



Australian Rugby League Commission Limited
ACN 003 107 293

National Rugby League Limited
ACN 082 088 962

Joint Modern Slavery Statement

For the Reporting Period 1 November 2021 to 31 October 2022

This statement covers the activities of the reporting entity Australian Rugby League Commission Limited (ACN 003 107 293) (**ARLC**) and its owned and controlled entities during the financial year ended 31 October 2022. This statement is a joint statement made by ARLC and the reporting entity National Rugby League Limited (ACN 082 088 962) (**NRL**).

This modern slavery statement is 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 ARLC, and is jointly made by the ARLC and NRL, and on behalf of the ARLC Group (defined below).

About us

At ARLC, we recognise that respecting the human rights of those affected by our business activities is important.

The ARLC's mission is to bring people together and enrich their lives through the sport of rugby league. The ARLC's objects are to foster, develop, extend and provide adequate funding for the game of rugby league from the junior to elite levels and to generally act in the best interests of the game. As an organisation, ARLC is driven by its beliefs that state:

1. We are Inclusive;
2. We are Positive;
3. We are United; and
4. We are Disciplined.

Rugby league has been a part of Australian sporting culture since 1907. In 1998, the National Rugby League competition was formed. ARLC was formed in 2012 and is the independent governing body for rugby league in Australia.

The first season of the elite women's National Rugby League competition, known as NRLW, was completed in 2018. The competition started with four NRLW Clubs and has now expanded to include 6 NRLW Clubs. It is expected to grow to 10 NRLW Clubs in 2023.

The elite men's National Rugby League competition, known as the NRL, had 16 teams in the reporting period. An additional team will be joining the competition in 2023.

Our structure and operations

ARLC is a non-for-profit company limited by guarantee incorporated in Australia. Our registered office is located at Rugby League Central, Driver Avenue, Moore Park, NSW 2021 (**RLC**). ARLC is the single controlling body and administrator of the sport of rugby league in Australia with a board consisting of up to eight independent Commissioners.

ARLC's members are the:

1. New South Wales Rugby League Limited (**NSWRL**) and Queensland Rugby Football League Limited (**QRL**) (which are separate entities and are not owned by ARLC);
2. 16 National Rugby League clubs (**Clubs**); and
3. The Australian Rugby League Commissioners.

ARLC is the parent company and owns and controls the following entities:

1. NRL (ARLC's operating entity);
2. ARLC Vic Limited;
3. ARLC SA Limited;
4. ARLC WA Limited;
5. ARLC NT Limited; and
6. NRL Foundation Limited, (together, **ARLC Group**).

NRL, a subsidiary of ARLC (ARLC is the sole member of NRL), is a company limited by guarantee headquartered at RLC. NRL is the operating entity for ARLC.

The ARLC Group company structure is summarised in Figure A below.

The ARLC Group conducts a diversified range of business activities across ticketing, licensing, merchandise, retail, supply, digital and content, hospitality, marketing, media, technology, IT, data, legal, finance, strategy, participation, partnerships (corporate, government and stadia), pathways, PR, publicity, events, policy development, investigative services, elite and community football.

ARLC and NRL's core operations are conducted at RLC. We also operate rugby league related services across Australia and in Papua New Guinea (**PNG**), Fiji, Tonga and Samoa. The NRL Pacific program uses the power of rugby league to engage and develop Pacific communities through fostering grass roots competition, coaching/mentoring, talent identification and other education activities connected with playing rugby league to improve gender equality, social cohesion and health and participation opportunities for people in the Pacific.

The operations of the other ARLC Group entities listed above (i.e. the NRL affiliated State and Territory entities (**Affiliates**)) are conducted out of offices in each of the relevant States and Territories.

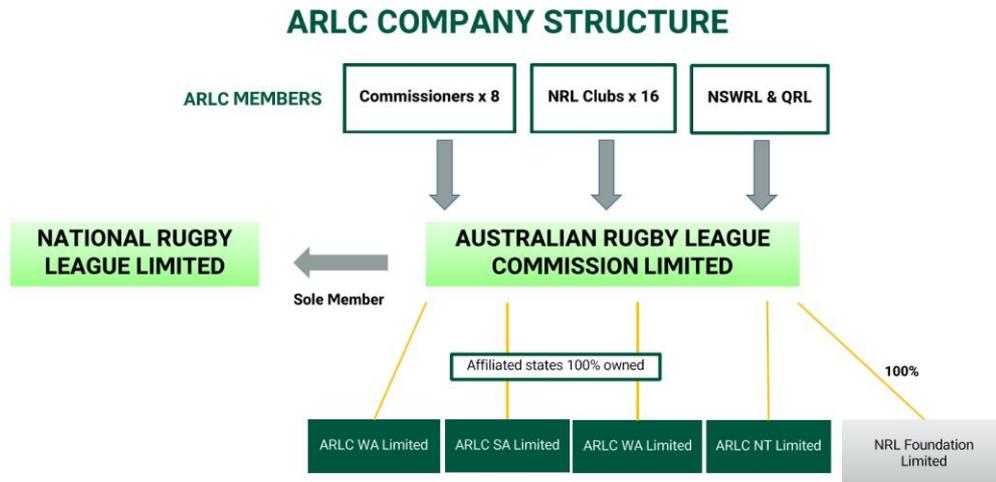
NRL and the Affiliates had 882 employees, including government funded employees (418 permanent and 464 casual) for the reporting period. There were also 39 employees (16 permanent and 23 casual) engaged in the Pacific for the NRL Pacific program.

In July 2022, ARLC purchased the Gambaro Hotel, located at 33 Caxton St, Petrie Terrace QLD 4000. ARLC is the owner of the Gambaro Hotel and has entered into various management agreements with providers to run the Hotel (including the restaurant) on its behalf.

During this reporting period, there was further focus on reduction of operating costs, which has improved the financial position of ARLC.

For more information about the ARLC, including its overall financial position for the reporting period, please refer to the ARLC's [2021/2022 Annual Report](#).

FIGURE A



Our supply chain

ARLC and NRL engage with suppliers to provide goods and services to support their operations. The main types of goods and services that the ARLC and NRL procure for their operations are the following key categories:

- Licensing, retail, merchandising: ARLC and NRL license intellectual property they own to licensees who then use our intellectual property on licensed products. These products are either then sold directly to consumers or to retailers. Licensed products include rugby league apparel, footballs and other rugby league related products.
- IT, digital, content and marketing: ARLC and NRL engage suppliers to provide IT, digital, content and marketing services including in relation to content management systems, data storage and sharing, communication to our stakeholders and the public, content and marketing creation. ARLC and NRL also engage suppliers to provide hardware and software, printers, audio/visual equipment, data room services and desk phones used by our employees.
- Venue hire and match day operations: ARLC and NRL engage suppliers to provide services directly in relation to NRL owned matches such as the men's and women's state of origin, , Magic Round, NRL and NRLW Finals Series, including the Grand Final, and themed NRL and NRLW Premiership Rounds.
- Travel and accommodation: ARLC and NRL procure travel and accommodation providers to assist in the operation of the NRL and NRLW competitions, as well as internal business operations generally (both at ARLC and NRL levels, as well as affiliated state levels).
- Hospitality, catering and events: ARLC and NRL use suppliers to assist in staging events related to its operations and catering/hospitality services at those events.
- Signage: In order to adhere to ARLC's and NRL's specific sponsorship and partnership obligations, we engage suppliers to provide signage (including painted and virtual on-field signage, permitter LED signage, static) that is displayed at NRL and NRLW related matches.
- External professional services: ARLC and NRL requires some external professional services to assist with specialised creative, IT, taxation, legal and insurance related matters.
- Office equipment and corporate building maintenance: NRL also procures office consumables for employees, including stationery, amenities and kitchen consumables and procures corporate/building services including office maintenance services, cleaning and security.

ARLC and NRL engage its suppliers mainly on an annual or multi-year basis. Our suppliers are primarily located in Australia. We do procure minimal goods and services from locations overseas including the UK and America (such as digital content through Facebook, Google etc with headquarters overseas). All of our game balls procured through Steeden are manufactured in India. In addition, in relation to the NRL Pacific Program, we have regular suppliers in each jurisdiction primarily for office, vehicle and phone supplies.

Modern slavery risks – ARLC and ARLC Group

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

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 and specific entity risk.

Our risk assessment has indicated that our operations and supply chain have a low potential for modern slavery risks on the basis that ARLC and NRL's employees are predominantly based in Australia and a large proportion of our supply chain suppliers are based in Australia which is considered to be a low risk country for modern slavery.

ARLC and NRL acknowledge and recognise that the ARLC Group could be indirectly linked to modern slavery risks. The key risk that has been identified is that our current supply chain (i.e. our direct, Australian based suppliers) may outsource or sub-contract their work to countries outside of Australia. This includes:

- the manufacture of game balls from India, which we understand is a region where modern slavery risks may be present; and
- IT and tech supply services, which we understand may be outsourced to regions including the UK, America, Cyprus, New Zealand and Ireland where modern slavery risks may be present.

We also have a small number of suppliers in the Pacific region, given our presence in Tonga, Samoa, Fiji and PNG, which presents some further potential for modern slavery risks.

COVID-19

ARLC and NRL have assessed the impact of COVID-19 pandemic on its practices and risks of modern slavery. The impact of COVID-19 continued to present challenges as we tried to 'co-exist' with COVID-19. We continued to have very strict and comprehensive protocols in place to protect players and staff including the use of constant RAT testing to safeguard players and the wider game and minimise risks. By the end of the 2022 season, the New Zealand Warriors were able to play their first match in New Zealand after many years of impact from COVID-19.

During this reporting period we also identified impacts to our supply chains, including some shortages, delays and factory shutdowns which negatively impacted our operations. This resulted in NRL having to make expensive switches to other suppliers, however there were no modern slavery risks identified with such temporary measures.

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. The actions and measures described below have allowed us to assess and address the risks of modern slavery in our operations and supply chains.

Supplier RFP and Procurement Policy

With the success of the improvements to our request for proposal (RFP) process, we focused on the business's wider procurement practices, including specific ways to address modern slavery risks in our procurement process. To assist, we commissioned KPMG to conduct an audit of our procurement processes and practices.

Contracts and supplier engagement

Where applicable, our suppliers, service providers and customers are contractually required to comply with any policies and procedures as directed by NRL and/or ARLC, including relevant policies listed below, and all applicable laws.

Policies, procedures and training

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

- Code of Conduct: This policy sets out the minimum expectations for our employees and contractors in respect of legal, regulatory and industry compliance, as well as standards of acceptable behaviour and interaction with our stakeholders.
- Grievance Policy: This policy supports and encourages employees to raise concerns internally that will be resolved in a supportive and timely manner, taking into consideration confidentiality, sensitivity and fairness to all parties as well as applicable legislation and without fear that their future employment prospects will be adversely affected.
- Whistle-blower Policy: This policy sets out a process for persons to raise concerns regarding suspected unethical, illegal or, fraudulent behaviour or other misconduct. This policy allows employees and members of the public to report improper conduct anonymously.

All NRL employees, as part of the new employee induction process, are required to complete training on the NRL's key policies, and refresher training is provided on a regular basis to all current employees. The training covers the following items:

1. Diversity and Inclusion Training
2. Diversity, Inclusion and EEO Policy
3. Indigenous Cultural Awareness Workshop
4. Mental Health First Aid Training
5. Social Media
6. Child and Vulnerable People Protection Policy
7. Discrimination, Bullying and Sexual Harassment Policy
8. Work Health Safety
9. Code of Conduct

ARLC and NRL have made the applicable policies accessible on our internal intranet, along with other important procedures and policies that govern how we operate. Some of our related policies are also forward facing and available through our website at nrl.com.au.

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

Over this reporting period, we assessed that the improvement to our RFP process were effective and assisted us in better understanding the modern slavery risks and issues that might be present in our supply chain.

With a focus on continuous improvement, we will continue to work on developing measures to ensure we can review the effectiveness of the actions we are taking to assess and address modern slavery risks in future reporting periods, as set out in the 'Looking forward' section below.

Looking forward

We will review and consider the steps we can take to assess and address the risks of modern slavery in our operations and supply chains.

Going forward, we will focus on the following:

- developing and improving our procurement practices and implementing the findings of KPMG's audit;
- looking to employ a Child Safety Officer;
- developing an action plan to focus and prioritise our actions for future reporting periods;
- incorporating terms into supply agreements which provide assurance that suppliers are aware of and comply with modern slavery obligations; and
- increasing the awareness and application of modern slavery risk treatment by NRL staff.

In order to assess the effectiveness of these actions, NRL will consider options to broaden its assessment, including:

- when commencing a new operation or engaging a new supplier, assessing whether our existing risk management processes remain appropriate; and
- tracking the number of suspected or identified modern slavery incidents identified and remediated.

Consultation

ARLC, NRL and other entities in the ARLC Group are covered by this statement. The ARLC Group entities are controlled and owned by ARLC and operate under the same governance and risk management procedures, systems and processes set out in this statement that apply to the ARLC and NRL.

ARLC and NRL and the other entities in the ARLC Group covered by this Joint Modern Slavery Statement are centrally managed by the ARLC and the NRL. They operate under the same governance and risk management procedures and policies set out in this Joint Modern Slavery Statement. Prior to being put to the Board of ARLC for review and approval, this statement was reviewed by ARLC management and external legal counsel.

Approval of statement

The Board of ARLC approved this Joint Modern Slavery Statement on 27 February 2023 in their capacity as the principal governing body of ARLC and as the parent entity for NRL and the other entities in the ARLC Group.

This statement is signed by Mr Peter V'landys AM in his role as Chairman of ARLC.

Signed: 

Name: Peter V'landys AM

Date: 27/2/23

Mandatory Criteria

This statement addresses 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.

Criteria	Page number
(a) Identify the reporting entity.	1
(b) Describe the structure, operations and supply chains of the reporting entity.	1-4

(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.	4
(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.	4-5
(e) Describe how the reporting entity assesses the effectiveness of such actions.	5
(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).	6
(g) Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	5-6