

An aerial photograph of a holiday park situated on a sandy peninsula. The park features numerous small, light-colored buildings and many parked motorhomes. A winding river flows through the park, bordered by lush green vegetation. In the background, a wide, sandy beach meets the clear blue ocean under a bright sky.

MODERN SLAVERY STATEMENT

JULY 2021 – JUNE 2022

Discovery Holiday Parks Pty Limited

Discovery Parks Holdings Pty Ltd



OUR STATEMENT

Discovery Holiday Parks Pty Limited (**Discovery Parks**) is committed to acting ethically and with integrity in our business dealings and relationships, and to implementing and enforcing systems and controls to address the risk of modern slavery practices in our own business operations and supply chains.

We endeavour to ensure there is transparency in our business and approach to tackling modern slavery risk, consistent with our reporting obligations under the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**).

Discovery Parks and Discovery Parks Holdings Pty Ltd (together, **Discovery**) are reporting entities for the purposes of the Modern Slavery Act and this is their joint Modern Slavery Statement, made pursuant to section 14 of the Modern Slavery Act.

Discovery owns and controls a number of entities, including Australian Park Licence Co Pty Ltd, which manages the G'day Parks (leading community of independent caravan and holiday parks) and G'day Rewards (membership program) brands. Together, these entities and brands are often collectively referred to as the **G'day Group**.

This Modern Slavery Statement describes the actions that Discovery, and the G'day Group more broadly, has taken in the Australian Financial Year 2021-2022 (**reporting period**) to assess and address the risks of modern slavery practices in our operations and supply chains. It has been drafted to meet the mandatory criteria at section 16(1) of the Modern Slavery Act. The table below indicates where each mandatory criterion is addressed.

MANDATORY CRITERIA	OUR MODERN SLAVERY STATEMENT	PAGE
Identify reporting entity	Our Statement	2
Describe the reporting entity's structure, operations, and supply chain	Our Structure, Operations and Supply Chain	4
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Assessing and Addressing Our Modern Slavery Risk	5
Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	Assessing and Addressing Our Modern Slavery Risk	5
	Our Performance	8
Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risk	Our Performance	8
	Our Future Plans	9
Describe the process of consultation with any entities the reporting entity owns or controls	Consultation and Commitment	10
Any other relevant information	Capacity Building	10

This Modern Slavery Statement builds on the actions outlined in our previous Modern Slavery Statements, with a particular focus on developing our policies and procedures; increasing our capability and awareness; and maturing our risk assessment and control measures.

ABOUT US

The G'day Group is Australia's largest regional accommodation network, directly operating more than eighty-five Discovery Parks properties across Australia and providing an online platform for more than two hundred and thirty independently operated G'day Parks properties. From modest beginnings in 2004 with just three parks, the G'day Group has evolved to become a clear market leader, with a business portfolio incorporating work stay, corporate and tourism accommodation.

As a significant contributor to the local and national tourism economy, we recognise that the way we manage our environmental and social responsibilities has a far-reaching impact. We invest significant capital into improving infrastructure in regional communities and form close ties with local businesses, suppliers, and tourism industry peers to create sustainable communities that are great places to live, work, and visit.

To support our local communities, we strive to source produce, supplies, and services from local businesses and assist local charities and volunteer groups by becoming actively involved in initiatives and fundraising. Our large number of domestic suppliers reflects this commitment to supporting local businesses.

We have recently published our Environmental, Social and Governance (ESG) Strategy, signalling our ongoing commitment to growing with care through supporting our people, giving back to the communities we operate in and protecting our environment.

OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

STRUCTURE & OPERATIONS

Headquartered in South Australia, our support office located in the Adelaide CBD has a team of over 240 staff providing support in areas including finance, marketing, procurement, legal, operations, information technology, workplace health and safety and people and culture.

OPERATIONS SNAPSHOT

Over **85** properties operated, including holiday parks, resorts and work stay sites

Accommodation provided in **7** states and territories

Over 2,000 employees (as at 30 June 2022)

\$294,725,611 consolidated revenue (as at 30 June 2022)

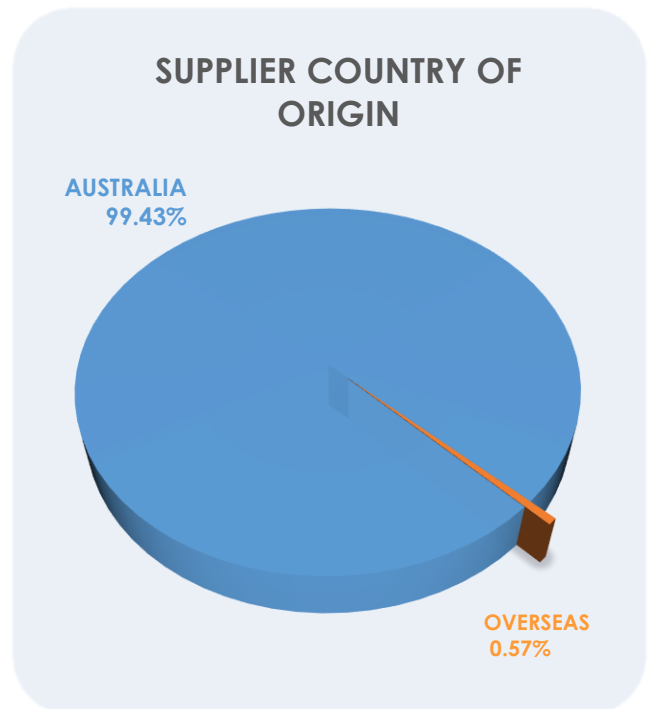
SUPPLY CHAIN

In the reporting period, we made payments to over 5,500 active suppliers. Discovery is a proudly Australian owned business and in line with our ongoing commitment to support other local businesses like ours, over 99% of our own suppliers in the reporting period were based in Australia.

SUPPLY CHAIN SNAPSHOT

Discovery's supply chain consists of goods and services that support the operation and development of our business, maintenance of our properties, and the provision of our accommodation services. Our key supply chain categories include:

- Utilities (including electricity and gas)
- Facilities management (including cleaning services, waste management, safety, and gardening)
- Property management (including hardware and furnishings for our properties)
- Development initiatives (including cabins, swimming pools, waterparks, and other facilities)
- Financial services (including banking services)
- Food & Beverage (including the provision of food and beverage to our work stay parks)
- Marketing (including digital marketing)
- Office consumables (including stationery)
- ICT (including telecommunications, IT hardware and software)



ASSESSING AND ADDRESSING OUR MODERN SLAVERY RISK

In identifying and assessing our risks of modern slavery practices, we have consulted the Australian Government's guidance and specifically, we have used the risk indicators from the *Modern Slavery Act 2018 - Guidance for Reporting Entities (Australian Government Guidance)*.

To prepare this Modern Slavery Statement, we have considered, as consistent with the Australian Government Guidance, the risk that we may **cause, contribute**, or be **directly linked** to modern slavery practices through our operations and our supply chain. For the reporting period, we have continued to focus our supply chain risk assessment on our Tier 1 suppliers, meaning suppliers that provide goods or services to us directly.

SUPPLY CHAIN RISK ASSESSMENT AND MANAGEMENT

Some of our suppliers are categorised as higher risk as identified by the Australian Government Guidance due to their sector and industry or product and services. Our supplier categories that we have assessed as higher risk include building contractors and materials suppliers for our developments, information technology products and services and laundry services.

While almost all of our suppliers are Australian based, some of our suppliers may source goods or services from overseas, including from locations that present a higher risk of modern slavery according to geographic risk indicators.

To assist with managing these risks in our supply chain, we undertake a number of due diligence steps, particularly at the supplier onboarding and tender evaluation stage. Specifically, we utilise a set of ESG compliance checklist questions to determine a risk level for specific suppliers. We then conduct a risk assessment and target risk management actions based on the risk level.

For targeted higher risk supplier agreements, we endeavour to ensure that we enter into agreements which contain provisions to mitigate the risk of modern slavery practices. In the reporting period, we have further refined our template modern slavery compliance clause for use in these supplier agreements.

In line with our commitment to continuous improvement, we have been focusing on maturing our supplier risk assessment process concerning modern slavery risk. In the reporting period, we developed a bespoke supplier risk assessment tool using a Supplier Risk Assessment Matrix. This matrix is based on risk assessment methodology constructed with reference to the key risk indicators identified in the Australian Government Guidance, specifically by determining risks associated with industry, product and service, geographical factors, and entity risk. We evaluated the tool based on a targeted group of five hundred suppliers, to assist with calculating our Overall Supplier Risk Rating.

Alongside this, we have started to develop a Supplier Risk Management Framework, which sets out our modern slavery supplier risk management approach across our supply chain, including how our Supplier Risk Assessment Matrix will be incorporated into our supplier onboarding and ongoing due diligence processes. Once implemented, this framework will assist our team to embed our modern slavery risk management process across our supply chain, from the initial identification of a procurement need, through to post engagement monitoring.

Separately, in the reporting period we engaged a small team of financial service support staff under an agreement with a service provider with offices based overseas. This engagement involved due diligence activities, including a high level and specific modern slavery risk assessment and contractual compliance clauses. Due to the pandemic and restricted travel, we undertook some of these due diligence tasks remotely, including conducting a virtual site tour. Key senior management staff are investigating the opportunity of a site visit of these specific offshore offices in the current reporting period, now that overseas travel restrictions have eased.

Our actions overall continue to be guided by proportionality to our understanding of our low risk profile as outlined by the key risk indicators in the Australian Government Guidance. We consider that our geographic risk is likely impacted by our low number, less than 1%, of overseas based suppliers. We are committed, as part of our continuous improvement approach, to further maturing our understanding of modern slavery supply chain risks, and to developing our supplier management approach.

OPERATIONS RISK ASSESSMENT AND MANAGEMENT

The G'day Group employs more than two thousand staff nationally, across both our support office and owned and operated parks. The majority of our employees are directly employed, on a combination of full-time, part-time, and casual contracts. As our employees are working exclusively within Australia, where employee-employer relations are strictly regulated by the *Fair Work Act 2009* (Cth) and relevant modern awards, our operational risk profile is likely reduced.

However, given the prevalence of modern slavery globally, we recognise that there may be a risk of being directly or indirectly linked to modern slavery practices in our operations. We specifically acknowledge that there may be a wider potential risk that third parties or individuals, over which we have limited control, may use our services while engaging in modern slavery practices. Accordingly, to assist in addressing these risks, we have undertaken targeted actions to increase training and awareness around identifying risks of modern slavery practices across the business.

We engage third party labour-hire companies and professional services suppliers to temporarily boost our workforce capabilities and capacity when needed, for example, to manage or implement specific projects. These arrangements are generally short-term and where a longer term may be required, we endeavour to ensure that staff are employed directly where practicable. We strive to use licensed labour hire providers that generally have long-standing relationships with us.

In the reporting period, due to chronic labour shortages within Australia, we were fortunate to partner with the Pacific Australia Labour Mobility (**PALM**) scheme to supply us with employing seasonal workers from the Pacific Islands to work in some of our remote operations. The PALM scheme is an initiative administered by the Australian Commonwealth Government that allows Australian businesses to hire workers from nine Pacific Island countries and Timor-Leste when there are insufficient local workers available to meet demand. Given the remote geographic locations of some of our accommodation sites, there are significant workforce availability challenges, particularly as Australia comes out of the global pandemic with reduced working holiday traveller numbers.

Through the PALM scheme, we have been able to source skilled workers to work at sites such as Discovery Kings Canyon, where we welcomed nineteen team members in May 2022 to work the peak season. As the PALM scheme is overseen by the Department of Foreign Affairs and Trade, we are assured of the probity and the integrity of the recruitment process. All participating workers, including our new team members, are afforded the same rights and protections as Australian workers and as the employer, we ensure we meet stringent criteria for participation in the scheme. The Australian Commonwealth Government additionally implements a range of measures to protect workers, including site visits, spot checks, regular reporting requirements and support service phone lines. Welcoming these team members has not only brought a wealth of experience and dedicated team members but has enriched our sense of community and cultural diversity.

The health and wellbeing of our employees is of paramount importance to us. Under our newly released ESG Strategy, G'day Group's people will continue to be nurtured through enhanced training and development opportunities as well as paid volunteering and parental leave. We will maintain and grow our inclusive culture through a new diversity and inclusion strategy. Our Whistleblower Policy supports the raising of reports of modern slavery practices. In the reporting period, we engaged an independent external provider, Stoplevel, to facilitate the reporting mechanism under this policy.

Our safety and compliance team implement a comprehensive health and safety management system, supported by high levels of internal awareness and risk assessment, reporting on work, health and safety trends and delivering a compliance program that fosters a strong safety culture across the business.

At Discovery, we aim to foster a culture of continuous learning. In the reporting period, we distributed a tailored modern slavery eLearning module through our online learning portal. This training has been designed to provide staff with an overview of the types of modern slavery and associated key risk indicators. The eLearning module builds awareness and capacity of our key operational staff to assist them to identify and report on risks of modern slavery practices in our operations and supply chain. The training module was delivered to all operational and support office employees and will be incorporated into the onboarding of all new employees.

In the 2020/2021 reporting period, we undertook substantial policy development by finalising our Modern Slavery Policy, Supplier Code of Conduct and Human Rights Policy. In combination with our eLearning module delivery, this suite of policy documents embeds our expectations of our personnel and increases their awareness and capacity to assist in assessing and addressing any risks of modern slavery practices.

OUR PERFORMANCE

Our actions for this reporting period have been driven by our Modern Slavery Working Group, comprised of key personnel including executive team members across legal, procurement, people and culture and operations business units.

KEY ACTIONS IN THE REPORTING PERIOD

Policy Development

- Commenced the development of our Supplier Risk Management Framework.

Supplier Due Diligence

- Incorporated our Supplier Code of Conduct into the Procurement Supplier Questionnaire that we deliver when onboarding new suppliers.

Training, Awareness, and Capacity Building

- Delivered our bespoke Modern Slavery training eLearning module via our online learning portal. This training eLearning module is designed to increase the capacity and awareness of our personnel to identify and report on the risks of modern slavery practices in our operations and supply chain.

Risk Identification and Assessment

- Developed an internal supplier risk assessment tool and associated supplier risk assessment methodology to enhance the sophistication of our risk appreciation.
- Undertook further interrogation, using our supplier risk assessment tool and enhanced supplier risk assessment methodology, of the risks identified in targeted supplier groups.
- Engagement of external provider, Stoplevel, to assist with managing our grievance reporting processes.

Assessing the Effectiveness of Our Actions

- Our internal Modern Slavery Working Group continued to drive and monitor our modern slavery compliance actions.
- Formulated our modern slavery compliance strategy for the next reporting period (see *Our Future Plans*).

OUR FUTURE PLANS

Looking ahead, and in line with our commitment to continuous improvement, we are continuing to progress the following actions in our 2022/2023 reporting period with our Modern Slavery Working Group overseeing the following program of work.

Supplier Due Diligence

- Reviewing the effectiveness of current supplier due diligence actions.
- Refining and testing our Supplier Risk Management Framework.
- Investigate the opportunity to undertake an inspection of relevant offshore service providers by senior personnel.

Industry Engagement

- Continue to collaborate and participate in industry working groups, to help maintain best practice in addressing modern slavery supply chain risks.

Training and Capacity Building

- Conducting training with key personnel on our proposed Supplier Risk Management Framework.
- Exploring options for supplier onboarding training.

Assessing the Effectiveness of Our Actions

- Determining our modern slavery strategy for the next reporting period.
- Developing a set of key reporting metrics to assist with measuring the effectiveness of our actions.

CAPACITY BUILDING

As part of our ongoing commitment to building our maturity in understanding our modern slavery compliance obligations, relevant staff have attended specific modern slavery training and obtained external specialist advice on our modern slavery compliance obligations. Our senior procurement staff are also accredited members of the Chartered Institute of Procurement and Supply.

In June 2022, a representative from our Modern Slavery Working Group attended the South Australian Modern Slavery Workshop facilitated by the University of South Australia's Centre for Enterprise Dynamics in Global Economies, designed as a multidisciplinary roundtable for various stakeholder groups. As of the current reporting period, we are now represented on the newly formed Lead Group of the South Australian Modern Slavery Research and Practitioner Network. We look forward to continuing to collaborate with industry peers, NGOs, researchers, and government representatives in this space to ensure that our approach to modern slavery compliance is informed by best practice.

CONSULTATION AND COMMITMENT

Our approach to consultation between and across our reporting entities reflects the nature of the relationship between the two and between our internal business units. Relevant staff from Discovery have been involved in the development of this Modern Slavery Statement, with input from many areas, including key legal, procurement, operations, finance, and people and culture personnel. With oversight provided by our internal Modern Slavery Working Group, we ensure our senior management are kept updated on activities in relation to our obligations under the Modern Slavery Act. The Discovery Parks Executive Team have been directly consulted on the preparation of this Modern Slavery Statement, with final approval provided by our Board.

This Modern Slavery Statement has been approved by the Board of Directors of Discovery Parks Holdings Pty Ltd on **9 December 2022**.



Grant Wilckens
Chief Executive Officer