



Australian Football League
ABN 97 489 912 318

MODERN SLAVERY STATEMENT

1 November 2020 to 31 October 2021

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For the Reporting Period 1 November 2020 to 31 October 2021

This is the second 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, 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 our 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. The framework for the AFL's modern slavery response was established in its inaugural Modern Slavery Statement. This second Statement sets out the actions taken to build on that framework to further our modern slavery risk mitigation commitment.

About the AFL

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 and talent pathways to reach those 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 the forthcoming AFLW Season 7 will see the competition expand to include AFLW teams from all 18 AFL Clubs.

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**), and the AFL State Entities (see further under 'AFL Structure'). MSL manages Melbourne's premier sports and entertainment venue, Marvel Stadium, and 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.

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 [2021 Annual Report](#).

AFL Structure

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 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 eight departments each led by an Executive General Manager: Game Development, Corporate Affairs, Customer and Commercial, People, Football Operations, Inclusion and Social Policy, Finance, Clubs and Broadcast, and Strategy. The Executive General Managers of each of the departments form the AFL's executive leadership team.

Within the Game Development department sits the operation of the 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 as follows:

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

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 AFL and its subsidiaries employ approximately 767 (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 that have not been included in this number (e.g. coaches and medical personnel for talent pathway programs). This cohort of employees fluctuates regularly depending on the time of year.

The AFL's 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, as well as to support 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.
- **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 coaching and medical 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 currently being undertaken by the AFL is the redevelopment of Marvel Stadium. The AFL has engaged John Holland Pty Ltd to carry out the build and it is anticipated that it will be completed by mid-2023.

Risks of modern slavery practices in the operations and supply chains of the AFL and the entities it owns or controls

Risks identified in operations

As was reported in our inaugural Modern Slavery Statement, the AFL has identified that its operations carried out directly by AFL employees pose a low risk of causing, contributing or being linked to modern slavery. All AFL employees continue to be based in Australia and, during the reporting period, all operations of the AFL carried out by AFL employees were carried out in Australia. During the AFL onboarding process, AFL employees are provided with copies of the AFL's key policies and are required to undertake "Healthy Workplace Training" and refresher training is required on a regular basis. The training covers the

following key areas (being the same areas as those previously reported with the addition of Cyber Security training):

- Sexual Harassment in the Workplace
- Workplace Bullying
- Safeguarding Children & Young People
- Anti-discrimination and Equal Opportunity
- Work Health and Safety
- Aboriginal and Torres Strait Islander Inclusion and Cultural Safety
- Cyber Security

Risks identified in supply chains

No modern slavery practices have been identified in the AFL's supply chains. However, the AFL recognises that there is an increased risk of modern slavery in certain industries and that we could be indirectly exposed to modern slavery risks through our supply chain. The key areas of risk that have been identified in our supply chain are:

- suppliers that engage large-scale temporary work forces, which is predominantly relevant to stadium operations, including suppliers that provide cleaning, security and hospitality services; and
- the geographical location of some suppliers that sit within the AFL supply chain are outside of Australia. This is particularly relevant in respect of suppliers to the AFL's official merchandise licensees, with their international supply chains primarily based in China.

All AFL official merchandise licensees were contacted prior to the completion of this Statement and asked to report on their modern slavery practices and supply chains. As with our first statement, there is presently no indication that suppliers within our official licensee supply chain source anything from the top 10 countries for modern slavery risk as reported *Walk Free Foundation – The Global Slavery Index 2018*. The AFL intends to undertake this reporting process with its official licensees on an annual basis.

Impact of COVID-19

The impact of COVID-19 on the AFL industry continued to be significant during the reporting period. The speed at which the AFL was required to respond to the ever-changing environment as a result of COVID-19 to ensure that the Men's and Women's elite competitions could continue meant that in many circumstances it was difficult to conduct a thorough assessment of the supply chains of contractors engaged in the time allowed. With the return of the elite competitions to a more traditional format, the AFL is committed to addressing this and putting in place a more structured process for pre-contractual due diligence of suppliers, as is further discussed below.

Action taken to assess and address modern slavery risks

Contracts

A review of the AFL's standard terms for engagement with official merchandise licensees was undertaken and additional provisions have been included to specifically address modern slavery that require licensees to:

- take all necessary steps to identify and address risks of modern slavery practices (as defined in the Act) in their supply chains and the supply chains of any of their related corporations, and that if at any time they become aware of any Modern Slavery practices in their operations or supply chains or the operations or supply chains of a Related Corporation, they will:
 - immediately take all necessary actions to remove these practices; and
 - as soon as reasonably practicable, advise the AFL of such practices and the actions taken to remove these practices;
- respond to any reasonable requests for information in respect of its Modern Slavery practices made by the AFL.

The AFL relied on these provisions to request all official AFL licensees to report on their modern slavery practices prior to the submission of this Statement.

The contractual provisions identified in our last statement continue to be included in agreements with official merchandise licensees.

Personnel

In furtherance of the AFL's commitment to addressing the risks of modern slavery in its business operations, the AFL has increased the personnel dedicated to the business areas of risk and procurement. Current key roles that service these business areas are:

- **Risk:** Risk and Compliance Manager, COVID Risk and Compliance Lead, Occupational Health and Safety Manager; and
- **Procurement:** Head of Procurement, Procurement Lead and Procurement Coordinator.

The Risk and Compliance team sits within the broader Legal & Regulatory Team and the Procurement team sits within the broader Finance team.

AFL Procurement - Supplier Due Diligence

The AFL Procurement team has implemented a process for conducting due diligence on suppliers at the pre-contractual stage and throughout engagement. Pre-contractual due diligence enables us to identify whether suppliers are able to meet the AFL's modern slavery risk mitigation expectations, whether additional controls are appropriate to assist in managing any risk associated with a particular supplier, and how to implement those controls. We are also committed to ongoing due diligence across our suppliers. The process implemented by AFL Procurement is as follows:

1. Communication: AFL's modern slavery risk mitigation expectations are communicated to prospective supplier.

2. Risk Assessment: AFL to assess risk level of prospective supplier.
3. Contract: Appropriate contractual clauses are included in AFL standard contracts to reflect the risk level identified.
4. Gap closure: To the extent that there is any gap between the AFL's risk mitigation expectations and the supplier's processes, agree a gap closure plan.
5. Ongoing Due Diligence: The AFL Procurement team monitors the existing supplier base and any suppliers identified as having a material risk of modern slavery in their business practices are subject to increased scrutiny from the AFL Procurement team. The AFL intends to codify the threshold risk level where this increased scrutiny will be activated and the options for remedial action to the extent that any risks are identified that have not been appropriately mitigated.
6. Remedial Action: Remedial action to be undertaken to the extent any risks are identified in the ongoing due diligence.
7. Continuous Improvement: AFL approach is continuous improvement in supplier performance management.

Further work is to be done to embed this process across the business to ensure that all prospective suppliers are subject to assessment prior to and during engagement.

Activity Risk Assessments

A formal risk assessment process has been developed that must be completed by AFL personnel prior to any external activity being undertaken e.g. a talent program or on-field activation. Details of all third parties engaged in the provision of the activity are required to be provided and the assessment must be approved by the AFL Risk team prior to the commencement of the activity. To the extent that any risks are identified in the risk assessment, appropriate control mechanisms must be identified and implemented.

Stadium Contractor Induction

All visitors to Marvel Stadium, including all contractor personnel, are required to complete an induction training course that includes sections on respectful conduct and how to report any incidents. Contractors that provide goods and services in higher risk industries are also required to complete a contractor pre-qualification assessment prior to provision of any goods and services at the Stadium that assesses the contractor on occupational health and safety conditions.

AFL Policies

- The AFL Procurement Policy has been retained but is currently undergoing an extensive review by relevant stakeholders.
- The Whistleblower Policy has also been retained with the whistleblower reporting mechanism available to the public on the AFL's policies page on its website.
- Additional relevant policies identified in our last statement that have been retained are the AFL's Indigenous Procurement Policy, People Code of Conduct, Equal Employment Opportunity Policy and Respect and Responsibility Policy.

Working Group

The AFL Modern Slavery Working Group has been established with representation from the Procurement, Legal, Finance, Licensing and Risk business functions. The establishment of

the working group has been relatively recent, and the group has further work to do to ensure that it is monitoring the effectiveness of the processes and systems implemented to combat modern slavery risks and is reporting on that effectiveness to senior management.

The working group has identified a number of improvements that could be made to AFL processes and systems, as further discussed in the 'Looking forward' section below, and we will report on the implementation of these improvements in the AFL's next statement.

Looking forward

The AFL has made significant progress on its modern slavery risk mitigation strategies, but it is also committed to continued improvement.

The AFL is currently in the process of assessing a proposed digital solution that would be embedded into our contracting and payment processes and would require potential suppliers to provide certain information, including with respect to their modern slavery practices, prior to being approved as a supplier of the AFL in our systems. Further assessment of the proposed solution is to be undertaken to understand the capability for analysis of the data provided to better identify where the risks of modern slavery sit within our supply chains.

Additional steps being undertaken or committed to be undertaken by the AFL to further identify, manage and mitigate the risks of modern slavery in our business operations and supply chain include:

- A thorough review of the AFL's Procurement Policy is currently being undertaken, which will include input from the AFL Modern Slavery Working Group. As part of the review, it is proposed that a standalone Supplier Code of Conduct would be established and, once established, it is intended that agreement to the Code of Conduct will form part of the digital solution currently under consideration.
- Tailor existing training that is provided to AFL personnel to specifically address modern slavery. Additional training on modern slavery to be provided to AFL personnel who engage suppliers as part of their role. This will cover key strategies for identifying the risks of modern slavery.
- A broad review of all AFL policies is currently being undertaken to establish a standardised approach to the review and update of AFL policies. This will ensure that AFL policies reflect the AFL's position and approach to addressing modern slavery risks in our business operations.

The AFL is also eager to take on a leadership role with AFL Clubs and community football to encourage the organisations involved to focus on the risks of modern slavery in assessing their business operations. The AFL is in the process of giving further consideration to the assistance it could provide to these organisations.

Consultation with controlled subsidiaries

The AFL and its controlled subsidiaries covered by this Statement 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 all AFL controlled subsidiaries covered by this Statement.

The AFL Commission have approved this Modern Slavery Statement on 18 May 2022.



Gillon McLachlan
Chief Executive Officer
Australian Football League

