

Modern Slavery Statement – FY22

Mulawa Holdings Pty Ltd

Introduction

This is the third Modern Slavery Statement published pursuant to the *Modern Slavery Act 2018* (Cth) (Act) by Mulawa Holdings Pty Ltd and its subsidiaries, known collectively as Federal Group, being an entity based and operating in Australia and having an annual consolidated revenue of more than A\$500 million.

Federal Group remains fully supportive of the Act and this third statement reinforces its continued commitment to implementing and enforcing policies, systems and controls that endeavour to identify and stop modern slavery practices occurring in its supply chains.

Federal Group's structure, operations and supply chains

Mulawa Holdings Pty Ltd is the ultimate holding company in the Federal Group and is an Australian-owned private company which manages and operates casinos, hotels, gaming networks, tourist services and a national sensitive freight company.

Federal Group is Tasmania's largest private sector employer with employees located right across the entire state of Tasmania. Including COPE Sensitive Freight, a national sensitive freight company, Federal Group employs approximately 2,400 people, located in every State and Territory of Australia.

The hotel operations continue the proud history of Federal Group as the oldest continually operating hotel group in Australia with its origins able to be traced back to Melbourne in the 1880s.

Federal Group's operations include:

- Wrest Point – Australia's first casino that offers accommodation, dining and entertainment services;
- Country Club Tasmania – Australia's first resort-style casino development that offers accommodation, dining and entertainment services, including an 18 hole, par 72 golf course;
- Saffire Freycinet – An international award-winning luxury coastal resort that offers accommodation, a day spa and dining services;
- MACq 01 Hotel – An award-winning storytelling hotel that offers accommodation, dining and activities services;
- The Henry Jones Art Hotel – Australia's first dedicated art hotel that offers accommodation, dining and art tour services;
- Vantage Group – Operates and manages Federal Group's 12 community-based hotels and 21 retail liquor stores across Tasmania providing bar, gaming, bistro, entertainment and retail goods;
- Network Gaming – Manages the distribution of gaming machines and Keno in hotels and clubs throughout Tasmania under the OASIS Gaming and TAskeno banners;
- Odyssey Gaming – A leading technology developer of programs and services which allows venues and Licensed Monitoring Operators to effectively manage and understand player activity; and
- COPE Sensitive Freight – Australia's largest independent specialist sensitive transport company that provides fragile equipment handling and distributing and warehousing services for clients across Australia.

To enable its operations, Federal Group procures goods and services from a wide variety of Australian based suppliers. This includes products provided directly to Federal Group such as food, beverages, gaming equipment, vehicles and cleaning products, services provided such as laundry, consultants and subcontractors and products and services used by indirect suppliers in Federal Group's supply chains such as fuel, components of gaming and IT equipment, furniture and fabrics. Entities within the Federal Group may also lease out parts of owned premises to a variety of commercial tenants and may purchase and dispose of land and property from time to time. Federal Group rarely purchases goods and services directly from non-Australian based suppliers.

Risks of modern slavery practices in the operations and supply chains

During this reporting period, Federal Group continued to monitor and review the likely risks of modern slavery practices across our operations and supply chain. Federal Group recognised that the vulnerability of workers to modern slavery practices may have increased as a result of the continuing COVID-19 pandemic and overseas events that are impacting business continuity, supply and transport in all tiers of our supply chain. Federal Group flagged the continuing impacts of these events in our last statement and these will continue on for an indeterminate time.

Federal Group businesses have been influenced or affected by the following over the last financial year, including:

- an increase in the demand for goods and services in the industries in which we operate after the government health and travel restrictions were eased and/or lifted;
- delays in, or in some cases the disappearance of supply chains; and
- inability to fill vacant and new positions, both because of people's preference to work from home (and sometimes from a different state) not aligning with our requirements and a reduction in the number of people looking for casual or part time work or work in industries such as hospitality, retail and IT.

However, the risks of modern slavery practices in Federal Group's operations and supply chains is assessed as being substantially the same as it was in 2020 and 2021.

Operations

All of Federal Group's operations are located within Australia. Although there is a risk of causing or contributing to modern slavery, this risk is decreased by all of Federal Group's employees and virtually all of its direct suppliers being based in Australia.

Supply chain

The main types of good and services that contribute to Federal Group products and services include:

- food, beverage and retail;
- utilities, rates and rent;
- consumables such as cleaning supplies;
- insurance and banking services;
- laundering, cleaning and maintenance services;
- professional services;
- repairs and maintenance services and supplies;
- vehicle fleet;
- ICT related hardware, software and services;
- marketing services;
- travel services

Federal Group recognises that the risk of modern slavery exists in its supply chain due to the sectors and industries, the types of products and services procured, the location of some of the suppliers or their suppliers/manufacturers and that some other entities may have poor governance structures in relation to modern slavery.

Federal Group will continue to work with its suppliers to build meaningful relationships. Federal Group continues to promote the use of Tasmanian produce and purchasing from local partners and suppliers for its Tasmanian based businesses, as it has done for many years, and actively demonstrates its support for its communities through purchasing policies that prioritise local businesses and suppliers.

Actions taken to assess and address these risks

Federal Group's Modern Slavery Policy requires Federal Group businesses to acknowledge they are accountable for addressing modern slavery risks and to map their supply chains to assess any identified risks and the principles of the Policy must be incorporated into all Federal Group business's policies, guidelines and procedures. Since this date, the Policy has been referenced as required to customers and suppliers to comply with procurement requirements.

Mapping and risk assessment of supply chains has not progressed, which has delayed development of any plans or processes that will incorporate elements such as a supplier questionnaire or more detailed risk assessments that allocate actions and mitigation strategies to suppliers based on risk. Development of a Federal Group Supplier Code of Conduct remains outstanding.

Federal Group's ability to identify and respond to human rights issues is reliant on employees and suppliers identifying and reporting potential breaches. As such, it is vital that employees have a good understanding of what human rights and modern slavery issues are, how to report them and how to address them.

Along with promoting Federal Group values in the Code of Conduct, the Federal Group Whistleblower Policy has recently been reviewed and updated to include a step-by-step *Guide for Disclosers*. The Policy is about to be relaunched to remind employees of this process, with details of new Disclosure Officers available across the business to assist those wanting to use the scheme.

Assessing the effectiveness of these actions

Federal Group already sees clauses relating to modern slavery and the requirement for a policy in our third party agreements which is reassurance of the importance and visibility of modern slavery to our suppliers and customers.

There have been no known instances of reporting of issues of risk of modern slavery from either through HR/management reporting channels or via our whistleblowing mechanism. The next step remains to be reviewing the risk mapping of the supply chain to develop the best measurement of effectiveness of Federal Group's management of modern slavery risks such as KPI's for suppliers, employee engagement and issues raised through our grievance and complaint and whistleblowing processes.

Process of consultation

This statement has been produced on behalf of all of Federal Group. It has been produced by the Federal Group Corporate Services team who perform a Group-wide function in consultation with the relevant people in each of its businesses.

**This Modern Slavery Statement is approved by the Board of Directors for Mulawa Holdings Pty Ltd
on 22 December 2022**



Greg Farrell (Dec 23, 2022 13:36 GMT+11)

Gregory Farrell
Managing Director
Mulawa Holdings Pty Ltd

Reporting Entities

The following entities are considered reporting entities under the *Modern Slavery Act 2018* (Cth) and are covered by this statement:

Mulawa Holdings Pty Ltd (ACN 000 259 834)
Janala Pty Ltd (ACN 003 672 839)
Federal Holdings Tasmania Pty Ltd (ACN 097 627 677)
Australian National Hotels Pty Ltd (ACN 009 477 552)
Tasmania Country Club Casino Pty Ltd (ACN 009 516 189)
Tasmanian Country Club Properties Pty Ltd (ACN 647 888 873)
Federal East Coast Holdings Pty Ltd (ACN 099 918 715)
Vantage Hotel Group Pty Ltd (ACN 087 546 245)
Halsata Pty Ltd (ACN 120 619 123)
Odyssey Gaming Services Pty Ltd (ACN 061 363 139)
Mulawa Arabian Stud (ACN 001 738 076)
Mulawa Management Pty Ltd (ACN 009 598 896)
FHR Support Services Pty Ltd (ACN 100 541 606)
Mulawa Properties Pty Ltd (ACN 075 034 150)
Mosavar Pty Ltd (ACN 110 473 571)
Palborn Pty Ltd (ACN 133 698 049)
Tal Holdings Pty Ltd (ACN 002 594 121)
The Federal Hotels Pty Ltd (ACN 004 108 249)
Odyssey Gaming Pty Ltd (ACN 074 735 452)
Bounty Pty Ltd (ACN 096 276 292)
Bounty Systems Pty Ltd (ACN 090 692 489)