

# Modern Slavery Statement

VR Australia Holdings Pty Ltd  
FY 2022/23

This statement covers the activities of VR Australia Holdings Pty Ltd (ACN 605 041 530) and its owned and controlled entities during the year ended 31 July 2023 | period 1 August 2022 to 31 July 2023.

References in this statement to 'we', 'our' and 'us' are references to VR Australia Holdings Pty Ltd and its owned and controlled entities.

This is our first modern slavery statement 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 has been approved by the Board of VR Australia Holdings Pty Ltd on 30 January 2024.

## About us

We are committed to preventing modern slavery and human trafficking in our business and supply chains. We have a zero-tolerance approach to any form of modern slavery and are committed to acting ethically and with integrity in all our business relationships.

## Our structure

VR Australia Holdings Pty Ltd is a company incorporated in Australia and our registered office is located at Level 11, 1 Constitution Ave, Canberra ACT 2601.

VR Australia Holdings Pty Ltd is a subsidiary of Vail Resorts, Inc, headquartered in Delaware, United States. Vail Resorts, Inc and its subsidiaries own and operate over 40 mountain destination and ski resorts across the world.

VR Australia Holdings Pty Ltd itself has two owned and controlled entities, Perisher Blue Pty Ltd (ACN 061 232 488) and the Snow Trust. These entities were acquired in 2015 and own and operate the Perisher Ski Resort (**Perisher**).

## Our operations

Perisher is located in the Kosciuszko National Park, the largest national park in New South Wales, Australia. The resort includes four base areas (Perisher Valley, Smiggin Holes, Guthega and Blue Cow) and their associated ski fields, as well as the site of the Skitube Alpine Railway at Bullock's Flat.

Our key operations include operating Perisher's ski lifts, ski patrol, snowsports school and the Skitube rack rail at Bullock's Flat. We also operate various retail and rental outlets which specialise in ski and snow apparel and equipment as well as two hotels at Perisher Valley and in Jindabyne.

Our employee numbers vary due to seasonal factors, as our workforce partially consists of a workforce contracted to work during the snow season, which typically takes place from June to October each year.

Terms of employment are set by either common law contracts, negotiated Enterprise Bargaining Agreements and the Alpine Resorts Award.

## ***Our supply chain***

We work with approximately 748 suppliers from a number of countries including Australia, European Union countries, USA and New Zealand . Our suppliers are primarily located in Australia, USA, New Zealand and the European Union, accounting for 100% of our total spend. We do not purchase directly from any countries classified as high risk on the Walk Free Foundation's Global Slavery Index 2018.

The main types of goods and services that we procure are:

- ski and snowboard apparel and equipment that is sold through our retail outlets;
- parts, machinery, and other supplies to support our ski lifts, snowmaking, snow grooming, Skitube and ski patrol activities;
- hospitality and catering;
- corporate/building services including office maintenance services, cleaning and security;
- information and communications technology including hardware and software, printers, audio/visual equipment, data room services, desk phones and mobile phones used by our employees;
- external professional services including financial services, taxation, legal, insurance, consulting and professional and personal development; and
- office consumables, including stationery, amenities and kitchen consumables.

We engage our suppliers on stable arrangements, where suppliers warrant that their supply chains are free from modern slavery and human trafficking. We also note that our machinery and associated parts are purchased from reputable global manufacturers and distributors within the European Union.

We also have a number of indirect suppliers, including the manufacturers of ski and snowboard apparel and equipment and are reliant on statements and information made available by local representatives regarding their manufacturing practices.

## **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 have implemented due diligence processes to assess and manage the risk of modern slavery and human trafficking in our supply chains, including engaging with our suppliers and contractors to understand their practices.

As part of this due diligence process, we utilised 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**); and
- the Walk Free Foundation's [Global Slavery Index 2018](#).

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

## **Risk profile**

<b>Risk</b>	<b>Description of risk</b>
Sector /Industry	<p>A risk of modern slavery practices exists in the alpine resort industry. This industry employs a high proportion of low-skilled, low-paid workers, including migrant workers, who are commonly employed on a seasonal basis. This risk is greater in circumstances where labour hire arrangements are used to source seasonal workers, as this limits the level of oversight operators have over hiring practices.</p> <p>However, we have taken steps to mitigate our exposure to the risks posed by this industry, most relevantly by avoiding labour hire arrangements and ensuring terms of employment comply with either common law contracts, negotiated Enterprise Bargaining Agreements and the Alpine Resorts Award.</p>
Product / Service	<p>As part of our operations we procure snow apparel for sale at our retail outlets, and machinery to support our ski operations. Of the five products identified by the Global Slavery Index (2018) as being of the highest risk of modern slavery, only the resale of garments (such as ski apparel) constitutes a material risk in our business.</p> <p>However, we are committed to dealing only with suppliers that have warranted or who will in the future warrant that their supply chains are free from modern slavery and human trafficking. Our machinery and parts are also purchased from reputable global manufacturers and distributors within the European Union.</p>
Geographic	<p>We acknowledge that our suppliers source some products from countries identified by the Global Slavery Index 2018 as being countries at risk of modern slavery, with products commonly manufactured in China, India and Vietnam.</p> <p>We are committed to dealing only with suppliers who have warranted or who will in the future warrant that their supply chains are free from modern slavery and human trafficking.</p>

## **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***

As noted above, we undertook an initial risk assessment to identify any key modern slavery risks that existed within our operations and supply chains.

### ***Governance and accountability framework***

We have implemented an action plan for our modern slavery compliance over the next three reporting periods to focus and prioritise our actions and initiatives. This action plan is sponsored by the directors of VR Australia Holdings Pty Ltd and is managed by senior staff members from across business functions including legal, finance, procurement, HSE and HR.

### ***Policies and procedures***

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

- Harassment and Discrimination Prevention Policy
- Social Responsibility Policy
- Design Modification and Purchase of Equipment Policy

- Fraud / Theft prevention and Anti-Corruption Policy
- Grievance Handling Policy

Furthermore, as part of the Vail Resorts group our corporate values include:

- Do Right – Act with integrity. Always do the right thing, knowing that it leads to the right outcome; and
- Be Inclusive – Welcome everyone to our company, resorts and communities. Include all races, gender identities, sexual orientations, abilities and the many qualities that make us unique.

These specific values, together with others, form the foundation of the culture of our operations and the expectations of our staff. We will continue to strengthen these values through the development of a modern slavery policy that reinforces our commitment to identifying and mitigating the risks of modern slavery and human trafficking in our operations and supply chains.

### ***Training***

We have conducted awareness sessions for employees to enable them to identify risks of modern slavery in our supply chains. We will continue to enhance employee awareness by conducting training sessions and providing ongoing guidance on how to identify, investigate and report risks.

Additionally, our staff involved in acquiring products, services and materials which constitute our supply chains will be provided with targeted training to identify risks associated with modern slavery and ensure that our suppliers certify that modern slavery does not occur in their supply chains.

All new staff are trained as part of their induction to understand the Corporate Policies and Values noted above. This is key component of on-boarding seasonal and returning staff, given seasonal nature of our operations. All permanent staff are required to undertake refresher training on Corporate Policies and Values annually as part of their terms of employment.

### ***Contracts and supplier engagement***

Model Modern Slavery Contract Clauses were developed during the reporting period. In the future, suppliers and service providers will be contractually required to comply with these clauses. We are introducing a procurement system that will provide better corporate governance controls over suppliers and product lines. Importing suppliers into that system will represent a key opportunity to introduce the requirement for suppliers to make a binding statement as to their commitment to meet the expectations of the modern slavery and human trafficking obligations.

### ***Future actions***

We have also planned to undertake further actions to identify and address our modern slavery risks as set out in the 'Looking forward' section below.

### **Assessing our effectiveness**

We are committed to reviewing the effectiveness of our actions by:

- regularly reviewing and updating our policies and procedures to ensure they are effective in detecting and preventing modern slavery and human trafficking;
- regularly reviewing our modern slavery processes, with senior management meeting annually to consider whether we are appropriately identifying and evaluating our modern slavery risks; and
- when commencing a new operation or engaging a new supplier, assessing whether our existing risk management processes remain appropriate.

We will also monitor our performance against a number of key performance indicators. These include:

- the percentage of employees involved in procurement activities who have completed training on modern slavery; and
- the number of suppliers who have been reviewed to ensure compliance with modern slavery requirements.

### **Looking forward**

We are committed to continuously improving our efforts to combat modern slavery abuses and to promoting transparency in our business and supply chains.

Going forward, we propose to focus on:

- developing an action plan to focus and prioritise our actions for future reporting periods;
- establish the roles and responsibilities of people in our business who will be responsible for developing a modern slavery framework;
- developing a modern slavery policy for our business that establishes our commitment to addressing modern slavery risks;
- introducing clauses in our standard form contracts to address modern slavery obligations;
- undertaking detailed supply chain mapping to better understand our supply chain and modern slavery risks;
- developing a supplier questionnaire to engage with our suppliers and develop our modern slavery risk assessment procedures;
- reviewing supplier questionnaires, modern slavery statements and other information provided from suppliers to assess the modern slavery risks in our supply chains; and
- training to relevant staff to raise awareness of modern slavery risks and how they may arise in our business.

In order to assess the effectiveness of these actions, we propose to:

- when commencing a new operation or engaging a new supplier, assess whether our existing risk management processes remain appropriate;
- track our actions completed against our action plan;
- monitor the number of suppliers committing to our policies and procedures;
- track the percentage of employees, identified as having procurement responsibilities as part of their function, who have completed training on modern slavery;
- monitor the number of supply contracts with modern slavery clauses included; and
- track the number of suspected or identified modern slavery incidents identified and remediated.

## Consultation

VR Australia Holdings Pty Ltd consulted with Perisher Blue Pty Ltd and the Snow Trust by providing a copy of this statement to the board of Perisher Blue Pty Ltd for review and offering it the opportunity to comment on the document.

As a subsidiary of Vail Resorts, Inc., our approach to modern slavery is largely comprised of overarching policies, systems and processes that are designed to be consistently applied across the each of the ski resorts owned and operated by Vail Resorts, Inc. in Australia.

This statement was approved by the Board of VR Australia Holdings Pty Ltd in its capacity as the principal governing body of VR Australia Holdings Pty Ltd on 30 January 2024.

This statement is signed by Nathan Butterworth in his role as Director of VR Australia Holdings Pty Ltd on 30 January 2024.



## 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
(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
(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.	3
(e) Describe how the reporting entity assesses the effectiveness of such actions.	4
(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).	5
(g) Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	NA