



# AFL Modern Slavery Statement

1 November 2022 - 31 October 2023

AUSTRALIAN FOOTBALL LEAGUE  
ABN 97 489 912 318

# Modern Slavery Statement

This is the Modern Slavery Statement (**Statement**) of the Australian Football League (ABN 97 489 912 318) (**AFL**), an Australian public company incorporated in Victoria, and its subsidiaries set out in Part 2 of this Statement, for the reporting period 1 November 2022 to 31 October 2023. This Statement is made to address the requirements of the *Modern Slavery Act 2018* (Cth) (**Act**). In this Statement, the AFL reports on its continued actions to identify, manage and mitigate the risks of modern slavery in its business operations and supply chain.

The AFL recognises the importance of eradicating human rights abuses, including modern slavery, from society and is committed to playing its part to eliminate the risks of all forms of modern slavery from its operations and supply chains. This Statement sets out the further actions taken to build on the AFL's modern slavery response framework from previous statements.

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Modern Slavery Statement  
For the Reporting Period 1 November 2022  
to 31 October 2023

# About the AFL

The AFL is a not-for-profit organisation incorporated under the *Corporations Act 2001* (Cth), 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 its Constitution.

The AFL is the governing body of the sport of Australian Football. It administers both the elite men's and the women's Australian Football competitions, talent pathways to reach those competitions and community football competitions.

The AFL was previously named the Victorian Football League. It changed its name to the Australian Football League in 1990 to reflect the expansion of the elite men's competition, which now has a national footprint, with matches played each season in every State and Territory in Australia. The elite men's competition is now made up of 18 Clubs (**AFL Clubs**).

The first season of the elite women's Australian Football competition, also known as AFLW, was completed in 2017. The competition started with eight AFL Clubs and has since progressively expanded to include AFLW teams from all 18 AFL Clubs.

The AFL is the parent entity of AFL Stadia Pty Ltd (ABN 26 615 077 891) and its subsidiaries, including Melbourne Stadiums Limited (ABN 37 098 476 594) (**MSL**). MSL manages one of Melbourne's premier sports and entertainment venues, Marvel Stadium.

The AFL has a subsidiary based in each Australian State and Territory, except for South Australia and Western Australia, that is responsible for the governance of Australian Football in that area. These are:

- Australian Football League (Victoria) Limited ABN 24 147 664 579
- Football Tasmania Limited ABN 93 085 213 350
- AFL Queensland Limited ABN 66 090 629 342
- AFL Northern Territory Limited ABN 81 097 620 525
- AFL (NSW/ACT) Commission Ltd ABN 53 086 839 385

# About the AFL

## AFL STATE ENTITIES

The AFL State Entities manage community Australian Football and second tier Australian Football competitions in all Australian States and Territories excluding South Australia and Western Australia.

This Statement is a joint statement of the AFL, MSL and the AFL State Entities (**Reporting Entities**).

As well as the AFL's activities in relation to Australian Football competitions, talent pathways and Marvel Stadium, key AFL operations include:

- provision of programs aimed at engaging the Australian community in Australian Football with a focus on education and wellbeing;
- provision and management of facility grants to support community Australian Football;
- fan engagement strategies including memberships, events, corporate hospitality and a licensing program for official AFL merchandise; and
- production of media content that is distributed across various platforms.

For more information about the AFL please refer to the AFL's 2023 Annual Report.

[2023 AFL ANNUAL REPORT](#)



# AFL Structure and Operations

The AFL Commission is the governing body of the AFL, and the Board of Commissioners are the directors of the AFL. The role of the Commission includes overseeing risk management and ensuring ethical standards and appropriate behaviours are adhered to. The members of the AFL are the 18 AFL Clubs.

The Board of Commissioners includes the AFL's Chief Executive Officer. The AFL Chief Executive Officer is appointed by the AFL Commission and is responsible for the operating performance of the AFL and the implementation of policy decided by the AFL Commission. Under the Chief Executive Officer, the AFL is divided into the following nine departments each led by an Executive General Manager: Game Development; Corporate Affairs; Government & Communications; Customer & Commercial; People; Football; Inclusion & Social Policy; Finance, Clubs & Infrastructure; Strategy, Technology, Data & Analytics and Legal, Regulatory & Integrity. The Executive General Managers of each of the departments form the AFL's executive leadership team.

The AFL's head office is located in Docklands, Melbourne and the operations of Australian Football League (Victoria) Ltd and MSL are also conducted out of head office. The operations of the other AFL State Entities are conducted out of offices in each of the relevant States and Territories.

The Reporting Entities employ approximately 920 (permanent, full time and part time) individuals nationally, who are all based in Australia. The AFL engages additional part time staff on a seasonal basis and casual staff to support Marvel Stadium operations that have not been included in this number (e.g. coaches, umpires and medical personnel for talent pathway programs and hospitality and security staff). This cohort of employees fluctuates regularly depending on the time of year.





# The AFL Supply Chain

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

- **Licensing:** The AFL licenses intellectual property it owns to licensees who use our intellectual property on products that they manufacture and then either sell directly to consumers or to retailers. Licensed products include uniforms and footballs that the AFL purchases for use in our operations.
- **IT and Communications:** The AFL engages suppliers to provide IT and communication services including in relation to website management, data storage and communications to stakeholders.
- **Match Day Operations:** The AFL engages suppliers to provide services directly in relation to the conduct of Australian Football matches particularly in relation to match day technology.
- **Travel and Accommodation:** The AFL procures travel and accommodation services to facilitate the conduct of the AFL and AFLW matches and other competitions, as well as to support its business operations generally.
- **Events and Catering:** The AFL uses suppliers to assist in staging events related to its operations and providing catering at those events.

- **Signage:** To meet its obligations under sponsorship agreements, the AFL engages suppliers to provide sponsor signage that is displayed at AFL and AFLW matches and other competitions.
- **Facilities Management:** The AFL manages a number of facilities across Australia, including Marvel Stadium, and requires services in relation to those facilities such as security and cleaning.
- **Player high performance support:** The AFL engages coaching and medical professionals to provide support in the talent pathway competitions and programs it administers.

For the most part, the AFL'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.

A key project currently being completed by the AFL is the redevelopment of Marvel Stadium. The AFL has engaged John Holland Pty Ltd to carry out the build which was substantively completed in March 2024, subject to minor outstanding works, and defect rectification works in accordance with contracted terms.

# Risks of Modern Slavery

Risks of modern slavery practices in the operations and supply chains of the Reporting Entities.

## **RISKS IDENTIFIED IN OPERATIONS**

As has been reported in previous Modern Slavery Statements, the AFL has identified that its operations carried out directly by AFL employees pose a low risk of causing, contributing or being linked to modern slavery.

All AFL employees continue to be based in Australia and, during the reporting period, all operations of the AFL carried out by AFL employees were carried out in Australia. During the AFL onboarding process, AFL employees are provided with copies of the AFL's key policies and are required to undertake "Healthy Workplace Training" with refresher training required on an annual basis.

AFL employees working in remote and/or rural areas are provided with additional training specific to their role to make sure they are prepared, aware and understanding of safe practices when working remote.

The training covers the following key areas (being the same areas as those previously reported with the addition of mental health training for AFL leaders and updated Aboriginal and Torres Strait Islander Inclusion and Cultural Awareness training):

- Sexual Harassment in the Workplace
- Respect at Work for Team Members
- Workplace Bullying
- Safeguarding Children & Young People
- Anti-discrimination and Equal Opportunity
- Work Health and Safety
- Aboriginal and Torres Strait Islander Inclusion and Cultural Awareness
- Cyber Security
- AFL People Code of Conduct





# Risks of Modern Slavery

## RISKS IDENTIFIED IN SUPPLY CHAINS

No modern slavery practices have been identified in the AFL's supply chains in the Reporting Period. However, the AFL recognises, as it has in its previous modern slavery statements that there is an increased risk of modern slavery in certain industries through our supply chain.

The key areas of risk identified in our supply chain are as follows.

- **Services that rely on manual labour and large-scale temporary workforces, such as construction, catering and cleaning:** The AFL relies on cleaning, property management, maintenance, hospitality, turf management, security and construction goods and services to operate our offices and stadia. The provision of these goods and services can carry modern slavery risks, including those associated with the widespread use of unskilled migrant and/or migrant visa holders and unauthorised subcontracting. The AFL understands that the construction industry is also susceptible to work health and safety risks, underpayment, exploitation of migrant workers and sexual harassment.
- **IT and telecommunications hardware:** The AFL procures a range of electronics, technology and telecommunications products and services such as laptops, computers and mobile phones to support our functions. These products and services have long and complex supply chains, where there is potential for exploited labour in overseas manufacturing factories and use of conflict minerals in components, which may be mined or processed using modern slavery.
- **Uniforms, apparel, equipment, merchandise and personal protective equipment (PPE):** The AFL directly sources footballs, equipment, merchandise packs for its Auskick program, umpire uniforms, PPE and indirectly, merchandise, produced by its official sponsors and official merchandise licensees, which may have risks of labour exploitation, including modern slavery.
- **Suppliers operating in countries that pose a higher degree of risk:** The AFL recognises that modern slavery can occur in any country, including in Australia. However, the AFL understands there are certain countries where modern slavery is reported as more prevalent, which is particularly relevant to suppliers of the AFL's official merchandise licensees.
- **Procuring hospitality goods and services:** The AFL procures hospitality goods and services when operating its events, arranging catering, travel and accommodation, and understands that the hospitality industry has had a range of issues including underpayment of wages, compliance with mandated paid breaks or working hours, insecure work, sexual harassment and bullying. Further, the AFL understands there are certain food and beverage products, which it procures for its events and in its offices and which may have risks of modern slavery in production and supply, including tea, coffee, chocolate, fruit and seafood.

# Actions Taken

The actions to assess and address modern slavery risks in our operations and supply chains are as follows.

## AFL INTEGRITY PUBLIC REPORTING TOOL

Modern slavery and unethical business practices may now be reported to the AFL's Integrity unit under the AFL's Make a Report – Report an Integrity Issue platform available here.

### [REPORT AN INTEGRITY ISSUE](#)

We confirm there have been no reports of modern slavery or unethical business practices made during this reporting period.

## AFL RISK MANAGEMENT – BUSINESS OPERATIONS

The AFL has started utilising an Enterprise Risk Management Framework to undertake risk assessments focused on modern slavery in its business operations. As outlined above in Part 5, the AFL has identified that its operations pose a low risk of causing, contributing or being linked to modern slavery. The AFL is continuing to improve its control frameworks for managing modern slavery risk and building awareness for AFL employees of those risks.

The AFL's Risk & Compliance team works in collaboration with the Procurement team to review the AFL's business operations, which at the time of preparing this statement reports results of the risk assessments to the AFL Modern Slavery Working Group (Working Group).

## AFL PROCUREMENT – SUPPLIER DUE DILIGENCE

As set out in the AFL's previous modern slavery statements, the AFL Procurement team implements processes for conducting due diligence on suppliers at the pre-contractual stage and throughout engagement. Pre-contractual due diligence enables the AFL to identify whether suppliers can meet the AFL's modern slavery risk mitigation expectations, whether additional controls are necessary to assist in managing any risk associated with a particular supplier, and implementation of any required controls.

The AFL Procurement team actively assesses modern slavery risks in our operations and supply chains based on the following risk factors provided below alongside monitoring public reporting, supplier assessment questionnaires and the consideration of geographic, product and supplier specific risk factors. This includes mapping of the AFL's supply chain and established sectors, types of products and services, categories of investments, countries and entities that may involve higher modern slavery risks.

### Risk factors considered:

- Reliance on temporary or migrant workers
- Levels of subcontracting
- Links to higher-risk geographies
- Reliance on lower-skilled labour
- Absence of grievance mechanisms
- Dangerous substandard living or working conditions

# Actions Taken

- Complex and fast-moving supply chains
- Excessive working hours
- Use of third-party recruitment
- Unreasonable restrictions on workers movements
- Retention of identity documents
- Isolation of workers

Further detail in relation to the AFL Procurement team's due diligence and onboarding activities are provided below.

- **Supplier onboarding and AFL Responsible Business Policy:** The onboarding process for all AFL suppliers is now fully integrated with the AFL's digital verification system, which requires all potential suppliers to undergo a mandatory check prior to being verified as a supplier of the AFL. This system ensures suppliers acknowledge and are aware of the AFL's Responsible Business Policy before commencing any work or supply to the AFL, which is designed to set expectations of the AFL and to enhance transparency and accountability in the supplier engagement process.
- **Supplier due diligence:** The AFL seeks to engage suppliers with aligned values, ethics and business practices, including those regarding modern slavery risks, and uses supplier risk assessments to identify potential suppliers or activities that require further risk monitoring with respect to modern slavery. The AFL Procurement team through the analysis of the AFL's spend profile, focuses on high-

level categories of spend against the AFL's targeted areas of risk. Further risk mitigation activities undertaken by the AFL Procurement team include:

- In relation to new suppliers classified as high-risk, a requirement to provide additional documentary evidence regarding the implementation of appropriate policies, processes, contract level obligations and practices in mitigating modern slavery risk; and
  - For existing suppliers classified as high-risk, systematic monitoring of activities via the AFL's digital verification system to monitor progress and capture potential and actual incidents relating to modern slavery risks.
- **Supplier Assessment Questionnaire (SAQ):** The AFL Procurement team has broadened the scope of suppliers that it issues SAQs to, which are requested from AFL suppliers identified as medium-to-high-risk. To assist suppliers in responding to the SAQ and in recognising variations in suppliers' capacities and understanding of modern slavery risks, the AFL provides guidance and offers user-friendly explanations of each question in the SAQ. The AFL's SAQ also shares various publicly available resources and tools to aid suppliers in identifying and managing modern slavery risks.

# Actions Taken

## CONTRACTS

The AFL continues to implement provisions to specifically address modern slavery in its standard terms for engagement with all official licensees and all those engaged under the an AFL consultancy agreement, as well as contracts for goods or services that are identified by the AFL Procurement team as being of a higher risk of modern slavery practices (for example, cleaning and security contracts at Marvel Stadium).

## PERSONNEL

The AFL continues to be committed to addressing the risks of modern slavery in its business operations, with the following key roles to manage these risks:

- **Risk:** Head of Risk & Compliance, Risk & Compliance Lead, Work Health and Safety Manager, Work Health and Safety Lead and Marvel Stadium operations Work Health and Safety Lead; and
- **Procurement:** Head of Procurement, Procurement Leads and Procurement Co-ordinator.

The Risk & Compliance team sits within the broader Legal, Regulatory & Integrity department and the Procurement team sits within the Finance, Clubs & Infrastructure department.

## WORKING GROUP

The Working Group has continued its work with representation from the Procurement, Risk, Finance and Legal business functions, with input from other teams, such as Licensing and Social Policy & Inclusion on an as needs basis.

The group is tasked with promoting an understanding and awareness from monitoring the effectiveness of the processes and systems implemented by the AFL to combat modern slavery risks. This includes providing briefings, advice and support to senior managers and relevant executive-level committees to support the development of our annual statement where required.

## AFL INDUSTRY LEGAL & RISK FORUM

The AFL's Legal and Risk & Compliance teams held periodic Legal & Risk Forums during the Reporting Period, which included representation from AFL Clubs, focusing on key legal and risk updates for the industry. This included a presentation on modern slavery and requirements under the Act, including identifying supply chains (direct suppliers, extended supply chains, products, services, raw materials and labour and services), updates on the review of the Act and cases in Australia where modern slavery has been reported.

# Actions Taken

## AFL POLICIES

The AFL Procurement Policy remains in place to set out guidance in relation to:

- principles for AFL procurement;
- roles, responsibilities and accountabilities;
- approach to high-risk procurement activities;
- processes for Requests for Quotations;
- tendering processes; and
- compliance monitoring and reporting.

The AFL Whistleblower Policy has also been retained with the *'Make a Whistleblower Report'* mechanism available to the public on the AFL's Policies page on its website.

### [AFL POLICIES](#)

Additional relevant policies identified in our inaugural statement that have been retained are the AFL's Indigenous Procurement Policy, People Code of Conduct, Responsible Business Policy, Safeguarding Children and Young People Code of Conduct, Complaints Resolution Policy and Procedure, Equal Employment Opportunity Policy and Respect and Responsibility Policy. In addition, the AFL continues to implement the AFL Policy Structure and Management Policy, which sets out a standardised approach on the cadence for the review, and update, of AFL policies to ensure they continue to reflect the AFL's position.

## AFL RESPONSIBLE BUSINESS POLICY

The AFL Responsible Business Policy continues to apply to any organisation the AFL (or any wholly owned subsidiary or controlled entity of the AFL) does business with including in relation to:

- labour and human rights;
- raising concerns of unsafe, unethical or inappropriate behaviour in the supply of goods or services to the AFL or AFL business arrangements more broadly;
- integrity and ethics – bribery, corruption and money laundering, conflicts of interest, provision of gifts, entertainment and hospitality, confidential information; and
- environmental sustainability.

The AFL requires all consultants, licensees, IT providers, event and hospitality providers, corporate partners and other suppliers of goods and services to the AFL (**AFL business partners**) agree to and comply with this policy upon initial engagement.

### [AFL RESPONSIBLE BUSINESS POLICY](#)



# Looking Forward

The AFL has continued to make progress on its modern slavery risk mitigation strategies, particularly in relation to its capturing of data and reporting, and remains committed to continued improvement.

Key steps being undertaken by the AFL to further identify, manage and mitigate the risks of modern slavery in our business operations and supply chain are set out below.

## INDEPENDENT REVIEW

The AFL has engaged an independent internal audit provider to review the AFL's key processes and controls underlying the management of modern slavery, which was completed in January 2024. The internal auditors examined the roles and responsibilities at the AFL for managing modern slavery, its existing policies and procedures, risk management processes, reporting processes and continuous improvement processes. The outcome of the review was overall positive with key recommendations being used by the AFL to further improve the control frameworks associated with modern slavery and to build awareness of modern slavery among AFL employees. This includes rolling out training that is provided to AFL personnel to specifically address modern slavery with additional training on modern slavery to be provided to AFL personnel who engage suppliers as part of their role.

## WORKING GROUP

The Working Group identified the need to further formalise the roles, responsibilities and reporting structures for the oversight and management of modern slavery. This has resulted in the preparation of a Terms of Reference that outlines the responsibilities of each business function represented in the Working Group and the reporting structures for modern slavery related data. The reporting structure outlined includes a regular report being prepared by the Procurement and Risk & Compliance teams for discussion in the Working Group, which in turn is used to inform the AFL Executive.

## RESPONSIBLE BUSINESS POLICY

The AFL has now embedded the Responsible Business Policy into our verification processes, requiring all organisations the AFL does business with to comply and to provide certain information prior to being approved in our digital verification system. As outlined above, this has allowed the AFL to require AFL business partners to agree to the AFL Responsible Business Policy through this digital solution. A review of the Responsible Business Policy will be conducted during the next reporting year.

# Looking Forward

## PROCUREMENT – CONTINUED DUE DILIGENCE OF SUPPLIERS

The AFL Procurement team is continuing to build our understanding and monitor modern slavery risks (including through identification of supplier-specific risks) by engaging with suppliers on a case-by-case scenario from information obtained from the supplier assessment questionnaires.

The AFL will continue to engage with AFL Clubs, including through periodical AFL Industry Legal & Risk Forums to encourage these organisations to focus on the risks of modern slavery in assessing their business operations.

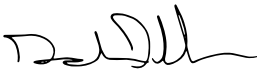




# Consultation

The Reporting Entities are centrally managed by the AFL. They operate under the same governance and risk management procedures and the policies and actions set out in this Statement apply to AFL controlled entities covered by this Statement. Consultation with MSL and the AFL State Entities was therefore not required.

The AFL Commission have approved this Modern Slavery Statement on 7 May 2024.



**Andrew Dillon**  
Chief Executive Officer  
Australian Football League

