

Modern Slavery Statement

July 2022 – June 2023

Discovery Parks Holdings Pty Limited
Discovery Holiday Parks Pty Limited



G'day Group acknowledges the Aboriginal and Torres Strait Islander people of Australia and pay our respects to their Elders past, present and emerging.

We recognise their unique connections to the land and water and thank them for protecting and caring for Country across countless generations.



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Modern Slavery Act Mandatory Criteria

Identify reporting entity

Describe the reporting entity's structure, operations, and supply chain

Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls

Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes

Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risk

Describe the process of consultation with any entities the reporting entity owns or controls

Any other relevant information

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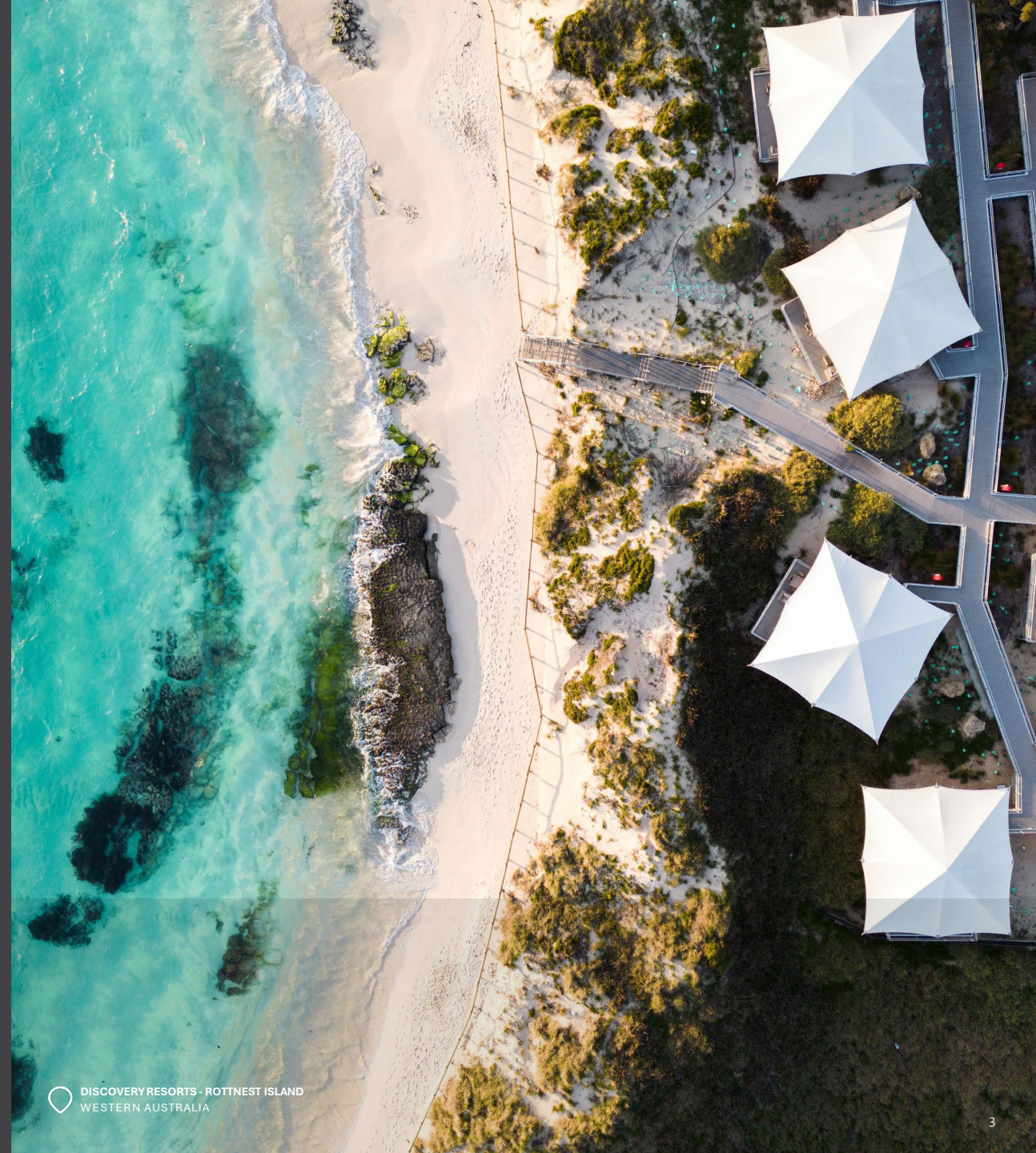
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OUR STATEMENT

Discovery Holiday Parks Pty Limited (**Discovery Parks**) is committed to acting ethically and with integrity in our business dealings and relationships, and to implementing and enforcing systems and controls to address the risk of modern slavery practices in our business operations and supply chains.

We aim to ensure there is transparency in our business and approach to tackling modern slavery risks, consistent with our reporting obligations under the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**).

Discovery Parks and Discovery Parks Holdings Pty Ltd (together, **Discovery**) are reporting entities for the purposes of the Modern Slavery Act and this is their joint Modern Slavery Statement, made pursuant to section 14 of the Modern Slavery Act.

Discovery owns and controls a number of entities, including Australian Parks Licence Co Pty Ltd which manages the G'day Parks and G'day Rewards brands and Wikicamps Pty Ltd, the administrator of 'Wikicamps', the number 1 paid application in Australia with the largest database of campgrounds, caravan parks and points of interest. Together, these entities and brands are referred to as **G'day Group**.

This Modern Slavery Statement describes the actions that Discovery, and the G'day Group more broadly, has taken in the Australian Financial Year 2022 – 2023 (**reporting period**). It has been drafted to meet the mandatory criteria at section 16(1) of the Modern Slavery Act..



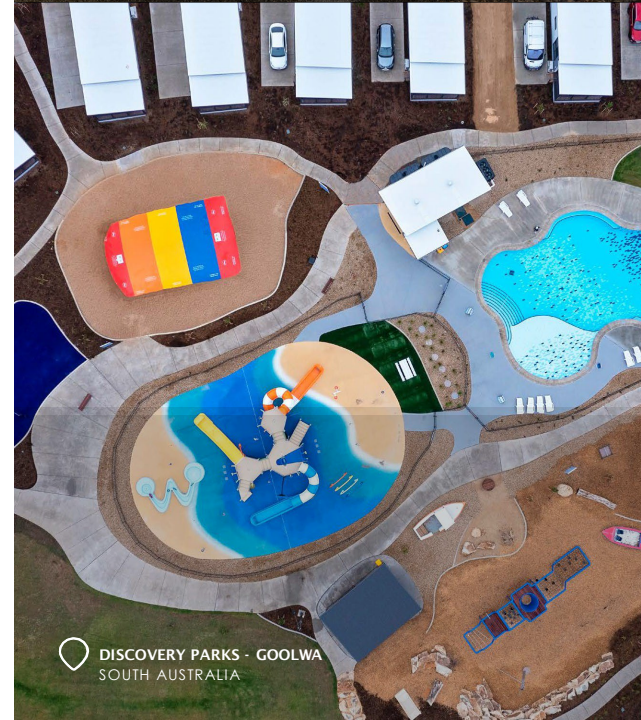
ABOUT US

The G'day Group is Australia's largest regional accommodation network, directly operating more than 85 Discovery Parks across Australia and providing an online platform for more than 200 independently operated G'day Park properties. From modest beginnings in 2004 with just three parks, the G'day Group has evolved to become a clear market leader, with a business portfolio incorporating work stay, mid-range and high end tourism accommodation.

As a significant contributor to Australia's local and national tourism economy, we recognise that the way we manage our environmental and social responsibilities has a far-reaching impact. We invest substantial capital into improving infrastructure in regional communities and form close ties with local businesses, suppliers, and tourism industry peers to create sustainable communities that are great places to live, work and visit.

To support the local communities, we strive to source produce, supplies and services from local businesses and assist local charities and volunteer groups by becoming actively involved in events, initiatives, and fundraising. Our large number of domestic suppliers reflects our ongoing commitment to supporting local businesses.

Our Environmental, Social & Governance (**ESG**) Strategy strengthens our ongoing commitment to growing with care through supporting our people, giving back to the communities we operate in and protecting our environment.



Our structure, operations and supply chain



STRUCTURE AND OPERATIONS

Headquartered in South Australia, our support office is located in Adelaide with a team of over 240 staff providing support in areas including corporate services (finance, legal and procurement), marketing, operations (including work health and safety), information technology, development and investments and people and culture.

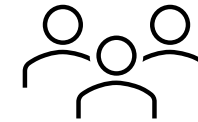
OPERATIONS SNAPSHOT



89
properties
operated



7
states and territories
where accommodation
is provided

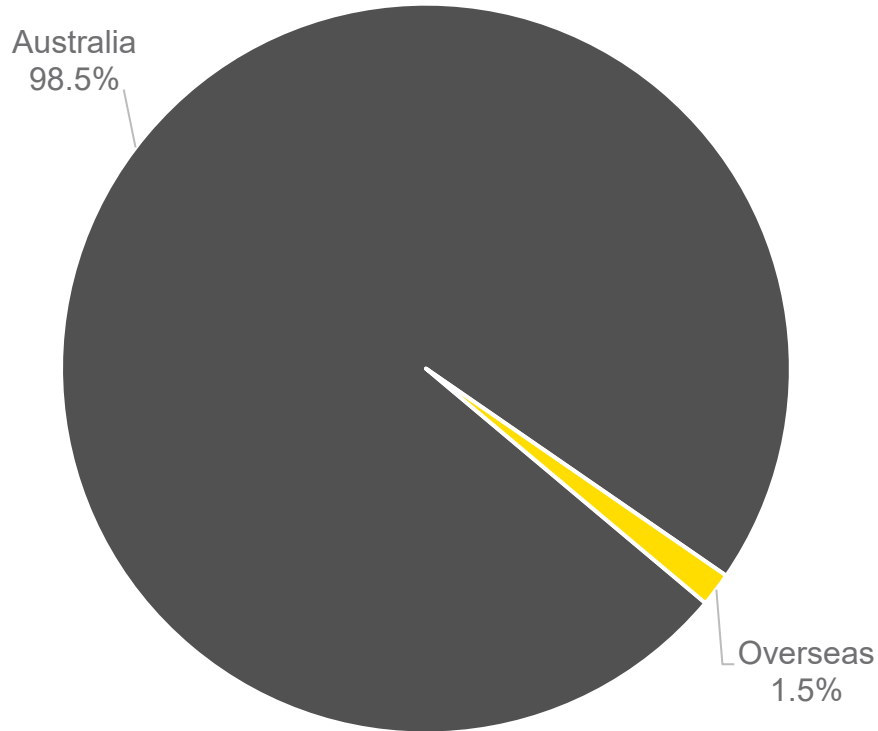


3,500+
employees

\$346,759,
164
consolidated revenue (as at
30 June 2023)

SUPPLY CHAIN

Supplier Country of Origin



In the reporting period, we made payments to over 5,500 active suppliers. Discovery is a proudly Australian owned business and, in keeping with our ongoing commitment to support other local businesses like ours, 98.5% of our own suppliers in the reporting period were based in Australia.

Discovery's supply chain consists of goods and services that support the operation and development of our business, maintenance of our properties, and the provision of our accommodation services. Our key supply chain categories include:

- Utilities (including electricity and gas);
- Facilities management (including cleaning services, waste management, safety, and gardening);
- Property management (including hardware and furnishings for our properties);
- Development initiatives (including cabins, swimming pools, waterparks, and other facilities);
- Financial services (including banking services);
- Food & Beverage (including the provision of food and beverage to our work stay parks);
- Marketing (including digital marketing);
- Office consumables (including stationery);
- Information communication technologies (including telecommunications, IT hardware and software).

Assessing and addressing our modern slavery risk



In identifying and assessing our risks of modern slavery practices we have consulted the Australian Government's guidance and specifically we have used the risk indicators from the Modern Slavery Act 2018 - Guidance for Reporting Entities (**Australian Government Guidance**).

To prepare this Modern Slavery Statement, we have considered, as consistent with the Australian Government Guidance, the risk that we may **cause, contribute, or be directly linked** to modern slavery practices through our operations and supply chain. For this reporting period, we have continued to focus our supply chain risk assessment on our Tier 1 suppliers, meaning suppliers that provide goods or services to us directly.

FRAMEWORKS, POLICIES AND PROCEDURES

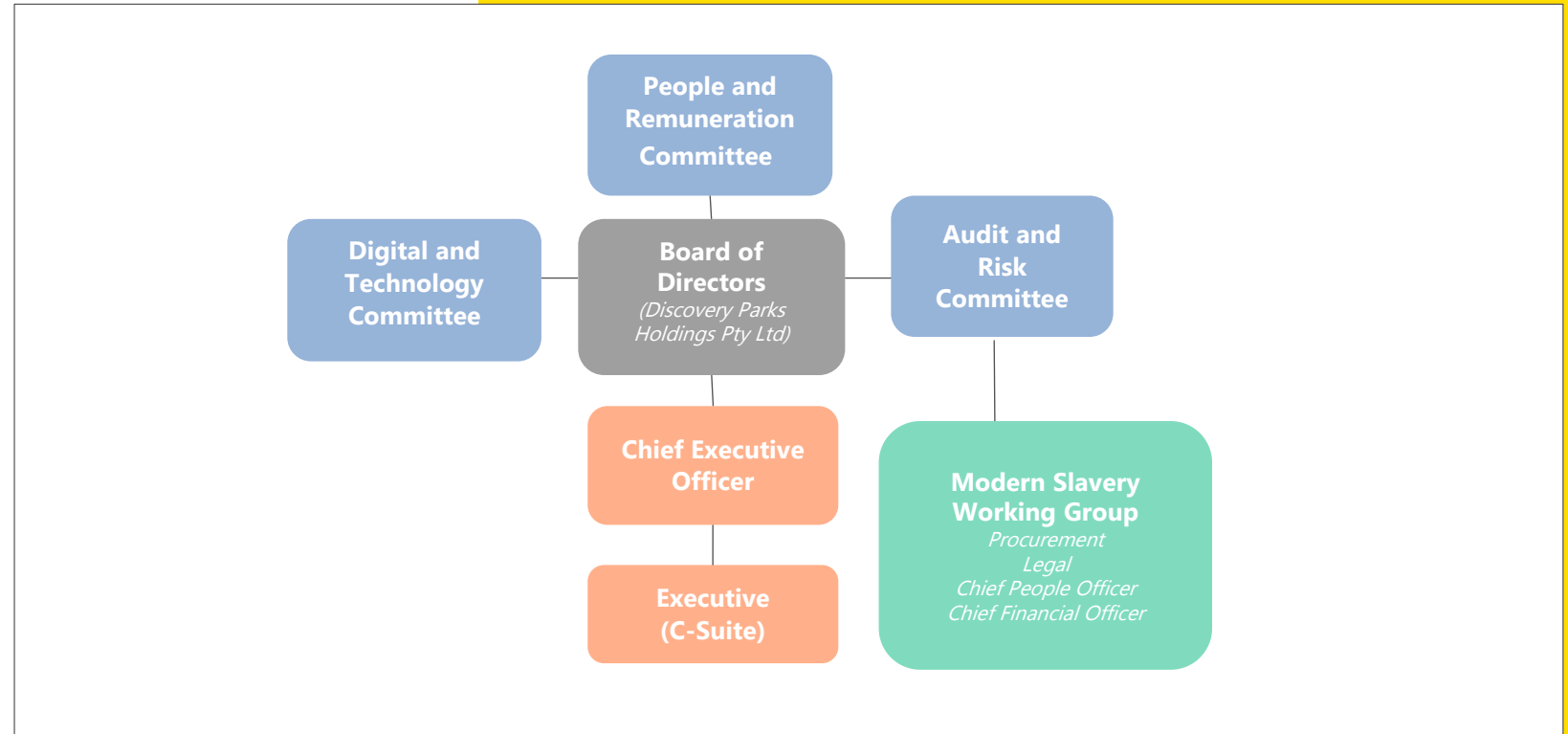
To support the implementation of our modern slavery compliance actions, Discovery has a number of policies, system procedures and frameworks. This key documentation includes our:

- Supplier Code of Conduct
- Supplier Risk Management Framework
- Ethical Sourcing Policy
- Modern Slavery Policy
- Whistleblower Policy



MODERN SLAVERY COMPLIANCE GOVERNANCE

Our Modern Slavery Working Group, comprised of members from key business units and executives, has active oversight of our modern slavery compliance actions and drives our modern slavery response plan. Discovery has a robust governance framework that supports the Working Group with monitoring, risk assessment and reporting processes.



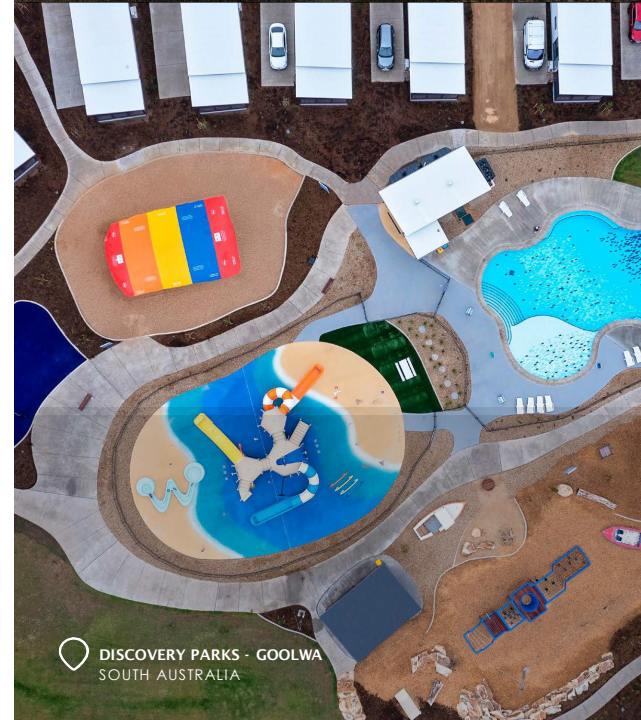
SUPPLY CHAIN RISK ASSESSMENT AND MANAGEMENT

We recognise that the Australian Government Guidance classifies and labels some of our suppliers as higher risk because of their sector and industry or product and service. We have evaluated some categories, such as building and material suppliers for our projects, information technology products and services and laundry services, as higher risk according to this guidance.

While almost all of our suppliers are based in Australia, some of our suppliers may source goods or services from overseas, including from locations that present a higher risk of modern slavery according to geographic risk indicators.

To assist with managing these risks in our supply chain, we undertake a number of due diligence steps, particularly at the supplier onboarding and tender evaluation stage. Specifically, we utilise a set of ESG checklist questions and our Supplier Risk Assessment Matrix, developed in the previous reporting period, to determine a supplier's risk level. These tools assist us to complete an assessment against the key risk indicators and target our risk management actions centring on risks associated with industry, product and service, geographical factors, and entity risk.

For targeted higher risk supplier agreements, we strive to enter into agreements which contain provisions that mitigate the risk of modern slavery practices. In the reporting period, we have further refined our template modern slavery compliance clause for use in specific, targeted supplier agreements.



We have maintained the services of a team of financial service support staff under an agreement with a service provider based overseas. This engagement is supported by due diligence activities and specific modern slavery risk assessment and contractual clauses. In the reporting period, members of senior management attended the offshore offices in person to conduct a site tour. This site tour involved a review of the office and work environment and inquiries into the travel arrangements of workers. The visit was highly valuable and allowed our staff to connect personally with the offshore team and we intend to continue these site tours on a bi-annual basis.

In this reporting period, we have worked with external, specialist procurement consultants to assist with developing our Procurement Strategy with a specific focus on modern slavery compliance actions. As part of this strategy, our procurement team is investigating methods to create broader awareness of our modern slavery position to our supply chain. For example, our tenders will initially include our Ethical Sourcing Policy, with a six monthly review completed to ensure all suppliers are provided with the policy. We are also working with other key business units to determine whether our eLearning module can be updated to include the key messages from this policy to inform our peers how we are communicating these messages to our suppliers.

In the reporting period, our Procurement Team has been developing reporting metrics to highlight the application of modern slavery assessments and mitigations, capturing key metrics including:

- number of suppliers that receive the Ethical Sourcing Policy;
- annual reporting regarding the number of tenders run where Ethical Sourcing Policy was issued as part of Scope;
- how many suppliers have completed the modern slavery questionnaire; and
- number of suppliers with high risk rating and mitigation steps in place (as a percentage of high risk rated suppliers).

Our actions continue to be guided by proportionality, given our understanding of our low risk profile based on the key risk indicators in the Australian Government Guidance. We consider our geographic risk is likely impacted by our relatively low number, 1.5%, of overseas based suppliers. We remain committed, as part of our continuous improvement approach, to further maturing our understanding of modern slavery supply chain risks, and to developing our supplier management approach.

OPERATIONS RISK ASSESSMENT AND MANAGEMENT

The G'day Group employs more than 3,500 staff nationally across both our support office and owned and operated properties. The majority of our employees are directly employed on a combination of full-time, part-time, and casual contracts. As our employees are working exclusively within Australia where employee-employer relations are strictly regulated by the Fair Work Act 2009 (Cth) and relevant modern awards, our operational risk profile is likely significantly reduced.

However, given the prevalence of modern slavery globally, we recognise that there may be a risk of being linked, indirectly, to modern slavery practices. We specifically acknowledge that there may be a wider risk of third parties or individuals, over which we have limited control, using our services while engaging in modern slavery practices. To address these risks, we have taken a targeted approach to increase training and awareness to all business units to aid in the identification of modern slavery practices.

We work with third party labour-hire companies and professional service suppliers to temporarily increase our workforce skills and capacity temporarily when needed. These arrangements are usually short-term however, where a longer term is required, we aim to ensure that staff are employed directly. We use licensed labour hire providers that have an established relationship with us.





Given the remote geographic locations of some of our owned and operated properties, there are significant workforce availability challenges. In the reporting period, due to continued labour shortages within regional Australia, we were fortunate to be able to continue our partnership with the Pacific Australia Labour Mobility (**PALM**) scheme, an initiative run by the Commonwealth Government that enables Australian businesses to recruit workers from nine Pacific Island countries and Timor-Leste when there are insufficient local workers available to meet demand.

Through the PALM scheme, we have been able to source skilled workers to work at sites across the country, from our high end resort property on Rottneest Island to our work stay properties in Blackwater and Carnarvon. We employed 24 team members in the reporting period across our business. As the PALM scheme is overseen by the Department of Foreign Affairs and Trade, we are assured of the probity and the integrity of the recruitment process. All participating workers, including our new team members, are afforded the same rights and protections as Australian workers and as the employer, we meet stringent criteria for participation in the scheme. The Australian Government also implements a range of measures to protect workers, including site visits and spot checks, regular reporting requirements and a support service phone line.

Relevantly, our Whistleblower Policy supports the raising of reports of modern slavery practices. The implementation of this policy is supported by an independent external provider, Stoptline, to facilitate the reporting mechanism.

At Discovery, we aim to foster a culture of continuous learning. In the reporting period, we continued to embed our tailored modern slavery eLearning module as part of our online learning portal. This training has been designed to provide staff with an overview of the types of modern slavery and associated key risk indicators. The modern slavery eLearning module builds awareness and capacity of our key operational staff to assist them to identify and report on risks of modern slavery practices in our operations and supply chain. The training module is delivered to all operational and support office employees and is incorporated into the onboarding of all new employees.



**Our
performance
and future
plans**



KEY ACTIONS FOR THE REPORTING PERIOD

Our actions for this reporting period have been driven by our Modern Slavery Working Group.

Policy development

- Finalised our Supplier Risk Management Framework and Ethical Sourcing Policy.

Supplier due diligence

- Explored enhanced measures to create broader awareness in our supply chain of our modern slavery position and the strategies we are employing to improve and de-risk our supply chain.
- Planned measures to ensure tenders include our Ethical Sourcing Policy as part of specification, and be sent to all suppliers initially, and then on a six monthly review to ensure all are captured.
- Attended on-site inspection of relevant offshore service providers by key senior management personnel.

Training, awareness and capacity building

- Delivered our Modern Slavery awareness eLearning module via our online learning portal to all new staff.
- Launched and delivered our Whistleblower awareness eLearning module via our online learning portal to reinforce the key messages in our policy to all staff.
- Participated in industry working groups, to help understand key factors addressing modern slavery supply chain risks.



Risk identification and assessment

- Developed an internal supplier risk assessment tool and associated supplier risk assessment methodology to enhance the sophistication of our risk appreciation.
- Undertook further interrogation, using our supplier risk assessment tool and enhanced supplier risk assessment methodology, of the risks identified in targeted supplier groups.

Assessing the effectiveness of our actions

- Our internal Modern Slavery Working Group continued to drive and monitor our modern slavery compliance actions.
- Developed reporting metrics to highlight the application of modern slavery assessments and mitigations.
- Formulated our Procurement Strategy 2023 and our modern slavery compliance strategy for the next reporting period (see 'Our future plans').



FUTURE PLANS

Looking ahead, and in line with our commitment to continuous improvement, we are continuing to progress the following actions in our 2023/2024 reporting period with our Modern Slavery Working Group overseeing the following program of work.

Supplier Due Diligence

- Conducting ongoing review of the effectiveness of current supplier due diligence actions.
- Finalising our Supplier Risk Management Framework data with a view to planning for ongoing six monthly reviews of same.
- Exploring further opportunities to conduct site visits for offshore service providers and targeted suppliers (e.g. newly engaged suppliers).
- Implementing processes to assist with ensuring that key suppliers receive our Ethical Sourcing Policy (including as part of tender specification).

Industry engagement

- Continuing to collaborate and participate with industry peers to inform best practice.

Training and capacity building

- Conducting training for the Procurement team with specific focus on risk mitigation processes for high, medium and low risk suppliers and industries under our Supplier Risk Management Framework.
- Exploring options for supplier onboarding training.

Assessing the effectiveness of our actions

- Determining our modern slavery strategy for the next reporting period.
- Finalising a set of key reporting metrics to assist with measuring the effectiveness of our actions.



CAPACITY BUILDING

As part of our ongoing commitment to building our maturity in understanding our modern slavery compliance obligations, relevant staff, have attended specific modern slavery training and obtained external specialist advice on our modern slavery compliance obligations. Our procurement staff are proudly accredited members of the Chartered Institute of Procurement and Supply.

During the reporting period, we were represented by a member of our Modern Slavery Working Group on the Lead Group of the South Australian Modern Slavery Research and Practitioner Network. Participation in this stakeholder network, facilitated by the University of South Australia's Centre for Enterprise Dynamics in Global Economies, enables us to collaborate with industry peers, researchers, and government representatives in this space to ensure that our approach to modern slavery compliance is informed by best practice.

CONSULTATION

Our approach to consultation between and across both of our reporting entities reflects the nature of the relationship between the two and between our internal business units. Relevant staff from Discovery have been involved in the development of this Modern Slavery Statement, with input from many areas, including key legal, procurement and people and culture personnel. Through the oversight provided by our internal Modern Slavery Working Group, we have ensured that our senior management are kept updated on activities in relation to our obligations under the reporting requirements in the Modern Slavery Act.

The Discovery Executive Team have been directly consulted on the preparation of this Modern Slavery Statement, with final approval provided by our Board.

This Modern Slavery Statement has been approved by the Board of Directors of Discovery Parks Holdings Pty Ltd, as its principal governing body, on 18 December 2023.



Grant Wilckens
Chief Executive Officer



