



MODERN SLAVERY ACT STATEMENT FOR AUSTRALIA FY23 FOR TEG PTY LTD AND ITS SUBSIDIARIES

INTRODUCTION

This statement has been prepared in accordance with the Modern Slavery Act 2018 (Cth) and sets out the steps taken by TEG to prevent modern slavery in our business and supply chain, and implement relevant controls, policies and practices, for the financial year ending 30 June 2023.

Except where context requires otherwise, any reference to TEG in this statement includes TEG and all of its subsidiary companies. TEG has consulted with the relevant entities it owns or controls regarding the preparation of this statement.

TEG Pty Ltd (ACN 604 938 534) is an Australian proprietary company with its registered office at Level 3, 175 Liverpool Street, Sydney. Together with its subsidiaries, TEG employs more than 400 employees, contractors and casual staff across Australia, New Zealand, United Kingdom, Singapore, Malaysia, The Philippines and United States of America.

TEG recognises that modern slavery, which seeks to take away personal freedoms, can take many forms and includes human trafficking, servitude, forced labour, debt bondage and worst forms of child labour. TEG is committed to eliminating all forms of modern slavery and we have zero tolerance for any of these practices in our business or in our supply chain. As at the date of publication, we are not aware of any circumstances of modern slavery occurring either within our business or supply chains.

OUR STRUCTURE AND BUSINESS OPERATIONS

TEG has been at the heart of the live event experience for 50 years through our touring and ticketing operations. In recent years we have welcomed many new members to the TEG family of businesses by expanding into new markets, genres and capabilities including musical theatre, children's entertainment and data & insights. Through our integrated operating model we bring the best live content, ticketing and technology to our partners, creating memories for fans that last a lifetime.

TEG operates through 4 divisions:

- (i) **Ticketing:** TEG's various ticketing entities (Ticketek in Australia, NZ and UK; Ticketek Marketplace in Australia; TicketWorld in The Philippines and TicketCharge in Malaysia, as well as Softix and Eventopia globally) operate ticketing services platforms which allow the inventory of venues, promoters, event organisers and consumers (in the case of Marketplace) to be sold. We also supply the hardware, equipment and software needed for this purpose;
- (ii) **Touring:** the TEG businesses involved in touring and events around the globe include TEG Live, TEG Dainty, TEG Sport, TEG Rugby Live, Handsome Tours, TEG Van Egmond, St Jerome's Laneway, TEG Live Europe, The Entertainment Store and Life Like Touring. These entities promote and produce live entertainment notably music tours, festivals & concerts, sporting events, musical theatre and children's entertainment;
- (iii) **Venues:** TEG owns Qudos Bank Arena in Sydney and operates or co-promotes content at 8 venues across the UK;
- (iv) **Digital, Data & Insights:** TEG also operates a leading analytics, data science and insights business providing access to consumers for market segmentation, behavioural data and insight generation.

TEG's controlling shareholder is Silver Lake Partners, the global leader in technology investing headquartered in the USA, with approximately US\$100 billion in combined assets under management and committed capital and a team of more than 100 investment and operating professionals across the world.

For more information about our businesses and operations please refer to our website at www.teg.com.au.

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OUR SUPPLY CHAIN

TEG's supply chain includes the purchase and delivery of products and services needed for day-to-day operations.

While most of our supply chain expenditure is in Australia, we also source goods and services from global suppliers who have operations in places such as the United Kingdom, the United States of America, New Zealand, Singapore, The Philippines and Malaysia.

Our supply chains include:

- Content suppliers to our live touring business including artists, rights holders, rights creators, management agencies
- Equipment suppliers ranging from turnstiles and scanners for events to staging and production hire at live events
- Service suppliers across our breadth of businesses including:
 - Labour hire companies
 - Marketing services and support companies
 - IT infrastructure and support
 - Software and support
 - Communications services
 - Banking services providers
 - Audit, tax and legal services
 - General service providers (e.g. office printing and photocopying services).

MODERN SLAVERY RISK IN OUR BUSINESS OPERATIONS & SUPPLY CHAIN

TEG is committed to the highest standards of conduct and ethical behaviour in all our business activities, and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance and strong corporate governance. This is underpinned by our policies, procedures, contracts of employment and Code of Conduct. These are the foundations of how we behave and interact with each other, our customers, suppliers, and partners. To that end, one of our aims is to ensure that there is no modern slavery or human trafficking in our business or in any part of our supply chain.

During our assessment process, we considered risks that may possibly cause, contribute and/or be directly linked to modern slavery practices, in accordance with the Australian Government's Department of Home Affairs draft guidance document (2018). TEG has reviewed its operations in detail again this year and has deemed the risk of modern slavery in its supply chain practices to be low.

Our assessment has considered:

- The nature of the work being undertaken by employees, with a majority of the workforce in professional roles with significant industry expertise
- The limited use of external suppliers for procuring items that might be more susceptible to Modern Slavery risks
- The nature of the industry in which we operate (e.g. the engagement of children is very limited within this industry)
- The locations where the majority of income is derived, or where the work occurs, are in countries with a low prevalence rating on the Global Slavery Index. We note that ~98% of our EBITDA is generated from locations that rank as having high standards (ranking of 163 or above) and low prevalence per the Global Slavery Index. We further note, as detailed below, that where we operate in markets with a higher prevalence, TEG has a policy of engaging a local General Manager that has professional international experience. TEG has engaged in briefing this local General Manager, ensuring engagement with TEG's process and procedures in relation to addressing modern slavery risk in TEG's business operations and supply chain.

Despite the above assessment, TEG takes its responsibilities in this area very seriously and in the next section of our statement we have laid out our key mitigating controls to ensure that any Modern Slavery practices are identified and remediated. In addition, we, as a business, have continued to recognise the key risks that may arise in our business operations and supply chain, including:

- the recruitment of performers, crew, and other live event-related personnel

- the use of sub-contractors and outsourced services
- venue and event-related services (e.g. cleaning, security, catering, etc)
- sale of merchandise.

In relation to the above points, we have made continued efforts to engage with our suppliers, endeavouring to create more structure around our procurement procedures. We have made these efforts to engage with our suppliers to also gain further understanding across the various levels of our supply chain (where appropriate) to allow us to identify potential areas of risk.

ADDRESSING MODERN SLAVERY RISK

During the prior year, we continued our stakeholder engagement with key labour-hire suppliers in the hope of having open and transparent dialogue with our suppliers regarding modern slavery risk in our supply chain. We continued to build upon our previous desktop review which identified the largest suppliers in order to align the program to the respective risk footprint. Again, this review identified that the largest single exposure to Modern Slavery compliance risk is within our Ticketing segment which uses a single third party labour hire company in Australia. Further, we identified the decentralized area of Touring had a high volume of small suppliers in this area.

During the past 12 months the business continued to request that these suppliers provide details of their policies, and we again requested smaller businesses to undertake a high level survey in order to assist TEG to identify any specific areas of risk that require further investigation. Once again, our engagement with our smaller suppliers has been more challenging, as many do not meet the legislative threshold and/or have continued to be significantly adversely impacted by COVID-19 (including due to staff shortages and turnover levels). We will continue to engage with these suppliers in the coming year to improve the quality of response. In the coming 12 months, we also intend a briefing session and online training with select suppliers in The Philippines, following the re-opening of that market after COVID-19 closure. We will also consult our local General Manager to begin the process of rolling out additional training (if required) to this region and request for them to provide a list of local suppliers to assess (and if necessary, address) any modern slavery risk in this region.

TEG has zero tolerance for any form of slavery-like practices. Rather than create new processes however, TEG has reviewed its key business policies with a view to ensuring we have integrated Modern Slavery diligence into existing business processes.

Policies and Procedures

We have formal policies in place that are intended to promote ethical and legally compliant business conduct. Our policies contribute to our commitment to prevent violations of human rights such as modern forms of slavery in our business. The key policies that govern these areas are:

Whistleblower Policy

TEG's Whistleblower Policy aims to provide clarity on how TEG supports our workers so that they are:

- are encouraged to express their concerns;
- know how to express their concerns;
- know what will happen when concerns are expressed; and
- feel safe in expressing their concerns.

Anybody within our business who has a suspicion of modern slavery is encouraged to speak to their Line Manager and/or Senior Leadership team member. All reported incidents are taken seriously, treated confidentially and investigated as appropriate. At the date of publication, we have not received any disclosures relating to modern slavery.

Employment & Recruitment Policies

The majority of our staff (75%) are based in Australia. We are an Australian employer subject to Australian employment laws and have well developed practices and controls in place to prevent the risk of modern slavery occurring in our business operations; these practices are under constant review to ensure continuous improvement and where we feel further advice is needed, we seek external legal counsel.

Permanent Employees:

All recruitment for permanent and fixed term employees is managed through a centralised function. Any new appointment is first validated by senior management and the independent People & Culture function. All candidates are vetted by our People

& Culture team before they are onboarded as an employee. Further, People & Culture ensures that all employment contracts and Right to Work checks have been properly completed and that the candidate has been met in person before a role is offered.

Temporary Employees:

We use temporary labour in our operations as needed. To control any risk of modern slavery, (where possible) we channel temporary appointments through a single agency; a well-recognised global market leader in this field. The nominated agency has implemented robust recruitment processes to help ensure that there is no existence of modern slavery in any of our temporary/ agency appointments, including thorough vetting of a candidate's identity, Right to Work documents, bank account and employment history.

Procurement Policies

Our Procurement team have a number of risk mitigation and robust procurement processes in place including:

- Operating under a Delegated Authority Matrix for material business commitments
- Contract Reviews via an internal legal team, and external legal support as required
- Regular tendering of material contracts
- Operating a centralised process for on-boarding and paying indirect suppliers
- Group CFO oversight of this process, including review of all material contracts.

We have fully rolled out a group wide Procurement Policy, which is reviewed periodically. In the next 12 months we will look to further refining this Procurement Policy to include an additional focus on necessary training and goods and services. This Procurement Policy includes a template agreement to purchase goods and services which incorporates key modern slavery terms, among other important areas including compliance with local laws and regulations – which we will look to further expand in the next 12 months (for example, we will look to incorporate these key modern slavery terms in our Supplier Agreement templates and more readily use this contract when engaging/contracting with our suppliers).

Governance

This statement has been reviewed and approved by the TEG board.

TEG has a senior leadership team in place and all members of that team have been briefed on relevant legislation. In addition, TEG is a member of Live Performance Australia and as such is also voluntarily bound by the LPA Codes of Practice which includes a commitment to 'To Prevent Workplace Discrimination, Harassment, Sexual Harassment and Bullying' and 'Child Employment in Live Entertainment'.

Following the establishment of TEG's Risk and Compliance Forum (comprised of senior leaders across relevant functions), Forum members meet at least quarterly throughout the year to consider risk and compliance reports, review policies and discuss any related issues raised, including as related to Modern Slavery policies and practice.

Contracting

TEG's standard form contracts continue to include, and enforce as key terms, provisions requiring counterparties to comply with all modern slavery laws, take reasonable steps to ensure that there is no modern slavery in its or its contractors' supply chains, and implement appropriate due diligence procedures.

Training

During the year, we undertook broad stakeholder engagement on Modern Slavery, including delivering appropriate awareness training sessions on modern slavery principles to relevant TEG personnel. We have also procured an online training module which we intend to roll out across the business in the coming year and which must be undertaken by all employees during their induction and annually thereafter.

Code of Conduct

Our Code of Conduct outlines the behaviours we expect our employees, contractors and casual workforce to exhibit with all other employees, suppliers, customers and stakeholders. Our code provides an overview of fundamental business values and summarises some important standards that underlie business ethics and professional integrity. These standards apply in all TEG workplaces and when representing TEG.

Through these arrangements TEG believes it can address modern slavery risk and ensure that all workers are engaged freely and willingly, that they are free to leave as they wish, are paid fairly and provided with a safe workplace.

HOW WE ASSESS EFFECTIVENESS OF OUR PRACTICES

We are committed to ensuring that we utilise a holistic approach to measuring our effectiveness in relation to the actions being taken to assess and address modern slavery risks.

In the past 12 months, TEG has assessed effectiveness on the following basis:

1. **Review of standard form contracts** – We have reviewed all of our standard contracts and note that 100% of our standard form Ticketing Services Agreements require adherence to modern slavery legislation and encourage the counterparty to conduct modern slavery-related due diligence enquiries. We also note that a number of our standard form supplier contracts include a modern slavery clause.
2. **Modern slavery-related complaints received** – We note that TEG has not received any complaints from staff or contractors relating to modern slavery in the financial year.
3. **Review and assessment of actions** – We recognise that our review and assessment of our actions to identify and address modern slavery risks in our operations and across our supply chains will be an ongoing and evolving process that we are committed to continue to build upon. To this end, we will set ourselves new goals to achieve and review/assess our actions, so that we can look back and assess the effectiveness of our approach and continue to inform our path forward.

LOOKING FORWARD

Following a review of the steps we have taken to ensure that there is no slavery or human trafficking in our business or supply chains, we also intend to take the following steps to further combat modern slavery and assess our effectiveness in the next financial year:

- Roll out online modern slavery-specific training modules and sessions to all TEG staff;
- Continue our analysis of the risks in our supply chain by engaging with identified high risk suppliers in our Ticketing and Touring segments to understand better how they are addressing modern slavery risks in their business;
- Continue to include modern slavery clauses in more of our standard form supplier contracts and review any master agreements that require renewal to scope the addition of a mandatory modern slavery clause. We will look to increase the percentage of our bespoke contracts including modern slavery clauses by 15%;
- Ensure ongoing review and updates to our suite of risk-related policies and governance control measures, including periodic briefing of senior management team and General Managers;
- Assess the work we are doing in relation to procurement to satisfy ourselves that we are free from any modern slavery risks (including continued application of supplier due diligence);
- Consider developing a 'Supplier Code of Conduct' which includes modern slavery risk mitigation.



Geoff Jones
CEO and Director
TEG Pty Ltd

22 December 2023

This statement was approved by the board of directors of TEG Pty Limited on 22 December 2023. It is made pursuant to Modern Slavery Act 2018 (Cth) and constitutes TEG Pty Limited's and its relevant subsidiaries' modern slavery statement for the financial year ending 30 June 2023.