

Delaware North Companies Australia Pty Ltd

# Modern Slavery Statement

2024



Delaware  
North<sup>SM</sup>

## Helping create a better world, one experience at a time.

Delaware North is one of the largest privately owned and operated hospitality and entertainment companies in the world that manages and provides food and beverage concessions, premium dining, entertainment, lodging and retail at many large venues and special places. These include sports stadiums, entertainment complexes, airports, and casinos.

Delaware North success is grounded in their vision and value statements which guide every action. The Delaware North vision is to delight guests by creating the world's best experiences today while reimagining tomorrow. To achieve it, Delaware North embraces core values of collaboration, innovation, leading by example and doing the right thing.



*"At Delaware North, we acknowledge the potential risks of modern slavery within our supply chains and operations. We are committed to eradicating all forms of modern slavery, both in Australia and New Zealand, by ensuring that our supply chains and operations uphold ethical practices and do not contribute to these violations."*

A handwritten signature in dark ink, appearing to read 'Gary Brown', written in a cursive style.

Gary Brown  
Managing Director

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## Reporting Entities

The Modern Slavery Act 2018 (Cth) (Act') requires large corporations with an annual revenue exceeding \$100 million to report annually on the risks of modern slavery in their operations and supply chains and what actions are taken to address those risks.

This Modern Slavery Statement is a joint statement under Section 14 of the Act and is submitted by:

Delaware North Companies Australia (DNCA) Pty Ltd, ABN 92 003 435 345

Delaware North Venue Services (DNVS) Pty Ltd, ABN 67 006 682 113 and

Delaware North Darwin Casino (DNDC) Pty Ltd, ABN 54 009 624 417.

The Statement is for the period of 1 January 2024 to the 31 December 2024.

## Consultation Process

Delaware North centrally manages its supply chain and human resources but engages in consultation with its related entities, sites, and venues across Australia when necessary. This collaborative approach helps Delaware North to identify risks, gather and distribute data, and implement standardized procedures and policies within its Australian operations.

Before finalizing this statement and presenting it to the Board, Delaware North conducted a comprehensive consultation process with the risk management committee which consists of members of the executive and senior management, who meet quarterly.

Through this engagement, consensus was reached on the proposed steps and actions, including the ongoing facilitation of regular roundtables to review and strengthen modern slavery policies and practices.

Delaware North's modern slavery strategy is led by its Head of Procurement, with support from key business functions such as Finance, Human Resources, Legal and Compliance, the Chief Operating Officer, and Information Technology. Members of these business functions form the Modern Slavery working group. For reference, the modern slavery Organogram is provided in Appendix A.

## Structure, Operations and Supply Chains

Delaware North Companies Australia Pty Ltd (ABN 92 003 435 345) was established in 1987 as a foreign-owned private company. For ease of reference, the company structure of Delaware North Companies Australia Inc is attached Appendix B. Delaware North generates revenue through catering, hospitality, and specialty retail services across Australia and New Zealand. With approximately 9,350 employees, the company operates from its head office in Docklands, Victoria.

As a global leader in hospitality and catering, Delaware North provide services across diverse sectors, including casinos, resorts, sports stadiums, merchandise, and airports. Its operations and supply chain are centrally managed, with the majority of food and beverage sourcing coming from Australian-based suppliers. Committed to full transparency,

Delaware North endeavours to ensure its supply chain is governed by pay awards. In Australia, approximately 75% of its suppliers focus on food and beverage, with the rest made up of merchandise, with a relatively small component of labour hire, equipment and services companies. that support staffing across its various locations.

The company's indirect food supply chain includes Australian farms and plantations, processing factories, and transportation services. Delaware North is aware of the potential risks of modern slavery practices within its supply chain, particularly related to geographic locations, product types, and workforce demographics.

## Further Details on Delaware North's Operations:

### Sports

Delaware North is a key player in sports hospitality, managing premium dining and concessions at over 50 sports and entertainment venues worldwide. Notable Australian locations include Marvel Stadium and the Melbourne Cricket Ground.

### Travel

As a leading airport food service and retail company, Delaware North operates at more than 30 airports and travel centres across the United States, Australia, and New Zealand. The Australian operations manage food and beverage outlets at Melbourne, Adelaide, and Perth Airports, and Auckland airport in New Zealand.

### Resorts

Delaware North's resorts in Australia, New Zealand and the United States provide exceptional hospitality in stunning

locations. In Australia, it operates the renowned Lizard Island Resort on the Great Barrier Reef and Pinewood Lodge in Queenstown New Zealand.

### Gaming

Delaware North is a prominent gaming operator, offering a range of entertainment options such as casinos, restaurants, lounges, and retail outlets, and owns and operates Mindil Beach Casino Resort in Darwin, Australia.

### Restaurants and Catering

Delaware North is renowned for its culinary expertise, delivering world-class dining experiences in unique locations globally.

### Specialty Retail

The company manages over 300 specialty retail outlets at airports, parks, gaming properties, and sporting venues. In Australia, Delaware North operates retail merchandise outlets at the Melbourne Cricket Ground and Collingwood Football Club.

## Risks of Modern Slavery

The Delaware North supply chain is categorised into:

1. Food and Beverage including fresh produce, dry goods, meats and poultry, beverages including alcohol
2. Merchandise including sporting apparel
3. Indirects including equipment, machinery, service providers, and transportation
4. Employees and agency staff



As part of the risk assessment, a desktop review of the top 50 suppliers by spend was conducted, which accounts for 71% of the company's total external supplier expenditure. The potential risks of modern slavery were evaluated, in line with the Act, and the Walk Free Global Slavery Index 2023, focusing on financial, industry, geographical, subcontractor-related risks, and whether suppliers submit a current modern slavery statement.

The desktop review found that the 50 suppliers were assessed as having a low likelihood of modern slavery risks. This assessment was based on publicly available information and data previously gathered from Delaware North's suppliers.

Several factors contributed to the high proportion of low-risk suppliers, including:

- Fifty percent of suppliers have a modern slavery statement.
- Key staff are provided with online training in modern slavery prevention.
- Supplier Agreements require supplier commitment to modern slavery prevention and mitigation.
- Delaware North conduct their own recruitment and adhere to Visa requirements.

- When required, four recruitment agencies are utilised that were engaged through a tender process where there is a modern slavery component built into the contract.
- The introduction of a screening process assists in preventing the onboarding of high-risk suppliers.
- Merchandise suppliers are required to be licensed by the Australia Football League (AFL), whereby the AFL has their own modern slavery statement and supplier due diligence process.

Although modern slavery has yet to be detected within Delaware North's supply chain or operations, there are some constraints on current visibility. Salient risks may occur related to forced labour, debt bondage and child labour for tier two and tier three suppliers of fresh produce where migrant workers are utilised and food products farmed and packaged in countries associated with a medium to high risk of modern slavery. This highlights the importance of conducting the collection of information through modern slavery questionnaires and checking the existence of supplier modern slavery statements.



*"At Delaware North, we rely on a diverse range of suppliers, so it is essential that we prioritise transparency, continuous supplier engagement and ethical sourcing. Ethical sourcing is not just a compliance issue – it is a moral obligation, and we recognise the critical role that Procurement play in identifying and eliminating modern slavery within our supply chain. Delaware North remains dedicated to continually enhancing its processes and systems to safeguard human rights across all aspects of its operations and supply chain."*

*Kathy Choi*

Kathy Choi  
Head of Procurement – AUS/NZ

# Delaware North's Actions

In 2024, Delaware North conducted key actions to assess and address modern slavery risks. These included:

## A Review of Internal Risk Management

Delaware North's existing policies and procedures were evaluated to determine if they adequately address the risks of modern slavery. This included evaluating:

### Delaware North's Modern Slavery Policy

- Affirms the company's commitment to the fundamental right of all individuals to live and work freely, while opposing all forms of modern slavery.
- Aims to educate staff and suppliers about the risks of modern slavery.
- Commits to the implementation of systems and controls to prevent modern slavery within Delaware North's business and supply chain.

### Delaware North's Modern Slavery Questionnaire

Delaware North's modern slavery questionnaire helps collect vital information on modern slavery risks associated with suppliers. It features 10 targeted questions assessing suppliers' exposure to these risks, with responses assigned a risk rating. The questionnaire covers key factors such as operations in high-risk regions, employment of migrant or underage workers, and the presence of policies to address modern slavery concerns.

## Relevant Policies

### Whistleblower Policy

Delaware North's Whistleblower Policy allows an eligible whistleblower to disclose any activity or conduct that is unlawful, unethical, or that falls within the definition of Modern Slavery.

Delaware North's employees are encouraged to report any suspected misconduct or impropriety relating to operations or practices. The policy is developed and implemented having regard to the protections afforded to eligible whistleblowers as prescribed in the Australian Corporations Act 2001.

### Approved Suppliers Program

Delaware North's Approved Suppliers Program established a structured, transparent, and accountable framework for the selection, approval and ongoing management of suppliers who provide goods and services critical to operations. The program is designed to ensure that all suppliers consistently meet Delaware North's business standards, customer expectations and legal obligations.

Implementing this program aims to:

- Safeguard product and service quality through the consistent use of pre-vetted suppliers who meet defined performance and quality criteria
- Ensure compliance with all relevant Australian laws and regulations, including food safety standards, workplace health and safety requirements, Australian consumer law and the Act.

- Mitigate operational risks by identifying and engaging with suppliers who demonstrate financial stability, operational reliability and responsible business practices.
- Promote ethical sourcing and sustainability by prioritising suppliers who uphold environmentally friendly sustainable and socially responsible practices.
- Enhance guest satisfaction through the delivery of consistently high-quality experiences enabled by reliable supplier partnerships.
- Improve operational efficiency by streamlining procurement processes and fostering strong, performance driven relationships with supply chain partners.

### Supplier Agreement

Delaware North's Supplier Agreement includes a requirement that all parties to the Supplier Agreement represent, warrant and undertake that while operating any of its business (including performance under the Supplier Agreement), the party and its operations will comply with the Act. A party may request the completion of periodical questionnaires relating to the sources of products, materials, and business practices in addition to conducting social accountability audits to verify that the other party's business practices comply with the Act.

### Employee Hotline Policy

Delaware North's employees are encouraged to report any improper, unethical or unlawful behaviour of which they become aware of via a hotline number or online. The hotline service is administered by a professional third party.

### People - Training

Delaware North's commitment to ethical sourcing is reinforced through online modern slavery training, which equips employees with the knowledge to make ethical purchasing decisions. Participants are required to complete a short evaluation at the end of the training to confirm their understanding of modern slavery. In its third year running and is incorporated into the onboarding process for relevant new employees.

### Centralised Supplier Screening and Onboarding

The enhancement of the supplier onboarding process has introduced centralized screening, for centrally arranged suppliers ensuring that these new suppliers undergo thorough evaluation by the Head Office procurement team. This proactive approach allows potential ethical risks to be identified and addressed before a supplier completes the onboarding process, reinforcing ethical supply chain practices. As part of this process, relevant information is gathered through the provision of modern slavery questionnaires, enabling a deeper assessment of supplier practices.

### Supplier Risk Assessments

Payment data for the period of January 2024 to December 2024 was analysed to determine the top 50 spend suppliers. These suppliers were assessed with a focus on financial, industry, geographical, subcontractor-related risks, and whether suppliers had submitted a modern slavery statement.



# Effectiveness of Actions

## Internal Risk Management – Evaluation of Policies and Procedures

The ongoing reviews of policies and procedures ensured the continued strength of a supportive framework that fosters the proactive prevention and responsible management of modern slavery risks.

## People - training

The continuation of employee training and awareness reinforces understanding and compliance for existing and new employees who undergo online training on modern slavery. This education equips staff with the knowledge needed to identify warning signs and engage in responsible procurement practices.

## Screening of suppliers during onboarding

The screening process proactively addresses suppliers that potentially pose a high/medium risk at the onboarding stage. This process, along with modern slavery questionnaires, ensures that suppliers align with ethical procurement standards.

The onboarding screening process is proving to foster transparent and collaborative relationships with suppliers, improving the transparency of Delaware North's supply chain operations, and aiding in identifying potential modern slavery risks.

## Risk Assessments for High-Spend Suppliers

Conducting desktop risk assessments for suppliers with significant financial engagement has assisted in pinpointing potential areas of tier two and tier three supplier concern while enabling targeted modern slavery questionnaires to gather further supplier modern slavery mitigation information.

## Modern Slavery working group

The modern slavery compliance team, comprising members from Delaware North's Legal and Compliance and Procurement departments, actively monitors and addresses issues related to suppliers. These issues may arise from responses to modern slavery questionnaires, complaints, or observations by staff. Any identified risks or instances of non-compliance are reported to the Risk Management Committee for further discussion and resolution.

## Moving Forward

Building on the modern slavery framework that has already been established, focus will be on the following key areas, evaluating their feasibility and effectiveness:

- Require, as far as reasonably practicable, current, and new relevant suppliers to complete a modern slavery questionnaire and declaration.
- Complete the enhancement of Delaware North's Global Supplier Code of Conduct
- Mandate that all new suppliers complete the updated Global Supplier Code of Conduct during the onboarding process.
- Explore opportunities to provide additional modern slavery resources and literature to suppliers, based on insights gained from the completed modern slavery questionnaires.
- Enhance internal accountability standards and procedures to ensure employees and contractors uphold Delaware North's standards on modern slavery and human trafficking. This will include:
  - Promptly addressing any potential risks of modern slavery.
  - Managing, and when necessary, enforcing consequences for non-compliance. Current agreements already include clauses requiring supplier compliance, self-reporting of breaches, and provisions for audits or risk of contract termination.
  - Establishing a process to remediate identified breaches.
  - Requiring all suppliers to meet minimum standards and continuously improve best practices.
  - Monitoring supplier compliance through a risk assessment process and maintaining the right to terminate agreements if a supplier fails or refuses to comply fully with the minimum standards.

Delaware North remains committed to continuously reviewing, refining, and enhancing its policies, controls, and procedures related to modern slavery.

# Statement Approval

The board of Delaware North Companies International Ltd has approved the Statement on 23 June 2025 for US

## DELAWARE NORTH COMPANIES INTERNATIONAL LTD (the "Company")

### CIRCULATING RESOLUTIONS OF THE DIRECTORS OF THE COMPANY PURSUANT TO S248A OF THE CORPORATIONS ACT 2001

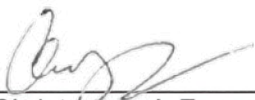
#### Background

We, being all of the Directors of the Company entitled to received notice of a board meeting and to vote on a resolution, are in favor of the resolution set out below. The resolution is passed by the directors without a board meeting on the date and at the time when the last director signs. In passing the resolution the directors note that they have reviewed the Modern Slavery Statement in Annexure A (the "Statement").

#### Resolution

The Board of Delaware North Companies International Ltd has approved the Statement on 23 June, 2025.

Signed:

  
Christopher J. Feeney, Director

Resolved on 23 June, 2025 at Buffalo, New York (USA)

Signed:

  
Amy A. Latimer, Director

Resolved on 23 June, 2025 at Buffalo, New York (USA)

Signed:

  
Janice R. Trybus, Director

Resolved on 23 June, 2025 at Boston, Massachusetts (USA)

DNCA has approved this statement on 19 June 2025.

# Statement Approval

The board of Delaware North Companies Australia Pty Ltd has approved this statement on

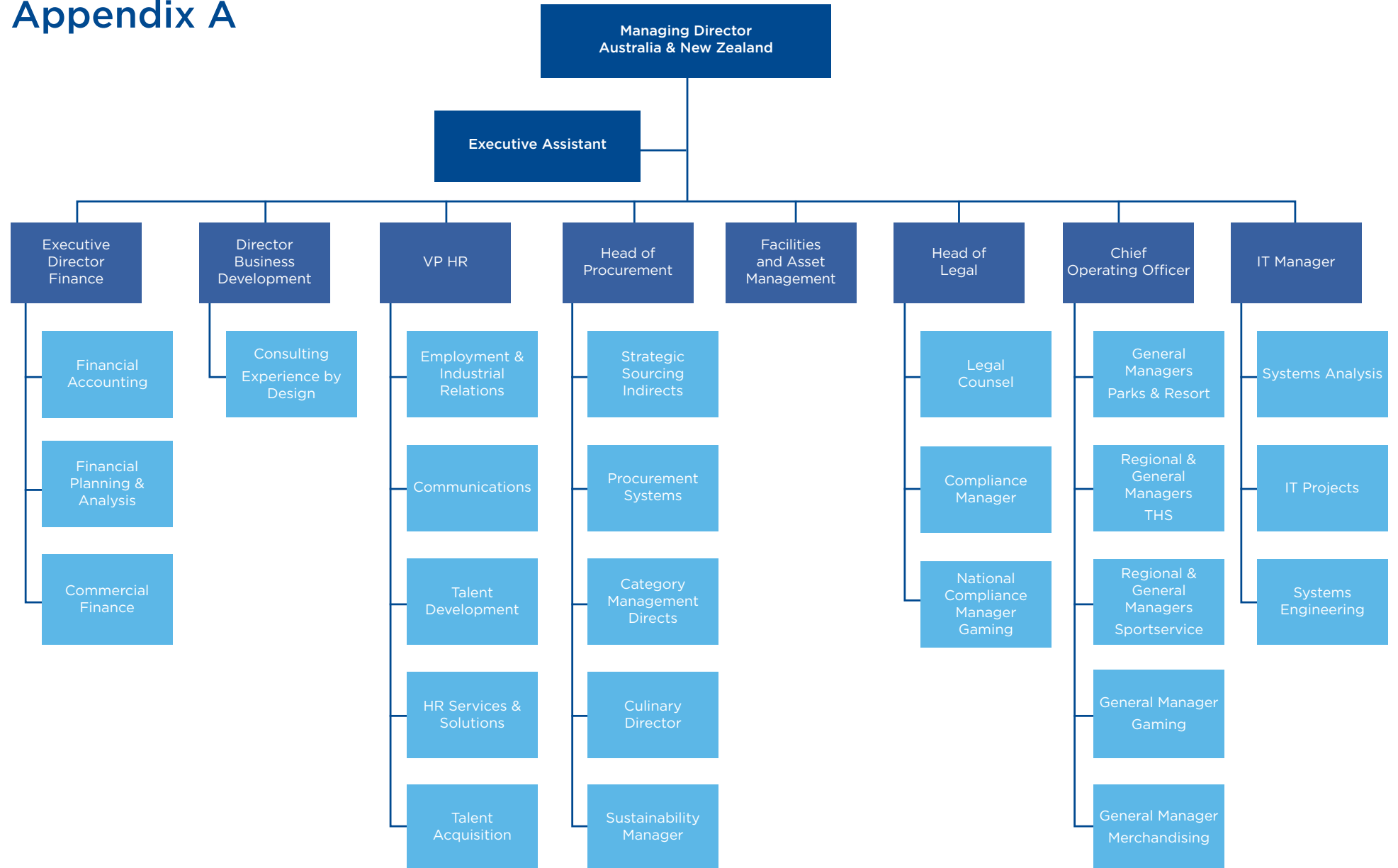
Date: 19 June 2025

A handwritten signature in dark ink, appearing to read 'Gary Brown', with a stylized flourish at the end.

Name: Gary Brown

Position: Managing Director

# Appendix A





# Appendix B

## Company Structure

19 June 2025

