



Australian Football League ABN 97 489 912 318

Modern Slavery Statement

For the Reporting Period 1 November 2019 to 31 October 2020

This is the first Modern Slavery Statement (**Statement**) of the Australian Football League (ABN 97 489 912 318) (**AFL**), an Australian public company incorporated in Victoria, and its subsidiaries made to address the requirements of the *Modern Slavery Act 2018* (Cth) (**Act**). This statement highlights the assessment and action that the AFL has taken to identify, manage and mitigate the risks of modern slavery in our business operations and supply chain.

The AFL takes its obligations in relation to addressing modern slavery risks in its business operations and supply chain very seriously and has a zero-tolerance approach. The AFL is committed to implementing processes and controls in our business practices to ensure the risks of all forms of modern slavery are eliminated from our operations and supply chains and that our business practices are conducted ethically.

About the AFL

The AFL is the governing body of the sport of Australian Football. It administers both the elite Men's and the Women's Australian Football competitions and talent pathways to reach those competitions.

The AFL was previously named the Victorian Football League. It changed its name to the Australian Football League in 1990 to reflect the expansion of the elite Men's competition, which now has a national footprint, with matches played each season in every State and Territory in Australia. The elite Men's competition is now made up of 18 Clubs (**AFL Clubs**).

The first season of the elite Women's Australian football competition, also known as AFLW, was completed in 2017. The competition started with eight AFL Clubs and has now expanded to include 14 of the 18 AFL Clubs.

The AFL is the parent entity of AFL Stadia Pty Ltd (ABN 26 615 077 891) and its subsidiaries, including Melbourne Stadiums Limited (ABN 37 098 476 594) (**MSL**), and the AFL State Entities (see further under 'Governance and Operations'). MSL manages Melbourne's premier sports and entertainment venue, Marvel Stadium, and the AFL State Entities manage community Australian Football and second tier Australian Football competitions in all Australian States and Territories excluding South Australia and Western Australia.

As well as the AFL's activities in relation to Australian Football competitions, talent pathways and Marvel Stadium, the AFL provides programs and facilities to engage the Australian community in Australian Football with a focus on education and wellbeing.

For more information about the AFL please refer to the AFL's [2020 Annual Report](#).

Australian Football League

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Governance and Operations

The AFL is a not-for-profit organisation, and its income and property must be used and applied solely for the purpose of carrying out, furthering and promoting the objectives of the organisation as set out in its Constitution. The AFL Commission is the governing body of the AFL and the Board of Commissioners are the directors of the AFL. The Board of Commissioners includes the AFL's Chief Executive Officer. The members of the AFL are the 18 AFL Clubs.

The AFL Chief Executive Officer is appointed by the AFL Commission and is responsible for the operating performance of the AFL and the implementation of policy decided by the AFL Commission. Under the Chief Executive Officer, the AFL is divided into the following eight departments each led by an Executive General Manager: Game Development and General Counsel, Corporate Affairs, Customer and Commercial, People, Football, Inclusion and Social Policy, Finance, Clubs and Broadcast and Strategy. The Executive General Managers of each of the departments form the AFL's executive leadership team.

Within the Game Development department sits the operation of the AFL State Entities. The AFL has a subsidiary based in each Australian State and Territory, except for South Australia and Western Australia, that is responsible for the governance of Australian Football in that area as follows:

- Australian Football League (Victoria) Ltd ABN 24 147 664 579
- Football Tasmania Ltd ABN 93 085 213 350
- AFL Queensland Limited ABN 66 090 629 342
- AFL Northern Territory Ltd ABN 81 097 620 525
- AFL (NSW/ACT) Commission Ltd ABN 53 086 839 385

The AFL's head office is located in Docklands, Melbourne and the operations of Australian Football League (Victoria) Ltd and MSL are conducted out of head office. The operations of the other AFL State Entities are conducted out of offices in each of the relevant States and Territories. The AFL and its subsidiaries employ approximately 765 (permanent, full time and part time) individuals nationally, who are all based in Australia.

The AFL acknowledges the importance of good corporate governance, which establishes accountability for the AFL Commission and management, and provides the policies and procedures for the equitable treatment of the 18 member AFL Clubs, recognition of the rights of other stakeholders and the Commission's role as the custodian of Australian Football.

The AFL's Supply Chain

The AFL engages with suppliers to procure goods and services to support its operations. The AFL's supply chain encompasses the following key categories:

- **Licensing:** The AFL licenses intellectual property it owns to licensees who use our intellectual property on products that they manufacture and then either sell directly to consumers or to retailers. Licensed products include uniforms and footballs that the AFL purchases for use in our operations.
- **IT and Communications:** The AFL engages suppliers to provide IT and communication services including in relation to website management, data storage and communications to stakeholders.

- Match Day Operations: The AFL engages suppliers to provide services directly in relation to the conduct of Australian Football matches particularly in relation to match day technology.
- Travel and Accommodation: The AFL procures travel and accommodation services to facilitate the conduct of the AFL and AFLW matches, as well as to support its business operations generally.
- Events and Catering: The AFL uses suppliers to assist in staging events related to its operations and providing catering at those events.
- Signage: To meet its obligations under sponsorship agreements, the AFL engages suppliers to provide sponsor signage that is displayed at AFL and AFLW matches.
- Facilities Management: The AFL manages a number of facilities across Australia, including Marvel Stadium, and requires services in relation to those facilities such as security and cleaning.

For the most part, the AFL's relationships with its suppliers are long standing. We are committed to building trusted and transparent relationships with our suppliers to ensure an open dialogue in which any risks identified can be efficiently and effectively addressed.

Risks of modern slavery practices in the operations and supply chains of the AFL and the entities it owns or controls

The AFL has assessed its operations and supply chain to identify risks of modern slavery in reference to the *Commonwealth Modern Slavery Act 2018 – Guidance for reporting entities* and the *Walk Free Foundation – The Global Slavery Index 2018*.

The AFL has identified that its operations carried out directly by AFL employees pose a low risk of causing, contributing or being linked to modern slavery. All AFL employees are based in Australia and, during the reporting period, all operations of the AFL carried out by AFL employees were carried out in Australia. The AFL complies with all Australian statutory requirements with respect to employment and our operations and people are covered by our policies and codes, including those set out in this Statement. During the AFL onboarding process, AFL employees are provided with copies of the AFL's key policies and are required to undertake "Healthy Workplace Training" and refresher training is required on a regular basis. The training covers the following key areas:

- Sexual Harassment in the Workplace
- Workplace Bullying
- Safeguarding Children & Young People
- Anti-discrimination and Equal Opportunity
- Work Health and Safety
- Aboriginal and Torres Strait Islander Inclusion and Cultural Safety

AFL policies are available on the AFL's intranet platform and certain policies are also available on the AFL's website.

A recent review of the AFL's supply chain for the reporting period identified that the significant majority of the AFL's suppliers are based in Australia. However, we recognise that the AFL could be indirectly exposed to modern slavery risks through our supply chains. The key areas of risk that have been identified in our supply chains are as follows:

- some AFL suppliers, particularly its apparel licensees, use suppliers that are based in countries other than Australia; and
- MSL and some of the AFL State Entities have contracts for the provision of large scale cleaning services by suppliers for the facilities they manage.

Through information collected from our licensees, there is presently no indication that the AFL's suppliers source anything from the top 10 countries for modern slavery risk as reported *Walk Free Foundation – The Global Slavery Index 2018*.

In the next reporting period, we will prioritise further review of supplier engagement activities particularly with our cleaning suppliers and in overseas supply chains with a focus on our apparel licensees.

Actions taken by the AFL and the entities it owns or controls to assess and address these risks

At the AFL we strive to prioritise our social responsibility in all our business operations, which includes addressing the risks of modern slavery in our policies and procedures.

AFL Procurement Policy

In late 2019 the AFL introduced its internal Procurement Policy (**Policy**). The Policy applies to the acquisition of goods and services for AFL's general operations, including consultants, contractors, business goods and services, event-related goods and services, equipment, apparel and merchandise. All AFL personnel (officers, employees and contractors) are responsible for implementing and complying with the Policy. The Policy provides that procurement best practice at the AFL requires that all procurement is conducted with a focus on leadership and accountability, sustainability and ethics, probity and value for money. Relevantly it acknowledges that:

- as one of Australia's most well-known and trusted brands, our social licence is built on ethical and sustainable engagement with suppliers and the wider community; and
- it is important that AFL's procurement processes are unbiased, ethical, accountable and transparent by treating all procurement processes fairly, thereby helping the procurement process to withstand internal and external scrutiny.

The Policy also sets out the process that must be followed prior to engaging a new supplier. Key requirements of the process include:

- all department Executive General Managers are required to develop an annual procurement plan and an exemption is required by the AFL's Procurement Manager and Chief Financial Officer for any formal procurement process to occur prior to approval of a department's plan;

- a framework for assessing the level of risk of a procurement activity to the AFL's business; and
- based on the level of risk associated with a procurement activity and the estimated spend, a procurement matrix is used to determine the information required from suppliers and the internal approval process to be followed in respect of the activity.

Other Relevant AFL Policies

In addition to the Policy, the following AFL policies provide a broader framework to support our commitment to addressing the risks of modern slavery in our business operations and supply chain

- **Whistleblower Policy:** AFL officers, employees, suppliers, associates and any relatives, dependents or spouses of such persons are encouraged to report any improper conduct they observe or encounter. Improper conduct includes conduct which is unethical or improper or is adverse to basic human rights. This policy is designed so such individuals may make a report of improper conduct anonymously without any fear of repercussion. The whistleblower reporting mechanism is available to the public and is located on the AFL's policies page on its website.
- **Indigenous Procurement Policy:** This policy was developed in consultation with Aboriginal and Torres Strait Islander people. The vision of the policy is to establish and maintain a procurement ecosystem within the AFL and the broader Australian football community which, amongst other things, engages with Aboriginal and Torres Strait Islander people and Indigenous enterprises to create employment and businesses opportunities with them through the AFL's procurement activities. The policy encourages consideration of diversity and equality as part of the procurement process to provide opportunities to generate positive social outcomes with Indigenous enterprises, and Aboriginal and Torres Strait Islander people more generally, in addition to the delivery of goods and services to the AFL.
- **People Code of Conduct:** At the AFL we conduct our business with integrity, in compliance with all relevant laws, regulations, codes, corporate policies and procedures and importantly, we behave in accordance with our values: play to win, play fair, play with passion and play as one team. This policy outlines the AFL's minimum standards of behaviour and conduct, providing guidance on the expectations the AFL has of all our people. A breach of the AFL People Code of Conduct may result in an investigation and/or disciplinary action.
- **Equal Employment Opportunity Policy:** The purpose of this policy is to ensure that AFL employees understand their rights and responsibilities regarding equal employment opportunity, bullying and harassment. This Policy outlines the AFL's standards and expectations, and the legislative rights and obligations under both Federal and State laws.
- **Respect and Responsibility Policy:** The AFL expects that all people connected with the game of Australian football will conduct themselves in a manner that demonstrates respect for all people, regardless of gender identity or sexual orientation, and recognises our game's responsibility to promote and model gender equality without tolerance for the harm of others based on gender. Any person may make a report of a breach of the AFL's Respect and Responsibility Policy via the reporting mechanism available on the AFL's policies page on its website.

Contractual Provisions

The AFL includes provisions in all its agreements with its licensees that require them to comply with applicable laws in relation to modern slavery. These provisions require our licensees to agree to:

- not directly or indirectly employ or make use of any children and not use any forced labour;
- comply with the minimum employment age limit defined by national law or by International Labor Organization Convention 138, whichever is higher;
- maintain a reasonable overall pattern of required working hours and days off for its employees so that total work hours per week do not regularly exceed industry norms;
- pay fair and timely compensation, including any required premium payments for overtime work; and
- advise new employees at the time of hiring if mandatory overtime is a condition of employment.

The AFL also requires its licensees to seek prior approval from the AFL prior to sub-contracting the manufacture of any licensed products bearing AFL intellectual property to any third party outside their core manufacturing facilities.

Supplier Survey

As noted further below in the 'Looking Forward' section, the AFL is in the process of developing a comprehensive supplier survey that will be distributed to AFL suppliers as part of the AFL Supplier Survey Project. The AFL has collected preliminary information from certain suppliers that are deemed to be of a higher risk due to the nature of their operations in relation to their modern slavery practices but is committed to formalising this process through the implementation of this Project.

Impact of COVID-19

The impact of COVID-19 to the AFL and the AFL industry more broadly cannot be overstated. The reporting period covered by this Statement was the most challenging period in the AFL's history.

With the cancellation of the 2020 AFLW season, temporary suspension of the 2020 AFL season and either cancellation or suspension of all community Australian Football seasons across the country, in March 2020, the AFL made the difficult decision to stand down almost 80% of its staff with the remaining staff on reduced hours. While operations were able to recommence with the relocation of the elite Men's competition predominantly to Queensland and recommencement of many community Australian Football competitions, sadly approximately 20% of AFL staff were made redundant in August 2020.

While the operations of the AFL contracted as a result of COVID-19, the AFL remained fully committed to addressing modern slavery risks in its business operations and supply chain and is now in a position to apply additional resources to its risk functions. As at the date of this Statement, the AFL is recruiting for a new Risk and Compliance Manager, with this

appointment to be made imminently, and has recently appointed a new Occupational Health and Safety Manager.

Looking forward, and how the AFL and the entities it owns or controls will assess the effectiveness of its actions

We will continue to address any risks identified relating to modern slavery and human rights more broadly in our business and adjust our policies and practices to mitigate those risks. This will include assessing the effectiveness of our actions taken to identify, manage and mitigate the risks of modern slavery in our business operations and supply chain.

In particular, the AFL will take the following steps:

- establish a cross-department Modern Slavery Working Group to oversee and implement the AFL's modern slavery risk mitigation strategies. The Modern Slavery Working Group will also be responsible for assessing the effectiveness of these risk management strategies;
- implement the AFL Supplier Survey Project to:
 - collect additional information from our existing suppliers in regard to their modern slavery practices through surveys with a focus on their supply chains to better understand the risk profile beyond our centralised suppliers; and
 - embed the requirement to complete the survey into our procurement processes for engaging new suppliers;
- enhance training in key areas of the business to ensure staff are not only familiar with the AFL Procurement Policy but also understand their obligations under that policy and other relevant policies and what the broad definition of modern slavery encapsulates; and
- review contractual provisions in supplier agreements and update as necessary to ensure they adequately address the risks of modern slavery in our supply chains and allow for incidents to be reported to the AFL for further assessment.

Consultation with controlled subsidiaries

The AFL and its controlled subsidiaries covered by this Statement are centrally managed by the AFL. They operate under the same governance and risk management procedures and the policies and actions set out in this Statement apply to all AFL controlled subsidiaries covered by this Statement.

The AFL Commission have approved this Modern Slavery Statement on 12 May 2021.



Gillon McLachlan
Chief Executive Officer
Australian Football League