

2024-2025 DSE Modern Slavery Statement

DOWNWARD SPIRAL ENTERPRISES (TAS) PTY LTD
ABN 30 163 277 718

REPORTING PERIOD:
1 JULY 2024 – 30 JUNE 2025

1. REPORTING ENTITY: IDENTIFYING THE REPORTING ENTITY.

Downward Spiral Enterprises (Tas) Pty Ltd, hereafter identified as DSE, is registered as an Australian Private Company, domiciled in the state of Tasmania. DSE operates as a centralized holding company for a diverse array of subsidiaries spanning the arts, hospitality, viticulture, event production, and technological services. DSE is primarily known as the parent organization for the Museum of Old and New Art (Mona) and DarkLab Pty Ltd (Dark Mofo) and operates as a major stakeholder in the Tasmanian tourism and cultural economy.

This statement, published under the Modern Slavery Act 2018 (Cth), confirms DSE's commitment to preventing all forms of modern slavery across its operations and supply chains.

We are committed to operating responsibly and procuring sustainably. We are supportive of the intention to eliminate modern slavery in all its forms. We are committed to improving the ethical standards of our supply chain and ensuring we have addressed the risks of modern slavery in our operations.

Our modern slavery focus areas based on previous reports and actions undertaken to date, are:

- **Continuous Improvement:** Continue to review and assess our sourcing, contracting and preferred supplier selection processes through contract templates and technology platforms including our new finance system implemented in October 2024;
- **Engagement Practices:** Communicate our expectations to suppliers by way of tenders and contracts which include modern slavery related questions and clauses;
- **Risk Management:** Consider and act on relevant risk assessments and audit findings from our operations and financial reports;
- **Training:** Provide training for our business in modern slavery risks and compliance with our Sustainable Procurement Guidelines;
- **Reporting:** Provide our employees and contractors with access to confidentially report any human rights concerns including any relating to modern slavery; and
- **Responsiveness:** Promptly investigate and address any concerns raised by internal or external sources.

2. **REPORTING ENTITY STRUCTURE:** DESCRIBE THE REPORTING ENTITY'S STRUCTURE, OPERATIONS, AND SUPPLY CHAINS.

Reporting Entities (DSE Subsidiaries)	Primary Activities	Key Locations
Moorilla Estate Pty Ltd	Museum of Old and New Art (Mona), Tourism, Hospitality, Winery, Art Exhibitions	Primarily Tasmania, Australia, also New Orleans, USA (Material Institute)
Family Art Group	Art acquisition and ownership	Tasmania, Australia
Moorilla Unit Trust	Asset/Property Owner for Moorilla Estate operations	Tasmania, Australia
Darklab Pty Ltd	Festival Events (Dark Mofo), Creative Precincts, Venues	Tasmania, Australia
Darklab Developments Pty Ltd	Property Development Urban Renewal	Tasmania, Australia
Art Processors Unit Trust	Technology Services	Tasmania & Victoria, Australia, also USA

Our employee footprint during the reporting period peaks at over 1200 people of which >90% based in Tasmania, Australia.

SUPPLY CHAIN COMPOSITION AND LOCALIZATION

DSE manages a diverse supply chain involving over 2,000 suppliers. Our core strategy is the prioritization of local suppliers, which not only supports the Tasmanian economy but also allows for greater oversight and reduced ethical risk.

Supplier Geographic Profile	Percentage of Total
Tasmanian-based office	> 60%
Australia and New Zealand	> 90%
International (primarily EU, USA, Canada)	< 10%

The concentration of suppliers within Australia and New Zealand (over 90%) significantly lowers the risk of modern slavery, as these jurisdictions have robust labor laws and enforcement mechanisms. For direct international suppliers, DSE primarily engages in countries with equivalent human rights legislation.

Major Spend Categories:

- Art and Artist related costs
- Construction and building services

Other Spend Categories:

- Event and exhibition costs
- Food and beverages
- Building maintenance services
- Professional services including architects and engineering consultants
- Accounting and legal advice
- Security services
- Cleaning, laundry services and waste removal
- ICT related hardware, software, equipment and services
- Consumables such as packaging, cleaning and hospitality products, office supplies
- Utilities and rent
- Advertising and marketing, media and design services
- Transport, logistics and travel services
- Insurance and banking services
- Apparel, books and retail merchandise

3. MODERN SLAVERY RISKS: DESCRIBE THE RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS AND SUPPLY CHAINS OF THE REPORTING ENTITY AND ANY ENTITIES IT OWNS OR CONTROLS.

OUR OPERATIONAL RISKS (AUSTRALIA/USA)

DSE maintains a robust set of internal policies that establish a clear standard of conduct for all employees and contractors, supported by ongoing training programs.

- ♦ **Remuneration Policy:** Confirms adherence to the Modern Award safety net and minimum pay rates.
- ♦ **Behaviour Code and Respectful Interactions:** Establishes expectations for a workplace free from discrimination and harassment.
- ♦ **Complaint and Conduct Management:** Outlines the processes for resolving disputes and addressing policy breaches.
- ♦ **Whistleblower Reporting:** Provides a confidential channel for employees to report unethical practices.

Our previously assessed high risk areas in operations with ongoing mitigation actions include:

High-Risk Areas	Mitigation Actions
Cleaning, hospitality and horticulture employees	Maintaining our internal recruitment team rather than outsourcing the risk; undertake payroll and audit checks ensuring pay remains above Modern Award minimums.
Labour Hire Workers including cleaning and vineyard labour	Executed contracts; licensing due diligence and KPI checks for external operators; timely payments to suppliers.
Migrant Workers	Auditing employee onboarding processes and policies including checks to ensure visas and rights-to-work.
HR Process Gaps	Implementation of a new, integrated HR platform in 2025 to streamline hours/entitlements tracking.

OUR SUPPLY CHAIN RISKS

We coordinate DSE procurement through a central team of dedicated resources, with the aim of improving oversight, consolidating supplier information, and training operational teams in best practices. This centralization allows for consistent vetting of suppliers for modern slavery and ethical risks, and compliance with our published Sustainable Procurement Guideline.

Our supply chain includes hundreds of small to medium sized diverse enterprises. Whilst over 60% are physically based in Tasmania we understand DSE is linked to global supply chains that intersect with jurisdictions characterized by weak rule of law, systemic poverty, and labor exploitation. Modern slavery risk within our extended global supply chain arises from geographic risks from where we indirectly source materials, the products and services that we source, the sectors that we operate in and the entities that are ultimately involved.

High-Risk product or sector areas we have previously identified with ongoing mitigations include:

High-Risk Areas	Mitigation Actions
Textiles including clothing and cotton products	Staff uniforms sourced from an Australian ethical manufacturer.
Food suppliers such as the fishing industry	Our sourcing strategy champions Tasmanian produce and lower-impact seafood.
IT hardware and software products, particularly electronic devices	Engaging global firms who are mature in their compliance with ethical standards including Data#3 and Honeywell Limited.
Timber products supplied from outside Australia	Vetting suppliers for compliance with International Standards for Phytosanitary Measures criteria and seeking only sustainable Australian sources.
Equipment, tools, and consumables including personal protection equipment and materials manufactured outside Australia	Reliance on suppliers who are accountable under the Modern Slavery Act 2018 (Cth) such as Wesfarmers and RSEA.

4. **ACTIONS TO ADDRESS RISKS:** DESCRIBING THE ACTIONS TAKEN BY THE REPORTING ENTITY AND ANY ENTITIES IT OWNS OR CONTROLS TO ASSESS AND ADDRESS THOSE RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES.

ACTIONS TAKEN IN OUR OPERATIONS AND SUPPLY CHAIN

During the reporting period for this statement, we undertook the following actions to assess and address the risk of modern slavery practices:

In October 2024, we successfully implemented a new finance system. This system will be leveraged to further integrate ethical screening into the contracting and supplier selection process. We communicate our expectations to suppliers through tenders and contracts that include specific modern slavery-related questions and obligations.

In March 2025, we successfully implemented a new integrated HR platform. This system results in:

- More streamlined and timely tracking of work hours and entitlements.
- More accurate data entry and assessment of entitlements, reducing the risk of worker exploitation or underpayment.

Extended supply chain mapping and visibility of our indirect supply chain remains an ongoing activity, assisted by our finance technology upgrades. This process will be enhanced through collaboration with the team responsible for mandatory climate reporting over the next two years.

The risk assessment process has been further developed. Our risk assessment process considers these four dimensions:

- authoritative determinations from reliable government bodies;
- identifying product categories that rely significantly on vulnerable populations in production or distribution;
- determining which supply chain business models rely heavily on sub-contracting of labour hire and management; and
- identifying supply chains originating from jurisdictions with low regulatory controls and higher risks of bribery and corruption.

The risk assessments undertaken during the reporting period have resulted in the following strategies for mitigation:

High-Risk Areas	Mitigation Strategy
Labour intensive services • Cleaning • Security • Laundry	We engage directly with local companies who are entitled to adjust their pricing for national wage increases and who are contractually responsible for modern slavery due diligence and compliance. We do not use an intermediary facilities management company and we do not award labour contracts based solely on a lowest price criteria.
Construction services and building materials	Our primary engagement for construction work in the reporting period was with Hutchies (J. Hutchinson Pty Ltd), who report under the Modern Slavery Act 2018 (Cth). The extended supply chain for high-risk materials such as timber, steel, quarried earth and stone is subject to further review.
The Pacific Australia Labour Mobility (PALM) scheme	The PALM scheme operates within Tasmania to assist with filling labour shortages in the agricultural sector. We are monitoring feedback on the scheme in order to determine whether it should be supported or not; and if labour hire options through the scheme remain viable. CGH Group is the one labour hire company we engage with associated with PALM who also report under the Modern Slavery Act 2018.
Merchandise	We employ dedicated resources to investigate merchandise manufacturers for quality and compliance with ethical standards. A documented process will be developed to assist with consistency.
Off-shore technical support services	We have identified the use of off-shore technical support services within our HRMS provider. This arrangement was not declared at the time of supplier selection and remains a concern. Whilst we are assured that the provider complies with all applicable modern slavery laws, including the U.K. and the Australia Modern Slavery Act, an opportunity to review this arrangement is being explored.

OUR DUE DILIGENCE

Our centralised Procurement function is responsible for managing the actions to assess and address modern slavery risks. This program is reviewed by the Governance committee reporting to the sole Director of DSE.

Procurement resources undertake training and collaboration in order to identify, measure and respond to modern slavery supply chain risks in our region and industry.

We monitor our known supply chain with publicly available information sources including:

- the Business and Human Rights Centre [database of allegations](#) of abuse against migrant workers on an annual basis. This database tracks, records, and analyzes publicly reported allegations of human rights abuses linked to over 10,000–20,000 companies worldwide. This process enables a short list out of the 1200+ companies currently identified to be monitored in greater detail.
- Fair Work Australia Ombudsman media releases to monitor our supply chain for public notifications of wage theft and investigations to protect migrant workers.

The Governance committee oversees our organisation's Modern Slavery obligations. This includes the CEO, CFO, CPO, CIO and senior managers and representatives from Facilities, the Museum, Safety, Procurement & Compliance, Public Affairs and Sustainability.

Modern slavery awareness training for our day-to-day operations to enable improved due diligence in the organisation remains a priority. We have extended our supplier review process to focus on winter festival operations during the reporting period.

OUR REMEDIATION PROCESS

We have reviewed our remediation process. We are committed to the prioritisation of the safety and wellbeing of the impacted people over the financial or reputational risks to the organizations involved, including ourselves or our suppliers.

If a breach is identified or suspected, this involves:

- Immediate protective actions: our first priority is to safeguard the individuals involved without causing further harm, such as deportation or retaliation. We would seek to cease harmful activities and engage experts to assist.
- Direct remediation options: the organisation responsible for the breach should provide or cooperate in financial redress to the individuals involved, facilitating worker support services, providing or referring victims to legal and migration advice and assisting to reconnect with new and lawful employment pathways.
- Operational and long term corrective actions: working with the organisation on corrective action plans to address the root cause of the exploitation, collaborating with industry peers to ensure collective leverage and providing training and support to report and address future risks.
- Official reporting channels: include the AFP, Fair Work Ombudsman and/or Salvation Army.

Application of this process would involve an initial collaborative approach with a supplier identified as high risk. There would be an escalation to consider stopping further engagement with the supplier if it appears the risk of modern slavery cannot be remediated and corrected in the long term. Termination of the business relationship is understood to be used as a last resort.

No requirements for remediation were undertaken during this reporting period.

5. EFFECTIVENESS ASSESSMENT: DESCRIBING HOW THE REPORTING ENTITY ASSESSES THE EFFECTIVENESS OF THE ACTIONS TAKEN.

We are committed to identifying and responding to modern slavery risks by way of continuous improvement activities in our procurement and human resources policies, practices and supplier relationships.

We are focussed on building awareness of the risks in our operations and supply chain and strengthening the capability of our organisation to identify, manage and report on the risks to enable proactive remediation. Our risk assessment process has been a key focus for this reporting period.

No instances of modern slavery in our operations or supply chain were identified in the reporting period.

At this stage, our efforts are directed towards maturing our engagement approach and documenting how and where modern slavery risks may be present in our operations and supply chain. Whilst we have not identified or had any reports of specific modern slavery risks, it is understood that we must continue to fully assess the effectiveness of measures we have undertaken, improve our processes and agree on future goals to ensure we can more comprehensively review and evaluate the effectiveness of our actions.

6. CONSULTATION PROCESS: DESCRIBING THE PROCESS OF CONSULTATION WITH ANY ENTITIES THE REPORTING ENTITY OWNS OR CONTROLS.

This statement has been produced on behalf of DSE and its wholly owned subsidiaries. It has been produced by the Moorilla Estate procurement team who perform an enterprise-wide function. In order to prepare this joint statement, we engaged with representatives from each of the reporting entities covered by this statement and consulted the entities we own or control.

7. APPROVAL AND SIGNING: THE STATEMENT MUST BE APPROVED BY THE BOARD (OR EQUIVALENT) AND SIGNED BY A RESPONSIBLE MEMBER.

This Modern Slavery Statement is approved and signed by David Walsh as the Sole Director of Downward Spiral Enterprises (Tas) Pty Ltd as the parent entity on 13 May 2026.



David Walsh
Sole Director

REPORTING ENTITIES

The following wholly owned subsidiaries are covered by this statement:

MOORILLA ESTATE PTY LTD	ABN 34 120 281 656
MOORILLA UNIT TRUST	ABN 83 812 406 611
FAMILY ART GROUP PTY LTD	ABN 22 134 319 798
DARKLAB PTY LTD	ABN 51 615 687 566
DARKLAB DEVELOPMENTS PTY LTD	ABN 22 665 297 021
THE TRUSTEE FOR ART PROCESSORS UNIT TRUST	ABN 90 883 533 077

DOWNWARD SPIRAL ENTERPRISES (TAS) PTY LTD
ABN 30 163 277 718
