many others.

5. Merchandise

Football Australia provides fans with opportunities to purchase national team merchandise through the Football Australia online shop and affiliated resellers and distributors.

6. Broadcasting

To promote visibility and engagement with Australian football, Football Australia enters into commercial agreements with broadcasting partners. Football Australia's broadcasting partner through to 2028 is Paramount Australia.

7. Marketing & Fan Engagement

Football Australia delivers marketing content to fans across various media platforms to drive engagement with the sport and national teams.

8. Sponsorships & Partnerships

Football Australia also enters into commercial partnerships with various brands to drive commercial growth and allow us to reinvest back into the community.

MODERN SLAVERY STATEMENT

2023-2024

SUPPLY CHAINS

To support operations, Football Australia engages a number of suppliers to provide goods and services. These engagements range from one-off purchases to ongoing multi-year arrangements. The supplier list for the reporting period revealed that Football Australia's largest purchase categories included the following:

	Travel and accommodation		Marketing and content
	Major event suppliers such as event hosting and security, ticketing, hospitality, entertainment and venue hire		External professional services
	Insurance		Digital
	Information technology, software and hardware		Community related programs
	Broadcasting rights		Freight and logistics
	Merchandise and equipment		

MODERN SLAVERY STATEMENT

2023-2024

RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS

Football Australia's compliance and procurement teams support the business with identifying and responding to modern slavery risks in business operations and supply chains. Where necessary, Football Australia engages independent third parties to provide expert advice to further improve Football Australia's response and advance its commitment to reducing modern slavery risk. For example, during the reporting period, Football Australia engaged external legal counsel to support in the preparation of a Supplier Code of Conduct (more detail provided on this below).

In completing this modern slavery statement, Football Australia undertook a review of its suppliers and identified key risk factors that exist in its operations and supply chains.



SPORTING INDUSTRY

There are many modern slavery risks that exist within the sporting industry. These risks range from the treatment of workers building sporting infrastructure such as stadiums, to the use of forced and/or child labour in the creation of uniforms and merchandise. Additionally, in the sporting world, there is a known risk that vulnerable people, such as children, are misled to believe they are pursuing professional sporting opportunities when they are in fact being entrapped in human trafficking. FIFA has indicated that these concerns are more prevalent in Africa, Asia and South America.



GEOGRAPHIC LOCATION

The majority of Football Australia's activities occur in Australia, and as a result, there is a lower risk of modern slavery in our operations. However, due to the global nature of football, Football Australia staff and national team players can travel to and from, and operate in, jurisdictions where there is an increased risk of modern slavery. This is particularly relevant as Football Australia is a member of the AFC, and Asia is identified by the Global Slavery Index as a vulnerable region in the world to modern slavery.



PROCURED GOODS AND SERVICES

Some of the goods and services that Football Australia procures are particularly high-risk. Football Australia procures from industries such as textiles and electronics, which are highly vulnerable to modern slavery. Football Australia purchases uniforms and merchandise and procures laptops and other technology to support staff. Football Australia is also aware that it may be playing in international stadiums which have been constructed via forced labour.

MODERN SLAVERY STATEMENT

2024-2025

ACTION TAKEN BY FOOTBALL AUSTRALIA TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

Football Australia is committed to reducing the risk of modern slavery in its operations and supply chains. During the reporting period, Football Australia took various actions to assess and address these risks.

DUE DILIGENCE PROCESS AND PROCUREMENT POLICY

When making purchases or entering into agreements that exceed an annualised value of \$60,000, Football Australia must comply with a governance framework for procurement. Prior to distributing a request for proposals, a risk assessment is undertaken. This risk assessment will consider various factors, including regulatory compliance, the level of risk associated with the country in which the supplier operates, the supplier's operations and processing activities, reputation of the supplier, and many other factors. This due diligence allows Football Australia to identify suppliers who may be engaging in conduct that falls short of Football Australia's expectations and values. Additionally, the procurement policy requires Football Australia to engage in competitive bidding and competitive evaluation. This means that a supplier's overall competitiveness is assessed against various evaluation guidelines, including important non-price factors (such as those listed above).

CODE OF CONDUCT FOR SUPPLIERS

Over the course of the reporting period, Football Australia has developed a Code of Conduct for Suppliers to further reduce the risk of modern slavery practices in its business and supply chains. As part of this process, external counsel was engaged to ensure the code reflected best practice and would be as effective as possible at addressing modern slavery risks. The code specifically contemplates:

- human rights;
- freedom of association;
- forced labour;
- child labour;
- discrimination;
- bullying and harassment;
- working hours, wages and benefits;
- diversity and inclusion; and
- health and safety.

Football Australia intends to implement the code during the next reporting period.

NATIONAL CODE OF CONDUCT AND ETHICS

This code applies to all State Body Members, competition administrators, clubs (including A-League clubs), players, club officials, match officials, team officials, and other members of the footballing community. The code of conduct provides standards and guidelines that Football Australia expect its people to adhere to and provides mechanisms through which Football Australia can hold its constituents accountable for any breaches. The National Code of Conduct specifically categorises criminal offences as misconduct, providing a mechanism through which Football Australia can respond to any modern slavery concerns if raised within the football community.

MEMBER PROTECTION FRAMEWORK

Football Australia has put together a member protection framework which encompasses bullying and harassment, discrimination, safeguarding and a national complaints procedure. The member protection framework applies to Football Australia, State Body Members, district associations, regional branches and zones, competition administrators, clubs, officials, players, parents and guardians, and spectators. Much like the code of conduct, this framework allows Football Australia to hold its people to certain standards of behaviour, and provides mechanisms through which breaches can be reported and investigated. Importantly, this framework allows Football Australia to protect the most vulnerable individuals associated with the sport. The Member Protection Framework seeks to provide a transparent means through which members of the football community can raise concerns and have these concerns addressed. It provides additional safeguards for children, who are particularly vulnerable to modern slavery.

WHISTLEBLOWER POLICY

Football Australia also has a whistleblower policy to provide guidance on who can make a protected disclosure, and how a protected disclosure can be made and investigated. The whistleblower policy applies to all employees and suppliers of Football Australia and includes appropriate remediation processes. This policy complies with whistleblower protections contained in the *Corporations Act 2001* (Cth).

MODERN SLAVERY STATEMENT

2023-2024

GRANT FUNDING AGREEMENTS

In its ordinary course of business, Football Australia often enters into grant funding agreements with government entities to roll out new programs, initiatives and events for the community. These agreements often require compliance with modern slavery laws and sometimes place contractual obligations on Football Australia to address modern slavery risks. These provisions place additional obligations on Football Australia to take measures to minimise the risk of modern slavery in its supply chains.

INTERNATIONAL TRANSFER CERTIFICATES

International transfer certificates (ITCs) are a FIFA requirement that help protect against modern slavery. ITCs are required for every player aged 10 years or over and are used to track the international movement of players across national associations. As noted above, there is a particular risk of human trafficking being disguised as a “professional football opportunity”. Whilst human trafficking is not as prevalent in Australia as it is in some other countries, ITCs nonetheless act as an important safeguard for members of the football community. The international transfer of minors is governed by article 19 of FIFA’s Regulations on the Status and Transfer of Players. These rules are in place to protect minors from exploitation and to ensure their well-being. The general principle is that the international transfer of players under the age of 18 is prohibited, but there are specific exceptions to that general principle. The exceptions are as follows:

- the minor’s parents are moving to the new country for non-football reasons (e.g., work opportunities);
- EU/EEA transfers for players aged 16-18 with full education and care guarantees (not applicable in Australia);
- border proximity: player and club are near the same border (within 50 km) (not applicable in Australia);
- the player moves with their guardian for non-football reasons (e.g., studies);
- refugee or humanitarian reasons; and
- academic exchange programs.

All international transfers of players to Australia require either FIFA or Football Australia approval. Violations of the rules can result in FIFA imposing disciplinary sanctions, including transfer bans, fines or other penalties.

WORKING WITH CHILDREN CHECK

It is Football Australia’s policy that all of its employees must obtain a working with children check. This process is an important measure in Football Australia’s response to modern slavery; reducing the risk of individuals who have records that lend themselves to modern slavery concerns (e.g. slavery or human trafficking offences under the *Criminal Code Act 1995* (Cth) or sexual offences under the *Crimes Act 1900* (NSW)) operating in the football community, where there is significant exposure to children.

SAFEGUARDING OFFICER

During the reporting period, Football Australia maintained a fulltime Safeguarding Officer who is charged with leading the administration and management of safeguarding matters involving children and vulnerable people in the football community. The Safeguarding Officer also supports the implementation of National Safeguarding Policy and the National Principles for Child Safe Organisations across the Australian football ecosystem.



MODERN SLAVERY STATEMENT

2023-2024

ASSESSING THE EFFECTIVENESS OF FOOTBALL AUSTRALIA'S ACTIONS

To effectively address the risk of modern slavery practices in its business and supply chains, Football Australia needs to consistently assess the actions it takes. Football Australia is committed to combatting modern slavery and continuously improving its approach.

Football Australia monitors the effectiveness of its actions by:

- Regularly reviewing and updating policies and procedures
- Providing training to staff on policies and procedures
- Tracking noncompliance with policies and procedures via a compliance log and taking actions to address any instances on noncompliance
- Responding to, and investigating, any reports of modern slavery made through the various reporting mechanisms
- Obtaining external expert advice and guidance when necessary
- Continuously assessing its approach against that of peers and best practice guidance

FUTURE COMMITMENTS

Football Australia is committed to combatting modern slavery in alignment with its own values, and that of the Australian football community. Over the next reporting period, Football Australia will endeavour to:

- Implement a Code of Conduct for Suppliers.
- Provide all Football Australia staff with education and training on the Code of Conduct for Suppliers and modern slavery risk.
- Provide all Football Australia staff with education and training on modern slavery.
- Review and revise legal template agreements such that they require supplier compliance with the Code of Conduct for Suppliers and any other human-rights related terms.
- Develop a more robust and comprehensive process to track supply chains and understand the location of suppliers.

PROCESS OF CONSULTATION

As noted above, Football Australia is the parent company and owns and controls Canberra United and the WAC LOC. No consultation process was undertaken with Canberra United as it is a dormant company. This modern slavery statement was prepared by Football Australia with input and feedback received from the Legal department at the WAC LOC.

This modern slavery statement was approved by the board of Football Australia in their capacity as principal governing body of Football Australia on 23 July 2025.

This statement is signed by Anter Issac in his role as the Chair of Football Australia on 24 July 2025.



Anter Isaac
Director of Football Australia
24 July 2025