



MODERN SLAVERY STATEMENT 2023

This statement is made pursuant to the *Modern Slavery Act 2018* (Cth) (the **Act**) and constitutes our slavery and human trafficking statement for the financial year ended 2023. This statement builds on our previous Modern Slavery statements.

CRITERION 1 & 2 – REPORTING ENTITIES AND STRUCTURE

TGI Sport Holdings Pty Ltd (ABN 79 628 374 210) is an Australian holding company with a head office at Level 3, 510 Church St, Cremorne, VIC, 3122. TGI Sport Holdings Pty Ltd controls a group of Australian companies which have a broad range of business operations within the sports and entertainment industry and this statement is issued on behalf of TGI Sports Holdings Pty Ltd and each of the related body corporates¹ listed in Schedule 1 (collectively **TGI**).

OPERATIONS

The activities undertaken by TGI can be grouped into two main areas.

The business operations of the companies in Column A of Schedule 1 (**Group A Companies**) include:

- Media rights acquisition and management;
- Providing clients and agencies with strategic, innovative advertising solutions in Sport via LED signage, virtual and parallel advertising and static signage;
- Provision and Installation of LED Signage, hardware, technology and data;
- Content creation and management, production and print services; and
- Developing technological advances in advertising solutions.

The business operations of the companies in Column B of Schedule 1 (**Group B Companies**) include:

- Talent and Media Representation;
- Sports Marketing;
- Events and Activations;
- Consultancy;
- Merchandise services;
- Creative, Content and Design; and
- Brand Management.

SUPPLY CHAINS

TGI operates in several different territories including Australia, UK, USA and certain parts of Europe but this statement is focused on the Australian Operations.

In the reporting period Group A Companies of TGI had direct supply chains as follows;

TGI Sport Pty Ltd had approximately 160 suppliers

- 98.13% of the suppliers are based in Australia;
- 0.063% of the suppliers are based in the United Kingdom;
- 0.063% of the suppliers are based in China; and
- 0.063% of the suppliers are based in Germany.

¹ As that term is defined in the Corporations Act, 2001 (Cth)



TGI Sport NZ Ltd had approximately 35 suppliers;

- 5.71% of the suppliers are based in Australia;
- 94.29% of the suppliers are based in New Zealand.

Sportsmate had approximately 13 suppliers,

- 84.62% are based in Australia;
- 7.69% are based in Finland; and
- 7.69% are based in Denmark.

The main suppliers that each member of Group A Companies of TGI uses are in the following categories:

1. goods and services (including digital LED screens for stadia perimeter and parapet as well as stand-alone screens) needed to construct, install, operate and maintain sporting advertising infrastructure;
2. goods and services needed to produce and deliver advertising material including paper, ink, printing services, equipment;
3. services needed for the everyday operations, including recruitment, legal and tax, auditing, information technology, telecommunications and cleaning; and
4. software licences.

In the reporting period the Group B Companies of TGI had direct supply chains made up of:

TGI Merchandise Pty Ltd

There are approximately 1769 Suppliers in TGI Merchandise Pty Ltd:

- 97.96 % of the suppliers are based in Australia;
- 0.34% % of the suppliers are based in China;
- 0.34% of the suppliers are based in Hong Kong;
- 0.11% of suppliers are based in India;
- 0.45 % of the suppliers are based in Italy;
- 0.11% of the suppliers are based in New Zealand;
- 0.06% of the suppliers are based in Sri Lanka;
- 0.06% of the suppliers are based in Thailand;
- 0.17% of Suppliers are based in the United Kingdom; and
- 0.40% of the suppliers are based in the United States of America.

TGI Sport Marketing (Aust) Pty Ltd

There are approximately 3770 suppliers in TGI Sport Marketing (Aust) Pty Ltd;

- 99.81 % of the suppliers are based in Australia;
- 0.03% of the suppliers are based in Denmark;
- 0.03% of the suppliers are based in Fiji;
- 0.03% of the suppliers are based in Hong Kong;
- 0.03% of the suppliers are based in United States.

The main type of suppliers that each member of Group B Companies of TGI uses are in the following categories:

1. Goods and services needed to run events and activations, both small and large including the provision of and installation of temporary infrastructure (including custom builds), theming, food and beverage, amusement rides and devices, pyrotechnics, cleaning, security, entertainers, staging, rigging, lighting etc.;
2. goods and services needed to manufacture and import sporting uniforms, promotional premiums and trading cards including clothing, paper products, inks, printing services, design services and freight forwarding, direct mail, packing and warehousing;



3. services needed for the everyday operations, including recruitment, legal and tax, auditing, information technology, telecommunications and cleaning; and
4. software licences.

TGI's suppliers vary from small Australian family operated businesses to large corporates.

Most Group suppliers are in Australia however some products and services are sourced from international suppliers based in regions such as UK, the Americas and China, particularly when we have a local presence in that market.

OUR COMMITMENT AND POLICIES

TGI is committed to ensuring that there is no modern slavery or human trafficking in its direct businesses and that the risk of modern slavery or human trafficking in its supply chain is eliminated or mitigated.

Our procurement process ensures that key suppliers commit to compliance with all necessary laws and regulations within their regions as well as an overall commitment to:

1. take reasonable steps to protect the health and ensure the safety of their own workforce and all workers in their supply chain;
2. not use or knowingly allow to be used any slavery in the performance of their obligations to us;
3. comply with local laws and best practices in their regions regarding the suitability of employee working conditions;
4. allow their workforce the freedom to leave their employment without the threat of deterrents;
5. take steps to prevent the illegal treatment of their workforce by their management or any third party;
6. have an anti-bribery policy;
7. where necessary, work with us to identify, audit, mitigate and where possible eradicate areas perceived to be at risk of modern slavery and human trafficking; and
8. show a continued commitment to work with us to rectify any risk of modern slavery.

In this reporting period, we have made further refinements to our procurement process ensuring that a more expanded Modern Slavery Questionnaire is sent out to suppliers as a necessary part of the procurement process when onboarding a supplier and our contracts set out a legal obligation for those suppliers to meet the commitments that they have set out to us and the standards that we expect.

CRITERION 3 – IDENTIFYING MODERN SLAVERY RISKS IN OUR SUPPLY CHAINS

Last reporting period we conducted a high-level initial assessment of the modern slavery risks in our supply chains. TGI's review of the risk of modern slavery practices across its supply chains was made with close consideration of the Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities document (Guidance Document).

In assessing the inherent risk of modern slavery in its supply chain, TGI also had regard to the most recent Global Slavery Index² (GSI) which rates the countries in the regions that TGI directly deals with (as set out below) as low for prevalence of modern slavery practices apart from China which is rated at a low-mid rating.

² <https://www.globallslaveryindex.org/>



Based on this initial assessment, TGI's direct global suppliers are predominately based in countries where there are reasonable standards of protection for individual rights and there is not significant workforce of vulnerable populations.

The GSI also lists Australia's top five imported product group at risk of being produced utilizing modern day slavery. Of the products identified, TGI purchases two product groups which are determined to be in a high-risk category being:

1. laptops, computers and mobile phones via domestic suppliers who in some cases may import from overseas; and
2. Garments.

TGI buys phones laptops, computers and mobile phones via domestic suppliers and has a policy whereby each item is purchased from a reputable brand who has its own policies in place to combat the risk of Modern Slavery.

In respect of the garments sourced from China we have ensured that we have collaborated with others in the industry, including a leading sporting goods brand who has developed its own safety and accreditation system when assessing factories compliance around Modern Slavery as well as other ethical compliance. As the relevant entity in our Group is a licensed supplier of this brand, we only order garments from factories that meet this high standard of accreditation thus minimising our own risk.

A snapshot of our direct supply chain by country was provided under the Supply Chain section above. In relation to its direct operations, given the location of each TGI company and the industry (sports marketing, management and advertising) in which we operate, we have assessed the risk of modern slavery across its direct business operations as low.

TGI has appropriate workplace management policies and practices, along with skilled managers, to ensure appropriate recruitment and management of employees, including compliance with minimum remuneration requirements.

In relation to its supply chain, the overall risk is low having regard to the GSI and low-mid in the case of certain products. We will focus and perform more due diligence where there is higher risk. In our next reporting period, we intend to investigate further down the supply chain and gain a better understanding of the risks by focusing on obtaining better visibility of the origin of products in particular promotional premiums.

In terms of services that we source domestically in Australia, the categories of higher risk that we have identified are cleaning, labour hire and food services. We are satisfied that we have picked reputable direct suppliers who have signed contracts attesting that they are paying appropriate minimum remuneration and have met and will continue to meet their obligations in ensuring there is no modern slavery practices in their organisation. The fact that TGI has worked with most of its suppliers over a long period of time and that most are leaders in their field gives us a great deal of confidence in the quality of their operations.

CRITERION 4 – ACTIONS TAKEN TO ASSESS OR ADDRESS MODERN SLAVERY RISKS.

The Australian businesses within TGI have undertaken the below initiatives in ensuring that the process of identifying and eradicating modern slavery is part of the inherent processes, policies and systems in conducting the everyday business of the entity.



These are already in place, and we will continue to review them for continuous improvement in this area;

- Guidelines for Supplier Procurement that all staff must follow for a supplier to be added to our supplier list which sets out approved principles and processes;
- A Supplier Code of Conduct that establishes the minimum ethical business standards expected from our suppliers is supplied to all our suppliers and they are required to respect and comply with this code as part of their contractual obligations;
- Standard form supplier contracts and checklists that proactively address modern slavery risks and set out TGI's expectations that suppliers are proactively working to ensure mitigation of modern slavery risks in their own supply chains;
- Human resources, finance, legal, procurement and risk management are all functions exercised by employees in our businesses whose roles include ensuring compliance with laws and internal policies and processes across the businesses;
- most of the recruitment for TGI is conducted internally by personnel located in each territory, with most employees based in Melbourne, Australia. TGI is therefore able to ensure that the process is conducted in an ethical and transparent manner and employment contracts contain fair and just terms in relation to wages, working hours and other working conditions;
- any material agreement is reviewed by our internal legal to be signed off from senior management prior to entry. This enables us to consider risks relating to entering into an agreement with a supplier, which could include the identity, location or operations of the counterparty; and
- internal training tailored to each Business Unit in relation to modern slavery.

In our last statement we set out further objectives that we wanted to achieve in the 2023 and report against these objectives as follows.

1. *Establishment of a formal risk management framework for monitoring and managing material risks associated with modern slavery in TGI's operations and supply chains.*

Embedding standard practice in engagement of suppliers and contracting as well as each staff member responsible for procurement being involved in looking at Supplier responses and staff training was the first component of this project that was achieved in 2023.

2024 - Objective - We will now be incorporating the material risks associated with Modern Slavery part of the TGI Risk Register and this will form the formal risk management framework.

2. *To survey of our top 50 suppliers (by spend) for the year ended 31 December 2022 at the conclusion of that year to:*
 - a. *Better understand our suppliers existing governance practices that address their modern slavery risks; and*
 - b. *Assess any potential modern slavery geographic risks amongst our largest tier one suppliers.*

This was completed and included a mix of international and domestic suppliers. These surveys took the form of detailed questionnaires, which required supplementary information, and which were tailored dependent on the location and type of supply and for international suppliers to go to their primary factory. Any supplier that ran a factory overseas had to submit an audit report performed by an independent 3rd party. 21 international factories completed the questionnaire. Four factories failed to produce a current audit and will do corrective action. One factory refused to be audited and may subsequently been removed from our supplier list and the others have committed to going through an audit so it will be incumbent on us to follow up. Whilst some audits showed



that working hours exceeded regular working hours at times and identified that social management systems needed improvement, the overall audit scores were sound, and the factories passed the audit. Further there was no evidence of forced overtime. Areas of improvement identified by the audits will be the focus of our 2024 quest for continuous improvement with the factories. A challenge we face is that whilst we have received information from the factory, most of the factories provided little detail about their own supply chain despite a series of questions back from TGI. Coming up with ways to get information in relation to these Tier 2/3 parts of the supply chain is a task that our merchandise team will continue to work through with the factories. In respect of our higher risk product, such as apparel, we operate as a distributor of a global leader in sports clothing manufacturing. Given that the majority of our sourcing is done via factories who are preferred suppliers of that global leader and who have signed up to their Code of Ethics and sustainable practices we are confident in the detailed systems and processes they have in place to ensure that the factories are meeting their high ethical standards. Their own modern slavery report details the vast amount of analysis, training and tailor-made programs that they have set up for their factories which has included directions to factories to only source cotton, a high-risk product, from growers who are licenced as having good farming and human rights standards.

2024 Objectives: To ensure that any factory who is due for an audit, completes one and to specifically monitor whether the recommended improvements from the previous audits have been addressed. To try to map out from information provided by the factories, the 2nd tier level and source of origin for raw materials, if possible.

3. *To Design a Modern Slavery Incident Response Procedure to assist staff in handling modern slavery concerns and to report incidents as they arise.*

Similar to the way we do other incident reporting in our business, in the 2023 year we set up a customised incident reporting template to ensure that our staff can freely report any concerns that they have that relate to suspicions of modern slavery.

Business Units completed modern slavery training in 2023 which was delivered in person and customised where appropriate to the specific risks of that particular business unit.

2024 Objective: In 2024, this training will be updated to capture any updates to legislation that have occurred and to focus also on the reporting template to make sure all staff, particularly those that are new to the organisation, are aware of its existence and how to use it. and that training will

CRITERION 5 –ASSESS THE EFFECTIVENESS OF ACTIONS

To continuously evolve and improve our approach to the risks of Modern Slavery in our supply chains, TGI will assess the effectiveness of its actions by ensuring that our policy reflects the following processes:

- Annual review of the Modern Slavery Policy and Procedures
- Annual Supplier surveys for existing suppliers and nominating at least 2 suppliers to be audited by an external agency each year and a report on the % of suppliers who have returned their surveys;
- Working with our suppliers to resolve or substantially mitigate any instances that are discovered in our supply chain to ensure that this is done in a respectful way and so that the supplier can demonstrate that with support it can remediate situations. Having said that there is a zero tolerance of practices such as child labour, servitude, trafficking or



bonded labour. In these instances, this will result in termination of the supply contract. This will be reviewed and reported each year; and

- Ensure all supplier contracts that include modern slavery clauses and a questionnaire.

CRITERION 6 –CONSULTATION WITH OWNED AND CONTROLLED ENTITIES

Consultation has occurred with each member of the listed entities who have had to provide some of the data used in this statement. Staff involved in the preparation of this statement have consulted with the necessary business operations of TGI to gather the necessary information to prepare this statement on behalf of the TGI and have given all Business Unit heads the chance to read and contribute to this statement.

This statement was approved by the board of TGI Sport Holdings Pty Ltd (ABN 79 628 374 210) on 28 June 2024

DocuSigned by:

A handwritten signature in black ink that reads 'Martin Jolly'.

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Martin Jolly

Director

TGI Sport Holdings Pty Ltd



SCHEDULE 1 – LIST OF COMPANIES TO WHICH THIS STATEMENT APPLIES

Group A Companies	
TGI Sport (Europe) Holdings Pty Ltd	ABN 46 628 470 084
TGI Sport (US) Holdings Pty Ltd	ABN 42 628 470 066
TGI Sport NZ Ltd	ABN 34 107 716 521
Sportsmate Technologies Pty Ltd	ABN 28 613 795 681
TGI Sport Pty Ltd	ABN 34 107 716 521
World Sports & Entertainment Holdings Pty Ltd	ABN 19 621 620 522
World Sports & Entertainment Technologies Pty Ltd	ABN 19 621 620 522
Group B Companies	
TGI Sport Marketing (Aust) Pty Ltd	ABN 36 603 385 575
TGI Merchandise Pty Ltd	ABN 79 119 725 469
TGI Sport (Rugby Talent) Pty Ltd	ABN 50 084 079 621