

# Mulawa Holdings Pty Ltd

## Modern Slavery Statement

### FY2024-2025

This is the sixth Modern Slavery Statement published pursuant to the *Modern Slavery Act 2018* (Cth) (Act) by Mulawa Holdings Pty Ltd and its subsidiaries (listed in the Appendix) known collectively as “Federal Group”, being an entity based and operating in Australia and having an annual consolidated revenue of more than A\$100 million.

Federal Group remains fully supportive of the Act and this sixth statement reinforces its continued commitment to implementing and enforcing policies, systems and controls that endeavour to identify and stop modern slavery practices occurring in its supply chains.

The Federal Group Board, executive and Audit and Risk Committee monitor the operations of the Federal Group as a whole.

#### **Federal Group’s structure, operations and supply chains**

Mulawa Holdings Pty Ltd is the ultimate holding company in the Federal Group and is an Australian-owned private company which manages and operates casinos, hotels, gaming networks, tourist services and a national sensitive freight company.

Federal Group is Tasmania’s largest private sector employer with employees located right across the entire state of Tasmania. Including COPE Sensitive Freight, a national sensitive freight company, Federal Group employs approximately 2,500 people, located in every State and Territory of Australia.

The hotel operations continue the proud history of Federal Group as the oldest continually operating hotel group in Australia with its origins able to be traced back to Melbourne in the 1880s.

Federal Group’s operations include:

- Wrest Point – Australia’s first casino that offers accommodation, dining and entertainment services;
- Country Club Tasmania – Australia’s first resort-style casino development that offers accommodation, dining and entertainment services, including an 18-hole, par 72 golf course and driving range;
- Saffire Freycinet – An international award-winning luxury coastal resort that offers accommodation, a day spa and dining services;
- MACq 01 Hotel – An award-winning storytelling hotel that offers accommodation, dining and activities services;
- The Henry Jones Art Hotel – Australia’s first dedicated art hotel that offers accommodation, dining and art tour services;
- Vantage Group – Operates and manages Federal Group’s 12 community-based hotels across Tasmania providing bar, gaming, bistro and entertainment;
- TasKeno – Manages the distribution of Keno in hotels and clubs throughout Tasmania;
- Odyssey Gaming – A leading technology developer of programs and services which allows venues and Licensed Monitoring Operators to effectively manage and understand player activity; and
- COPE Sensitive Freight – Australia’s largest independent specialist sensitive transport company that provides fragile equipment handling and distributing and warehousing services for clients across Australia.

To enable its operations, Federal Group procures goods and services from a wide variety of Australian based suppliers. This includes products provided directly to Federal Group such as food, beverages, gaming equipment, vehicles and cleaning products, services provided such as laundry, consultants and subcontractors and products and services used by indirect suppliers in Federal Group's supply chains such as fuel, components of gaming and IT equipment, furniture and fabrics. Entities within the Federal Group may also lease out parts of owned premises to a variety of commercial tenants and may purchase and dispose of land and property from time to time. Federal Group rarely purchases goods and services directly from non-Australian based suppliers.

### **Risks of modern slavery practices in the operations and supply chains**

During this reporting period, Federal Group continued to monitor and review the likely risks of modern slavery practices across our operations and supply chain.

Federal Group Values include our most important principle, leaving it better than how you found it, which applies to all our dealings with all those we encounter. We strive to champion and better our suppliers, customers, staff, venues and partnerships. As part of this we are committed to using our influence to prevent and mitigate all forms of modern slavery within our operations and supply chain. Not only is it the right thing to do, it supports our values, and our ambition to leave a positive imprint on the communities we're part of, the people we connect with, and the world we all share.

Federal Group businesses have been influenced or affected by many factors over the last financial year, including the emerging risk factors of:

- rising cost of living across the world has increased costs for our suppliers and their workers. Sustainable price modelling then becomes even more important; and
- labour shortages which can perpetuate poor human rights practices in industries or regions where sourcing labour is difficult.

However, the risks of modern slavery practices in Federal Group's operations and supply chains is still assessed through its risk management framework as being low.

If a Modern Slavery incident is identified, per the modern slavery policy it will be taken seriously and dealt with on a case by case basis with reporting to the executive and Audit and Risk Committee until the matter is satisfactorily complete.

### **Operations**

All of Federal Group's operations are located within Australia. Although there is a risk of causing or contributing to modern slavery, this risk is decreased by all of Federal Group's employees and virtually all of its direct suppliers being based in Australia.

### **Supply chain**

The main types of good and services that contribute to Federal Group products and services include:

- food and beverage;
- utilities, rates and rent;
- consumables such as cleaning supplies;
- insurance and banking services;
- laundering, cleaning and maintenance services;
- professional services;
- repairs and maintenance services and supplies;
- vehicle fleet;
- ICT related hardware, software and services;
- marketing services; and
- travel services.

Federal Group recognises that the risk of modern slavery exists in its supply chain due to the sectors and industries, the types of products and services procured, the location of some of the suppliers or their suppliers/manufacturers and that some other entities may have poor governance structures in relation to modern slavery.

Federal Group continues to work with its suppliers to build meaningful relationships, to promote the use of Tasmanian produce and purchasing from local partners and suppliers for its Tasmanian based businesses, as it has done for many years, and actively demonstrates its support for its communities through purchasing policies that prioritise local businesses and suppliers.

**Actions taken to assess and address these risks**

Our actions form part of our due diligence and remediation processes to assess and address modern slavery risks.

During the year, the risk appetite for modern slavery was set by the Board through the review of the risk matrix of the group as “Zero Appetite” which means the target risk rating is “low” under the matrix. This was defined as:

- We have **zero appetite** to modern slavery, including forced labour, human trafficking and child labour within our operations or supply chain. We recognise that modern slavery is a serious human rights violation, and we are committed to identifying, assessing and mitigating the risk wherever it may arise.
- We have **zero appetite** for knowingly engaging with suppliers, partners or other stakeholders that are involved in or fail to adequately address the risk of modern slavery.
- While we acknowledge that some risk may be inherent in operating across our supply chains, this is mitigated through due diligence, supplier engagement, contractual obligations, training and ongoing monitoring.

Actions taken in this reporting period.

Our Action	Progress
Modern slavery clauses included in major contracts	Ongoing
Ensure major suppliers formally communicated and acknowledge our Modern Slavery Policy	Ongoing
Modern Slavery training conducted for key internal stakeholders, including executive team and awareness for all staff	Commenced and ongoing
Whistleblower framework strengthened & approved by the Board	Complete
Commitment to modern slavery through reporting to our customers	Ongoing
Implementation of LexisNexis for automated updates to legislation, which includes modern slavery	Complete
Demonstrating our commitment to ethical behaviour, we surveyed our customers and suppliers on environmental, social and governance topics	Complete

Federal Group’s Modern Slavery Policy requires Federal Group businesses to acknowledge they are accountable for addressing modern slavery risks and to map their supply chains to assess any identified risks and the principles of the Policy must be incorporated into all Federal Group business’s policies, guidelines and procedures.

As part of the overall Risk Management of the Federal Group, modern slavery is actively managed by Management and reported regularly to the Audit and Risk Committee. Through this process, any new modern slavery obligations, or gaps in the current obligations, are identified and responded to accordingly to ensure compliance.

In the procurement space, mapping and risk assessment of supply chains is in development given the large number and diversity of suppliers within the Group.

As we continue to map the supply chain in more detail, in the interim, the Federal Group template agreements for goods, services and consultancy arrangements (as well as Request for Proposal (RFP) template documents) include a Modern Slavery clause which requires our Suppliers to acknowledge and commit to supporting ethical practices and warrant that a supplier has not engaged in modern slavery practices and that it does and will continue to comply with all relevant laws in relation to modern slavery.

In addition, our COPE Sensitive Freight business includes a similar clause in its standard terms and conditions, customer and linehaul contracts, emphasising their commitment to ethical practices and laying out its expectations that all contractors and suppliers comply with all modern slavery laws.

### Assessing the effectiveness of these actions

We continually enhance our efforts to understand our risk profile and performance in managing modern slavery risks. Our robust governance framework which is championed by the Executive and the Audit and Risk Committee, provides a framework of accountability and transparency from the Board down that enables us to better identify, manage, mitigate and address these risks.

We measure effectiveness through:

Measure of Effectiveness	KPI/metric
Ensuring new legislative updates are considered and implemented in a timely fashion	There were 23 alerts during the period and all were reviewed and appropriately actioned
Monitoring of breaches through regular reporting to the Audit and Risk Committee as well as reporting the overall risk health of the modern slavery governance framework	Formal reviews on the modern slavery framework progress were presented to the Audit and Risk Committee in March 2025. No compliance breaches were noted (target 0) and overall risk assessed as low on a high/medium/low scale (target low).
Monitoring the completion rate of internal training through the internal training platform	<p>Modern slavery compliance training completion rate – procurement (target 100%) (metric to be first assessed in 2026 report).</p> <p>Modern Slavery compliance training completion rate – other staff (target 95%) (metric to be first assessed in 2026 report).</p> <p>Note that modern slavery training will have its own module delivered through the Group training platform in FY26. Currently modern slavery concepts are scattered through various other training modules but not as a stand-alone module.</p> <p>Overall training completion rate 2025: 99% (target 95%+)</p>
Monitoring the acknowledgement of suppliers to our modern slavery supply conditions	<p>37 new contracts with the modern slavery clause included were signed during the period totalling \$21M for goods and services in our hospitality businesses.</p> <p>We are in the process of centralising all contracts &amp; templates so in the future will be able to assess what % of total purchases under contract have the clause included.</p>
Monitoring, Executive and Board transparency and actioning of any whistleblower notifications	There have been no known instances of reporting of issues of risk of modern slavery from through either HR/management reporting channels or via our whistleblowing mechanism (target none).

### Future Actions

Future actions include:

- Continuing to assess and manage suppliers based on modern slavery risk;
- Continue to roll out training on modern slavery, particularly to those in key areas such as People and Culture and procurement;
- Ensure modern slavery clauses are included in all new or renewed procurement tenders for goods and services;
- Ensure commitment to modern slavery is communicated and acknowledged by our major suppliers;
- Review of corporate credit cards to ensure alignment with modern slavery policy and practices; and
- Development of supplier code of conduct.

### Process of consultation

This statement has been produced on behalf of all of the Federal Group and relevant staff throughout the Federal Group have been consulted in the preparation of this statement.

**This Modern Slavery Statement is approved by the Board of Directors for Mulawa Holdings Pty Ltd on 24 December 2025.**



[Greg Farrell \(Dec 24, 2025 17:14:42 GMT+11\)](#)

Gregory Farrell  
Managing Director  
Mulawa Holdings Pty Ltd

## APPENDIX

### REPORTING ENTITIES

The following entities are considered reporting entities under the *Modern Slavery Act 2018* (Cth) and are covered by this statement:

Mulawa Holdings Pty Ltd (ACN 000 259 834)

Janala Pty Ltd (ACN 003 672 839)

Federal Holdings Tasmania Pty Ltd (ACN 097 627 677)

Australian National Hotels Pty Ltd (ACN 009 477 552)

Tasmania Country Club Casino Pty Ltd (ACN 009 516 189)

Tasmanian Country Club Properties Pty Ltd (ACN 647 888 873)

Federal East Coast Holdings Pty Ltd (ACN 099 918 715)

Vantage Hotel Group Pty Ltd (ACN 087 546 245)

Halsata Pty Ltd (ACN 120 619 123)

Odyssey Gaming Services Pty Ltd (ACN 061 363 139)

Mulawa Arabian Stud (ACN 001 738 076)

Mulawa Management Pty Ltd (ACN 009 598 896)

FHR Support Services Pty Ltd (ACN 100 541 606)

Mulawa Superannuation Pty Ltd (ACN 070 099 375)

Mulawa Properties Pty Ltd (ACN 075 034 150)

Mosavar Pty Ltd (ACN 110 473 571)

Palborn Pty Ltd (ACN 133 698 049)

Tal Holdings Pty Ltd (ACN 002 594 121)

The Federal Hotels Pty Ltd (ACN 004 108 249)

Odyssey Gaming Pty Ltd (ACN 074 735 452)

Bounty Pty Ltd (ACN 096 276 292)

Bounty Systems Pty Ltd (ACN 090 692 489)