

**Australian Venue Co.
Modern Slavery Statement**

1 July 2019 - 28 June 2020

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1. Introduction /

This Modern Slavery Statement covers the activities of Canoe Holdco Pty Limited (ABN 90 619 977 070) and its controlled entities (Australian Venue Co) in respect of the financial year ended 28 June 2020 in identifying and addressing the potential risk of modern slavery for our operations and supply chain. Refer to section 6 for the list of entities that are considered reporting entities under the Modern Slavery Act 2018 (Cth).



2. About Australian Venue Co /

Australian Venue Co is the second largest pub group in Australia and New Zealand. The group was created in 2014 with the vision of becoming a leading pub operator. Australian Venue Co is a large group but aims to feel like a small one with the majority of venues operating as a standalone pub, bar or restaurant with their own defined brand and service proposition. Many of Australian Venue Co's venues are rich in heritage, with some in operation for more than 100 years.

Through its venues, Australian Venue Co aims to become a part of the fabric of communities in which it operates. Australian Venue Co's success relies on the confidence that customers and the community have in the way we conduct our business, and we are committed to ensuring that we operate and source our products ethically, sustainably and responsibly.

3. Structure, Operations & Supply Chains /

Australian Venue Co operates in excess of 150 pubs, bars and restaurants in Australia and New Zealand under a variety of brands.

Our operations are underpinned by a labour force of approximately 4,300 employees (full-time, part-time and casual).

Our direct supply chains are comprised of approximately 2,500 suppliers, with 95% of our procurement spend with suppliers operating in Australia and New Zealand.

Due to the localised nature of our direct supply chain, we experienced limited to no supply chain impact associated with Covid-19.

Our largest category of supplier spend is on food and drink direct to our pubs, bars and restaurants. Our second largest category of supplier spend is on goods and services indirect to the operations on expenditure such as maintenance, waste and cleaning, security, rent and utilities.

4. Risks of Modern Slavery Practices in our Operations and Supply Chains /

Australian Venue Co has a relatively large workforce and supplier base, and we have undertaken a risk assessment to understand the modern slavery risks within our operations and our supply chains.

Due to our framework of employment policies and procedures, and internal controls including grievance and whistleblower channels, we have assessed the risk of modern slavery in our operations as low. Notwithstanding this assessment, Australian Venue Co will continue to monitor risk across our operations.

In relation to our supply chains, Australian Venue Co's risk assessment included a risk mapping of our supply chains to identify priority risk areas where there may be a higher risk of modern slavery practices. In undertaking this risk profiling we considered the category of the product or service being procured, the geographic location of the supplier, high risk business models, and suppliers that engage or employ vulnerable people.

The outcome of the risk mapping has enabled Australian Venue Co to identify potential risks in the cleaning services and fruit & vegetable farming sectors of our supply chains due to their potential reliance on migrant and undocumented workers. Notwithstanding this assessment, Australian Venue Co considers that it has good mitigation measures in place to address the potential modern slavery risks in our supply chains pertaining to these sectors due to the centralised procurement procedures that are in place for supplier pre-qualification, contracting, monitoring and contract management.

Due diligence and risk assessments are undertaken as part of pre-qualification for potential suppliers. This process includes assessment of modern slavery policies and procedures, labour practices including whistleblower procedures, internal audit procedures and labour licensing status.

Australian Venue Co's procurement contractual requirements include compliance with applicable laws relating to modern slavery and ongoing compliance reporting. In the event Australian Venue Co were to identify a modern slavery risk with a supplier, Australian Venue Co would seek further supplier information and reporting, and seek to collaborate to resolve the risk. In the event of an unresolved risk, Australian Venue Co would look to initiate contractual remedies and/or consult appropriate law enforcement authorities. Australian Venue Co did not find any instances of modern slavery in the supplier assessments undertaken this year.

5. Future Priorities /

Australian Venue Co will seek to progress the following initiatives:

- whilst the current focus has been on Australian and New Zealand suppliers given they comprise 95% of our procurement spend, Australian Venue Co will undertake additional diligence procedures in relation to its overseas supply chains;
- uplift our supplier due diligence capabilities by implementing new technology that will enhance our risk assessment procedures; and
- review our current policies related to modern slavery to ensure they meet best practice.

6. Reporting Entities /

The following Australian Venue Co entities are considered reporting entities under the Modern Slavery Act 2018 (Cth) and are covered by this Statement: Canoe Holdco Pty Limited, Canoe Mezzco Pty Limited, Canoe Midco Pty Limited, Canoe Bidco Pty Limited, Australian Venue Co Limited, AVC Operations Pty Limited, Queensland Venue Co Pty Ltd and AVC Sapphire Holdings Pty Ltd.

7. Consultation /

A process of consultation across Australian Venue Co and its reporting entities helped to guide the preparation of this Statement. This included engagement with each relevant function within Australian Venue Co including Human Resources, Safety, Procurement, Legal, Licensing and Compliance.

This statement for Canoe Holdco Pty Limited and its controlled entities was approved by the Board of Canoe Holdco Pty Limited as the parent entity on 2021.

A handwritten signature in black ink, appearing to read 'Paul', with a stylized flourish extending to the right.

Paul Waterson
Chief Executive Officer & Managing Director
Canoe Holdco Pty Limited
28 March 2021

Appendix /

This Modern Slavery Statement was prepared in accordance with the criteria set out in the Modern Slavery Act 2018. The table below outlines where information related to each mandatory reporting criteria can be found.

Mandatory criteria for modern slavery statements	Location of Information
Identify the reporting entity	Section 6
Describe the structure, operations and supply chains of the reporting entity	Section 3
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Section 4
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Section 4
Describe how the reporting entity assess the effectiveness of such actions	Section 4
Describe the process of consultation with any entities that the reporting entity owns or controls	Section 7
Provide any other information that the reporting entity, or the entity giving the statement, considers relevant	Section 2