



West Australian Football Commission ABN 51 167 923 136

Modern Slavery Statement

For the Reporting Period 1 November 2022 to 31 October 2023

This is the third Modern Slavery Statement (**Statement**) that the West Australian Football Commission (ABN 51 167 923 136) (**WAFC**) and its subsidiaries have made to address the requirements of the Modern Slavery Act 2018 (Cth) (**Act**).

The WAFC takes its obligations in relation to addressing modern slavery risks within its business operations and supply chain seriously. The WAFC is committed to implementing processes and controls within our business operations to ensure the risks of all forms of modern slavery are reduced from our operations and supply chains and that our business is conducted ethically.

About the WAFC

The WAFC is the governing body of the sport of Australian Football (Football), within Western Australia. The WAFC was previously named the West Australian Football League Inc. It changed its name to the West Australian Football Commission in 1989 to reflect that it provides football opportunities and activities throughout Western Australia not limited to the WAFL.

The WAFC is responsible for the overall development and strategic direction of football in Western Australia. The WAFC oversees the West Australian Football League (both Men's and Women's competitions), Junior and Senior Community Football, including regional football, women's football, Auskick, All Abilities football and Talent Development programs. The WAFC is the sole shareholder of the Fremantle Football Club and Indian Pacific Limited (West Coast Eagles) and therefore both Clubs are subsidiaries of the WAFC.

For more information about the WAFC please refer to the WAFC [2023 Annual Report](#).

Governance and Operations

The WAFC is a not-for-profit organisation incorporated in WA, 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 our Constitution. The WAFC is the governing body of football within WA and is governed by a Board of Directors, referred to as Commissioners. The Board includes eight (8) Commissioners who are elected by the Nominee Members and Affiliates as outlined in the WAFC Constitution. The WAFC Nominee Members include: Fremantle Football Club, Indian Pacific Limited (West Coast Eagles), nine (9) WAFL Clubs and our Affiliates which include: WA Country Football League, Metropolitan Football League, Perth Football League and AFL Masters WA.

The two (2) AFL Clubs based in Western Australia are: Fremantle Football Club (FFC) and Indian





Pacific Ltd (West Coast Eagles (WCE)). Each of the Clubs' Constitutions outline that the WAFC is the sole member. Additional agreements between both Clubs outline the responsibilities and obligations of each of the Clubs and the WAFC.

Both FFC and WCE are provided the autonomy to conduct their general operations without interference or involvement of the WAFC. The WAFC must confirm the appointment of each of the Clubs' Directors, prior to being appointed as a Director.

The WAFC Chief Executive Officer is appointed by the WAFC Board and is responsible for the operating performance of the WAFC and the implementation of policy decided by the WAFC and relevant state and federal legislation. Under the Chief Executive Officer, the WAFC is divided into the following five departments each lead by an Executive Manager: Country Football, Affiliates & Facilities, Football Operations, Game Development & Community, Operations & Capability and Brand & Growth. The CEO and Executive Managers of each of the departments form the WAFC's Executive Leadership team.

The WAFC's head office is located in Tuart Hill, Perth. The majority of our operations are conducted from the office in Tuart Hill, along with delivering activities related to regional development and district development which are conducted from offices within each of the regions and districts that are serviced. The WAFC employs approximately 108 (permanent, full time and part time) individuals, with the majority based in metropolitan Western Australia.

The WAFC acknowledges the importance of good governance, which establishes accountability for the WAFC and management, and provides the policies and procedures for the equitable treatment of our members and Affiliates, and the WAFC's role in governing the game for all Western Australians.

The WAFC's Supply Chain

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

- **Licensing:** The WAFC licenses intellectual property it owns to licensees who use our intellectual property on products that they manufacture and then provide directly to consumers, participants and members. Licensed products include uniforms and footballs that the WAFC purchases for use in our operations.
- **IT and Communications:** The WAFC engages suppliers to provide IT and communication services including those relating to website management, data storage and communications to stakeholders.
- **Match Day Operations:** The WAFC engages suppliers to provide services directly related to the conduct of Australian Football matches particularly in relation to match day technology for the WAFL and WAFLW.





- **Travel and Accommodation:** The WAFC procures travel and accommodation services to facilitate its talent development programs, State Teams, WAFL and WAFLW matches played in regional WA and to support its business operations generally.
- **Events and Catering:** The WAFC uses suppliers to assist in staging events related to its operations and providing catering at those events.
- **Signage:** To meet its obligations under a range of sponsorship agreements, the WAFC engages suppliers to provide sponsor signage that is displayed predominantly at WAFL and WAFLW matches.

For the most part, the WAFC'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 WAFC

The WAFC has reviewed 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 WAFC has identified that its operations carried out directly by WAFC employees pose a low risk of causing, contributing to or being linked to modern slavery. All WAFC employees are based in Australia and, during the reporting period, all operations of the WAFC carried out by WAFC employees were carried out within Australia.

The WAFC complies with all Australian and WA statutory requirements with respect to employment and our operations and people are covered by internal policies, including those set out in this Statement. During the WAFC onboarding process, WAFC employees are given access to the WAFC's key policies and are required to undertake online induction courses and refresher training as required regularly.

The training covers the following key areas:

- Diversity in the Workplace
- Work Health and Safety Awareness
- Discrimination and Equal Employment Opportunity
- Aboriginal and Torres Strait Islander Inclusion and Cultural Education

WAFC policies are available on the WAFC Intranet / SharePoint platform, Human Resource Information System and certain policies are also available on the WAFC website. Furthermore, the WAFC complies with a number of the Australian Football League (AFL) policies, which are available on their website and include:





- Coaches Code of Conduct
- Privacy Policy
- Respect and Responsibility Policy
- Vilification Policy
- AFL Community Football Gender Diversity Policy

A recent review of the WAFC's supply chain for the reporting period identified that the significant majority of the WAFC's suppliers are based in Australia. However, we recognise that the WAFC 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 WAFC suppliers, particularly its apparel licensees, use suppliers that are based in countries other than Australia.

In the next reporting period, we will continue to prioritise further reviews of supplier engagement activities particularly with our suppliers who have supply chains outside of Australia, with a focus on our apparel licensees, as well as our suppliers that currently do not have to comply with the Modern Slavery Act 2018 as these present greater risk.

Actions taken by the WAFC to assess and address these risks

At the WAFC 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.

The WAFC and its Subsidiaries have actioned the following in the last reporting period

- The WAFC discussed modern slavery with Fremantle Football Club and Indian Pacific Limited (West Coast Eagles) and continues to work with and assess their current supply chains to determine if changes to their operations are required, to ensure the risks of all forms of modern slavery are reduced from our operations and supply chains and that our business is conducted ethically.
 - These discussions lead to the understanding that both organisations are aware of modern slavery and wish to continue work with the WAFC to review their current processes to reduce the risk of all forms of modern slavery in their operations and supply chains.
 - WAFC has built in regular discussions with both Fremantle Football Club and Indian Pacific Limited regarding modern slavery through our quarterly meetings.
- The WAFC has developed a Procurement Policy which outlines the WAFC expectations





and commitment to reducing the risk of modern slavery within its operations. Both the Fremantle Football Club and Indian Pacific Limited (West Coast Eagles) agreed to jointly develop the Procurement Policy so all three organisations are aligned in this matter.

- The WAFC has updated its Contract Signing Memo Template (the approval process for any contracts valued at over \$50,000 per annum) to include a section that outlines the steps taken to understand and therefore reduce any risks associated with modern slavery, and confirm whether or not a modern slavery clause is applicable and has been included. The Contract Signing Memo approval process links to the WAFC Delegations Policy, which is overseen by the WAFC Risk & Governance Committee and the WAFC Finance, Funding & Commercial Committee. Any contracts valued at over \$200,000 per annum and/or over 3 years in duration also require approval from the WAFC Risk & Governance Committee and the WAFC Board.
- The WAFC contract templates include provisions requiring parties to comply with applicable laws regarding modern slavery. These provisions require parties to agree to the following:
 - Not directly or indirectly employ or 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 Organisation Convention 128, 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;
 - Advise new employees at the time of hiring if mandatory overtime is a condition of employment;
 - To seek approval from the WAFC prior to sub-contracting the manufacture of any licensed products bearing WAFC intellectual property to any third party outside their core manufacturing facilities.

Other Relevant WAFC Policies

The following WAFC policies provide a broader framework to support our commitment to addressing the risks of modern slavery in our business operations and supply chain:

- Code of Conduct
- Equal Employment Opportunity Policy
- Grievance Resolution Policy
- Workplace Health & Safety Policy



- Delegations Policy

Looking forward, and how the WAFC and its subsidiaries 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 WAFC will take the following steps:

- Having developed the Procurement Policy, the WAFC will review how it works in practice and identify any areas that may require strengthening.
- Continue to collect additional information from our existing suppliers regarding their modern slavery practices through surveys which focus on their supply chains to better understand the risk profile; and
- Continue to embed the requirement to complete the survey into our procurement processes for engaging new suppliers.
- Continue to enhance training in key areas of the business to ensure staff are not only familiar with the WAFC Procurement Policy but also understand their obligations under that policy and other relevant policies and what the broad definition of modern slavery encapsulates.
- Continue to 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 WAFC for further assessment.
- Continue to engage both the Fremantle Football Club and Indian Pacific Ltd (West Coast Eagles) to gain a further understanding of their practices and operations mitigating the risks in regard to modern slavery.

Consultation with controlled subsidiaries

The controlled subsidiaries of the WAFC, covered by this Statement, are not centrally managed by the WAFC. They operate within their own governance and risk management procedures and policies. The actions set out in this Statement apply to the WAFC operational business only.



The WAFC Board of Commissioners approved this Modern Slavery Statement on 17 April 2024 and the statement is signed by Hon Wayne Martin AC KC in his role as Chair.

Wayne Martin

17/04/2024

Hon Wayne Martin AC KC
Chair West Australian Football Commission

DATE

