

# MODERN SLAVERY STATEMENT 2020

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This statement is made in accordance with the Australian Modern Slavery Act 2018 (Cth) (the Act) by Village Roadshow Pty Ltd (VRL, Village, We, Us or Our) (ABN 43 010 672 054). This statement is submitted as a joint statement on behalf of VRL and VRL's subsidiary reporting entities listed in Appendix A (VRL Group).

## INTRODUCTION

Village commenced business in Melbourne, Australia in 1954 where it remains headquartered. Village owns a diversified portfolio of businesses including Theme Parks, Cinema Exhibition, Film Distribution and Marketing Solutions and has approximately 5,000 employees, predominantly based in Australia.






Village is committed to identifying and reducing the risk of modern slavery from the VRL Group and its supply chain and this statement sets out the actions taken by us to minimise the risk of modern slavery occurring in our business and supply chain over the financial year ended 30 June 2020.

VRL was listed on the Australian Securities Exchange (ASX: VRL) for the financial year ended 30 June 2020 (FY20). Subsequent to the financial year end and following the implementation of a scheme of arrangement, VRL was removed from the Official List of ASX Limited at the close of trading on 30 December 2020. VRL is now a wholly owned subsidiary of VRG HoldCo Pty Ltd.



## STRUCTURE, OPERATIONS AND SUPPLY CHAIN

The VRL Group sources a range of goods and services from a significant number of suppliers. These include those set out in the table below.

Key Businesses	Main Operations	Supply chain
 VILLAGE ROADSHOW	<ul style="list-style-type: none"> <li>Provides centralised finance, accounting, reporting, legal, IT, governance and treasury services to businesses within the group</li> </ul>	<ul style="list-style-type: none"> <li>Office consumables</li> <li>Technology (hardware, software)</li> <li>Professional services consultants</li> </ul>
 VILLAGE ROADSHOW THEME PARKS	<ul style="list-style-type: none"> <li>Operation of Theme parks and attractions in Queensland, USA and China</li> <li>Accommodation in Queensland</li> <li>Movie/television production studios</li> </ul>	<ul style="list-style-type: none"> <li>Office consumables and promotional merchandise</li> <li>Technology (hardware, software)</li> <li>Uniforms and work attire</li> <li>Food and beverage products</li> <li>Accommodation requirements</li> <li>Hospitality and catering services</li> <li>Animal care related requirements</li> <li>Supply of new rides</li> <li>Park and hotel maintenance requirements</li> <li>Call centre based in Queensland</li> <li>Facilities services/waste management</li> </ul>
 VILLAGE CINEMAS	<ul style="list-style-type: none"> <li>Cinema operations</li> <li>Related food and beverage services</li> <li>Amusement parlour operations</li> </ul>	<ul style="list-style-type: none"> <li>Food and beverage products</li> <li>Intellectual property</li> <li>Office consumables and promotional merchandise</li> <li>Technology (hardware, software)</li> <li>Uniforms and work attire</li> <li>Hospitality and catering services</li> <li>Supply of amusement machines</li> <li>Cinemas and amusement machine maintenance requirements</li> <li>Facilities services/waste management</li> </ul>
 ROADSHOW	<ul style="list-style-type: none"> <li>Distribution of theatrical film product to cinemas</li> <li>Distribution of movie and television content to broadcasters and home entertainment platforms</li> <li>Investing in original television and film content</li> </ul>	<ul style="list-style-type: none"> <li>Office consumables and promotional merchandise</li> <li>Technology (hardware, software)</li> <li>Intellectual property acquisition from studios, predominantly based in the US</li> </ul>
 MARKETING SOLUTIONS	<ul style="list-style-type: none"> <li>Consumer incentive programs</li> </ul>	<ul style="list-style-type: none"> <li>Office consumables and promotional merchandise in the UK where the business is based</li> <li>Technology (hardware, software)</li> <li>Professional service providers.</li> </ul>

The diversity of the products and geographic location of some suppliers and their supply chains can potentially expose the VRL Group to risks associated with modern slavery. The VRL Group is committed to reducing this risk and has developed a framework to mitigate the risks. Our policy is available on the Village Roadshow corporate website [www.villageroadshow.com.au](http://www.villageroadshow.com.au).



## RISKS OF MODERN SLAVERY PRACTICES IN THE VRL GROUP'S OPERATIONS AND SUPPLY CHAINS

As characterised in the table above, the VRL Group procures a range of goods and services both locally and internationally. The VRL Group conducted a risk assessment of modern slavery practices in its supply chain based on the definition of Modern Slavery in the Act. The VRL Group's risk assessment of its supply chain identified the following risk categories which warranted further assessment:



### 1. GEOGRAPHICAL LOCATION

A number of countries have been identified by the UN, and noted in the Global Slavery Index of 2018, as having varying levels of human rights protections, including labour rights. The VRL Group sources a number of goods from international suppliers and has deemed international supply as a risk category due to the likelihood of the impacts of known modern slavery risk factors.



### 2. DIRECT SPEND

The relationship, the size of the supplier and the annual direct spend made with the supplier were considerations to determine the further assessment of those suppliers.



### 3. KNOWN INDUSTRY RISKS

Industry specific risks were highlighted as a risk category due to the type of product or service supplied to the VRL Group. It was identified as a risk category as there are known risks or potential exposure to modern slavery practices in certain supply chains based on historical modern slavery violations or noncompliance.



## ACTIONS TAKEN BY THE VRL GROUP

VRL acknowledges that there are risks of modern slavery practices in the VRL Group supply chain. In order to address these risks, the VRL Group took various actions in FY20.

The VRL Group developed a Modern Slavery Framework and established a Modern Slavery Steering Committee with the aim of reducing the risk of modern slavery, working with suppliers to assess risks of modern slavery in their supply chains and improve compliance with the Modern Slavery Framework through training and communication.

The VRL Group has a significant number of suppliers. It was necessary to map the supply chain and segment suppliers into categories to focus on the higher risk groups. In FY20 we targeted tier 1 suppliers, the tier 1 suppliers were then classified into one of the three risk categories identified by the VRL Group's risk assessment, being geographical location, direct spend and known industry risks. This sub-category was known as Category A suppliers. The assessment process, steps and actions taken by the VRL Group in FY20 focused on Category A suppliers.

### UPDATE AND DEVELOP DOCUMENTATION

VRL adopted a Modern Slavery Framework and recognised the importance guiding principles have on improving practices within an organisation. Following the adoption of the framework, VRL completed a review of its policies and documents to ensure compliance with the Act. We developed the VRL Modern Slavery Policy and published it on the VRL company website. The Modern Slavery Policy addresses the actions the VRL Group has taken and will undertake regarding modern slavery. The VRL document review resulted in the following:

- Developed self-assessment questionnaire
- Developed Modern Slavery Policy
- Developed Supplier Non-Compliance process
- Updated Supplier Code of Conduct
- Updated Group Procurement Policy
- Updated contract templates

### RISK ASSESSMENTS

The risk based assessments undertaken during the FY20 reporting period included developing a self-assessment questionnaire (SAQ) for suppliers. The SAQ incorporates questions addressing risks of modern slavery practices of suppliers and, where relevant, of a supplier's supply chain. The SAQ included modern slavery risk based questions as well as other risk areas relevant to the VRL Group.

The SAQ, together with the updated Supplier Code of Conduct, was issued to Category A suppliers, new suppliers onboarded during FY20 and those suppliers involved in tendering processes.

### TRAINING

A tiered training program addressing modern slavery was rolled out across the VRL Group. A group wide overview of the modern slavery regime was presented to staff, followed by face to face training with senior managers and finally an online training module to relevant employees.

The face to face training allowed policies, processes and risks to be discussed by business managers prior to a wider distribution throughout the organisation.

The online training module was undertaken by relevant staff across the VRL Group. The training materials defined modern slavery, outlined the internal policies and processes, provided awareness of the modern slavery risks in the VRL Group's supply chains, and considerations and questions to ask when engaging suppliers.



## EFFECTIVENESS OF THE VRL GROUP'S ACTIONS

The VRL Group has improved its policies and procedures relating to modern slavery risks. We have recognised gaps in existing policies and adopted new policies to strengthen our governance position. The procurement related policies were centrally developed, endorsed by the VRL Audit and Risk Committee and are applicable to the entire VRL Group. We have published our adopted Modern Slavery Policy on the corporate website which makes the VRL Group more accountable and raises awareness of the risks and our compliance under the Act to our customers and suppliers.

The implementation of the modern slavery training program, via our staff training program, is raising awareness within our employee population and ensures that the information being received is applicable to VRL's businesses.

VRL had a KPI relating to the number of SAQs and Supplier Codes of Conduct received from Category A suppliers across the VRL Group. VRL met the KPI for the FY20 period and was able to analyse responses from the SAQs to improve the SAQ questions in identifying potential future risks. The SAQ also enabled us to ask further questions of suppliers and get a greater understanding of extended supply chains in order to assess risk.

The Modern Slavery Steering Committee consists of senior VRL executives. The Steering Committee met with the project team during the year to review the actions taken by the VRL Group, to discuss any risks or potential risks identified and to ensure targets set are being achieved.



## VRL GROUP CONSULTATION

All reporting entities are subsidiaries of VRL and for FY20 all reporting entities operated under the same governance and reporting structure. The VRL Board and the Modern Slavery Steering Committee have contributed to the adoption of the Modern Slavery Framework and drafting of this statement. The VRL Group adhere to the Act, the Modern Slavery Framework developed and adopted by each reporting entity and the governing resolution passed by VRL's Audit and Risk Committee.

## OTHER INFORMATION

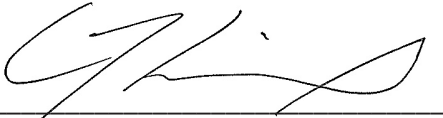
### Impact of COVID-19

The COVID-19 pandemic has had a significant impact on the operations of many of the VRL Group businesses. VRL continues to work with its suppliers to monitor the risk of modern slavery in its supply chain. During the COVID-19 pandemic we continued communications with our suppliers to understand where risk profiles may have changed.



## APPROVAL OF JOINT STATEMENT

This joint statement has been approved by the Board of Directors of each Village reporting entity in accordance with section 14 of the Act.



Clark Kirby  
CEO  
Village Roadshow



## APPENIDIX A – VRL GROUP ENTITIES

Details of Australian wholly owned subsidiaries which, together with Village Roadshow Pty Ltd, form the VRL Group. Entities marked with an asterisk (\*) are reporting entities in accordance with section 5 of the Act.

Entity Name	ABN/ACN
DEG Holdings Pty Ltd	90 003 124 221
Entertainment of the Future Pty Ltd	64 066 861 514
MyFun Pty Ltd	57 080 185 593
Reel DVD Pty Ltd	93 113 324 815
Roadshow Distributors Pty Ltd *	58 004 885 189
Roadshow Films Pty Ltd *	28 100 746 870
Roadshow Pay Movies Pty Ltd	77 083 817 734
Roadshow Productions Pty Ltd	49 139 341 861
Roadshow Television Pty Ltd	29 005 080 188
Roadshow Unit Trust	48 207 725 679
Sea World Management Pty Ltd	16 006 841 470
Sea World Property Trust	91 446 761 107
Sinced Investments Pty Ltd	44 004 891 990
Village Cinemas Australia Pty Ltd *	36 006 735 002
Village Golf Holdings Pty Ltd	60 615 018 007
Village Online Investments Pty Ltd	39 083 817 574
Village Roadshow Pty Ltd*	43 010 672 054
Village Roadshow Australian Films Pty Ltd	57 100 491 834
Village Roadshow Digital Pty Ltd	31 158 241 073
Village Roadshow East Coast Pty Ltd	18 133 710 148
Village Roadshow Exhibition Pty Ltd	77 077 569 469
Village Roadshow Group Services Pty Ltd	71 074 733 994
Village Roadshow Holdings Pty Ltd	62 083 817 672
Village Roadshow Intencity Pty Ltd	96 065 260 255
Village Roadshow IP Pty Ltd	63 077 568 980
Village Roadshow Leisure Pty Ltd	63 061 400 824



Entity Name	ABN/ACN
Village Roadshow Pictures International Pty Ltd	36 080 186 250
Village Roadshow Pictures Television Pty Ltd	89 069 490 071
Village Roadshow Share Plan Pty Ltd	073 667 688
Village Roadshow SPV 1 Pty Ltd	28 129 267 752
Village Roadshow Theatres Pty Ltd	20 006 199 659
Village Roadshow Theme Parks Pty Ltd *	60 010 919 623
Village Roadshow Treasury Pty Ltd	69 083 818 071
Village Roadshow UK Holdings Pty Ltd	23 074 733 725
Village Roadshow USA Holdings Pty Ltd	32 129 267 770
VR - Big Croc Pty Ltd	15 117 829 302
VR Corporate Services Pty Ltd	39 095 620 894
VR ESP Finance Pty Ltd	14 060 514 043
VR Leisure Holdings Pty Ltd	34 055 851 486
VRPPL Pty Ltd	75 069 490 008
VRS Holdings Pty Ltd	45 010 662 343
VRTP Entertainment Pty Ltd	13 099 132 948
VRTP Services Pty Ltd	52 003 816 260
Warner Bros. Movie World Holdings Joint Venture	41 213 298 248
WB Properties Australia Pty Ltd	50 003 719 051
WSW Units Pty Ltd	82 056 225 015

