



AFL Modern Slavery Statement

1 November 2023 - 31 October 2024

Modern Slavery Statement

This is the Modern Slavery Statement **(Statement)** of the Australian Football League (ABN 97 489 912 318) **(AFL)**, an Australian public company incorporated in Victoria, and its subsidiaries set out in *About the AFL*, for the reporting period 1 November 2023 to 31 October 2024 (Reporting Period). This Statement is made to address the requirements of the *Modern Slavery Act 2018* (Cth) **(Act)**. In this Statement, the AFL reports on its continued actions to identify, manage and mitigate the risks of modern slavery in its business operations and supply chain.

The AFL recognises the importance of eradicating human rights abuses, including modern slavery, from society and is committed to playing its part to eliminate the risks of all forms of modern slavery from its operations and supply chains. This Statement sets out the further actions taken to build on the AFL's modern slavery response framework from previous statements.

Australian Football League
ABN 97 489 912 318

Modern Slavery Statement
For the Reporting Period 1 November 2023
to 31 October 2024



About the AFL

The AFL is a not-for-profit organisation incorporated under the *Corporations Act 2001* (Cth), and its income and property must be used and applied solely for the purpose of carrying out, furthering, and promoting the objectives of the organisation as set out in its Constitution.

The AFL is the governing body of the sport of Australian Football. It administers both the elite men's and the women's Australian Football competitions, talent pathways to reach those competitions and community football competitions.

The AFL was previously named the Victorian Football League. It changed its name to the Australian Football League in 1990 to reflect the expansion of the elite men's competition, which now has a national footprint, with matches played each season in every State and Territory in Australia. The elite men's competition is now made up of 18 Clubs **(AFL Clubs)**.

The first season of the elite women's Australian Football competition, also known as AFLW, was completed in 2017. The competition started with eight AFL Clubs and has since progressively expanded to include AFLW teams from all 18 AFL Clubs.

In 2023, the AFL granted a conditional licence for a 19th club to join the AFL and AFLW competitions. It is currently anticipated that the club will join both the AFL and AFLW competitions by 2028.

The AFL is the parent entity of AFL Stadia Pty Ltd (ABN 26 615 077 891) and its subsidiaries, including Melbourne Stadiums Limited (ABN 37 098 476 594) **(MSL)**. MSL manages one of Melbourne's premier sports and entertainment venues, Marvel Stadium.

AFL STATE ENTITIES

The AFL has a subsidiary based in each Australian State and Territory, except for South Australia and Western Australia, that is responsible for the governance of Australian Football in that area. These are:

- Australian Football League (Victoria) Limited ABN 24 147 664 579
- Football Tasmania Limited ABN 93 085 213 350
- AFL Queensland Limited ABN 66 090 629 342
- AFL Northern Territory Limited ABN 81 097 620 525
- AFL (NSW/ACT) Commission Limited ABN 53 086 839 385

(AFL State Entities).

The AFL State Entities manage community Australian Football and second tier Australian Football competitions in all Australian States and Territories, excluding South Australia and Western Australia.

About the AFL

This Statement is a joint statement of the AFL, MSL and the AFL State Entities (**Reporting Entities**).

As well as the AFL's activities in relation to Australian Football competitions, talent pathways and Marvel Stadium, key AFL operations include:

- provision of programs aimed at engaging the Australian community in Australian Football with a focus on education and wellbeing;
- provision and management of facility grants to support community Australian Football;
- fan engagement strategies including memberships, events, corporate hospitality and a licensing program for official AFL merchandise; and
- production of media content that is distributed across various platforms.

For more information about the AFL please refer to the AFL's 2024 Annual Report.

[2024 AFL ANNUAL REPORT](#)



AFL Structure and Operations

The AFL Commission is the governing body of the AFL, and the Board of Commissioners are the directors of the AFL. The role of the Commission includes overseeing risk management and ensuring ethical standards and appropriate behaviours are adhered to. The members of the AFL are the 18 AFL Clubs.

The Board of Commissioners includes the AFL's Chief Executive Officer. The AFL Chief Executive Officer is appointed by the AFL Commission and is responsible for the operating performance of the AFL and the implementation of policy decided by the AFL Commission. Under the Chief Executive Officer, the AFL is divided into the following nine departments each led by an Executive General Manager:

- Game Development
- Corporate Affairs, Government & Communications
- Customer & Commercial
- People
- Football
- Inclusion & Social Policy
- Finance, Clubs & Infrastructure
- Strategy, Technology, Data & Analytics
- Legal, Regulatory, Healthcare & Integrity

The Executive General Managers of each of the departments form the AFL's executive leadership team.

The AFL's head office is located in Docklands, Melbourne and the operations of Australian Football League (Victoria) Ltd and MSL are also conducted out of head office. The operations of the other AFL State Entities are conducted out of offices in each of the relevant States and Territories. The Reporting Entities employ approximately 970 (permanent, full time and part time) individuals nationally, who are all based in Australia. The AFL engages additional part time staff on a seasonal basis and casual staff to support Marvel Stadium operations that have not been included in this number (e.g. coaches, umpires and medical personnel for talent pathway programs and hospitality and security staff). This cohort of employees fluctuates regularly depending on the time of year.





AFL Supply Chain

The AFL engages with suppliers to procure goods and services to support its operations. The AFL's supply chain encompasses the following key categories:



Licensing: The AFL licenses intellectual property it owns to licensees who use our intellectual property on products that they manufacture and then either sell directly to consumers or to retailers. Licensed products include uniforms and footballs that the AFL purchases for use in our operations.



IT and Communications: The AFL engages suppliers to provide IT and communication services, including in relation to website management, data storage and communications to stakeholders.



Match Day Operations: The AFL engages suppliers to provide services directly in relation to the conduct of Australian Football matches particularly in relation to match day technology.



Travel and Accommodation: The AFL procures travel and accommodation services to facilitate the conduct of the AFL and AFLW matches and other competitions, as well as supporting its business operations generally.



Events and Catering: The AFL uses suppliers to assist in staging events related to its operations and providing catering at those events.



Signage: To meet its obligations under sponsorship agreements, the AFL engages suppliers to provide sponsor signage that is displayed at AFL and AFLW matches and other competitions.



Facilities Management: The AFL manages a number of facilities across Australia, including Marvel Stadium, and requires services in relation to those facilities such as security and cleaning.



Player high performance support: The AFL engages professionals to provide support in the talent pathway competitions and programs it administers.

For the most part, the AFL's relationships with its suppliers are long standing. We are committed to building trusted and transparent relationships with our suppliers to ensure an open dialogue in which any risks identified can be efficiently and effectively addressed.

A key project completed by the AFL in the Reporting Period was the redevelopment of Marvel Stadium. The AFL engaged John Holland Pty Ltd to carry out the build, which was substantively completed in March 2024, subject to minor outstanding works and defect rectification works in accordance with contracted terms.

Risks of Modern Slavery

RISKS IDENTIFIED IN OPERATIONS

As has been reported in the AFL's previous Modern Slavery Statements, the AFL has identified that its operations carried out directly by employees of the Reporting Entities pose a low risk of causing, contributing or being linked to modern slavery.

All employees of the Reporting Entities continue to be based in Australia and are centrally managed by the AFL's People team. During the AFL onboarding process, employees of the Reporting Entities are provided with copies of the AFL's key policies and are required to undertake "Healthy Workplace Training". All staff except for casual employees are further required to undertake refresher training on this topic on an annual basis. AFL employees working in remote and/or rural areas are provided with additional training specific to their role to make sure they are prepared, aware and understanding of safe practices when working remote.

The training covers the following key areas (being the same areas as those previously reported):

- Sexual Harassment in the Workplace
- Respect at Work for Team Members
- Workplace Bullying
- Safeguarding Children & Young People
- Anti-discrimination and Equal Opportunity
- Work Health and Safety
- Aboriginal and Torres Strait Islander Inclusion and Cultural Awareness
- Cyber Security
- AFL People Code of Conduct



Risks of Modern Slavery

While the risk of modern slavery practices within the operations of the AFL has been determined to be low, there are some risk areas that have been identified as follows:



Employees working in remote and/or rural locations: The AFL has employees who often work in remote or rural locations to deliver participation growth programs in the Game Development department. These settings can pose unique challenges, including isolation, limited oversight and restricted access to resources. Such conditions heighten the risk of modern slavery practices, which may be experienced alongside other factors by some groups of people, such as Aboriginal and Torres Strait Islander Peoples (see further below on “People facing systemic inequity”).



Seasonal work: The AFL relies on some seasonal casual work, driven by the demand for temporary labour during peak periods such as AFL and AFLW Finals and major events at Marvel Stadium. Workers are employed in roles such as event set-up, breakdown and delivery, security, safety, media and ticketing. This transient and high-demand labour model can create vulnerabilities to modern slavery practices.



High pressure work environments: The AFL operates in a high-pressure work environment, particularly during large-scale events such as AFL and AFLW Finals or high-profile concerts at Marvel Stadium. These environments often demand extended working hours, tight deadlines and rapid decision-making. Such conditions can create vulnerabilities to modern slavery practices, especially for workers in lower-skilled or casual roles.

Risks of Modern Slavery

RISKS IDENTIFIED IN SUPPLY CHAIN

The key areas of risk identified in our supply chain are as follows:



Services that rely on manual labour and large-scale temporary workforces, such as construction, catering and cleaning: The AFL relies on cleaning, property management, maintenance, hospitality, turf management, security and construction goods and services to operate our offices and stadia. The provision of these goods and services can carry modern slavery risks, including those associated with the widespread use of unskilled migrant and/or migrant visa holders and unauthorised subcontracting. The AFL understands that the construction industry is also susceptible to work health and safety risks, underpayment, exploitation of migrant workers and sexual harassment.



IT and telecommunications hardware: The AFL procures a range of electronics, technology and telecommunications products and services such as laptops, computers and mobile phones to support our functions. These products and services have long and complex supply chains, where there is potential for exploited labour in overseas manufacturing factories and use of conflict minerals in components, which may be mined or processed using modern slavery.



Uniforms, apparel, equipment, merchandise and personal protective equipment (PPE): The AFL directly sources footballs, equipment, merchandise packs for its Auskick program, umpire uniforms, PPE and indirectly, merchandise produced by its official sponsors and official merchandise licensees, which may have risks of labour exploitation, including modern slavery.

Risks of Modern Slavery



People facing systemic inequity:

The AFL recognises that Aboriginal and Torres Strait Islander Peoples may face particular vulnerabilities of modern slavery due to systemic racism, impacts of colonisation, over-representation in sectors that have a higher risk of modern slavery (such as construction) and potential challenges in accessing support and protection for those who live in remote, rural or regional communities.



Procuring hospitality goods and services: The AFL procures hospitality goods and services when operating its events, arranging catering, travel and accommodation, and understands that the hospitality industry has had a range of issues including underpayment of wages, compliance with mandated paid breaks or working hours, insecure work, sexual harassment and bullying. Further, the AFL understands there are certain food and beverage products, which it procures for its events and in its offices and which may have risks of modern slavery in production and supply, including tea, coffee, chocolate, fruit and seafood.



Risks of Modern Slavery

During the Reporting Period, the AFL onboarded 1,153 new suppliers, and 2,641 suppliers were used across the Reporting Entities. The AFL also implemented a new industry risk measurement tool, which ranks a supplier's modern slavery risk profile from 1 (Negligible/No Risk) to 9 (Absolute Risk). Using this tool, the risk profile of AFL suppliers was determined, and the results are set out in Figure 1 below. A key finding is that 16% of AFL suppliers have a modern slavery risk rating of Moderate High, High or Very High.

Figure 1: Risk profile of AFL suppliers in the Reporting Period

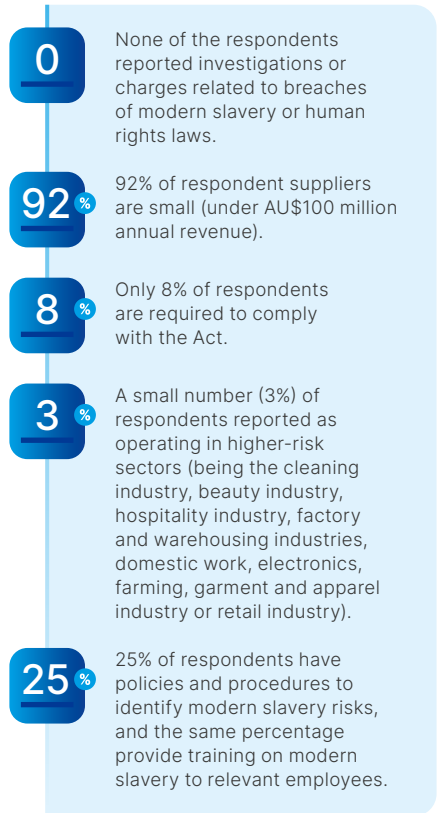
NEGLIGIBLE/ NO RISK	VERY LOW	LOW	%
49	725	617	52%
MODERATE LOW	MODERATE	MODERATE HIGH	
512	298	180	38%
HIGH	VERY HIGH	ABSOLUTE RISK	
214	38	-	10%

The AFL's modern slavery supplier questionnaire was distributed to all AFL suppliers at the conclusion of the Reporting Period. Figure 2 is a summary of the key information obtained from the questionnaire responses received (noting not all suppliers submitted their response).

MODERN SLAVERY INTEGRITY REPORTS

The AFL previously reported that it has established a publicly available reporting platform for modern slavery and unethical business practices. There were no reports of modern slavery or unethical business practices made during the Reporting Period through the platform.

Figure 2: Summary of Supplier responses



Actions Taken

In the Reporting Period, the AFL took several key actions to manage modern slavery risk within its operations and supply chains as follows.

MODERN SLAVERY PREVENTION PILLARS

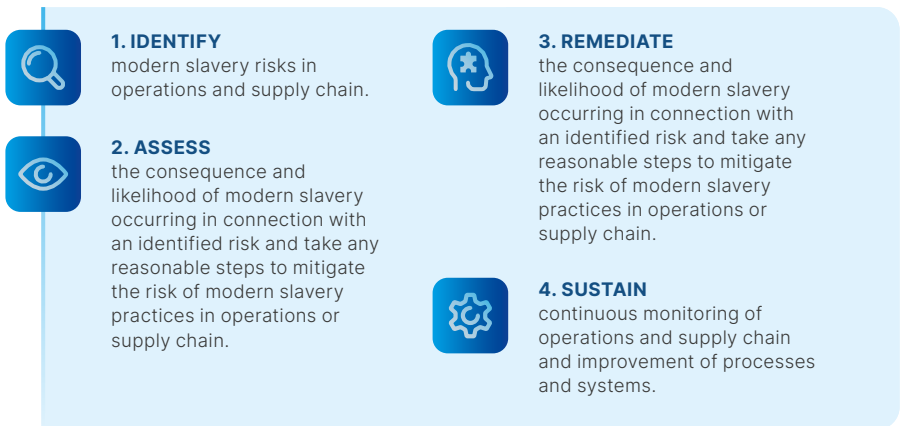
The AFL has established Modern Slavery Prevention Pillars to provide a structured framework within which to identify, assess and address the risks of modern slavery. The Prevention Pillars are set out in Figure 3.

The AFL Procurement and Risk teams have embedded these Prevention Pillars in their day-to-day management of modern slavery risks.

SUPPLIER ONBOARDING PROCESS

The AFL Procurement team has embedded its supplier onboarding process in the AFL's finance technology platform, which is used across all Reporting Entities. This has meant that suppliers to all Reporting Entities are subject to the onboarding process, resulting in a consistent and transparent process across the entire business and increased accountability, data security, compliance, efficiency, financial control and professional expertise.

Figure 3: Modern Slavery Prevention Pillars



Actions Taken

GOVERNANCE OF MODERN SLAVERY RISKS

The AFL Procurement team has undertaken an assessment of the AFL's operating landscape to ensure that all operating functions within the control of the AFL are being managed in accordance with the AFL Procurement Policy. This will ensure that all functions are captured within the governance framework.

The Modern Slavery Working Group is the cornerstone of the governance of modern slavery risk at the AFL. It has continued to meet on a periodic basis throughout the Reporting Period in accordance with its Terms of Reference.

The Terms of Reference clearly define the role of the Procurement, Legal, Risk and Finance teams in relation to managing modern slavery risks. A summary of the responsibilities is as follows:

- **Risk:** Undertake modern slavery risk assessments, assess effectiveness of risk mitigation processes, report on any identified modern slavery risk trends, implement remediation processes when modern slavery risks are identified in AFL operations.

- **Procurement:** Include modern slavery risk due diligence and ongoing monitoring processes in procurement processes, obtain suppliers' agreement to the AFL's Responsible Business Policy, issue modern slavery questionnaire and analyse results, implement remediation processes when modern slavery risks are identified in supply chain.
- **Legal:** Include modern slavery clauses in contracts as required, review and update the AFL Responsible Business Policy as required and prepare the modern slavery statement in consultation with relevant business units.
- **Finance:** Support modern slavery initiatives including through the provision of relevant data.

The AFL Risk and Procurement teams will together provide education to the business on modern slavery risk management (see further in *Looking Forward*) and develop the annual work plan to support the delivery of modern slavery initiatives.

Actions Taken

FORMAL RISK IDENTIFICATION PROCESS FOR AFL OPERATIONS AND SUPPLY CHAIN

The AFL Risk team has established a formal risk identification process for identifying modern slavery risks in AFL operations, which is aligned with the AFL's Enterprise Risk Management Framework, Modern Slavery Prevention Pillars and ISO 31000:2018 guidelines. The team reviews operational risks within each department on a quarterly basis, with any identified modern slavery risks then reported to the Working Group.

The AFL Procurement team has embedded a leading industry research tool in its risk management strategy to assist in identifying industry-specific risk, including regulatory changes, economic fluctuations and competitive threats within the AFL's supply chain. To identify modern slavery risks within the AFL's supply chain, the AFL Procurement team utilises an industry-leading research tool that considers factors like operational nature, location, asset value, structure and governance (including ethical practices and supply chain transparency). This enables the AFL to receive current insights from an independent body about the exposure of industries to modern slavery risks and what those risks are. The information obtained through this tool is then supplemented by information obtained by the AFL Procurement team from their supplier onboarding due diligence processes and the supplier questionnaire that is distributed annually to obtain a better picture of the modern slavery risk profile of AFL suppliers.

The introduction of the formal risk identification process for AFL operations and the industry research tool for the AFL's supply chain has enabled the AFL to report more detailed modern slavery risk data as set out in *Risks identified in supply chain*.

ASSESSMENT OF IDENTIFIED RISKS

The AFL has established a risk assessment framework that guides how identified modern slavery risks will be assessed. The framework is used to assess any modern slavery risks identified by the AFL through its internal processes as well as any risks that are reported to the AFL via the AFL's publicly available integrity reporting platform. The framework sets out factors that will be considered when determining the level of exposure from the identified risk, which include, most importantly, potential harm to persons, and then reputational risks, supply chain impact, legal implications, geographic context, stakeholder concerns, and whether any vulnerable groups are involved. The identified risk will be given a rating based on assessment against these factors, and then, as required, escalated, mitigated, remediated and monitored.

Actions Taken

TRAINING AND AWARENESS

The AFL has also developed a Modern Slavery Information Sheet, which is provided to suppliers that the AFL Procurement team considers may need further education on modern slavery. This initiative is particularly important given the significant number of suppliers the AFL engages that are small to medium-sized suppliers, are not subject to the Act, and may have limited awareness of modern slavery issues.

The AFL has also launched an internal Modern Slavery Information Page to enhance awareness about modern slavery issues among its staff. This initiative will be further supported by targeted training sessions for employees, as detailed in *Looking Forward*.

EXISTING RISK MITIGATION MEASURES

The AFL has continued to implement the following modern slavery risk mitigation measures during the Reporting Period, which have previously been reported on in our modern slavery statements:

- **Pre-Contractual Supplier Due Diligence:** Pre-contractual due diligence enables the AFL to identify whether suppliers can meet the AFL's modern slavery risk mitigation expectations, whether additional controls are necessary to assist in managing any risk associated with a particular supplier, and to implement any required controls prior to engaging in a business relationship.
- **Ongoing Supplier Due Diligence:** The AFL Procurement team considers public reporting, supplier assessment questionnaires and the consideration of geographic, product and supplier specific risk factors in their ongoing due diligence of suppliers.
- **AFL Responsible Business Policy:** All new suppliers are required to acknowledge their agreement to the AFL Responsible Business Policy prior to engagement and they are requested to acknowledge on an annual basis for the duration of the relationship.

Actions Taken

- **Relevant Policies:** The following internal AFL policies have continued to apply during the Reporting Period:
 - AFL Procurement Policy and AFL Indigenous Procurement Policy
 - AFL Whistleblower Policy
 - AFL People Code of Conduct
 - Safeguarding Children and Young People Code of Conduct, Complaints Resolution Policy and Procedure, Equal Employment Opportunity Policy
 - Respect and Responsibility Policy
- **Contractual Controls:** The AFL Legal team continues to include contractual provisions that specifically address modern slavery in its standard terms for engagement. The level of contractual controls included will vary depending on the risk profile of the contracting party.
- **Reporting:** The AFL's publicly available reporting platform for modern slavery and unethical business practices.



Assessment of Actions Taken

The AFL has continued to make progress on its modern slavery risk mitigation strategies, particularly in relation to its capturing of data and reporting, and remains committed to continued improvement.

Figure 4 is a summary of the AFL's approach to assessing the effectiveness of its modern slavery risk mitigation approach.

The AFL intends to establish formal performance indicators and reporting metrics that measure the effectiveness of the actions taken by the AFL to address modern slavery risks during the next Reporting Period (see *Looking Forward*).

Figure 4: AFL's approach to assess actions taken



Looking Forward

Key steps being undertaken by the AFL to further identify, manage and mitigate the risks of modern slavery in our business operations and supply chain are set out below.



Pre-qualification Questions: The AFL Procurement team intends to incorporate pre-qualification questions in Request for Proposal documents that relate to how potential suppliers address the risks of modern slavery in their operations and supply chains. In determining successful tenderers, the AFL will take into consideration the responses to these questions to ensure we are working with suppliers that comply with the AFL's Responsible Business Policy.



Enhanced Supplier Ongoing Due Diligence: A more interventionist approach is intended to be implemented to monitor suppliers that are considered to be of a higher risk of modern slavery practices. Depending on the risk profile of the supplier, the application of this approach may include more frequent on-site audits or remote assessments, enhanced data analysis, increased reporting requirements, increased frequency of communication, requirement to undertake training and connecting suppliers with relevant resources and support networks.



Tailored Supplier Questionnaires: The current supplier questionnaire is targeted at larger businesses that have a comprehensive understanding of modern slavery. It is potentially a less useful tool for small to medium-sized businesses that we engage with, which may account for the lower response rate to the questionnaire. The AFL intends to tailor the questionnaire for different industries and financial thresholds to encourage a higher response rate.



Staff Training: The following modern slavery training is intended to be delivered:

- All permanent AFL staff will participate in standard online modern slavery training to educate staff on the various forms of modern slavery and its impact and to equip staff to identify and report potential risks within the AFL's operations and supply chain.
- The AFL Senior Leaders group will attend further in-person training to provide the group with an overview of modern slavery, explore its potential impact on the AFL, offer strategies to identify, mitigate and prevent modern slavery within the AFL and its supply chain, and educate leaders on how to raise awareness and report suspected cases of modern slavery.

Looking Forward



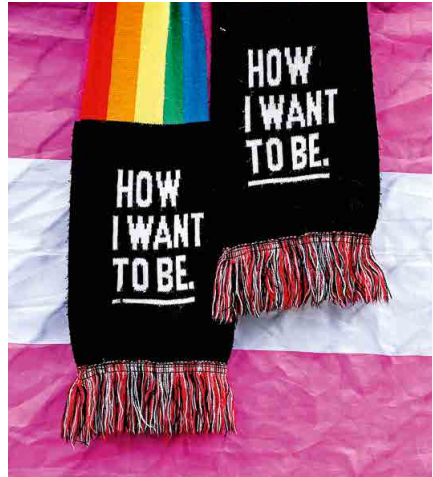
Modern Slavery Dashboard Report: Submission of a quarterly Modern Slavery Dashboard Report to the AFL Executive presenting key metrics measuring the effectiveness of the actions taken to address the risks of modern slavery in operations and supply chain, including:

- The percentage of high-risk suppliers in supply chain, number of suppliers with certified ethical sourcing standards and supplier response rate to the annual questionnaire;
- Metrics from AFL staff modern slavery training; and
- The number of modern slavery reports received through the publicly available reporting tool.

These metrics will be measured against performance indicators that will be established in the Modern Slavery Work Plan developed on an annual basis by the AFL Risk and Procurement teams.




Collaboration: Continue to collaborate with sporting industries to share activities, knowledge, adopt best practices and foster innovation on tracking modern slavery.



Consultation with controlled entities

The Reporting Entities are centrally managed by the AFL. They operate under the same governance and risk management procedures and the policies and actions set out in this Statement apply to AFL controlled entities covered by this Statement. Consultation with MSL and the AFL State Entities was therefore not required.

The AFL Commission approved this Modern Slavery Statement on 4 March 2025.



Andrew Dillon
Chief Executive Officer
Australian Football League

