



# **DISCOVERY HOLIDAY PARKS**

## **Modern Slavery Statement**

**July 2020-June 2021**

# DISCOVERY MODERN SLAVERY STATEMENT

## About this Modern Slavery Statement

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Discovery Holiday Parks Pty Limited (**Discovery Parks**) is committed to acting ethically and with integrity in our business dealings and relationships, and to implementing and enforcing systems and controls to address the risk of modern slavery practices in our own business operations or in any of our supply chains.

We endeavour to ensure that there is transparency in our business and in our approach to tackling modern slavery risk throughout our supply chains and operations, consistent with our reporting obligations under the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**).

Discovery Parks and Discovery Parks Holdings Pty Ltd (together, '**Discovery**') are 'reporting entities' for the purposes of the Modern Slavery Act and this is their joint Modern Slavery Statement, made pursuant to section 14 of the Modern Slavery Act. As required under the Modern Slavery Act, this Modern Slavery Statement describes the actions Discovery has taken in the Australian Financial Year 2020-2021 (**reporting period**) to assess and address our risks of modern slavery practices in our operations and supply chains. It has been drafted to meet the mandatory criteria at section 16(1) of the Modern Slavery Act (see Index).

This Modern Slavery Statement builds on the actions outlined in our previous Modern Slavery Statement for the Australian Financial Year 2019-2020, with a particular focus on developing our policies and procedures, increasing our capability and awareness, and maturing our risk assessment and control measures.

## About us

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Discovery is Australia's largest regional accommodation provider, offering a vast array of accommodation across more than 75 properties nationally. From modest beginnings in 2004 with just three parks, Discovery has evolved to become a clear market leader, with a business portfolio incorporating work stay, corporate and tourism accommodation.

As Australia's largest regional accommodation provider, we are committed to growing, supporting and protecting regional communities.

We invest significant capital into improving infrastructure in regional communities and form close ties with local businesses, suppliers and tourism industry peers to create sustainable communities that are great places to live, work and visit.

To support the local communities we strive to source produce, supplies and services from local businesses and assist local charities and volunteer groups by becoming actively involved in events, initiatives and fundraising. Our large number of domestic suppliers reflects this commitment to supporting local businesses.

## Our structure, operations and supply chain

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### Structure & Operations

Discovery Parks Holdings Pty Ltd and Discovery Parks own and control a number of entities, including Australian Parks Licence Co Pty Ltd which manages the G'day Parks (leading community of independent caravan and holiday parks) and G'day Rewards (membership program) brands. Together, these entities are often referred to as the G'day Group. Headquartered in South Australia, our support office is located in Adelaide with a team of over 170 staff providing support in areas including finance, marketing, procurement, legal, operations, IT, Workplace Health & Safety and People & Culture.

In relation to our provision of accommodation services, we currently operate over 75 holiday parks, resorts and work stay sites in 7 states and territories across Australia.

### Operations snapshot

Over **75** properties operated.

Accommodation provided in **7** states and territories.

**1800+** employees

**\$208,783,978** consolidated revenue (as at 30 June 2021).

### Supply chain

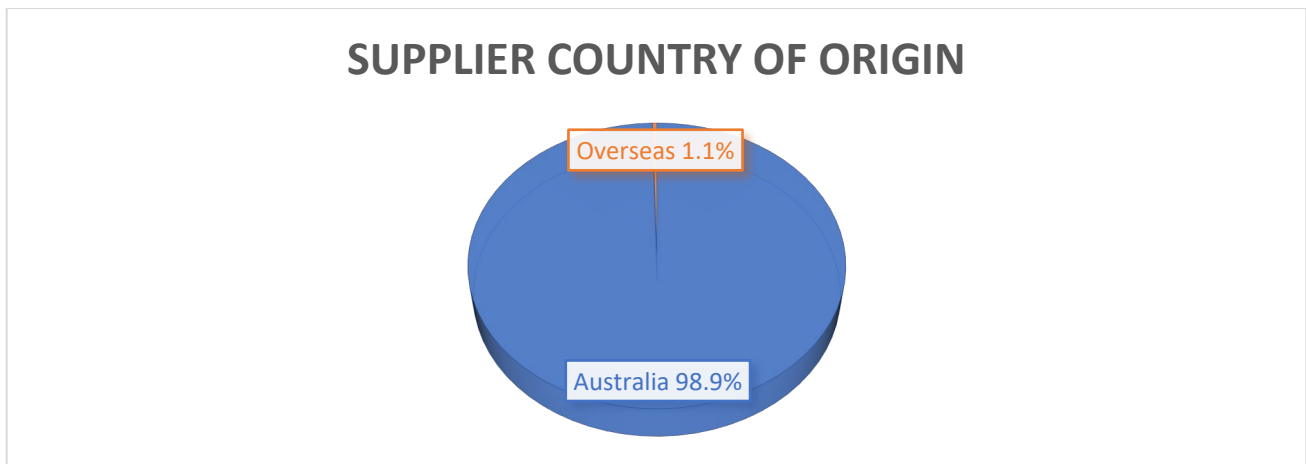
In the reporting period, we made payments to over 4600 active suppliers. Discovery Parks is a proudly Australian owned business and in line with our ongoing commitment to support other local businesses like ours, over 98% of our own suppliers, in the reporting period, were based in Australia.

### Supply chain snapshot

Discovery's supply chain consists of goods and services that support the operation and development of our business, maintenance of our properties, and the provision of our accommodation services. Our key supply chain categories include:

- Utilities (including electricity and gas);
- Facilities management (including cleaning services, waste management, safety and gardening);
- Property management (including hardware and furnishings for our properties);
- Development initiatives (including cabins, swimming pools, waterparks and other facilities);
- Financial services (including banking services);
- Food & Beverage (including the provision of food and beverage to our work stay parks);

- Marketing (including digital marketing);
- Office consumables (including stationery); and
- ICT (including telecommunications, IT hardware and software).



## Assessing and addressing our modern slavery risk

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In identifying and assessing our risks of modern slavery practices we have consulted the Australian Government's guidance and specifically, we have used the risk indicators from the *Modern Slavery Act 2018-Guidance for Reporting Entities* (**Australian Government guidance**).

To prepare this Modern Slavery Statement, we have considered, as consistent with the Australian Government guidance, the risk that we may **cause**, **contribute**, or be **directly linked** to modern slavery practices through our operations and our supply chain. For the 2020/2021 reporting period, we have continued to focus our supply chain risk assessment on our Tier 1 suppliers (meaning suppliers that provide goods or services to us directly).

### Supply chain risk assessment and management

Some of our suppliers are in categories that have been identified by the Australian Government's guidance as higher risk due to the sector and industry or product and services. The supplier categories that we have assessed as higher risk include building contractors and materials suppliers for our developments, ICT products and services and laundry services.

While almost all our suppliers are based in Australia, some of our suppliers may source goods or services from overseas, including from locations that present a higher risk of modern slavery according to geographic risk indicators.

To assist with managing these risks in our supply chain, we take a number of due diligence steps, particularly at the supplier onboarding and tender evaluation stage. In particular, we conduct a risk assessment and undertake targeted risk management actions based on the risk level determined for specific suppliers by use of a set of ESG compliance checklist questions. For targeted higher risk supplier agreements, we endeavour to ensure that we enter into agreements which contain provisions that mitigate the risk of modern slavery practices. In the reporting period, we have developed a template modern slavery compliance clause for use in specific, targeted supplier agreements.

Also in the reporting period, we have undertaken significant policy development with the finalisation of the following important documents:

- Supplier Code of Conduct;
- Modern Slavery Policy; and
- Human Rights Policy.

Once implemented via our supplier onboarding process, this suite of documents will assist in embedding our expectations of ethical standards across our vendor groups.

Our actions continue to be guided by proportionality to our understanding of our low risk profile based on the key risk indicators in the Australian Government's guidance. In particular, we consider that our geographic risk is likely impacted by our relatively low number (1.1%) of overseas based suppliers. We are committed, as part of our continuous improvement approach, to further maturing our understanding of modern slavery supply chain risks, and to developing our supplier management approach based on this understanding.

### Operations risk assessment and management

We directly employ 1800+ employees on a combination of full-time, part-time and casual contracts. As our employees are working exclusively within Australia, where employee-employer relations are strictly regulated by the *Fair Work Act 2009* (Cth) and relevant modern awards, our operational risk profile is likely significantly reduced.

Modern slavery risks that relate to our operations and direct workforce are assessed in the context of our health and safety and human resources policies and practices, ethical standards and behavioural conduct requirements as per our Code of Conduct, and legal and contractual obligations such as employment conditions. We maintain internal policies, systems and processes to comply with our legal and contractual obligations and to manage entitlements relating to our people.

The health and wellbeing of our employees is of paramount importance to us. To this end, our People & Culture team drives programs to promote a diverse and inclusive workplace aimed at being free from discrimination, bullying and harassment. These programs also target workplace health and wellbeing including offering flexible working arrangements to support employee work-life balance. As part of our commitment to a culture of continuous learning, we encourage ongoing staff development and equal access to opportunities.

Additionally, our Safety & Compliance team implements a comprehensive Health and Safety Management System, supported by high levels of internal awareness and risk assessment, reporting on WHS trends and delivering a compliance program that fosters a strong safety culture across the business.

We also have an internal staff conflict resolution policy that encourages employees to notify their manager, team members or human resources if they believe there is behaviour or actions within the business that do not align to our Code of Conduct. The human resources team are highly capable in undertaking confidential and comprehensive internal workplace investigations, in response to issues raised via our internal grievance reporting mechanisms.

We engage third party labour-hire companies and professional services suppliers to temporarily boost our workforce capabilities and capacity when needed, in particular to manage or implement specific projects. These arrangements are generally short-term and, where practicable, we endeavour to ensure that staff are employed directly where their services are required longer term. Where practicable, we generally use licensed labour hire providers with long-standing relationships with us.

As an Australian based business with a domestic workforce or largely directly employed staff, we understand that our risk exposure to modern slavery practices in our operations is likely significantly reduced. However, given the prevalence of modern slavery globally, we recognise that there may be a risk of being linked, indirectly, to modern slavery practices in our operations. Specifically, we acknowledge that there may be a wider potential risk that third parties or individuals over which we have limited control may use our services while engaging in modern slavery practices. Accordingly, to assist in addressing these risks we have undertaken targeted actions to increase training and awareness around identifying risks of modern slavery practices across the business.

At Discovery, we aim to foster a culture of continuous learning. In the reporting period, modern slavery training was provided to key legal, procurement and business development personnel, along with our Executive Team. A further significant project undertaken in the reporting period was the development of a bespoke, specific modern slavery eLearning module for use in our online learning portal. This training has been designed to provide staff with an overview of the types of modern slavery and associated key risk indicators. The modern slavery eLearning module will build the awareness and capacity of our key operational staff to assist them to identify and report on risks of modern slavery practices in our operations and supply chain. The training module will be delivered to staff via our online learning platform and will be incorporated into the onboarding of all new employees.

As noted in our description of our supply chain risk assessment and management, in the 2020/2021 reporting period we undertook substantial policy development by finalising our Modern Slavery Policy, Supplier Code of Conduct and Human Rights Policy. In combination with our eLearning module delivery, this suite of policy documents will assist in embedding our expectations of our personnel and increase their awareness and capacity to assist in assessing and addressing any risks of modern slavery practices.

## Our performance

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Our actions for this reporting period have been driven by our newly established Modern Slavery Working Group, comprised of key personnel across our Legal, Procurement, People & Culture and Operations business units.

### Key actions in the reporting period

#### Policy development

- Finalised key policies and procedures, including:
  - Modern Slavery Policy;
  - Human Rights Policy; and
  - Supplier Code of Conduct.

#### Supplier due diligence

- Developed a template modern slavery compliance clause for targeted use in specific supplier agreements.

#### Training, awareness & capacity building

- Provided modern slavery compliance training to key relevant staff including our procurement and legal teams, and members of our Executive team; and
- Developed a bespoke modern slavery training eLearning module designed to increase the capacity and awareness of key operational personnel to identify and report on the risks of modern slavery practices in our operations and supply chain.

#### Risk identification and assessment

- Undertook a comprehensive risk scoping exercise to further mature our understanding of the risks of modern slavery in our supply chain.

#### Assessing the effectiveness of our actions

- Established an internal Modern Slavery Working Group to drive and monitor our modern slavery compliance actions; and
- Formulated our modern slavery compliance strategy for the next reporting period (see 'Our future plans').

## Our future plans

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Looking ahead, and in line with our commitment to continuous improvement, we are continuing to progress the following actions in our 2021/2022 reporting period with our Modern Slavery Working Group overseeing the following program of work.

### Policy implementation

- Implementing and including relevant policy documents through our supplier onboarding process.

### Training and awareness

- Delivering our newly developed bespoke modern slavery training eLearning module via our online learning portal.

### Risk identification and assessment

- Undertaking a further interrogation of the risks identified in targeted supplier groups;
- Developing a Supplier Risk Management Framework; and
- Exploring the possible engagement of an external provider to assist with managing our grievance reporting processes.

### Assessing the effectiveness of our actions

- Developing our modern slavery strategy for the next reporting period.

## Consultation

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Our approach to consultation between and across both of our reporting entities reflects the nature of the relationship between the two and between our internal business units. Relevant staff from Discovery Parks have been involved in the development of this Modern Slavery Statement, with input from many areas, including, in particular, key Legal, Procurement and People & Culture personnel. Through the oversight provided by our internal Modern Slavery Working Group, we have ensured that our senior management are kept updated on activities in relation to our obligations under the reporting requirements in the Modern Slavery Act. The Discovery Parks Executive Team have been directly consulted on the preparation of this Modern Slavery Statement, with final approval provided by our Board.

## Capacity building

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As part of our ongoing commitment to building our maturity in understanding our modern slavery compliance obligations, relevant staff, including members of our Executive Team, have attended specific modern slavery training and obtained external specialist advice on our modern slavery compliance obligations. Our senior procurement staff are also accredited members of the Chartered Institute of Procurement and Supply (CIPS).



## Reporting Requirements of the Modern Slavery Act

Our Modern Slavery Statement has been prepared to meet the mandatory criteria set out in the reporting requirement at section 16(1) of the Modern Slavery Act. The table below indicates where each mandatory criterion is addressed.

Modern Slavery Act Mandatory Criteria	Our Modern Slavery Statement	Page
1. Identify reporting entity	About this Modern Slavery Statement	2
2. Describe the reporting entity's structure, operations and supply chain	Our structure, operations and supply chain	3
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Assessing and addressing our modern slavery risk	4
4. Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	Assessing and addressing our modern slavery risk	4
	Our performance	7
5. Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risk	Our performance	7
	Our future plans	7
6. Describe the process of consultation with any entities the reporting entity owns or controls	Consultation	8
7. Any other relevant information	Capacity building	8

This Modern Slavery Statement has been approved by the Board of Directors of Discovery Parks Holdings Pty Ltd on **22 December** 2021.



**Chief Executive Officer**  
**Grant Wilckens**