

Modern Slavery Statement

FWWC2023 PTY LTD 2023

This statement covers the activities of FWWC2023 PTY LTD (ACN 650 853 302) and its owned and controlled entities during the period 1 January 2023 to 31 December 2023.

This modern slavery statement is submitted under the Modern Slavery Act 2018 (Cth) (**the Act**) and sets out the actions we have taken to assess and address modern slavery risks in our operations and supply chains.

This statement was approved by the Board of FWWC2023 PTY LTD on 21 April 2024.

About us

At FWWC2023 PTY LTD, we respect the human rights of those affected by our business activities.

FWWC2023 PTY LTD was created to support the preparation and delivery of the Fédération Internationale de Football Association Women's World Cup 2023 in Australia and New Zealand (FWWC 2023).

The FWWC 2023 is a binational tournament which recognises the unique stories and cultures of First Nations people in Australia and Māori as Mana Whenua in Aotearoa New Zealand. In Australia, the organizers acknowledge the Traditional Custodians of the Lands and pay respect to Elders, past, present and future. In Aotearoa New Zealand, the organizers acknowledge Māori as Tangata Whenua and Te Tiriti o Waitangi partners.

Our structure

FWWC2023 PTY LTD is a company incorporated in Australia, with its registered office at Level 40, 1 Farrer Place, Sydney, NSW, 2000.

FWWC2023 PTY LTD is a subsidiary of Fédération Internationale de Football Association (FIFA), headquartered at FIFA Strasse 20, 8044 Zurich, Switzerland. FIFA and its subsidiaries conduct a diversified range of business activities across the development of football around the world and the organization and promotion of association football's major international tournaments.

Our operations

We are the main event organizer of the FWWC 2023, which took place from 20 July to 20 August 2023.

Our core operations are in Australia and New Zealand.

We engage 1,011 employees and 162 contractors.

Our supply chain

We work with 20 licensees and 472 suppliers and contractors from a number of countries, a large majority of which are based in Australia and New Zealand.

The main types of goods and services that we procure are ITC, consulting, graphics, broadcasting, marketing, medical, security, transport, catering, accommodation, temporary construction, apparel, office consumables, including stationery, amenities and kitchen consumables.

We engage our suppliers on a short-term basis.

We also have a number of indirect suppliers, including IT hardware, office supplies, office rental, stadium signage and wayfinding service.

In addition, we had four sponsors who provided monetary funds as well as value in-kind.

Modern slavery risks

We recognise that modern slavery may impact our business activities, and we endeavour to take responsibility for reducing the risk that we might contribute to modern slavery through our operations and supply chains.

Risk assessment methodology

We utilized a risk assessment methodology which considers a number of indicators of modern slavery risks, including sector and industry, the type of products and services, geographical location and specific entity risk. These risk factors are based on the risk indicators and information published in:

- the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities (Commonwealth Guidance);
- the Walk Free Foundation's Global Slavery Index 2018 (GSI 2018);
- International Labour Organization (Global Estimates of Modern Slavery: Forced Labour and Forced Marriage 2022) (ILO Global Estimates of Modern Slavery); and
- Australian Council of Superannuation Investors' 'Modern Slavery Risks, Rights & Responsibilities' report 2019 (ACSI Report).

Our initial risk assessment has indicated that our operations and supply chain have a medium potential for modern slavery risks. Our risk profile is summarized in the table below.

Risk profile

Risk	Description of risk	
Sector /Industry	Certain services that FWWC2023 PTY LTD subcontracts may be typically linked to some labour and modern slavery risks. This is particularly relevant to services such as catering, cleaning, construction, accommodation (hospitality) and private security. Issues include: low wages, long working hours and lack of proper rest, strong reliance on migrant or low-skilled workers that are more exposed to labour exploitation and multiple subcontracting and outsourcing practices. Limitation of freedom of movement, passport confiscation, physical or psychological abuse and deceptive recruitment may be of concern, in particular across the security sector. However, given that security, construction, hospitality and catering services were provided in Australia and New Zealand, two countries with a strong rule of law and good labour safeguards, the above-mentioned risks are less likely than if the services had to have been performed in other contexts.	
	The apparel industry is part of FWWC2023 PTY LTD's value chain. This industry has long been associated with modern slavery risks at various stages of production, from raw material extraction to manufacturing and distribution. Some of the key modern slavery risks in the apparel industry include: forced labour in the raw material production and manufacturing; presence of low-skilled and migrant workers, which are often more vulnerable to labour exploitation and modern slavery; child labour; and multiple levels of subcontractors, which may lead to complex and difficult-to-track supply chains.	
	The plastic industry is also represented across FWWC2023 PTY LTD's value chain. Plastic is used for manufacturing products such as pens, stationery and bottles, products that have all been supplied by FWWC2023 PTY LTD for the tournament. The global plastic supply chain may intersect with situations of exploitative labour conditions and modern slavery in multiple ways: the extraction of raw material used in plastic production (e.g., petroleum or natural gas) may be associated with instances of forced labour; in some regions, the plastic industry may engage predominantly migrant and informal workers that are more exposed to modern slavery.	
Product / Service	See the information provided in the "Sector / industry" section above. Services related to cleaning, catering, construction and accommodation are particularly at risk of modern slavery. Further information related to the risks is provided above. Merchandise goods, such as apparel, accessories, sports equipment, luggage,	
	stationeries, etc., are particularly exposed to labour and modern slavery risks due to production taking place, to a large extent, in low-wage countries with weaker legislation related to labour protection, as well as law enforcement. The industry further relies on long working hours, low-skilled workers and to some extent on migrant workers that are more exposed to labour exploitation.	
	Goods provided as part of catering services, such as agricultural products, livestock and fisheries, are also subject to high labour and modern slavery risks due to the same issues as mentioned above: low wages, long working hours and lack of proper rest, strong reliance on migrant or low-skilled workers that are more exposed to labour exploitation and multiple subcontracting and outsourcing practices. Limitation of freedom of movement, passport confiscation, physical or psychological abuse and deceptive recruitment are also of concern in these industries.	
Geographic	China has faced concerns and allegations related to modern slavery risks in various sectors. Some areas of concern include: forced labor in Xinjiang, labour exploitation and poor and unsafe working conditions in some industries such as apparel, deceptive recruitment and debt bondage, lack of freedom of association and collective bargaining.	
COVID 19 risks	N/A	

Actions to assess and address risk

We understand the importance of working collaboratively with our employees, suppliers and the broader industry to combat modern slavery. That is why during our first reporting period we introduced a number of steps to assess and address modern slavery in our operations and supply chains.

Due diligence

The risk assessment/due diligence undertaken was the above-mentioned desktop analysis for purposes of this statement.

FWWC2023 PTY LTD undertook general social and environmental risk assessments of its suppliers and licensees based on the FIFA Sustainable Sourcing Code (SSC) and the FIFA Human Rights Policy, which address various aspects related to modern slavery issues, including forced labour, child labour, harassment and abuse, discrimination, fair compensation, working hrs, etc. Suppliers should take adequate measures to avoid causing or contributing to these adverse human rights impacts through their own activities and address such impacts when they occur. They should also seek to prevent or mitigate adverse human rights impacts that are directly linked to their activities (e.g., through their business relationships). Auditing is part of our due diligence processes to ensure that suppliers are compliant with the SSC and any other contractual obligations, including with respect to modern slavery topics.

To monitor compliance, FWWC2023 PTY LTD identified and prioritized high-risk suppliers in the supply chain according to a set of criteria. For suppliers, monitoring mechanisms were developed, including on-site auditing of high-risk suppliers. The criteria used were the risk categories/sectors mentioned above and monetary spend.

Our licensees and their manufacturers were reviewed to ensure they comply with contractual sustainability requirements, including the SSC. Any identified non-compliance was classified, and follow-up action was taken accordingly (including corrective action plans or, depending on the severity, contract suspension or termination).

Governance and accountability framework

- Design of a risk management model to manage tournament suppliers throughout the tender and contract stages. This included early engagement with the Legal, Finance and Procurement teams, standardization of a sustainability clause in supplier contract templates, incorporation of the FIFA Sustainable Sourcing Code and the FIFA Code of Conduct for Third Parties into every tender and contract, risk-based methodology for supplier screening and monitoring and diversification of supply chains through membership of First Nations and Māori business networks.
- Establishment of an auditing process to assess and monitor high-risk suppliers. Suppliers participating in accommodation, marketing services, signage, transport services, overlay, and security underwent on-site audits. Corrective action plans were developed and shared to address any identified sustainability shortcomings. This process ensured accountability and encouraged continuous improvement.
- Creation of a dedicated team of human rights and sustainability experts both at FIFA and at FWWC2023 PTY LTD to oversee and monitor all the procurement processes and risk models, in coordination with the Legal, Finance and Procurement teams.

Policies and procedures

In our existing governance framework, we have a number of policies and procedures to enable us to assess and address modern slavery risks, including:

- FIFA's Human Rights Policy, which outlines FIFA's commitment to respecting internationally recognised human rights, including labour rights, in accordance with the UN Guiding Principles on Business and Human Rights. It is based on the commitment enshrined in article 3 of the FIFA Statutes.
- The FIFA Sustainable Sourcing Code (SSC), which sets out the minimum standards and requirements for our business partners and their subcontractors to manage the sustainability impacts of their activities

in the context of any products or services supplied to FIFA and according to risks that are material to our organization. In line with FIFA's Human Rights Policy, the SSC includes terms and conditions related to human rights, including forced labour, child labour, harassment and abuse, discrimination, fair compensation, working hours, etc. We have also established an expectation with our suppliers that they will engage with their own suppliers on similar terms. We commit to working in partnership with our suppliers to address the risks of modern slavery that our suppliers may present.

- A supply chain risk management model to manage tournament suppliers throughout the tender and contract stages. This includes early engagement with the Legal, Finance and Procurement teams, standardization of a sustainability clause in supplier contract templates, incorporation of the FIFA Sustainable Sourcing Code and the FIFA Code of Conduct for Third Parties into every tender and contract, risk-based methodology for supplier screening and monitoring, and diversification of supply chains through membership of First Nations and Māori business networks. The implementation phase included intervention points during the tender process, contract negotiation and the auditing and monitoring of high-risk suppliers.
- A due diligence process to screen licensing merchandise manufacturers via social and environmental audit reports to ensure they comply with the requirements of the Sustainable Sourcing Code (SSC), including international labour standards.
- A reporting portal to report on various topics, including human rights and modern slavery. This mechanism is available to any person who wishes to report human rights grievances in relation to FIFA's activities and events, including the FWWC 2023. The platform allows for anonymous communication, and reports are treated with the strictest possible confidentiality under the applicable laws and regulations so as to avoid retaliation for reporters.

These policies and procedures complement our existing governance framework, which includes the FIFA Statutes.

Training

We conducted targeted training for all new staff on sustainable procurement and human rights.

Contracts and supplier engagement

Our suppliers, licensees and service providers are contractually required to comply with the the FIFA Sustainable Sourcing Code and the FIFA Code of Conduct for Third Parties under our standard supplier terms. As noted above, these requirements address various aspects related to modern slavery issues, including forced labour, child labour, harassment and abuse, discrimination, fair compensation, working hours, etc. The same requirements must be addressed by prospective suppliers during the procurement stage and additional sector/project-specific requirements are added depending on the risks identified.

Assessing our effectiveness

We are committed to reviewing the effectiveness of our actions by conducting a review of our sustainable procurement and due diligence practices. FIFA, the parent company of FWWC2023 PTY LTD, is taking the procurement practices of the latter into consideration to improve practices, assess gaps against due diligence legislation applicable to FIFA, and, in a second step, will take the necessary steps to close the identified gaps. Furthermore, FIFA is in the process of expanding its due diligence activities on its merchandise producers. Both of these processes are conducted / supported by a third-party auditing and consulting company.

We also monitor our performance against a number of key performance indicators. These include the number of merchandise manufacturers undergoing due diligence checks, the number of suppliers undergoing third-party audits, the number of non-compliances identified and corrected (divided into zero tolerance, critical and moderate/minor).

Looking forward

We will continue to review and consider the steps we can take to assess and address the risks of modern slavery in our operations and supply chains.

Consultation

FWWC2023 PTY LTD does not own or control any other entities and therefore this criterion is not applicable.

However, as a subsidiary of FIFA, FWWC2023 PTY LTD's approach to modern slavery is largely comprised of overarching policies, systems and processes that are designed to be consistently applied across FIFA.

During 2023, there was consistent consultation and collaboration between the management of FWWC2023 PTY LTD and the human rights and anti-discrimination team within FIFA.

Prior to being put to the Board of FWWC2023 PTY LTD for review and approval, this statement was reviewed by:

- Marta Piazza, Human Rights Advisor (Freelancer), Human Rights & Anti-Discrimination, FIFA;
- Sara Stocker, Senior Sustainability Manager, Sustainability & Environment, FIFA;
- Jas Mance, Senior Legal Counsel, Institutional Legal, FIFA;
- Emily Jackson, Head of Legal Australia and New Zealand, FWWC2023 PTY LTD; and
- Sophie Trousdale, Senior Accountant AUS, FWWC2023 PTY LTD.

This statement was approved by the Board of FWWC2023 PTY LTD in their capacity as the principal governing body of FWWC2023 PTY LTD on 21 April 2024.

This statement is signed by Sarai Bareman in her role as a Director of FWWC2023 PTY LTD on the date set out below.

Date	
	DocuSigned by:
Signature	Sarai Bareman
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Name	

Statement Annexure

Mandatory criteria

This statement complies with the mandatory criteria for a modern slavery statement outlined in section 16 of the *Modern Slavery Act 2018* (Cth). The below table indicates where each requirement is addressed in this statement.

Requirement	Page Number
(a) Identify the reporting entity.	1
(b) Describe the structure, operations and supply chains of the reporting entity.	1 to 2
(c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	2 to 3
(d) 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.	4 to 5
(e) Describe how the reporting entity assesses the effectiveness of such actions.	5
(f) Describe the process of consultation on the development of the statement with any entities that the reporting entity owns or controls (if a joint statement has been made under section 14, also describe the process of consultation with the entity giving the statement).	6
(g) Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	N/A