



## MODERN SLAVERY STATEMENT

This statement is made pursuant to the Australian *Modern Slavery Act 2018* (Cth) and the United Kingdom's *Modern Slavery Act 2015* (**the Acts**) and constitutes our slavery and human trafficking statement for the financial year ended 2022.

### CRITERION 1 & 2 – REPORTING ENTITY AND STRUCTURE

TGI Sport Holdings Pty Ltd (ABN 79 628 374 210) is an Australian holding company with a head office at **Level 3, 510 Church St, Cremorne, VIC, 3122**. TGI Sport Holdings Pty Ltd controls a group of companies which have a broad range of business operations within the sports and entertainment industry and this statement is issued on behalf of TGI Sports Holdings Pty Ltd and each of the related body corporates<sup>1</sup> listed in Schedule 1 (collectively “TGI”). There are some companies who have joined TGI who will make their own statement for the year ended 2022 given the fact that the acquisition of those companies has been relatively recent.

#### **Operations.**

The activities undertaken by TGI can be grouped into two main areas.

The business operations of the companies in Column A of Schedule 1 (**Group A Companies**) include:

- Media rights acquisition and management
- Strategically providing clients and agencies with innovative advertising solutions in Sport via LED signage, parallel advertising, sports-based apps and static signage;
- Provision and Installation of LED hardware, technology and data;
- Content creation and management, production and print services; and
- Developing technological advances in advertising solutions.

The business operations of the companies in Column B of Schedule 1 (**Group B Companies**) include.

- Talent and Media Representation;
- Sports Marketing;
- Events and Activations
- Consultancy
- Merchandise services
- Creative, Content and Design; and
- Brand Management

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<sup>1</sup> As that term is defined in the Corporations Act, 2001 (Cth)



## Supply Chains.

TGI operates in several different territories including Australia, UK, USA and certain parts of Europe.

In the reporting period **Group A** Companies of TGI had direct supply chains with made up of;

- Approximately 206 of suppliers;
- 96.6% of the suppliers are based in Australia;
- 0.097% of the suppliers are based in the United Kingdom
- 0.049% of the suppliers are based in the United States of America;
- 0.049% of the suppliers are based in Germany (Describe)
- 0.049% of the suppliers are based in Denmark;
- 0.049% of the suppliers are based in Finland; and
- 0.049% of the suppliers are based in NZ.

The main suppliers that each member of **Group A** Companies of TGI uses are in the following categories:

1. goods and services (including digital LED screens for stadia perimeter and parapet as well as stand-alone screens) needed to construct, install, operate and maintain sporting advertising infrastructure;
2. goods and services needed to produce and deliver advertising material including paper, ink, printing services, equipment;
3. services needed for the everyday operations, including recruitment, legal and tax, auditing, information technology, telecommunications and cleaning; and
4. software licences.

In the reporting period the **Group B** Companies of TGI had supply chains made up of:

- Approximately 1749 number of suppliers in TLA Merchandise;
- 99.26 % of the suppliers are based in Australia;
- 1.39% % of the suppliers are based in China;
- 0.23% of the suppliers are based in Hong Kong
- 0.34 % of the suppliers are based in the UK;
- 0.06% of the suppliers are based in Sri Lanka; and
  
- Approximately 229 suppliers in TLA Worldwide;
- 99.6 % of the suppliers are based in Australia;
- 0.4%% % of the suppliers are based in China;

The main type of suppliers that each member of **Group B** Companies of TGI uses are in the following categories;



1. Goods and services needed to run events and activations, both small and large including the provision of and installation of temporary infrastructure (including custom builds), theming, food and beverage, amusement rides and devices, pyrotechnics, cleaning, security, entertainers, staging, rigging, lighting etc.;
2. goods and services needed to produce and deliver consultancy services including data and stats collection/analysis, consultants and agencies;
3. goods and services needed to manufacture and import sporting uniforms, promotional premiums and trading cards including clothing, paper products, inks, printing services, design services and freight forwarding, direct mail, packing and warehousing;
4. services needed for the everyday operations, including recruitment, legal and tax, auditing, information technology, telecommunications and cleaning; and
5. software licences.

TGI's suppliers vary from small Australian family operated businesses to large corporates. The majority of Group suppliers are located in Australia however some products and services are sourced from international suppliers based in regions such as UK, the Americas and China, particularly when we have a local presence in that market.

### **OUR COMMITMENT AND POLICIES**

TGI is committed to ensuring that there is no modern slavery or human trafficking in its direct businesses and that the risk of modern slavery or human trafficking in its supply chain is eliminated or mitigated.

Our procurement process ensures that key suppliers commit to compliance with with all necessary laws and regulations within their regions as well as an overall commitment to:

1. take reasonable steps to protect the health and ensure the safety of their own workforce and all workers in their supply chain;
2. not use or knowingly allow to be used any slavery in the performance of their obligations to us;
3. comply with local laws and best practices in their regions regarding the suitability of employee working conditions;
4. allow their workforce the freedom to leave their employment without the threat of deterrents;
5. take steps to prevent the illegal treatment of their workforce by their management or any third party;
6. have an anti-bribery policy;
7. where necessary, work with us to identify, audit, mitigate and where possible eradicate areas perceived to be at risk of modern slavery and human trafficking; and
8. show a continued commitment to work with us to rectify any risk of modern slavery.

*CRITERION 3 – IDENTIFYING MODERN SLAVERY RISKS IN OUR SUPPLY CHAINS*



We have conducted a high-level initial assessment of the modern slavery risks in our supply chains and began to develop a roadmap to enhance our modern slavery risk management framework. TGI's review of the risk of modern slavery practices across its supply chains was made with close consideration of the Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities document (**Guidance Document**).

In assessing the inherent risk of modern slavery in its supply chain, TGI also had regard to the most recent Global Slavery Index<sup>2</sup> (**GSI**) which rates the countries in the regions that TGI directly deals with (*as set out below*) as **low** for prevalence of modern slavery practices apart from China which is rated at a **low-mid** rating.

Based on this initial assessment, TGI's direct global suppliers are predominately based in countries where there are reasonable standards of protection for individual rights and there is not significant workforce of vulnerable populations.

The GSI also lists Australia's top five imported product group at risk of being produced utilizing modern day slavery. Of the products identified, TGI purchases two product groups which are determined to be in a **high-risk category** being;

1. laptops, computers and mobile phones via domestic suppliers who in some cases may import from overseas.
2. Garments.

TGI buys phones laptops, computers and mobile phones via domestic suppliers and has a policy whereby each item is purchased from a reputable brand who has its own policies in place to combat the risk of Modern Slavery.

In respect of the garments sourced from China we have ensured that we have collaborated with others in the industry, including a leading sporting goods brand who has developed its own safety and accreditation system when assessing factories compliance in the area of Modern Slavery as well as other ethical compliance. As the relevant entity in our Group is a licensed supplier of this brand, we only order garments from factories that meet this high standard of accreditation thus minimising our own risk.

A snapshot of our direct supply chain by country is as follows:

Country	GSI Risk	Approx. Supplier Count
Australia	Low	2166
United Kingdom	Low	8
USA	Low	2
Germany	Low	1
China	Low to Mid	2
Sri Lanka	Low	1
Hong Kong	Low	4
Finland	Low	1

<sup>2</sup> <https://www.globalslaveryindex.org/>



Denmark	Low	1
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In relation to its direct operations, given the location of each TGI company and the industry (sports marketing, management and advertising) in which we operate, we have assessed the risk of modern slavery across its direct business operations as **low**.

TGI has appropriate workplace management policies and practices, along with skilled managers, to ensure appropriate recruitment and management of employees, including compliance with minimum remuneration requirements.

In relation to its supply chain, the overall risk is **low** having regard to the GSI and low-mid in the case of certain products. We will focus and perform more due diligence where there is higher risk. In our next reporting period, we intend to investigate further down the supply chain and gain a better understanding of the risks by focusing on obtaining better visibility of the origin of products in particular promotional premiums.

In terms of services that we source domestically in Australia, the categories of higher risk that we have identified are cleaning, labour hire and food services. We are satisfied that we have picked reputable direct suppliers who have signed contracts attesting that they are paying appropriate minimum remuneration and have met and will continue to meet their obligations in ensuring there is no modern slavery practices in their organisation. All these suppliers will be surveyed. The fact that TGI has worked with the majority of its suppliers over a long period of time and that most are leaders in their field gives us a great deal of confidence in the quality of their operations.

CRITERION 4 – ACTIONS TAKEN TO ASSESS OR ADDRESS MODERN SLAVERY RISKS.

The Australian businesses within TGI have undertaken the below initiatives in ensuring that the process of identifying and eradicating modern slavery is part of the inherent processes, policies and systems in conducting the everyday business of the entity. These are already in place, and we will continue to review them for continuous improvement in this area;

- Guidelines for Supplier Procurement that all staff must follow for a supplier to be added to our supplier list which sets out approved principles and processes;
- A Supplier Code of Conduct that establishes the minimum ethical business standards expected from our suppliers;
- Standard form supplier contracts and checklists that proactively address modern slavery risks and set out TGI's expectations that suppliers are proactively working to ensure mitigation of modern slavery risks in their own supply chains.;
- Human resources, finance, legal, procurement and risk management are all functions exercised by employees in our businesses whose roles include ensuring compliance with laws and internal policies and processes across the businesses;
- the majority of recruitment for TGI is conducted internally by personnel located in each territory, with most employees based in Melbourne, Australia. TGI is therefore



able to ensure that the process is conducted in an ethical and transparent manner and employment contracts contain fair and just terms in relation to wages, working hours and other working conditions;

- any material agreement is reviewed by our internal legal to be signed off from senior management prior to entry. This enables us to consider risks relating to entering into an agreement with a supplier, which could include the identity, location or operations of the counterparty; and
- internal training tailored to each Business Unit in relation to modern slavery.

Our objective is that these embedded practices are rolled out to all members of our Group in the 2023 calendar year.

The further objectives we have for the 2023 year are;

- Establishment of a formal risk management framework for monitoring and managing material risks associated with modern slavery in TGI's operations and supply chains.
- To survey of our top 50 suppliers (by spend) for the year ended 31 December 2022 at the conclusion of that year to:
  - o Better understand our suppliers existing governance practices that address their modern slavery risks.
  - o Assess any potential modern slavery geographic risks amongst our largest tier one suppliers;
- To Design a Modern Slavery Incident Response Procedure to assist staff in handling modern slavery concerns and to report incidents as they arise.

Our surveys have been designed to be more detailed for suppliers if they are in a country or category that is at a higher risk. Following on from these surveys, we will then be working with our suppliers to further identify and map our indirect supply chain.

#### CRITERION 5 – ASSESS THE EFFECTIVENESS OF ACTIONS

In order to continuously evolve and improve our approach to the risks of Modern Slavery in our supply chains, TGI will assess the effectiveness of its actions by ensuring that our policy reflects the following processes;

- Annual review of the Modern Slavery Policy and Procedures
- Annual Supplier surveys for existing suppliers and nominating at least 2 suppliers to be audited by an external agency each year and a report on the % of suppliers who have returned their surveys;
- Working with our suppliers to resolve or substantially mitigate any instances that are discovered in our supply chain to ensure that this is done in a respectful way and so that the supplier can demonstrate that with support it can remediate situations. Having said that there is a zero tolerance of practices such as child labour, servitude, trafficking or bonded labour. In these instances, this will result in termination of the supply contract. This will be reviewed and reported each year;



- Review and report on the number of supplier contracts that include modern slavery clauses.



CRITERION 6 –CONSULTATION WITH OWNED AND CONTROLLED ENTITIES

Consultation has occurred with each member of the listed entities who have had to provide some of the data used in this statement. Staff involved in the preparation of this statement have consulted with the necessary business operations of TGI to gather the necessary information to prepare this statement on behalf of the TGI and have given all Business Unit heads the chance to read and contribute to this statement.





Approval

This statement was approved by the board of TGI Sport Holdings Pty Ltd (ABN 79 628 374 210) on 8 June 2023.

DocuSigned by:

*Martin Jolly*

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**Martin Jolly**  
**Chief Executive Officer**  
**TGI Sport Holdings Pty Ltd**



## SCHEDULE 1 – LIST OF COMPANIES TO WHICH THIS STATEMENT APPLIES.

<b>COLUMN A Companies</b>	<b>COLUMN B Companies</b>
TGI Sport Pty Ltd	TLA Worldwide (Aust) Pty Ltd
TGI Sport (Europe) Holdings Pty Ltd	TLA Merchandise Pty Ltd
TGI Sport (US) Holdings Pty Ltd	TLA Worldwide Ltd
Sportsmate Technologies Pty Ltd	
World Sports & Entertainment Holdings Pty Ltd	
World Sports & Entertainment Technologies Pty Ltd	