

MODERN SLAVERY STATEMENT

Australian Venue Co

3 July 2023 to 30 June 2024

1. Introduction

This Statement is published in accordance with the *Modern Slavery Act 2018* (Cth) and covers Aardvark TopCo Pty Ltd (ABN 24 670 588 824) and those additional reporting entities comprising the Australian Venue Co group which are described in part 8 of this Statement (“**Australian Venue Co**”). It sets out the actions taken by Australian Venue Co in identifying and addressing the potential risk of modern slavery for our operations and supply chains in respect of the financial year ended 30 June 2024 (“**FY24**”).

Information presented in this Statement is current as at 30 June 2024 unless stated otherwise.

In this Statement, references to an Act are to the *Modern Slavery Act 2018* (Cth) unless stated otherwise.

2. About Australian Venue Co

Australian Venue Co was during the relevant reporting period 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 in Australia and New Zealand, combining a high-quality portfolio of venues with a strong corporate platform, systems and controls.

Australian Venue Co operates a portfolio of highly differentiated venues rich in tradition and tailored to local markets across metropolitan, suburban and select regional locations in Australia and New Zealand. Through our venues, Australian Venue Co aims to become a part of the fabric of communities in which we operate. 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 our venues and source our products ethically, sustainably and responsibly.

3. Our Structure, Operations and Supply Chains

Australian Venue Co operates more than 200 pubs, bars and restaurants in Australia and New Zealand under a variety of brands.

Our operations are underpinned by a labour force of approximately 8,000 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. We seek to provide a first-rate hospitality experience and as such, seek to source our products from high quality and reputable producers.

Our largest category of supplier spend is on food and beverage direct to our pubs, bars and restaurants. Our second largest category of supplier spend is on goods and services 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 undertake ongoing risk assessments to understand and prevent modern slavery risks within our operations and our supply chains as outlined below.

Supply Chains

We have conducted an extensive analysis of the modern slavery risks inherent in the hospitality industry which serves as a foundation for gaining a deeper understanding of areas where risks may be present. We acknowledge that specific supply chains and operations within Australian Venue Co may face increased vulnerability to modern slavery risks. This vulnerability arises from factors such as the geographical origin of goods from lower-socioeconomic regions, high risk business models, the labour-intensive nature of certain service lines or production processes. Although our interaction with international suppliers is limited, with less than 5% of our expenditure allocated to products sourced from businesses outside Australia and New Zealand, we understand that our visibility in certain international markets is restricted. Additionally, our Australian suppliers may source component materials globally, which introduces additional modern slavery risks in the lower tiers of our supply chain.

Our supply chain risk assessment process is underpinned by a risk mapping of our supply chains to identify areas which may face increased vulnerability to modern slavery risks. In undertaking this risk profiling, we consider the category of the product or service being procured (i.e. in relation to industry sectors such as food and beverage, cleaning, security, waste management), the geographic location of the supplier, high risk business models, and suppliers that may engage or employ vulnerable people.

Australian Venue Co considers that it has good mitigation measures in place to address the potential modern slavery risks in our supply chains due to the procurement procedures that are in place for supplier pre-qualification, contracting, monitoring and contract management.

As part of our procurement procedures, modern slavery due diligence and risk assessments are undertaken as part of pre-qualification for potential suppliers. This process includes an assessment of modern slavery policies and procedures, labour practices including whistleblower procedures, internal audit procedures and licensing and compliance requirements. For areas that have been identified as being of potentially higher risk based on Australian Venue Co's supply chain risk mapping, Australian Venue Co requires suppliers to address an enhanced risk assessment procedure which includes the provision of documented evidence of the steps undertaken to mitigate modern slavery risks in their operations and supply chains. This process has now been expanded on and improved in FY24 as outlined in part 5.

Australian Venue Co's procurement contractual requirements include compliance with applicable laws relating to modern slavery and ongoing compliance reporting. That is, Australian Venue Co's standard contractual provisions require all suppliers of goods and services generally to have policies in place that address sustainability and modern slavery risks in its procurement supply chain, with related requirements to keep records of these policies and provide evidence of these policies on a reasonable request of Australian Venue Co. In addition, in the current financial year, Australian Venue Co has sought to improve on its procurement processes in respect of supplier vetting and identification of risks as outlined in part 5.

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, including through contractual mechanisms to audit suppliers, and seek to collaborate to resolve the risk. In the event of an unresolved risk, Australian Venue Co would look to promptly remediate the situation including but not limited to, termination of the procurement arrangements with the supplier, initiating contractual remedies and/or consulting with appropriate law enforcement authorities.

Operations

Australian Venue Co recognises that labour exploitation can occur in the hospitality industry and is committed to an employment framework that protects its workforce. All venues and employing entities are subject to Australian Venue Co's corporate compliance framework including Australian Venue Co's Code of Conduct.

Australian Venue Co implements a range of measures to ensure compliance with relevant employment instruments and obligations, including but not limited to:

- Use of time and attendance systems with industry award and enterprise agreement interpretation across all venues. This system also includes a self-service portal to enable staff visibility on rosters, payslips including rates and hours worked.
- Central management of employment contracts by the Australian Venue Co Human Resources department to manage compliance with applicable employment entitlements.
- Maintenance of a detailed suite of employment policies including whistleblower and grievance policies and procedures (with Board oversight).
- Central oversight of venue management.
- A dedicated centralised Safety department.
- Dedicated training courses for employees including in relation to anti-discrimination, bullying and harassment.

Australian Venue Co is committed to continuous improvement of our payroll processes, systems and operation and we periodically engage external specialist consultants to verify compliance with our governance framework, systems and controls in relation to payroll.

Australian Venue Co's workforce includes international workers who are employed by Australian Venue Co strictly in accordance with visa conditions and relevant employment laws. Australian Venue Co actively encourages internal training and progression of our workforce. Many international employees have progressed to senior roles at Australian Venue Co and all form an important part of our workplace community.

Australian Venue Co applies additional measures when engaging suppliers who may assist with international recruitment of labour including verifying overseas recruitment practices to ensure that practices, even if they are common and legal in the country of origin, align with the high standards and commitment upheld by Australian Venue Co.

Within Australian Venue Co, we actively encourage our employees to speak up and we are committed to ensuring the accessibility of our grievance and whistleblower reporting avenues.

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 is committed to a meaningful group-wide response to modern slavery and will be continuing to monitor risk across our operations.

5. Additional Actions We Have Taken to Assess and Address Risks in FY24

Australian Venue Co has undertaken the following additional activities in FY24 to enhance our ability to assess and address the impacts and risks of modern slavery

Improvement of procurement procedures in connection with early supplier vetting

Australian Venue Co's procurement team has sought to embed in its early supplier pre-qualification and vetting processes, a requirement for formal attestation from suppliers (with supporting documentation) that suppliers have appropriate policies and procedures in place in respect of modern slavery risks in relation to their supply chain and business. These additional requirements have been embedded into Australian Venue Co's procurement processes for industry sectors covering food and beverage, cleaning, consumables, pest and hygiene, security, and waste management.

Each supplier is required to provide formal attestation of its understanding of modern slavery risks and acknowledgment of requirements to assess and address modern slavery risks in its supply chain and business including by reference to the Act and specific guidance materials published by the Commonwealth Attorney-General's Department.

Business assurance activities

Australian Venue Co is implementing a new business assurance function which will consolidate and centralise all internal business assurance activities including in relation to the workplace condition, employee work health & safety and training at Australian Venue Co's venues. This function will provide additional assurance as to the standard and regulatory compliance of Australian Venue Co's facilities for its workforce.

Psychological health and safety infrastructure review

Australian Venue Co has commenced a psychological health and safety infrastructure review by independent and qualified psychologists which includes an audit of Australian Venue Co's existing psychological health and safety infrastructure for employees as against the current and applicable regulatory and legislative obligations (e.g. the *Work Health and Safety Act 2011* (Cth), *Anti-Discrimination and Human Rights Legislation Amendment (Respect at Work) 2022* (Cth) amongst others). Whilst this initiative has commenced, it will run into the financial year ending 29 June 2025 ("FY25") and the results of this initiative are expected to be reported on in a future Statement (once finalised).

6. How We Assess the Effectiveness of Our Actions

To ensure continuous improvement, Australian Venue Co continually reviews the effectiveness of the actions we have taken to address the modern slavery risks in our operations and supply chains, with a view to improvement of its actions in future reporting periods.

Supplier vetting

Australian Venue Co's supplier pre-qualification process provides transparency on modern slavery risks in our supply chains and enables us to partner with suppliers to improve practices.

Conducting regular internal governance and assurance processes

Australian Venue Co's initiatives to manage modern slavery risks in our operations are regularly assessed as part of our governance and risk management processes including investigation of grievances and confidential whistleblower disclosures to validate the effectiveness of our efforts. To enhance our knowledge of the evolving landscape of modern slavery risks we also regularly engage external expert advisers to provide training and to facilitate collaboration among key stakeholders of Australian Venue Co to support our continued effort to address modern slavery risks.

Ongoing collaboration with suppliers and external partners

Australian Venue Co continues to foster partnerships with our suppliers and other external stakeholders to jointly address modern slavery risks and share best practices.

Based on the insights gained from these processes, Australian Venue Co will adapt and strengthen our actions to continually enhance our response to modern slavery. Our commitment remains focused on continual improvement in combatting modern slavery and promoting responsible practices throughout our operations.

7. Future priorities for FY25

In FY25 Australian Venue Co will seek to progress the following initiatives:

- Appointment of designated personnel to ensure proper identification and compliance with modern slavery risks and practices.
- Implementation of a mixture of formal and informal audits of suppliers to ensure their commitment against modern slavery practices.
- Completion of the psychological health and safety infrastructure review by independent and qualified psychologists which will include an audit of Australian Venue Co's existing psychological health and safety infrastructure for employees as against the current and applicable regulatory and legislative obligations.
- Expanding and improving on the existing process in place for immigration VISA renewals and applications for new and existing employees by way of implementation of an eform/application to enhance the VISA renewal and application process.
- Continuing to build the expertise of our people through training and education on modern slavery risks and practices, so they can better identify and address any such risks.
- Continuing to enhance the procurement processes to expand our visibility over suppliers' inputs and supply chains, and otherwise to drive improvements in addressing modern slavery risks.

8. 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: Aardvark TopCo Pty Ltd, Aardvark HoldCo Pty Ltd, Aardvark MidCo Pty Ltd, Aardvark BidCo Pty Ltd. Australian Venue Co Holdings 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, AVC Sapphire Holdings Pty Ltd, and LHG Pty Ltd.

9. Consultation

A process of consultation across Australian Venue Co 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 Aardvark TopCo Pty Ltd and its controlled entities was approved by the Board of Aardvark TopCo Pty Ltd as the parent entity of Australian Venue Co on 27 November 2024.

A handwritten signature in dark ink, appearing to read 'Paul', followed by a stylized flourish.

Paul Waterson
Chief Executive Officer & Managing Director
Australian Venue Co

Acknowledgement of Country

In the spirit of reconciliation, Australian Venue Co acknowledges the Traditional Custodians of country throughout Australia and their connections to land, sea and community. We pay our respect to their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today.

APPENDIX

This Modern Slavery Statement was prepared in accordance with the criteria set out in section 16 of the *Modern Slavery Act 2018* (Cth). The following table outlines where information related to each mandatory reporting criteria can be found in the Statement:

Mandatory criteria for modern slavery statements	Location of information
Identify the reporting entity	Part 8
Describe the structure, operations and supply chains of the reporting entity	Part 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	Part 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	Parts 4 and 5
Describe how the reporting entity assesses the effectiveness of such actions	Part 6
Describe the process of consultation with any entities that the reporting entity owns or controls	Part 9
Provide any other information that the reporting entity, or the entity giving the statement, considers relevant	Part 2