



MODERN SLAVERY STATEMENT

2021





Tennis Australia recognises that a genuine and ongoing assessment of business operations is required to ensure the company is aware of its place within the supply chain.

INTRODUCTION AND IDENTITY OF REPORTING ENTITY

This is the second Modern Slavery Statement (Statement) issued by Tennis Australia Limited (ABN 61 006 281 125) (Tennis Australia), as a reporting entity pursuant to the Modern Slavery Act 2018 (Cth) (the Act).

In 2020, Tennis Australia amended its financial year end to 30 September. Permission was granted by the Modern Slavery Business Engagement Unit at Australian Border Force to align future statements to the new financial year end. As a result, this is a transitional statement covering the 15 month period, 1 July 2020 to 30 September 2021.

Tennis Australia's purpose is to grow, manage, promote and showcase the game of tennis domestically and represent Australia's tennis interests internationally. The Australian Open is owned and organised by Tennis Australia each year at Melbourne Park, Victoria. Tennis Australia's members comprise six state and two territory tennis associations, also known as Member Associations.

The purpose of this Statement is to assess, address and demonstrate Tennis Australia's responsibility under the Act and more importantly, to assist in the promotion and preservation of human rights. Whilst confident its business operations and supply chain do not pose a high risk of exposure or opportunities for human rights abuses, Tennis Australia recognises its responsibility within these supply chains and is constantly seeking to enhance its corporate contribution.

ORGANISATIONAL STRUCTURE, OPERATIONS AND TA SUPPLY CHAIN

Organisational Structure

Tennis Australia is a not for profit company limited by guarantee and registered in Australia. It has subsidiaries as follows:

- (a) The Australian Tennis Foundation Limited (ABN 98 138 906 797), a charitable organisation registered with the Australian Charities and Not-for-Profits Commission.
- (b) Tennis Nxt Limited, a company incorporated and domiciled in Hong Kong. Tennis Nxt is currently dormant, with no statement of profit or loss or other comprehensive income and statement of changes in equity prepared for the last financial year to 30 June 2021, due to there being no income or changes in equity during that year.
- (c) Wildcard Ventures 1 Pty Ltd (ACN 650152202) and Wildcard Ventures 1 Trusco Pty Ltd (ACN 650151812), a venture capital investment company incorporated in Australia. There is also a trust (Wildcard Ventures 1 Trust ABN 64 501 829 721) sitting underneath Wildcard Ventures 1 Trusco Pty Limited.

None of the subsidiaries named above are considered reporting entities under the Act.

Tennis Australia Operations and Supply Chain

Tennis Australia is a national sporting organisation (NSO). Tennis Australia's head office is located at Melbourne Park, Melbourne, Victoria, with the majority of its workforce located within Victoria but some team members based in other locations, primarily in states and territories of Australia.

Tennis Australia's operations are primarily based in Australia, with a significant proportion of the company's revenue and expenses directly attributable to the Australian Open Grand Slam event held in Melbourne each year. As previously reported, whilst a majority of suppliers are domiciled within Australia, there are still a proportion of suppliers based offshore, and some local suppliers obtain their goods from third party, offshore suppliers. The impacts of the COVID-19 pandemic has increased reliance on locally sourced, Australian products and manufacturers. Tennis Australia believes that this local engagement and oversight may have reduced the risks commonly associated with modern slavery.

Front of house and back of house operations at Melbourne Park, the venue at which the Australian Open is held, are conducted by Melbourne and Olympic Parks Trust under an operational agreement.



Tennis Australia continues to regularly review and maintain its internal and public facing policies, guidelines and training modules.

RISKS OF MODERN SLAVERY PRACTICES WITHIN TA'S OPERATIONS AND SUPPLY CHAINS

Tennis Australia considers the risk of its operations directly resulting in modern slavery practices to be quite low. It also considers the risk of its supply chain contributing to any such practices to be small. However, Tennis Australia recognises that a genuine and ongoing assessment of business operations is required to ensure the company is aware of its place within the supply chain.

Tennis Australia has identified the following streams at some risk of modern slavery practices:

- (a) merchandise;
- (b) larger procurement projects (primarily offshore); and
- (c) offshore engagement in high risk jurisdictions (both suppliers and revenue partners).

During the reporting period, Tennis Australia was able to further streamline its appointment and consideration of third party suppliers, namely due to:

- A. A more significant application of the Victorian government's Local Jobs First Policy under the Local Jobs First Act 2003 (VIC) to the award of major contracts within Victoria;
- B. The impact of the COVID-19 pandemic saw a greater reliance on locally sourced, Australian products and manufacturers due to the significant global impact and uncertainty in relation to local supply chains. Tennis Australia believes that this local engagement and oversight may reduce the risks that are commonly associated with modern slavery (where visibility is reduced); and

C. The major event industry business faced significant uncertainty during the pandemic period, and therefore a number of existing supplier relationships were extended (following a thorough assessment under Tennis Australia's procurement policy). These extensions reduced the ambiguity associated with the engagement of new, unknown suppliers, whilst maintaining independent integrity of the arrangements.

Application of Tennis Australia's previously revised Procurement Policy and Request for Tender Material

As previously reported, Tennis Australia had recently reviewed and updated its procurement policy and associated request for tender materials. This most recent reporting period enabled the business to publicly stress test its materials and approach to third party appointments. Whilst there were fewer tenders run during the reporting period due to the impact of the pandemic, the renewed approach gave the business (and the Procurement team) increased comfort in relation to further examining the modern slavery risks associated with the business.

Management and monitoring of compliance of the procurement policy sits with Tennis Australia's Procurement team. The Procurement team continues to maintain arms' length and independent guidance in relation to significant contracts, in order to provide uninhibited guidance to the operational and commercial teams.

Tennis Australia undertook a significant tender in 2021 in engaging a supplier to design, construct and fit out a new temporary broadcast compound for the Australian Open event. This is one of the largest

tenders run by the business in recent times and provided the procurement and broadcast teams with the opportunity to appropriately stress test the supply chain offered by the ultimate successful respondent.

The Legal team continues to review and assess its core suite of contracts to ensure ethical contractual provisions are imposed upon our suppliers to assist in minimising the risk of modern slavery. The implementation and establishment of a more robust finance and procurement system during the reporting period has provided the Finance and Procurement teams with enhanced oversight of third parties engaged and paid by Tennis Australia.

Engagement of offshore suppliers and partners in higher risk jurisdictions offshore

As noted above, the engagement of offshore suppliers reduced in the period, however, Tennis Australia continued to rely upon its previously reported Guidelines for Selecting Third Parties to Represent Tennis Australia (Guidelines). The purpose of the Guidelines is to outline for Tennis Australia team members:

- (a) the expected general business conduct and practices while carrying out their Tennis Australia duties; and
- (b) the requirements when selecting third parties to represent Tennis Australia.

These Guidelines are shared with team members to ensure that ethical practices are utilised in the promotion and sale of goods and services on behalf of the company. The Guidelines continue to be a valuable tool to assess the appropriateness of businesses that Tennis Australia chooses to work with.

In selecting third parties to represent Tennis Australia, team members are required to use appropriate due diligence, approval and contractual safe holds when selecting and engaging these third parties to ensure they are:

- (a) reputable and qualified;
- (b) able to agree to, and will, comply with, all applicable laws and Tennis Australia policies;
- (c) not on the AUSTRAC sanction list; and
- (d) in the case of any third party who:
 - (i) wishes to represent Tennis Australia in discussions or negotiations with a government or government official; or
 - (ii) is located in a jurisdiction with a CPI¹ score of 65 or below, that a further, in-depth and independent assessment has been conducted by an appropriately qualified third party.

Tennis Australia Policies

Tennis Australia maintains a robust set of policies, guidelines and training for its team members, which will assist in monitoring modern slavery practice compliance, including the following:

- (a) Code of Conduct;
- (b) Whistleblower Policy;
- (c) Guidelines for Selecting Third Parties to Represent Tennis Australia;
- (d) Safeguarding Children Code of Conduct;
- (e) Tennis Anti-Corruption Policy;
- (f) Gift and Entertainment Policy; and
- (g) Procurement Policy.

Tennis Australia's policies are reviewed regularly, on an annual or bi-annual cycle, to ensure they remain appropriate and relevant given the nature of its operations as an NSO.

Tennis Australia continues to regularly review and maintain its internal and public facing policies, guidelines and training modules. Due to a significant number of people commencing employment with Tennis Australia during the pandemic and unable to attend face to face training, greater reliance has been placed upon individual training of new team members through the use of online modules.

¹ CPI is the Corruption Perceptions Index published annually by Transparency International that ranks 180 countries and territories by their perceived levels of public sector corruption according to experts and business people and uses a scale of 0 to 100, where 0 is 'highly corrupt' and 100 is 'very clean'.



A photograph of the Tennis Australia headquarters building, featuring a modern facade with a perforated metal screen and large glass windows. The building is illuminated at dusk. The text "TENNIS HQ" and "Home of the AO" is visible on the building's facade.

Tennis Australia is committed to maintaining its strong focus and oversight of third party engagements by ensuring solid collaboration by all stakeholders within the business, to ensure ethical responsibility is understood, managed and administered across the business by all team members.

ACTIONS TO ASSESS AND ADDRESS TA'S MODERN SLAVERY RISKS

Tennis Australia believes that it has again appropriately identified the primary risks in its operations and supply chain in relation to modern slavery practices, as set out above. The Tennis Australia Legal, Finance (primarily Procurement) and Integrity teams will continue to examine business streams and operations, particularly with new product lines and innovations being rolled out regularly across the business.

Tennis Australia is committed to maintaining its strong focus and oversight of third party engagements by ensuring solid collaboration by all stakeholders within the business, to ensure ethical responsibility is understood, managed and administered across the business by all team members.

ASSESSING THE EFFECTIVENESS OF TENNIS AUSTRALIA'S ACTIONS

Tennis Australia will continue to work towards the creation of a more targeted anti-modern slavery practices policy as well as enhancing current training and onboarding practices for its workforce in identifying and managing these risks.

This Statement is made pursuant to the Modern Slavery Act 2018 (Cth) and has been approved by the Board of Tennis Australia Limited.

Signed

A handwritten signature in black ink, appearing to read "Janice van Reyk".

Janice van Reyk
Director
Tennis Australia Limited
March 2022

