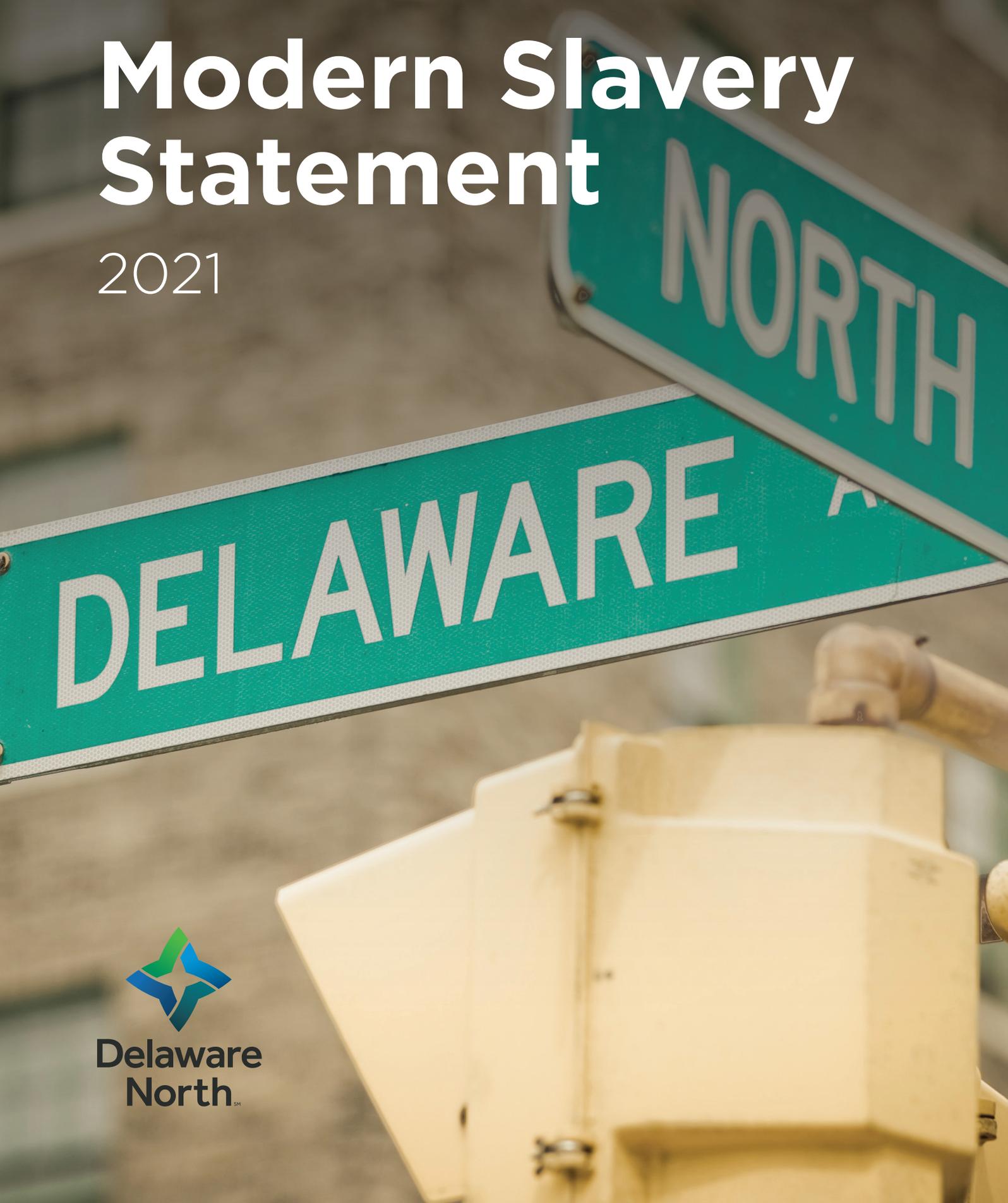


Delaware North Companies Australia Pty Ltd

Modern Slavery Statement

2021



Delaware
NorthSM

1. Introduction: Delaware North Australia Companies Pty Ltd

Delaware North Australia Companies Pty Ltd (**'Delaware North'**), ABN 92 003 435 345, was established in 1987. Delaware North is a foreign-owned private company, deriving revenue from the provision of catering and hospitality services in Australia and New Zealand. The company employs approximately 9,430 people and is administered from its head office in Docklands, Victoria.

Delaware North Companies Australia is a wholly owned subsidiary of the US-based food service and hospitality company, Delaware North Companies Inc.

Delaware North 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, national and state parks, airports and casinos.

Delaware North's success is grounded in our vision and value statements, which guide our every action.

Our Vision:

To delight guests by creating the world's best experiences today while reimagining tomorrow.

Our Values:

Lean Forward: We are innovative creators who continually reimagine what's next.

Come Together: We work collaboratively with each other and believe in the power of partnership.

Stand Up: We lead by example, own our decisions and take initiative.

Do Right: We value integrity and always do the right thing, especially when no one is looking.

Think Guest: The guest experience is at the heart of everything we do.

The Modern Slavery Act No.153, 2018

In 2018, the Australian Government passed the Modern Slavery Act 2018 (Cth) (**'the Act'**), that requires large corporations in Australia with an annual consolidated revenue of more than \$100 million, to annually report on the risks of modern slavery in their operations and supply chains, and actions taken to address those risks.

For the purposes of the Act, this is a Joint Statement as provided for in Section 14 of the Act, submitted by Delaware North, on behalf of each of the Reporting Entities identified below for the period ended 31 December 2021:

1. Delaware North Australia Companies Pty Ltd ABN 92 003 435 345; and
2. Northern Rise Village Services ABN 90 165 392 450.

Delaware North Companies Australia and Northern Rise Village Services Pty Ltd had an annual consolidated revenue exceeding \$100 million in 2021.

Delaware North recognises that modern slavery happens at the most extreme end of the working spectrum, and that it involves the gravest abuses of human rights and serious crimes, having severe and often lifelong consequences for its victims. The term modern slavery is used to describe situations where there is coercion, threats or deception.

The Act defines modern slavery as including 8 types of serious exploitation:

- Trafficking in persons;
- Slavery;
- Servitude;
- Forced marriage;
- Forced labour;
- Debt bondage;
- Deceptive recruiting for labour or services; and
- The worst forms of child labour. The worst forms of child labour means situations where children are subjected to slavery or similar practices, or engaged in hazardous work.

Delaware North commits to ending all forms of modern slavery, both in Australia and overseas, by ensuring our own supply chains and operations don't contribute to modern slavery practices, and to take appropriate action to respond to the humanitarian impacts of modern slavery. Delaware North is further committed to consistently reviewing and strengthening our processes and systems to minimize the risk of human rights infringements anywhere in our operations and supply chain.

2. Delaware North's structure, operations and supply chains

For ease of reference, we provide the Company Structure of Delaware North Companies Inc. as per attached Appendix A. As reported in Section 1 of this Statement, there are 2 Reporting Entities within the Australian Group; the other entities do not have annual consolidated revenue exceeding \$100 million.

Delaware North primarily comprises catering and hospitality services at a Casino in Darwin, Resorts, Sports Stadiums and Airports. In respect of Northern Rise Village Services Delaware North provides accommodation, catering, transport and facility management services to the region's resources, construction, tourism and government sectors, including remote parts of Australia (specifically in Western Australia, Northern Territory and Queensland).

Our operations and supply chain at Delaware North are centrally controlled and supply chain sources from a variety of locations, however the majority of our spend is sourced from local suppliers. There is full transparency over our supply chain, whilst our operations are covered by pay awards.

Approximately 75% of our suppliers provide food and beverages, and we further engage with a labour hire company to provide resources for our various sites. The indirect supply chain by our suppliers for food provisions, originate from farms and plantations on which raw materials are grown, the factories which process these raw materials, and the transportation services involved in the supply chain.

We realise that there is a risk for modern slavery practices to have the potential to exist within our supply chain. Taking into consideration variables such as geographic location, product/service type, industry and possible workforce demographics, we consider that this risk may be inherently higher amongst food, beverage and related catering and hospitality products/services.

We provide further details of our business below:

Sports

Delaware North is a major player in several sectors of sports, including as one of the leading foodservice and retail management companies at stadiums, arenas and ballparks across the globe. Delaware North Sportservice, its flagship operating company, helped pioneer the sports concession industry 100 years ago.

Among the more than 60 sports and entertainment venues worldwide at which it operates premium dining, restaurants and food and beverage concessions are Melbourne and Olympic Parks, home of the Australian Open tennis championships, Marvel Stadium and Melbourne Cricket Ground in Melbourne.

2. Delaware North's structure, operations and supply chains

Travel

Delaware North is one of the world's leading airport food service and retail companies, operating at more than 30 airports and travel centres in the United States, Great Britain and Australia. It manages more than 300 restaurants and retail stores, serving more than 350 million travelers each year. Major locations in Australia include a range of food and beverage outlets at Melbourne Airport, Adelaide Airport and Perth Airport.

Resorts

Delaware North's portfolio of distinct luxury resorts in special places in Australia and the United States provide guests with world-class hospitality, the best local cuisine and spa and other amenities to complement the natural beauty of their locations. The company draws upon its deep culinary expertise and considerable experience in the resort management services arena to deliver incredible guest experiences.

In Australia, they own and operate the world-famous Lizard Island Resort located on the Great Barrier Reef in Queensland.

Gaming

Delaware North is one of the most innovative gaming operators in the US and Australia, creating regional casino destinations with video gaming machines, table games, poker rooms, racing simulcast centres, restaurants, lounges, nightclubs, sports bars, event centres, retail shops and hotels.

Our locations have won hundreds of awards because we offer the best available gaming and leverage Delaware North's global hospitality expertise and dedication to guest service.

In Australia, Delaware North owns and operates the Mindil Beach Casino Resort in Darwin.

Restaurants and Catering

Delaware North is one of the world's leading restaurant and catering companies -- it's culinary and hospitality staff provide extraordinary dining experiences for guests at unique locations, worldwide, every day. In Australia, iconic locations such as the Phillip Island Nature Parks in Victoria see Delaware North complement the amazing natural habitat through the delivery of local culinary offerings to millions of visitors every year.

Remote Services

Delaware North operates a range of remote services sites supporting the feeding and lodging of workforces operating across a broad array of industries, including mining.

Within these operations, which can number supporting the accommodation and food and beverage needs of over 1,000 workers at a single point in time, Delaware North, operating as Northern Rise Village Services, provide services which can include culinary delivery to support workforces, through to full accommodation management solutions encapsulating room turnover and facilities management and maintenance.

3. Risks of modern slavery practices in the operations and supply chains of Delaware North

Delaware North is committed to the highest standards of ethics and business integrity in our operations and supply chain. We aim to ensure our staff and suppliers are treated fairly, with respect and dignity, in order to uphold the said highest standards. This is also consistent with our vision and values.

There is a low risk of modern slavery in our operations as in terms of human capital, we operate in an industry that is covered by pay awards, which provide for minimum pay rates and conditions of employment, including leave and entitlements. However, we appreciate the risks of potential modern slavery within the operations and supply chain of our suppliers abroad. This is particularly so when the overseas supplier is based in a geographic region with known modern slavery concerns, the products/goods and/or industry involved are linked to modern slavery, and the amount involved in the transactions are material. We are, however, not aware of any of our suppliers abroad having engaged in conduct or suspected conduct, which may amount to modern slavery.

Delaware's primary risk of modern slavery in our supply chain, confers in our use of external suppliers for the supply of fresh products. In particular, we are not able to determine with certainty the origin for the provision of seafood. All suppliers are required to complete our Delaware North, Supply of Goods and Service Agreement; being a formalised documented process which ensures supplier engagement uniformity and consistent standards, that suppliers are subject to on-going monitoring, review and improvement and ensure suppliers act in a manner in accordance with the Agreement.

Suppliers are carefully vetted to ensure they align with our legal and contractual obligations. Similarly, our high ethical standards are at the core of how we engage with our suppliers and is a reflection of how we work as an organization at Delaware North.

During the course of addressing our modern slavery risks in both 2020 and 2021, we have considered the Modern Slavery List of Industries and List of High-Risk Countries, as provided for in The Global Slavery Index 2018, in determining our risks of modern slavery in our operations and supply chain. We have further considered information and resources made available through organisations that includes: the Transparency International Corruption Perceptions Index; Global Contact Network; Global Estimates of Modern Slavery 2017; 'Hidden in Plain Sight', Report of the 2017 Parliamentary Inquiry into establishing a Modern Slavery Act in Australia; and the Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities.

The majority of our top 50 vendors, in regard to spend, are locally based within Australia. Initial review of our supply chain indicates that majority of our vendors are medium to low risk of modern slavery.

4. Actions taken by Delaware to assess and address modern slavery risks, including due diligence and remediation processes

In 2021, Delaware North in consultation with a third-party consulting firm, conducted a modern slavery risk assessment of our operations and supply chain. In doing so, we created a modern slavery framework for development, and which assisted us in the preparation of our first modern slavery statement. Our Head of Procurement drove the Modern Slavery process.

The assessment comprised two parts:

- Identified existing risk management policies and procedures within Delaware North and determined whether this can be broadened to include the Risks of Modern Slavery, through ethical sourcing, quality standards or other compliance reporting.
- Conducting a risk assessment over our current suppliers in terms of our payment data, for the period January 2020 to June 2021.

In conducting a risk assessment of existing risk management policies and procedures, we reviewed all relevant policies including Code of Conduct, Supply of Goods and Service Agreement, Professional Services Agreement, Recruitment and Selection Policy and Whistleblower Policy.

We further developed a Modern Slavery Policy which:

- Exhibits our commitment to the right of all individuals to live and work freely, together with our opposition to all forms of modern slavery.

- Seeks to inform and educate our staff and suppliers in relation to risks associated with modern slavery.
- Demonstrates our commitment to implementing and maintaining effective systems and controls, which will ensure we play a constructive role in helping to reduce the risk of modern slavery occurring within our business and supply chain.

In performing the risk assessment of our suppliers, we conducted a desk top review of our top 50 suppliers in terms of spend, that comprise 68% of our total spend to external suppliers. Delaware North considered risks that may potentially cause, contribute to or be directly participating in modern slavery practices, consistent with the Act and the Commonwealth Modern Slavery Act 2018 - Guidance for Reporting Entities. These risks areas included: Financial; Industry; Country (geographic location); Sub-Contractors; and evidence as to whether the supplier has submitted a modern slavery statement.

4. Actions taken by Delaware to assess and address modern slavery risks, including due diligence and remediation processes

The results of our desk top review identified that the 46 of our 50 suppliers scored an overall modern slavery risk rating of low risk, whilst the remaining 4 of the 50 suppliers scored an overall risk rating of medium risk to modern slavery. This is based on what was determined by us using public available records and information we had previously obtained from our suppliers and recorded within our systems.

We created a modern slavery questionnaire that we distributed to selected current Top 50 spend suppliers and that is required to be completed by all new suppliers. The questionnaire contains inquiring questions relevant to modern slavery, as opposed to the generic modern slavery questions. This includes a risk rating for 10 pertinent modern slavery questions, and for the submission of supporting documents to us where applicable. We believe this is a crucial step in identifying and where applicable, eradicating human trafficking and modern slavery, where there is any suggestion or the slightest suspicion that this may be occurring.

The questions included:

1. Does your company operate in any high-risk countries?
2. Does your company operate in any high-risk industries?
3. Does your company engage with suppliers who have operations in any high-risk countries?
4. Does your company engage with suppliers who have operations in any high-risk industries?
5. Does your organisation have any migrant employees?
6. Does your organisation have any employees under the age of 18 years?

7. Does your organisation have policy of procedures in place to manage and mitigate risks of modern slavery?
8. Does your organisation provide training on modern slavery?
9. Has your organisation taken actions to increase visibility and transparency of your supply chain?
10. If your company engages the service of subcontractors, labour only companies or labour from employment businesses; do you have procedures or controls in place to ensure subcontractors and such are not being forced to work or subject to bonded labour?

We received and reviewed 25 completed supplier modern slavery questionnaires. We determined based on the responses to the 10 crucial questions, that 16 of the 25 suppliers to be at low risk to modern slavery and the remaining 9 to be at medium risk. No suppliers were determined to be high risk of modern slavery. Each supplier and their respective risk rating has been captured into a live spreadsheet for record purposes. We have identified potential avenues and recommendations for further enquiries with the suppliers should this be necessary, and where applicable. This process forms part of our continued commitment to ensuring our supply chain is reasonably free of modern slavery risks. It also assists our suppliers in improving their own modern slavery processes and procedures.

We have conducted a training session on modern slavery to our procurement teams in the form of a hybrid online and in-person meeting. We are also considering online courses which we hope to implement in the next financial year.

5. Assessing the effectiveness of actions taken by us

We have described above, our activities performed during the immediate assessment of modern slavery risk within our operations and supply chain. This includes policy review, drafting of new policies, the completion of a modern slavery questionnaire by our suppliers and a desk top risk assessment for our high spend suppliers.

In completing the above, Delaware North has mapped out key parts of operations and supply chains to improve our understanding of potential modern slavery risks.

All medium and low risk (and where identified going forward all high-risk suppliers) of modern slavery, and new suppliers will be vetted for modern slavery risks through the completion of a questionnaire that incorporates modern slavery requirements and the provision of supporting documents where applicable.

To further improve the management of current risks, we will expand upon our supplier on-boarding process where new suppliers are set up in our system. In addition to the standard documentation that's required when internal employees request a supplier set up, being food safety certifications, insurance certificates etc., we will also include a brief Modern Slavery Questionnaire and Compliance Checklist which must be completed by suppliers to accompany the request for set up. All of these set up requests are reviewed by central Procurement prior to approval.

Delaware North aims to use the information obtained from this, to build transparent and collaborative relationships with suppliers. This will further ensure that our expectations of reporting of modern slavery risks within the respective supplier's supply chain, has been clearly communicated to us, and that we have satisfied ourselves that modern slavery

risks have been and are being effectively managed.

We will review our policies that now incorporate and make provision for modern slavery compliance and ensure that Delaware North staff and Suppliers where applicable, certify that they have read and understand these policies, on an annual basis. We will regularly review and improve our modern slavery internal controls and procedures in order to monitor their effectiveness and respond to areas that are not. This will include updating policies and procedures where deemed necessary.

Whilst we are not aware of any modern slavery having occurred within our operations and supply chain, and that of our suppliers that can reasonably be determined at this stage, we appreciate our visibility is still in its infancy and needs to be developed. As such, the ability to assess the effectiveness of our response, is similarly in its early stages. We expect that the development of stronger modern slavery assessment processes will occur as our initiatives are further integrated within our operations and supply chain, and more information becomes available for the actions we have taken and implemented to date.

6. Describe the process of consultation with any entities the reporting entity owns or controls

Our supply chain and human resources are centrally controlled, however where required we have consulted with the other entities owned or controlled by Delaware North. This has occurred when commencing with our current Modern Slavery actions and during the implementation of actions taken during this reporting period by Delaware North, to assess and address modern slavery risks, including due diligence and remediation processes.

This included a consulting session with other stakeholders prior to finalising this statement and submission to the Board. The stakeholders comprised a cross section of employees from Delaware North, with representation from Supply at the Darwin Casino and Northern Rise Village Services, our Executive Chef for the business and our Food and Beverage Manager for Adelaide Airport.

There has been agreement with the steps and actions to be taken on the way forward, as provided for in Section 7 of our Statement below, and the need for regular roundtables to discuss and agree on our modern slavery processes.

Our Modern Slavery process is being driven by our Head of Procurement and supported by other business streams, including: Finance; Human Resources; Legal and Compliance; Internal Audit; Chief Operating Officer; Information Technology. For ease of reference, we provide our Modern Slavery Organogram as per attached Appendix B.

7. Other relevant information - the way forward Delaware North

Delaware North will work proactively to reduce modern slavery within our supply chain and operations, and we expect all Suppliers we engage with to do the same. In order to build on the modern slavery framework, we have established to date, we will be focusing on the following areas and the extent to which these are achievable:

- Introduce modern slavery training to our staff in the next calendar year in the form of on-line courses. These will be interactive courses that staff will complete based on role, how close that employee is to our supply chain and will therefore be in a position to identify and report red flags, and to respond accordingly.
- Require as far as reasonably practicable, a requirement for current Suppliers, and all new Suppliers to complete a Modern Slavery Questionnaire and Declaration.
- Consideration will be given to providing additional modern slavery literature to our vendors. This may be dependent on the results achieved in the completion of our required Modern Slavery Questionnaire.
- Performing social accountability audits on our suppliers, within reason, by conducting random onsite inspections to evaluate their practices with respect to the treatment of their workers and identifying and determining any potential risks, including modern slavery and human trafficking.
- Developing internal accountability standards and procedures further, to hold our employees and contractors accountable for non-compliance with our standards on modern slavery and human trafficking, including:
 - Promptly address any potential risks of modern slavery.
 - Managing and where required enforcing consequences for non-compliance. Currently we have an extensive clause built into our agreements which require supplier to comply and to self-report potential breaches and allow us to conduct audits or risk termination for non-compliance.
 - Establishing a process to remediate such breaches.
 - Encourage all Suppliers to meet Minimum Standards and promote best practice and continuous improvement.
 - Monitor Suppliers for compliance with the Minimum Standards through a supplier risk assessment process. Provide the Company with rights of termination if a Supplier is unable or unwilling to work towards full compliance with the minimum standards.
 - Monitor and review the effectiveness of our Modern Slavery Policy and our procedures, taking into account the suitability, adequacy and effectiveness in reducing the risks of modern slavery.

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

18 July 2022 (Date)

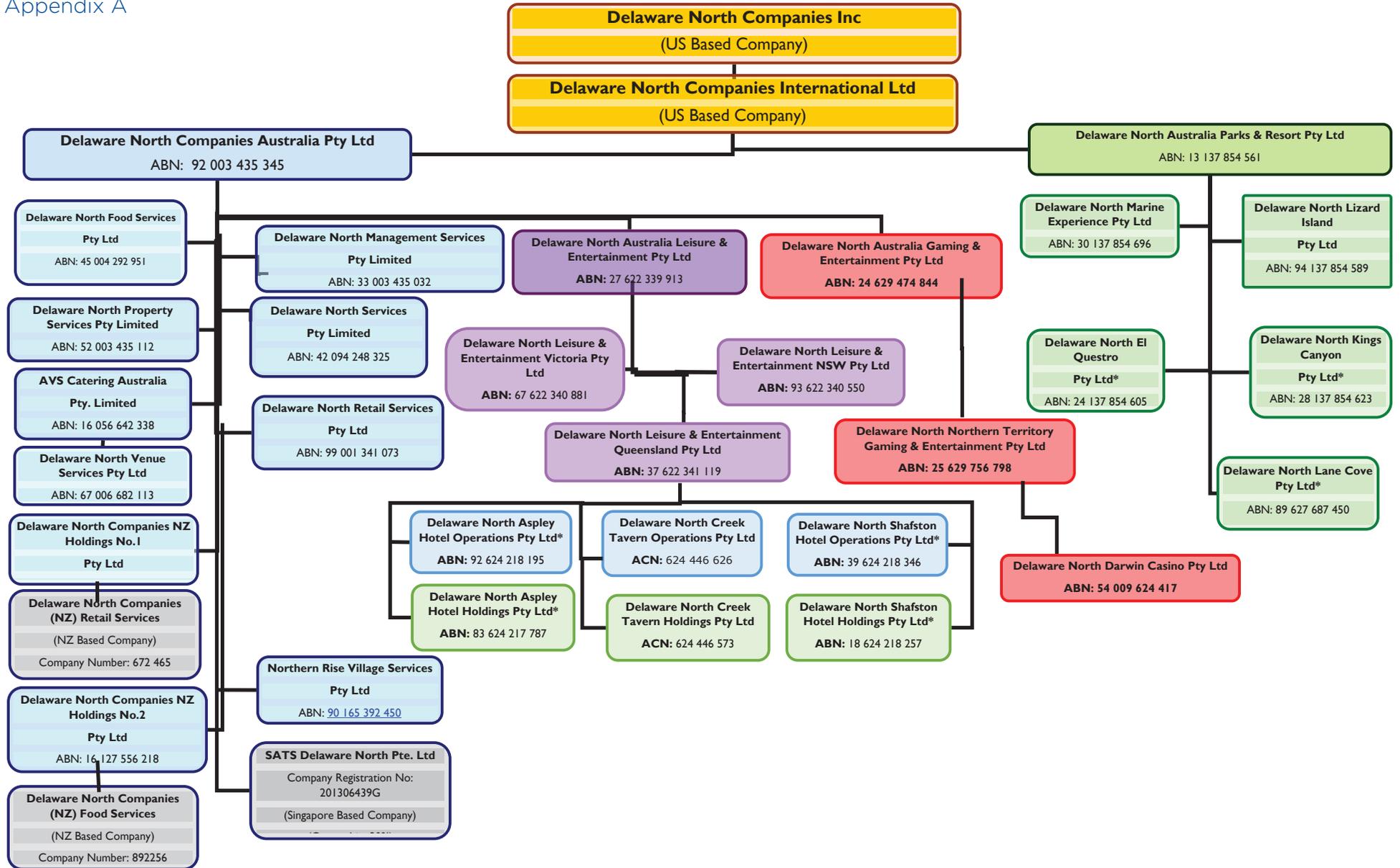
 (Signature)

Signed by:

Gary Brown (Name)

Managing Director (Position)

Appendix A



*The assets of this entity have been sold and the entity is pending deregistration.

Appendix B

