



Morris Group

Modern Slavery Statement

1 July 2022 – 30 June 2023

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1. Introduction

This Modern Slavery Statement for Morris Group covers activities over the financial year ending 30 June 2023 and has been prepared to comply with the Modern Slavery Act 2018. This statement applies to and describes the steps taken by Morris Group and the entities considered reporting entities under the Act including Finico Pty Ltd (ACN: 002 046 559) and ATF The Morris Family Trust (ABN: 29 850 607 491).

2. Morris Group structure, operations and supply chains

2.1 Structure and Operations

Morris Group is an Australian-owned family business striving to make a positive impact while doing what we love. Our privately owned group of entities primarily operate under a trust structure, with the holding entity being Finico Pty Ltd and ATF The Morris Family Trust. The ultimate beneficial owner of Morris Group is our Founder Chris Morris. The registered office is located at 85 Dundas Place, Albert Park, VIC 3206.

Morris Group's network of businesses employ approximately 1670 people. As a collective, we are committed to creating a positive impact, particularly in the locations of our operations and believe that business can be a force for good. Our vision of success is defined by our ability to create strong communities, thriving environments, and happy people. We believe economic success and the sustainability of People, Place and Planet go hand-in-hand. We aim to exceed the 'tread lightly' approach, striving to strengthen and enrich the environments and communities in which we work; actively restoring, repairing, and enhancing these ecosystems.

Morris Group entities are primarily Australian based, operating a diverse portfolio of assets including hospitality, brewing, hotels and luxury accommodation, aviation, marine, agriculture and technology. The full portfolio list can be found on the [Morris Group Website](#) and is made up of Colonial Leisure Group, CBCo Brewing, Northern Escape Collection, Barragunda Estate, The Ville Resort and Casino, Nautilus Aviation and Morris Technology. The Group has one Joint Venture partner at Townsville Entertainment and Convention Centre which is Townsville City Council. Morris Group also owns Pennsylvania Castle Estate in Portland, United Kingdom.

Morris Group invests in a broad range of sectors including technology, property, automotive and impact investments. Depending on the individual business we have both long-term supplier contracts/relationships and shorter-term interchangeable suppliers.



2.2 Supply chain

During the reporting period Morris Group directly procured goods and services from approximately 2,500 entities. Of these, suppliers 80% of our spend sits with 159 of them. We define these as our Tier One suppliers. Approximately 96% of (all) our total direct suppliers are based in Australia and the UK. Broadly, the Group directly sources goods and services related to fulfilling the offerings of the Group and those related to the business operations.

These three procurement activities broadly make up the Morris Group supply chain and include:

1. Goods directly related to fulfilling the offerings of the Group include regular ongoing contracts with food & beverage suppliers used in venues, brewery suppliers, restaurants and larger assets such as helicopters.
2. Goods related to operations of the Group include IT equipment, construction materials, industrial materials and equipment.
3. Services acquired include waste management, cleaning, IT support, marketing, security and trades.

The main categories of goods and services procured by Morris Group for the reporting period were equipment, food, beverage, construction and transport/freight. These categories combined to represent over 60% of the total business spend within the reporting period.

3. Risks of modern slavery practices in the Morris Group supply chain and operations

Morris Group employs an extensive workforce comprising a team of over 1670 direct employees. There is a wide range of suppliers including a small amount of third-party labour such as cleaners and security. Morris Group recognises the risks of modern slavery occurring in any supply chain, in any country, in any business.

To get a clearer picture of the specific risks within the Morris Group, a risks analysis of our operations, supplier chain and processes was undertaken. The analysis comprised of the following steps:

- Creating a consolidated database of all our suppliers;
- Categorising the suppliers by their geographic location, the category of the product or service and any known business models which pose higher risks; and



- Analysing the results and insights with the working group to design an action plan to address them.

The below sections summarise the risks we have identified relating to supplier geography, sector, product, and business model.

Supply chain

3.1 Geographic risks

Some countries may have higher risks of modern slavery due to poor governance, a lack of labour laws, conflict and unrest, failure of the state to protect human rights and socio-economic factors including poverty and discrimination (Modern Slavery Register, 2020). As noted in the previous section, approximately 96% of our total direct suppliers are based in Australia and the UK. Due to the robust labour laws in each of these countries, our overall risk of modern slavery occurring in our immediate supply chain is deemed to be low. While many of our suppliers are in Australia and the UK, we recognise that it is likely that they may source goods and services from countries who may have a higher risk of modern slavery.

3.2 Sector risks

Certain sectors and industries may have high modern slavery risks because of their characteristics, products, and processes. Typically, if the sector or industry relies on informal and/or unregulated labour, it will be considered high risk.

Australian Border Force has identified several categories that present increased risks for instances of modern slavery. Morris Group identified several of these categories to be existent within our supply chain including: fashion/textiles (uniforms and linen), cleaning, food (farming), electronics and fishing.

3.3 Product risks

Along with category risks, there are also specific products which are known to have an increased risk of modern slavery occurring within their production. This risk is increased if the product has been sourced from a geographic region known to have increased risk within their labour practices.

The Global Slavery Index 2023, via Walk Free identified the top five products important into Australia which are at risk of modern slavery. **These include: electronics, fish, garments, solar panels and textiles.** While it is likely Morris Group makes use of all products identified as high risk, this inaugural



supplier screening process did not make distinctions at a product level. Further, 96% of our direct suppliers are based in Australia or the UK, yet, we do not have visibility on their importing activities. At this stage in our analysis we are unable to determine the source country of the products within our supply chain when, as with the case of electronics, we have purchased from a retailer.

3.4 Third-party labour

Morris Group faces some risk of modern slavery occurring in supplier relationships where there is not a direct contract between the Morris Group and the individual worker providing the service. Morris Group engages third-party labour for several services including IT, legal, graphic design, trades and cleaning. We found that the main risks for Morris Group occur through our use of subcontracted cleaning services, as cleaning is a known higher-risk category. In these agreements, the individuals providing the cleaning service are not an employee of the Group. Due to the geographical location of our suppliers, the chance of modern slavery practices existing within our service providers is low, but not improbable.

Operations



3.5 Operations




In addition to reviewing the business models of our suppliers, we also engaged in a top-level analysis of our own operational processes. The purpose of this review was to understand how our procurement processes may have an indirect impact on the chance of modern slavery occurring. For instance, we reviewed our procurement decisions in relation to proposing tight deadlines and/or the impact of pricing negotiations. Our assessment of our procurement process resulting in modern slavery practices is relatively low; however, we note that we can improve by implementing a unified procurement process which would support our ability to report going forward.

4. How Morris Group is addressing the risks of modern slavery

4.1 Supply chain

In FY22 Morris Group focused on key goals to address the risks of modern slavery, along with a review of the Group's policies and obligation

FY23 Focus	Progress	Actions undertaken	FY24 Focus
<p>Establish a modern slavery working group and associated roles involved in procurement</p>		<p>Establish a modern slavery working group</p> <ul style="list-style-type: none"> • Determine members of the working group from cross-departments • Set meeting frequency <p>Identify the roles who have influence on supply chain decisions</p> <ul style="list-style-type: none"> • Identified the staff members who are directly involved with procurement decisions 	<ul style="list-style-type: none"> • Provide training on modern slavery: Explore options for delivering modern slavery training to individuals in procurement decision making positions. • See below cell
<p>Undertake a supply chain assessment to increase visibility</p>		<ul style="list-style-type: none"> • Gather data of all current suppliers • Analysed suppliers for their geographic, category, product and business model risks • Shared learnings with the team 	<ol style="list-style-type: none"> 1. Increase supply chain visibility: Build on our FY22 supplier assessment and deepen our understanding of the types of risks in our supply chain. 2. Improve procurement processes: Develop a supplier assessment guide to support supplier risk assessment during the procurement processes. 3. Investigate software for database management: Conduct a discovery and assessment processes to determine the best way to manage and update a centralised supplier database. 4. Supplier onboarding: Instigate a process for onboarding surveys.

<p>Commit to annual workshop series to review and refine goals and targets</p>		<ul style="list-style-type: none"> • Hosted first annual workshop to assess and respond to the identified risks and establish goals for FY23 • Great data detail was required to set relevant goals and targets. This area will need further focus in FY24 	<p>Continue annual workshop with Modern Slavery Working Group to review the progress of the actions Morris Group has taken in the past twelve months and discuss their effectiveness</p>
<p>Connect modern slavery to our wider sustainability strategy</p>		<p>Included supply chain integrity focus within our Group sustainability strategy. In future years we seek to more closely embed these sustainability goals.</p>	<p>Provide training on modern slavery: Explore options for delivering modern slavery training to individuals in procurement decision making positions.</p>
<p>Review our operational policies and their connection to modern slavery industry risks</p>		<p>Morris Group recognises our role in providing decent working conditions. In line with this, we implement a range of measures designed to provide staff with safe working environments. Related policies and obligations include:</p> <ul style="list-style-type: none"> • Whistleblower and grievance policies • Whistle-blower and grievance hotline • Digital pay systems for all casual workers • Central oversight of venue management • Regular review of third-party contractors 	<p>See above cells</p>



4.2 Operations

Morris Group recognises that the hospitality industry faces a unique set of labour conditions and that labour exploitation can occur within the industry. While the focus of this statement is on minimising the risk and prevalence of modern slavery, Morris Group also recognises our role in providing decent working conditions. In line with this, we implement a range of measures designed to provide staff with safe working environments. Related policies and obligations include:

- Whistleblower and grievance policies
- Whistleblower hotline
- Digital pay systems for all casual workers
- Dangerous activity, workplace health and safety policy
- Compliance with industry awards regarding employee remuneration and benefits
- Compliance with national employment standards
- Compliance with the Superannuation Act

5. Assessing the effectiveness of our actions

Morris Group will continually review the effectiveness of the actions outlined above in order to address the modern slavery risks in our operations and supply chains. We will

- **Continue annual workshop with** the Modern Slavery Working Group to review the progress of the actions Morris Group has taken in the past twelve months and discuss their effectiveness
- **Undertake quarterly reviews to track the actions** that have been implemented and their associated impact. For example: how many staff have undertaken training and how did it impact their awareness of modern slavery.



6. Consultation

This statement was prepared in consultation with the heads of each of the Morris Group entities. A supply chain integrity workshop was also facilitated by our Head of Sustainability and Consultants from Rewild Agency in order to understand the principles of modern slavery risks and then to collaborate on the development of the statement.

This statement for Morris Group and its reporting entities was approved by the Morris Group Board on 20 July 2023.

A handwritten signature in cursive script that reads "Penelope Cottle".

Penelope Cottle
CEO
Morris Group

APPENDIX

Mandatory criteria for modern slavery statements	Location
Identify the reporting entity	Section 1, pg 2
Describe the reporting entity's structure, operations and supply chains	Section 1&2, pg 2-3
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Section 3, pg 3-5
Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	Section 4, pg 5-8
Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Section 5, pg 8
Describe the process of consultation with any entities that the reporting entity owns or controls	Section 6, pg 9
Any other information that the reporting entity, or the entity giving the statement, considers relevant.	Section 2, pg 2