



**Australian Football League**  
**ABN 97 489 912 318**

# **MODERN SLAVERY STATEMENT**

**1 November 2024 to 31 October 2025**

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### Modern Slavery Statement

For the Reporting Period 1 November 2024 to 31 October 2025

#### Part 1 – Introduction

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 Part 2 of this Statement, for the reporting period 1 November 2024 to 31 October 2025. 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.

#### Part 2 – 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 19<sup>th</sup> club to join the AFL and AFLW competitions. It is currently anticipated that the club will join both the AFL and AFLW competitions in 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.

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 Ltd 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.

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 2025 Annual Report.

### **Part 3 – 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 ten departments each led by an Executive General Manager or the General Counsel: Game Development; Football Performance; Football Operations; Finance; Broadcast & Infrastructure; People; Corporate Affairs; Legal & Regulatory; Strategy, Data & Analytics; Operations. The Executive General Managers 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 990 (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.

## Part 4 – 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 its 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 its 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 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. The AFL is committed to building trusted and transparent relationships with its suppliers to ensure an open dialogue in which any risks identified can be efficiently and effectively addressed.

## Part 5 – Risks of Modern Slavery

### (a) 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

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" in Part 5(b)).
- **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.

**(b) Risks identified in supply chains**

The AFL recognises, as it has in its previous modern slavery statements, that there is an increased risk of modern slavery in certain industries the AFL engages with through its supply chain.

During the Reporting Period, the AFL onboarded 1,153 new suppliers, and 2,803 suppliers were used across the Reporting Entities. Using the AFL’s industry risk measurement tool, which ranks a supplier’s modern slavery risk profile from 1 (Negligible/No Risk) to 9 (Absolute Risk), the risk profile of AFL suppliers was determined, and the results are set out in Figure 1 below. A key finding is that 17% 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	
53	774	659	53%
Moderate Low	Moderate	Moderate High	
540	310	187	37%
High	Very High	Absolute Risk	
238	42	-	10%

A summary of the key risk industries identified are as follows:

- **Goods and apparel manufacturing (Risk rating: High – approximately 102 suppliers):** The AFL directly sources footballs, equipment, merchandise packs for its Auskick program, umpire uniforms, PPE, electronics, technology and telecommunications products and indirectly, merchandise produced by its official sponsors and official merchandise licensees, which may have risks of labour exploitation, including modern slavery, particularly given high reliance on international manufacturing.
- **Cleaning and security (Risk rating: High – 52 suppliers):** The AFL procures cleaning and security services when operating its events and facilities. The prevalence of migrant workers and international students in this workforce who may not be aware of their rights coupled with cost-driven models that can put pressure on wages, potentially leading to underpayment or cash arrangements, creates a higher risk of modern slavery practices in these industries.
- **Procuring hospitality and events goods and services (Risk: High – approximately 38 suppliers):** The AFL procures hospitality and events goods and services when operating its events. The hospitality industry’s reliance on casual, seasonal and temporary staff for major events increases the risk of modern slavery risk. This risk is heightened with the use of migrant and young workers who are more vulnerable to exploitation. High pressure environments with irregular hours can also lead to fatigue management issues and wage theft. 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.

- **Construction and maintenance (Risk: Moderate to High, approximately 50 suppliers):** The AFL relies on property management, maintenance, turf management and construction goods and services to operate its offices and stadia. The AFL understands that the construction industry is susceptible to work health and safety risks, underpayment, exploitation of migrant workers and sexual harassment. Risks are heightened due to the need for raw materials, which may be sourced from higher risk geographies, and the use of labour hire companies for site works, which can reduce visibility of employment conditions.

In addition to the industries identified as having greater risks of modern slavery, the following factors were identified as creating higher risks in the AFL's supply chain:

- **Suppliers operating in countries that pose a higher degree of risk:** The AFL recognises that modern slavery can occur in any country, including in Australia. However, the AFL understands there are certain countries where modern slavery is reported as more prevalent, which is particularly relevant to suppliers of the AFL's official merchandise licensees.
- **Vulnerable Groups:** The AFL recognises that Aboriginal and Torres Strait Islander Peoples may be particularly vulnerable to modern slavery practices due to systemic racism, over representation in sectors that have a higher risk of modern slavery (e.g. agriculture) and potential challenges in accessing support and protection for those who live in remote communities.

The AFL's modern slavery supplier questionnaire was distributed to all AFL suppliers at the conclusion of the Reporting Period. An enhanced strategy to target supplier non-responsiveness was introduced to improve data integrity with a focus on suppliers in high-risk industries as further detailed at section 6(a) below. Responses received revealed the following key information:

1. eight modern slavery risk events were reported across six suppliers (see further below at section 5(c) below);
2. 76.5% of respondent suppliers check proof of age of their workers prior to engagement;
3. 8% of respondents are required to comply with the Act;
4. 47% of respondents have policies and procedures to identify modern slavery risks, and 40.2% provide training on modern slavery to relevant workers;
5. only 29.5% of respondent suppliers assess their own supplier base for modern slavery risks; and
6. 67.3% of suppliers do not require their suppliers to have a modern slavery policy.

### **(c) Reported risks in supply chain**

The AFL implemented the following remediation process in response to the eight reported modern slavery risk events reported by six suppliers:

1. Two of the reporting suppliers did not provide any details of the risk events. Formal notices were issued to these suppliers seeking details. Both suppliers advised that

they had reported the risk events in error and no modern slavery investigations or breaches had occurred.

2. One of the reporting suppliers subsequently advised that the risk it had reported was reported in error (after they were advised by their relevant supplier that the relevant risk had been a reporting error).
3. The remaining three suppliers have been flagged in the AFL's systems as having risks that are currently being monitored. Based on the information those suppliers have provided, the AFL is satisfied that these suppliers have mature risk frameworks in place, and that appropriate remediation plans were put in place to address the risks. Two of the suppliers have been tagged for enhanced monitoring moving forwards. The third supplier's contract with the AFL is due to expire and so they will not be subject to enhanced monitoring.

#### **(d) 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.

### **Part 6 – Actions to assess and address modern slavery risks in AFL operations and supply chains**

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

#### **(a) Enhanced Supplier Due Diligence**

The following enhancements were made to the AFL's existing supplier due diligence activities to look beyond policy compliance and assess the practical safeguards suppliers have in place:

- **Tailored questionnaires:** Tailored questionnaires were delivered to suppliers identified to be in High risk industries (as set out in 5(b) above). For example, for manufacturing suppliers, specific questions were included regarding offshore operations, and, for event services suppliers, specific questions were included regarding wage compliance. Further, the questionnaire was simplified for non-High risk suppliers to remove barriers to completion and increase response rates.
- **RFP & onboarding integration:** Pre-qualification questions regarding modern slavery governance have been integrated into the AFL's supplier onboarding workflow. This ensures that enhanced due diligence is triggered automatically before a supplier can be created in the AFL's finance systems and any invoice paid. Pre-qualification questions have also been included in Request for Proposal documents issued by the AFL and responses are taken into consideration in the evaluation of successful tenderers.
- **Supplier engagement:** A tiered escalation strategy to address supplier non-responsiveness to questionnaires was implemented as follows:

- Automated Escalation: All 2,803 suppliers received an initial invitation followed by three automated reminder emails at 14-day intervals for incomplete submissions.
- Targeted High-Risk Outreach: Suppliers in high-risk industries that failed to respond to automated prompts were subject to manual review by the AFL Procurement team. Procurement conducted direct phone and email outreach to these priority suppliers to ensure their participation.
- Risk Assumption: High-risk non-responders were categorised as 'Low Maturity' in the AFL's procurement systems. They will be subject to enhanced due diligence (including a requirement for document review of relevant policies) upon their next contract renewal.

### **(b) Modern Slavery Work Plan**

A Modern Slavery Work Plan framework was established for the Reporting Period setting out the key actions to be addressed across the Reporting Period to continue to identify, assess and address modern slavery risks in accordance with the AFL's Modern Slavery Prevention Pillars:

- IDENTIFY modern slavery risks in operations and supply chain;
- ASSESS the consequence and likelihood of modern slavery occurring in connection with an identified risk and take any reasonable steps to mitigate the risk of modern slavery practices in operations or supply chain;
- REMEDIATE any identified modern slavery practices in operations or supply chain; and
- SUSTAIN continuous monitoring of operations and supply chain and improvement of processes and systems.

The Work Plan will be enhanced over the upcoming reporting period by the Modern Slavery Working Group.

### **(c) Modern Slavery Dashboard Report**

A Modern Slavery Dashboard Report has been built, which presents key controls to measure the effectiveness of the actions taken to address the risks of modern slavery in operations and supply chain. Distribution to key business departments will commence in 2026 to raise awareness across the business of risk areas.

### **(d) 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 the AFL's modern slavery statements:

- **Risk Assessments:** Operational risk assessments were conducted on a continuous basis throughout the Reporting Period under the guidance of the AFL's Enterprise Risk Management Framework. The scope of these assessments covered all AFL business operations and Marvel Stadium.

- **Modern Slavery Working Group:** The Modern Slavery Working Group is the cornerstone of the governance of modern slavery risk at the AFL. Its Terms of Reference clearly define the role of the Procurement, Legal, Risk and Finance teams in relation to managing modern slavery risks.
- **Supplier Due Diligence:** Throughout the Reporting Period the AFL's Modern Slavery Prevention Pillars of Identify, Assess, Remediate and Sustain provided the structured framework within which the AFL addressed the risks of modern slavery in its supply chain. Pre-contractual due diligence enabled the AFL to identify whether suppliers can meet the AFL's modern slavery risk mitigation expectations, whether additional controls were necessary to assist in managing any risk associated with a particular supplier, and implement any required controls prior to engaging in a business relationship. The AFL Procurement team considered public reporting, supplier assessment questionnaires and the geographic, product and supplier specific risk factors in their ongoing due diligence of suppliers.
- **AFL Responsible Business Policy and Modern Slavery Information Sheet:** All new suppliers are required to acknowledge their agreement to the AFL Responsible Business Policy prior to engagement, and they are requested to acknowledge it on an annual basis for the duration of the relationship. Additionally, a Modern Slavery Information Sheet developed by the AFL is provided to suppliers where the AFL Procurement team considers there is a need for further education on modern slavery.
- **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:** Publicly available reporting platform for modern slavery and unethical business practices.

## **Part 7 – Assessment of actions taken and looking forward**

### **(a) Assessment of Actions Taken**

The following 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 *Part 7(b) – Looking Forward*).

### **(b) Looking Forward**

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

- **Staff Training:** The following modern slavery training is scheduled to be delivered:
  - o 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 equip them to identify and report potential risks within the AFL's operations and supply chain.
  - o The AFL Senior Leaders group will attend further in person training to provide them 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.
- **Enhanced Integration of Procurement and Risk Teams:** To further close the gap between supply chain data reporting and organisational risk reporting, the AFL Procurement team will appoint a Procurement Risk Champion, who will be responsible for communicating supply chain risk findings directly into the AFL's operational risk registers to ensure that modern slavery supply chain risks are captured centrally alongside internal operational risks.
- **Supplier toolkit and mapping:** To better address the limited oversight of the AFL's supply chain below the AFL's immediate suppliers, the Procurement team intend to:
  - o launch a supplier toolkit with key modern slavery information resources, particularly for those AFL suppliers that have limited (or no) internal modern slavery governance; and
  - o undertake a supply chain mapping workshop with the AFL's top 20 manufacturing suppliers.

- **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 2026.

A handwritten signature in black ink, appearing to read 'A. Dillon', with a horizontal line extending to the right.

Andrew Dillon  
Chief Executive Officer  
Australian Football League

