



Panthers Group 2020 Modern Slavery Statement

This statement sets out the Panthers Group response to Modern Slavery as defined in the Commonwealth of Australia Modern Slavery Act 2018 in our business and supply chain for the year ending 31-Oct-2020.

Introduction

Panthers Group is one of Australia's largest entertainment groups. Our main goals are the promotion of Penrith Panthers NRL team, providing entertainment, dining, function facilities and fun to our members. We have over 120,000 members across the group. Employing 645 staff across NSW, Panthers Group is made up of the following:

Panthers Licensed Venues

- Panthers Penrith
- Panthers Port Macquarie
- Panthers Bathurst
- Panthers North Richmond
- Panthers Glenbrook

Panthers Rugby League

- Penrith Panthers NRL team
- Panthers Rugby League Academy
- Panthers Stadium

As a not-for-profit organisation, giving back is the heart of what it means to be a Panther we work on local projects and with local services to assist people within our community.

The Panthers Group consists of the following organisations;

- Penrith Rugby League Club Ltd (ABN 57 000 578 398),
- Penrith District Rugby League Football Club Ltd (ABN 28 003 908 503),
- Mulgoa Land Trust (No. 1),
- Mulgoa Land Trust (No. 1) Pty Ltd (ABN 55 245 739 756),
- Panthers Catering Pty Ltd (ABN 55 125 979 393),

There has been no trading in Mulgoa Land Trust (No. 1) or Panthers Catering in the last 12 months to 31-October-2020.

Our Business & Supply Chain

Panthers Group supplies food and beverage, gaming, hospitality, sporting facilities, and other entertainment facilities, and supports the Penrith Rugby League Team. Panthers Suppliers include large national corporations, a couple of international suppliers, and largest number of our suppliers are Australian based small to medium businesses. As our focus has always been on local supply, supporting local business, charities, and organisations.

Panthers Group in its response to the introduction of the Modern Slavery Act has undertaken an extensive review of its policies, engagements with our staff, & our supply chain; to educate, inform and ensure a continual improvement process with our compliance obligations. This process has started in 2020 and will continue as we refine and improve our business response to this worldwide problem. Panthers Group started a project team (which included representatives from different functions and represented different group companies) to understand our position and to respond to the Modern Slavery Act. This project team is made up of several key senior management personal and has been effective in a consolidated response from the Board level down to individual employees. The team has impacted changes in the following areas:



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Policies

Panthers Group has introduced a new specific Modern Slavery Policy, which has been approved by the Board of Directors. This forms the corner stone of our changes but not the complete structure. Several policies have been amended to reflect the introduction of the Modern Slavery Policy including policies regarding procurement through to whistle blower policies.

- Modern Slavery Policy
- Panthers Procurement Policy
- Contract Management Policy
- Expense Claims Policy
- Delegated Authority Policy
- Fixed Asset Policy
- Whistle Blower Policy

Compliance is built into our purchasing systems by dealing with approved suppliers through our purchasing systems. As Panthers renews contracts with our suppliers we will be introducing specific Modern Slavery clauses into our contracts, and our tender processes, to ensure our suppliers are assisting us to remove the risks of modern slavery in our supply chain. Panthers Group actively reviews its purchasing practices to review compliance with nominated approved suppliers enforcing purchasing policies.

Panthers policies also ensure all of our expenses are reviewed and authorised by people that have been subject to the mandatory Modern Slavery Training. Breaching of Panthers policies for employees can lead to disciplinary action and even termination. For our suppliers this can also result action against them including ceasing supply from that organisation.

Staff Training

Panthers Group has created an online education package covering; the basis for the Modern Slavery, a detailed review of our amended policies, risk areas, and consequences. The training has been made mandatory for all Board members, executives, senior managers, and everyone that has access to our procurement systems. This will ensure maximum effect on our large and diverse organisation. 100% of all personnel with access to our purchasing systems have been trained.

Supply Chain

An analysis of our group expenses by supplier has been conducted for the year ending 31-Oct-2020. From there our total suppliers we broke this down into Phase One Review which looked at all large value direct suppliers with a focus on suppliers of physical products (which constituted over 76% of our total purchases) were then requested to complete a survey, which included questions on policies, reviews conducted within their organisations & supply chains, and to provide copies of their Modern Slavery Statements. Our reviews have included on-site visits, face to face meetings and other investigations. Once this was completed a further review by the project team was conducted to further analyse the risk within these organisations.

Phase One Review found;

- A small number of Suppliers have ceased trading with Panthers Group, so no further action has been taken.
- A large section of suppliers were not able to provide a Modern Slavery Statement, or were unaware of the Modern Slavery Act, we have started discussion with those suppliers on reporting requirements.
- A small number of suppliers have been flagged as having a potential risk, these suppliers are being reviewed in detail with Senior Management to understand further any potential risks that may be in their organisations or supply chains. This process is ongoing at this time.





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Over the coming year Panthers Group will clarify potential risks identified under Phase One. Phase Two will be reviewing new suppliers and any remaining suppliers not already reviewed. As we review the smaller suppliers we will need to spend increased time educating and assisting with processes for those small suppliers.

Risk Management & our Supply Chain

Given the large volume of small local suppliers, and the focus on the large businesses by the Modern Slavery Act, we see our overall risk as low. We understand that we need to fully investigate every aspect of our operations & supply chain.

Panthers will continue to investigate and review deeper into its supply chain, and continue to monitor those customers that are seen as medium risk or above with the intention to move the organisation to a position to minimise all risks of Modern Slavery associated with the Panthers Group.

Conclusion

Panther group has started their journey to being full compliance of the modern slavery act into its organisation operations and supply chain. Initial Reviews have supported a position of low risk by the group due to our purchasing policies and focus on local suppliers.

Brian Fletcher

Panther Group C.E.O.

On behalf and approved by the Panthers Group Board

31 March 2021

