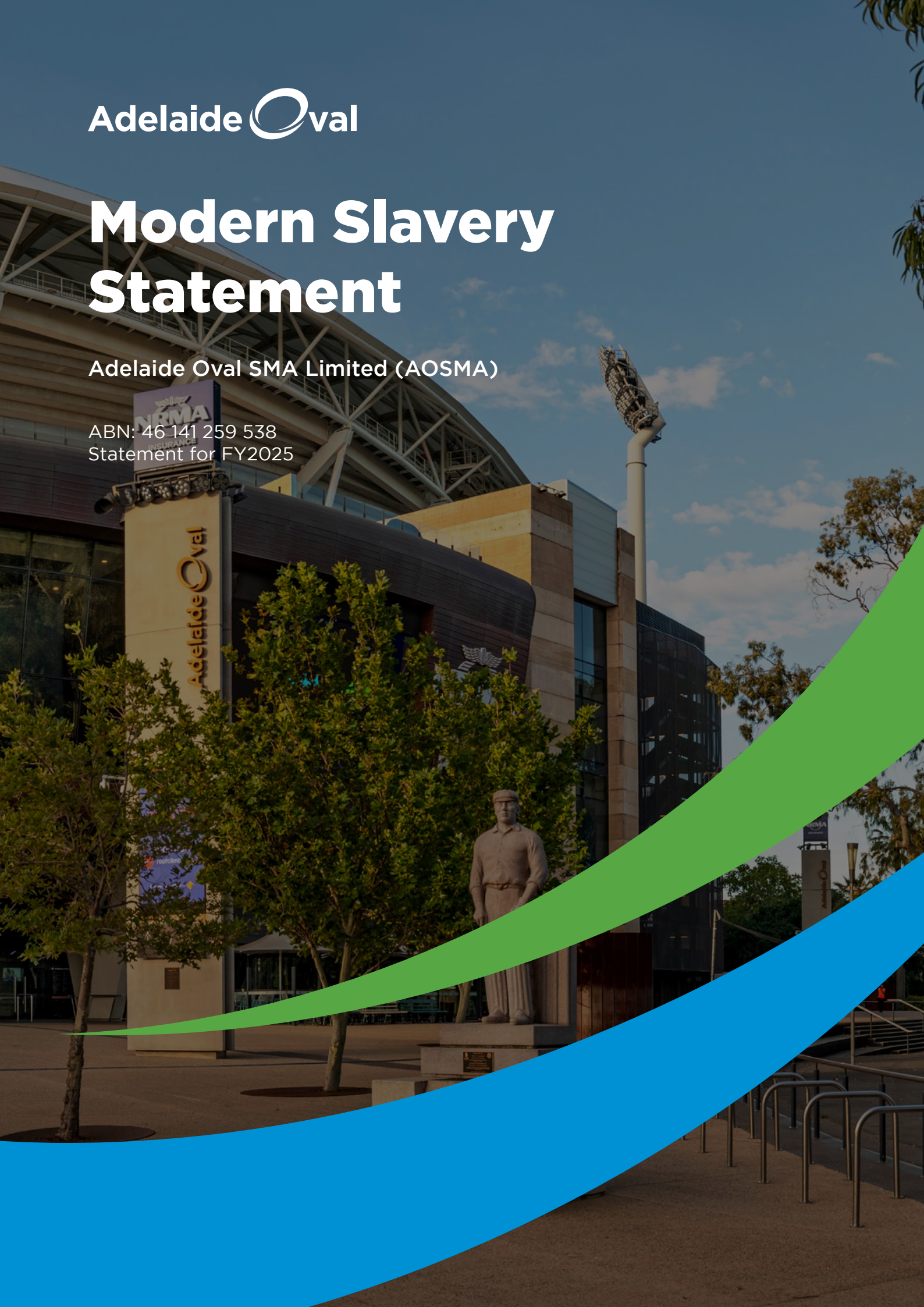


Adelaide Oval

# Modern Slavery Statement

Adelaide Oval SMA Limited (AOSMA)

ABN: 46 141 259 538  
Statement for FY2025



# Acknowledgement of Country

Adelaide Oval SMA Limited (AOSMA) acknowledges the traditional owners of country throughout the lands upon which we operate, which always was and always will be, Aboriginal land.

We pay our respects to Aboriginal and Torres Strait Islander cultures, their spiritual relationship with their lands, waters and communities, and Elders past and present.





# Our Structure and Governance

## Reporting Entity

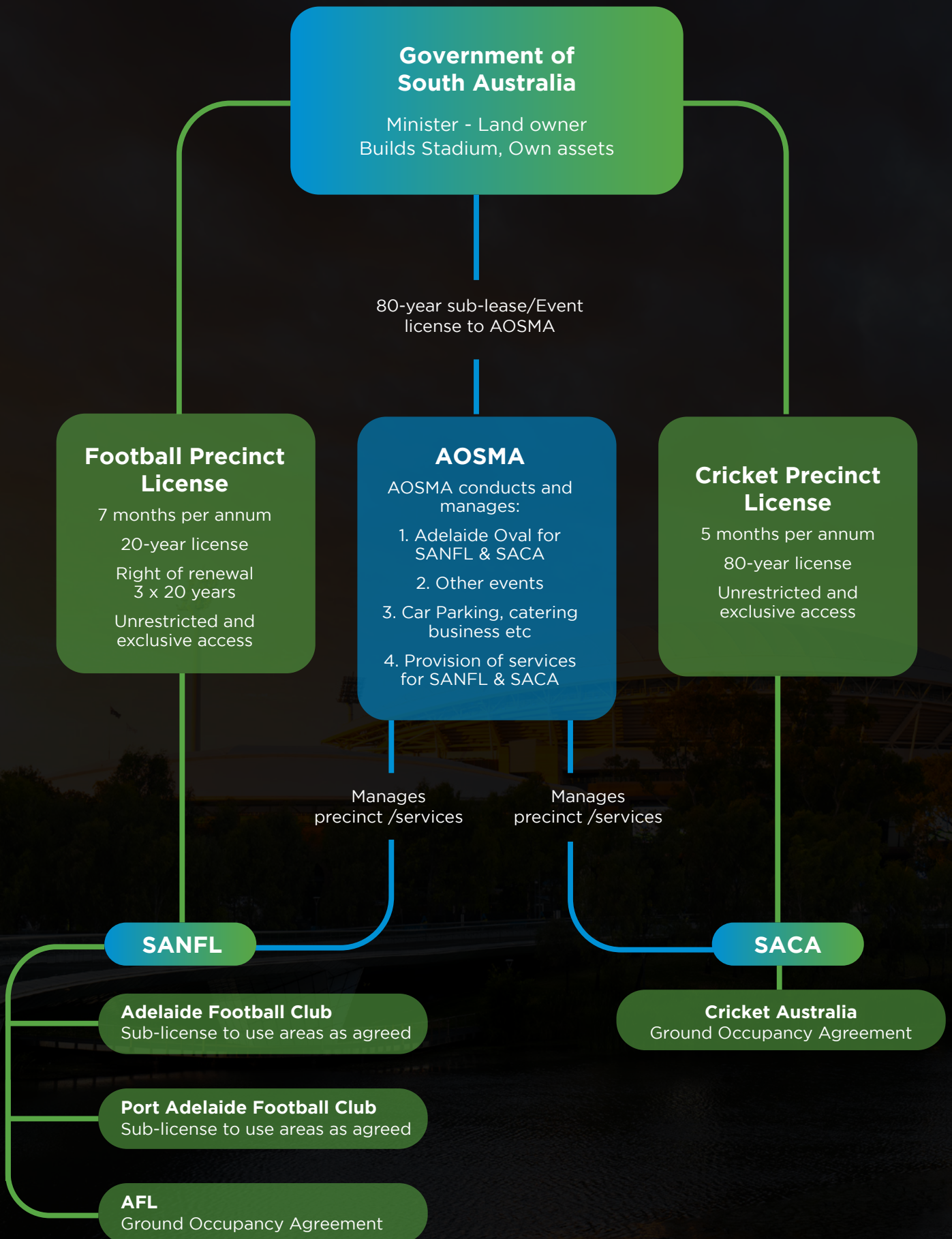
**Adelaide Oval SMA Limited (AOSMA)  
ABN: 46 141 259 538 is the Reporting Entity.**

AOSMA is incorporated in Australia and regarded as an Australian entity. It conducted business in Australia during the financial year ending 31 October 2025 and recorded Total Income of \$109 million for the period 1 November 2024 to 31 October 2025.

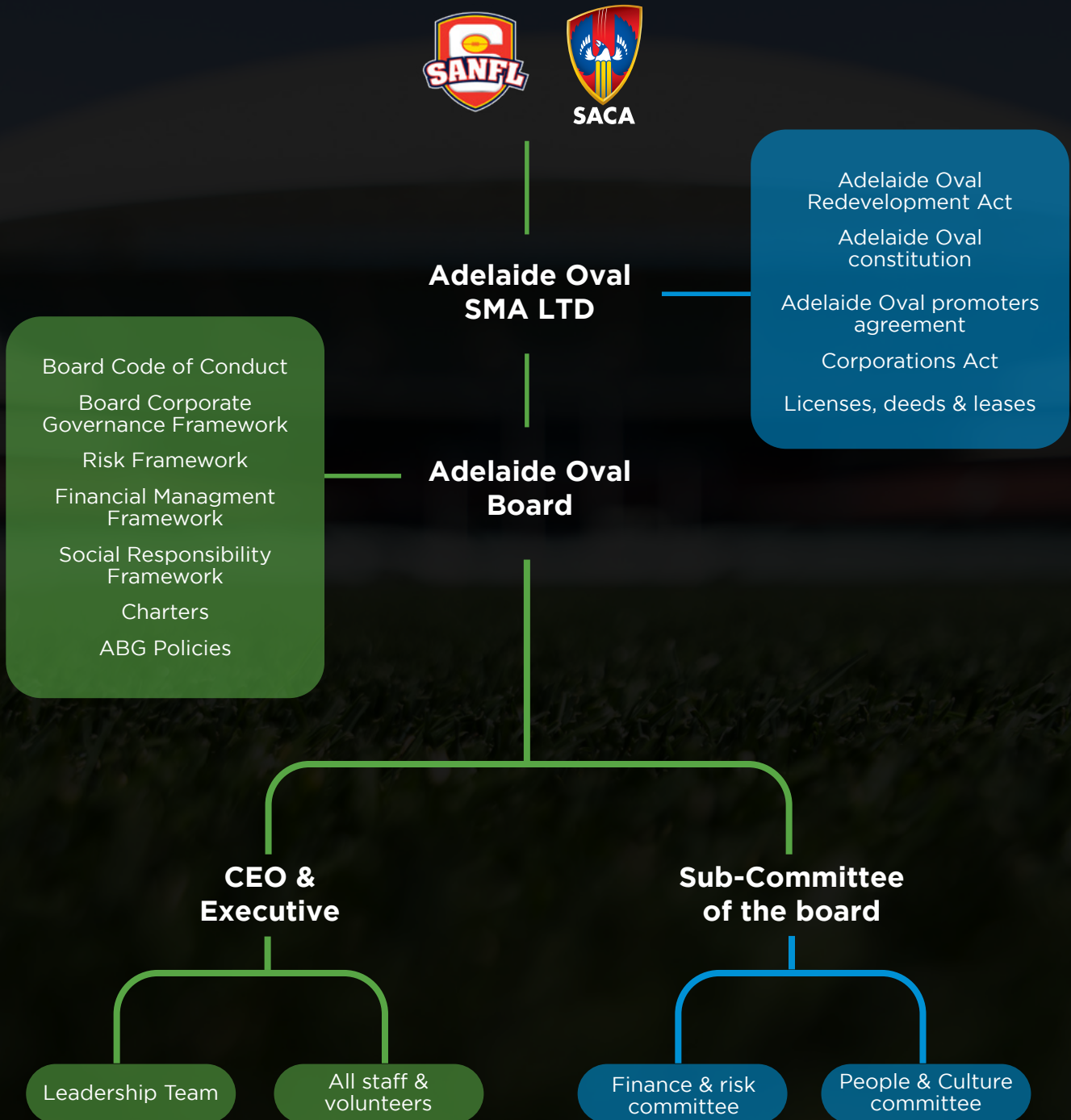
AOSMA is incorporated under the Corporations Act as a public company limited by guarantee. Established in 2013, it was formed to manage the redevelopment of the Adelaide Oval and to oversee its ongoing operations.

Building on the foundations established in our inaugural year, we have continued to progress our modern slavery program. Over the past year, we focused on strengthening the processes introduced in our first reporting period and further developing our approach to identifying, assessing, and remediating modern slavery risks across our business and supply chain. We remain committed to enhancing our risk assessment and remediation activities in future reporting periods.

# AOSMA Structure



# AOSMA's Stakeholders





## Company overview

In 2013, AOSMA was formed to manage the Adelaide Oval venue redevelopment and ongoing operations. AOSMA is a joint venture company for the two entities responsible for growing and developing cricket and Australian Rules Football in South Australia; The South Australian Cricket Association Limited (SACA) and the South Australian National Football League (SANFL).

AOSMA is a not-for-profit public company limited by guarantee. AOSMA is responsible for running, maintaining and developing Adelaide Oval, operating under an 80-year lease from the Government of South Australia.

In 2014, the redeveloped Adelaide Oval proudly took its place on the global stage as a truly 21st-century stadium, featuring state-of-the-art facilities and a pavilion roofline nestled within the city's heritage listed parklands.

Today, Adelaide Oval is a multi-purpose tourism and events destination that operates every day of the year, well beyond game and event days. Through major events, functions, RoofClimb, Stadium Tours, and the Oval Hotel, Adelaide Oval welcomes more than 1.8 million visitors annually. AOSMA continues to manage its affiliated entities within their commercial businesses including the Adelaide Oval Hotel, RoofClimb, Malt Shovel Taphouse, café at the Monarto

Safari Park, external catering and hospitality contracts, and Adelaide Oval Turf Solutions.

AOSMA has extended its sphere of influence not only through global exposure, predominantly from major event promotion and coverage, but also national and international consulting opportunities across the fields of stadium operations, security, tourism, hospitality and turf curation.

The registered office, and the principal place of business for AOSMA is:

**Adelaide Oval War Memorial Drive  
North Adelaide, SA 5006**

AOSMA does not own or control any entities but does have affiliated entities.

As at 31 October 2025, AOSMA's number of employees was 1,937.



## Objects for which AOSMA was established

As a not for profit public company limited by guarantee, AOSMA cannot make any distributions to its members. The Company's income and property must be applied solely towards promoting its objects. The objects are noted within the Company Constitution. These objects are:

- 3.1 *To encourage, promote, control and manage*
  - a. sport, and in particular games of cricket and games of football within the Adelaide Oval Core Area and elsewhere; and
  - b. recreational and entertainment events other than sporting events including cricket and football.
- 3.2 *in furtherance of the objects contained in clause 3.1 to:*
  - a. promote, control and manage:
    - i. any other premises or sports grounds controlled by the Company from time to time;
    - ii. and otherwise maximise the use of the Precinct, having regard to, among other things, the environment; and
  - b. otherwise maximise the use of the precinct.
- 3.3 *to make distributions, provide grants and/or render financial assistance to any sporting club, association, organisation, institution or company provided that such sporting club, association, organisation, institution or company at the time of*
  - a. has as a principal object, the encouragement of sport;
  - b. and does not carry on business for the profit or gain to its individual members.

# Governance of AOSMA

AOSMA defines Corporate Governance as “The appropriate structures and systems are established and operating effectively to ensure AOSMA’s ongoing success”. This definition of corporate governance includes:

- Enhancing organisational performance and wellbeing,
- Increasing stakeholder value and the achievement of AOSMA’s business objectives, and
- Effective governance practices, skills and capabilities, effectiveness and professional development.

The Board of AOSMA recognise that a strong governance framework which is practical yet robust and sustainable is a critical contributor to its success. Good governance is those high-level processes and behaviours that ensure AOSMA performs by achieving its intended purpose, and conforms by complying with all relevant laws, codes and directions and meets stakeholder expectations of accountability and transparency.

**The Board of Directors are charged with legal and fiduciary responsibilities as described in the Australian Corporations Act 2001. These include:**

To act in good faith in the best interests of the company

To perform duties with care and diligence

To avoid conflicts of interest

To retain appropriate confidentiality of Board deliberations

To use information received as a Director properly and in the best interest of the Company, and

To ensure the Company does not trade when insolvent.

The Members of AOSMA are the eight Directors, four each appointed by SACA and SANFL.

# Governance of AOSMA

The Board of Directors is responsible for the effective corporate governance of AOSMA, the appointment of the Chief Executive Officer (CEO) and works with the CEO to:

Set the strategic direction of the Company

Ensure the objects of the Company are achieved

Be informed about organisational management and processes to make appropriate decisions

Monitor changes in Government policy and community attitudes

Ensure the development of appropriate policies and procedures to achieve the objectives of the Company

Be accountable for the appropriate use of finances

Consider recommendations and reports presented by Board appointed Committees / Working Parties

Review organisational performance against targets and objectives

Address issues relating to risk management across the company

The CEO is supported by a Leadership Team and is responsible for implementing the strategy and managing the day-to-day operations of the company.

## **Affiliated companies not owned or controlled by AOSMA**

The reporting entity is AOSMA. AOSMA has affiliated companies that it provides services to, as noted below.

These companies are not a part of the Reporting Entity and do not have any Modern Slavery Reporting obligations.

### **Adelaide Oval Hotel Pty Ltd (AOHT)**

AOHT operates the Adelaide Oval Hotel which is built into the Adelaide Oval. AOHT contracts AOSMA to provide management and staffing services to operate the Adelaide Oval Hotel.

AOSMA sub-leased a portion of the Adelaide Oval space to AOHT for these operations and provides management services to AOHT. AOHT pays a lease fee and services fee to AOSMA.

AOHT pays commissions on food and beverage sales that occur within AOHT on a game day to AOSMA. AOHT engages AOSMA's management services for the delivery of the MTX club on game days on a commission basis.

### **Commercial Operations Pty Ltd (COT)**

COT operates the Adelaide Oval RoofClimb, Adelaide Oval Turf Solutions and some off-site food and beverage catering. COT contracts AOSMA to provide management and staffing services to operate the Adelaide Oval RoofClimb, Adelaide Oval Turf Solutions and off-site food and beverage catering ventures.

AOSMA licensed a portion of the Adelaide Oval space to COT for these operations and provides management services to COT. COT pays a license fee, hire fees for machinery and services fee to AOSMA.

It should be noted that AOSMA does not meet the definition of having control over either AOHT or COT and therefore neither entity is considered to be owned or controlled by AOSMA for the purposes of the Modern Slavery Statement and the reporting obligations or the Reporting entity.

# Our Mission

Our Mission is to collaborate with our clients and stakeholders to deliver an outstanding customer experience 365 days a year and thereby drive revenue for the benefit of sport in South Australia.

# Our Vision



**TO BE AUSTRALIA'S MOST ICONIC PROVIDER OF WORLD-CLASS, UNMISSABLE EXPERIENCES FOR ALL.**



## OUR VALUES



**PRIDE**  
WE CELEBRATE WHO WE ARE AND WHERE WE HAVE BEEN



**INNOVATION**  
WE LOOK FORWARD WITH A CURIOUS MINDSET



**COLLABORATION**  
WE DELIVER AND ACHIEVE GREAT THINGS TOGETHER



**FUN**  
WE ENJOY WHAT WE DO AND REVEL IN THE EXCITING MOMENTS



## Our Strategy

Our strategic plan shapes everything we do at AOSMA.

Our strategic plan is embedded across our business. AOSMA has just entered the third horizon of our strategic plan which is the delivering phase. Throughout the financial year ending 31 October 2025 we were in the building phase (phase two).

This coming year we are focusing on our five strategic priorities:

**People** - Recognised nationally as an employer of choice

**Experiences** - Our experiences match our world class brand promise

**Social** - A social responsibility program that we are proud of

**Technology & Data** - Technology and data drives value and efficiencies for our team and guests  
**Growth** - Achieve sustainable & transformational growth to drive returns to SA cricket and football

AOSMA will review the strategic plan with the Board of Directors annually and will track progress with our five key metrics: Employee, Experience, Brand & Reputation, Technology & Data and Financial.

The execution of our strategic plan is underpinned by our Mark of Service. At AOSMA we keep our Mark of Service alive by modelling the standards we have set for ourselves as an organisation.

# Strategic Priorities

## WHY

To nurture and promote the icon that is Adelaide Oval, for all those that treasure it.

## HOW

We act with “local heart and global pulse” across everything we do.

## WHAT

We create and deliver extraordinary, memorable experiences

### Strategic Priorities

### Positioning

### Building

### Delivering

#### People

Extend and enhance our employee value proposition

Our community is unified and champions our employee brand

Recognised nationally as an employer of choice

#### Experiences

Proudly promote our diverse range of experiences

We create, promote, and deliver extraordinary experiences

Our experiences match our world class brand promise

#### Social

Develop and commence our Social Responsibility roadmap

We advocate change with our Social Responsibility program

A Social Responsibility program that we are proud of

#### Technology & Data

Implement year 1 of our digital and technology strategy

Build our customer data strategy and ensure technology enhances our operations and experiences

Technology and data drives value and efficiencies for our team and guests

#### Growth

Drive growth and identify transformational revenue opportunities

We grow and diversify our revenue streams

Achieve sustainable and transformational growth to drive returns to South Australian cricket and football

### METRICS

Employee

Experience

Brand & Reputation

Technology & Data

Financial

# Our Mark of Service

We are  
**approachable  
& welcoming**

- We acknowledge our members, visitors, returning patrons and internal stakeholders as our guests
- We warmly welcome each person we interact with, with a friendly smile & authentic greeting
- We naturally interact with as many people as possible & say hello to everyone we walk past
- We say thank you & share our gratitude



We are  
**innovative**  
proactive,  
knowledgeable  
& helpful

- We enhance experiences for all by anticipating & resolving guest needs
- We don't say "I don't know" we say "I will find out for you"
- We are knowledgeable and informed through the continuous learning provided to us



We take **pride**  
in what we do

- We take responsibility for the appearance of ourselves, our ground & our venue
- We wholeheartedly believe; The standard that you walk past is the standard you accept
- We proudly promote our diverse range of experiences



We **collaborate**  
as a team to  
create world-class  
experiences

- We support each other to step up & step forward
- We listen and follow through on feedback
- We are trusted and empowered to make decisions
- Our success is measured by the collective performance of the entire organisation, not just individual departments



We inject **fun**  
into all our  
experiences

- We go out and have fun, smile & laugh with our guests and with each other
- We take moments and turn them into memories
- We celebrate wins! From mini achievements to major milestones & everything in-between



# Our Operations

**The principal activities of AOSMA include the stadium and grounds management of the Adelaide Oval in operating as a venue for sporting events, concerts, functions and other events.**

AOSMA leases the Adelaide Oval from the South Australian Government. AOSMA's responsibilities in relation to the management of the venue are noted within the Adelaide Oval Redevelopment and Management Act 2011.

AOSMA also performs a role in the conservation of the Adelaide parklands, being responsible for

the maintenance, protection and enhancement of selected areas.

AOSMA's commercial business revenue streams comprise of food and beverage sales, match day recharges and stadium operations, major event venue hire, and management, function and event venue hire and management, car parking, tourism offerings, merchandise and licence fees and service and hire agreements.





## Our Supply Chains

**AOSMA is committed to collaborating with its suppliers and business partners to mitigate the risk of modern slavery in its supply chain.**

We are continuing to undertake a program to identify key suppliers and assess the risks they bring to our operations. This is largely associated with the types of products and services they contribute to our supply chain.

All procurement at AOSMA is guided by our Procurement Policy, Contract Management Policy and

associated procedures. All contracts are entered into in accordance with our Delegations of Authority.

Our procurement and contract management process involves thorough due diligence to ensure alignment with our values and regulatory compliance. Our process has been adjusted in the current year to assess the potential partner's risk profile and check whether they have a modern slavery statement published on the portal.

# Product Suppliers

AOSMA sources products from a diverse range of suppliers. Our key products are noted below:

## Raw Materials and Consumables

AOSMA's largest commercial business line is the food and beverage outlets, and food and beverage associated with corporate venue hospitality production. This requires the purchase of all food and beverage from our business partners and suppliers. Consumables also include cleaning, kitchen, operations and ground management consumables such as dishwashing detergents, chemicals, gloves, sanitiser and sunscreen.

## Uniforms and Merchandise

AOSMA event day staff, all internal AOSMA departments and AOSMA tours volunteers are provided with a branded uniform. Maintenance, Grounds and other operational staff are provided with high-vis uniform requirements, steel cap boots and other workplace safety items where PPE is required. The concierge at Adelaide Oval also sells branded AFL, Cricket, AOSMA apparel and souvenir merchandise.

## Stadium Equipment

Stadium equipment such as hospitality kitchen and dining equipment, natural and artificial turf, vehicles and machinery, lighting systems, crowd control systems such as barriers, bollards, gates and security equipment.

## Capital Expenditure for Building Fit Outs

AOSMA undertakes capital sinking fund projects each year in accordance with the requirements within the Adelaide Oval Redevelopment and Management Act 2011. Capital projects for this financial year included level five deck, investment in audio visual assets, the completion of the multifith room, and other bespoke built stadium equipment. AOSMA has an internal capital maintenance team who buy products such as plaster, tiles, paint, glass bathroom fittings, carpet and furnishings.

## IT, Administration, Communications and Office Equipment

IT infrastructure, Wi-Fi, intercommunication systems, televisions, scoreboard, computers, servers and administrative office equipment.

# Service Providers

**AOSMA works with various service providers and business partners to deliver a range of services including:**

## **Content and Match Day Services**

This includes all match day and major event services relating to the execution of the football match, cricket match, or to the venue hirer's major event. Match day services include staffing, utilities, security, cleaning, hire of equipment and medical services.

## **AOSMA Lease**

AOSMA lease the stadium from the South Australian Government and pay a lease fee in accordance with the Adelaide Oval Redevelopment and Management Act 2011.

## **Ticketing Services**

Ticketing services related to printing, preparing, selling and the distribution of tickets to events held at Adelaide Oval.

## **IT and Software Services**

IT services and software such as data storage, cybersecurity, communications, website, risk, board governance and accounting systems, POS solutions, event management, visitor management and booking systems.

## **Stadium Operations Services**

All functional expenses incurred within the day-to-day operations of the Adelaide Oval. This includes marketing, advertising, public relations, car parking services, waste management services, fire safety, hire of equipment, venue maintenance, presentation and cleaning services.

## **Administrative Services**

Audit, Tax, Banking, Legal and Insurance services provided to AOSMA.

## **Social Responsibility Services**

Services engaged through AOSMA's social responsibility initiatives such as business partnerships through our reconciliation action plan (RAP), modern slavery requirements, sustainability audits and charity partners.

## **Utilities**

Stadium utilities for the day-to-day operations of the venue (exclusive of match day and major content days), such as power, gas and water.

## Geographic Locations

**Our tier one supply chain is extensive and has global reach. It incorporates a range of products and services across various industries.**

In FY2025 AOSMA spent \$61.375m on goods and services from over 2000 suppliers across various categories of the above-mentioned products and services.

Of our 2000 active suppliers, only 34 are international with minimal spend. The international suppliers are in the following countries: Singapore, Netherlands, UK, USA, Canada, Ireland, Norway, Germany, France and NZ. None of the overseas suppliers are

based in countries that are rated high risk for modern slavery. We note that these suppliers may still pose a risk to AOSMA.

Based on our scoping exercise and risk assessment, multinational suppliers are generally of a size that requires compliance with the modern slavery legislative obligations and we are therefore able to review these to support AOSMA's response to Modern Slavery compliance.

# Risks of Modern Slavery

## Practice within our Operations

**AOSMA complies with relevant Australian Work Health and Safety and other legislation. Our staff are based in Australia (South Australia and Victoria) and undertake induction training that covers our code of conduct, whistleblowing, equal opportunity, sexual harassment and work health and safety. We have not identified any specific modern slavery risks in our own operations.**

Although no modern slavery instances have been identified to date, we continue to assess and review the key industries, products and services, and geographical locations that may present the highest risk within our supply chain. We conduct an ongoing review to identify any emerging areas of concern. These risks include:

### **Geographic Risk**

AOSMA engages with a multinational supply chain, which can provide limitations on full visibility. We acknowledge that our supply chain operates in countries that may have higher risks of modern slavery, including factors such as poor governance, weak rule of law, conflict, migration flows, and social economic challenges.

### **Industry and Product Risk**

Certain industries and products purchased by AOSMA may pose risks of modern slavery due to the methods of production, provision or use. These include but are not limited to; cleaning, medical, food and beverage suppliers, security, vehicle and machinery, garment/apparel/uniforms, and IT products.

### **Services Risk**

This risk includes cost requirements and delivery timeframes which AOSMA may set with a contract provider, which may encourage the supplier to engage in excessive working hours, make cost savings on labour hire, or rapidly increase workforce size.

We acknowledge that the risk of modern slavery goes beyond the direct supplier relationships, and it is our responsibility to assess those engaged with our suppliers within our broader supply chain. In partnership with our suppliers, we are focused on identifying potential risks that may be present in the next tier of our supply chain.

# Addressing our Modern Slavery Risk

AOSMA continues to build on its approach to addressing modern slavery risks within its operations and supply chains. In this second reporting year, we have focused on strengthening the foundation of our program and advancing our commitment to the ongoing identification, assessment, and remediation of modern slavery risks across our organisation.

Key projects the AOSMA undertook in the current year:

## Finalised the Social Responsibility Framework

This Framework outlines AOSMA's ongoing commitment to sustainability and responsible business practices and provides structured guidance on how these principles are embedded across our operations. It reflects our intent to not only comply with relevant legislation and industry expectations but to take a leadership position in promoting ethical, inclusive, and environmentally conscious practices.

Key areas covered in the framework include:

### Environmental Factors

Our approach to environmental sustainability, including climate change, biodiversity and resource management, and pollution and waste. This area also covers topics such as decarbonisation, energy efficiency, circular economy, and the management of hazardous materials.

### Social Factors

Our approach to socially responsible efforts, including ethical procurement, supplier engagement, and modern slavery risk management. It includes human rights, health and safety, wellbeing, labour practices, and diversity and inclusion. It also covers community partnerships, philanthropy, product safety, data privacy, and stakeholder engagement, including consumer satisfaction and societal dialogue.

### Governance Factors

Alignment with global frameworks and national reporting requirements. This incorporates corporate leadership, board structure, transparency, ethics, executive remuneration, and risk management. Topics such as anti-bribery, tax avoidance, cyber security, ESG reporting, and sustainable finance are also addressed.

### Social Responsibility Framework

The Social Responsibility Framework will act as an internal reference point and a governance tool, helping guide decision-making at all levels of the organisation. It also reinforces the link between financial sustainability and broader environmental and social performance, a connection increasingly relevant to investors, partners and stakeholders.

# Addressing our Modern Slavery Risk

We anticipate that this addition will support the work of the Finance and Risk Committee and the Board by clarifying how sustainability is factored into long-term planning, procurement decisions, and operational priorities.

## Human Rights Policy was Finalised and Published

AOSMA finalised and published its inaugural Human Rights Policy. The policy focuses on human rights, modern slavery practices, health and safety, wellbeing, labour practices, diversity and inclusion and community engagement. This is the first of our nine Social Responsibility policies to roll out as part of the Social Responsibility Framework.

## Appointed our Social Responsibility Working Group

In the current year we appointed our social responsibility working group. The Social Responsibility working group was established to enhance and promote social responsibility initiatives within AOSMA, in alignment with the organisation's strategic plan and the strategic priority - Social Responsibility. The Working Group will work towards embedding social responsibility across AOSMA's operations and related entities, driving sustainable practices, ethical business conduct, and a positive impact on the communities AOSMA serves.

## Legal Supplier Review

During the current year, we engaged legal advisors to conduct a comprehensive review of all our suppliers. The results of this review were returned in late October and presented to the Social Responsibility Committee and participants of the Modern Slavery Working Group. Work is now underway to determine how to mitigate any risks highlighted by the review and assess whether these risks are relevant to our organisation. The next steps will involve developing a risk mitigation plan for any risks deemed applicable.

## Built and Delivered In-house Training

AOSMA has built and delivered its in-house training module to educate staff about modern slavery and our supply chains. This training, launched on 13 October 2025, is targeted at the following groups:

- Senior Leadership Team
- All holders of Delegations of Authority (DOA)
- All Finance and Procurement staff
- All Social Responsibility Committee members

As at 31 October 2025, 31.6% of our staff had completed the training, increasing to 78.2% at the time

# Addressing our Modern Slavery Risk

of publishing this report. This demonstrates significant progress in embedding awareness and understanding of modern slavery risks across our workforce.

## **Delivered Sustainability Reporting Training to the Finance Committee**

AOSMA invited an audit and assurance partner to speak to the Finance Committee, presenting on the upcoming Sustainability Reporting requirements and their implications for AOSMA. The session also outlined an appropriate timeframe for preparing to meet these requirements.

## **Risk Management Review**

A new risk management process and reporting tool is currently under development. Work on this initiative has been ongoing throughout the year, beginning with the establishment of the risk register and the risk appetite statement. The process is partially complete and is expected to be finalised by May 2026, in line with the annual risk review.

The new process will enhance risk reporting and discussions, enabling management, the Finance and Risk Committee, and the Board to make more informed decisions by assessing risks against our appetite and acceptable tolerance levels. It will also provide a clear view of our current risk position and highlight key actions required to achieve our desired risk rating.

## **New Supplier Process Scoped and Underway**

The Modern Slavery Working Group and the IT department conducted a scoping and planning session to define the new supplier process, including the data required to review suppliers effectively and understand their business, security, and social responsibility practices. The initial scoping exercise was completed in mid-2025, with the project to develop the new forms and incorporate our Supplier Code of Conduct commencing at the end of October 2025. The process is anticipated to be finalised by mid-2026.

## **New policy for Purchasing and Supplier Engagement & Pre-Engagement Risk Assessment Form**

A new policy has been developed for all DOA holders to clarify their responsibilities when engaging suppliers for goods and services. The policy addresses preferred suppliers and identifies factors that may indicate a high-risk supplier. It outlines the process that DOA holders must follow and highlights key considerations when using authorised credit cards for purchases.

The accompanying form is a detailed document for suppliers to complete. Rollout of the form has been delayed until we receive an update on the new supplier process. Depending on the timing of the new process, the policy may require amendment, and the

# Addressing our Modern Slavery Risk

form could become redundant, as it will eventually be integrated online with the Supplier Code of Conduct. In addition to the above key projects AOSMA has been working towards this year we also:

- AOSMA actively manages contracts with its key service providers to ensure compliance with workplace, occupational health and safety and other relevant legislation. We are committed to ensuring that contractors are meeting workplace agreements and Australian legislation.
- AOSMA's Supplier Code of Conduct has been finalised; we are now awaiting the implementation of the new supplier process to formally distribute the code.
- AOSMA contracts have a specific clause for modern slavery that the Supplier shall comply with all applicable anti-slavery and human rights legislation, including the Modern Slavery Act 2018 (Cth), and warrant that they have not been convicted of any offence or investigation in connection with slavery and/or human trafficking. This is relevant for all tenders and contracts within AOSMA.
- AOSMA continues to manage new supplier requests through our formal request forms, with approval restricted to those holding a special delegation. As part of the approval process, each supplier is researched, and any issues are identified and addressed before

sign-off can occur. In some instances, we engage directly with the supplier to ensure a formal risk mitigation process has been completed.

- AOSMA has an Employee Code of Conduct Policy that establishes clear expectations for behaviour of our employees and contractors. It requires all staff to act with integrity, comply with law and to report any questionable practices.
- AOSMA has a whistleblower policy which allows staff and contractors to report legislative breaches, misconduct or other information safely and anonymously, knowing that they are supported and protected throughout the process.
- AOSMA has a procurement policy which outlines the principles for procurement activities. We aim to mitigate adverse impacts to the environment and society while upholding economically viable business practices through our operations and supply chain.
- AOSMA has a grievance policy, the purpose of this policy is to provide employees with a transparent procedure for raising and resolving grievances.
- AOSMA has a risk management framework and underlying policy which outlines the approach used by AOSMA to control organisation risks in a consistent and systematic manner.

# Addressing our Modern Slavery Risk

The risk management framework covers the risk strategy, risk appetite and profiling, risk processes and policies, internal risk reporting and maintenance of the risk register, risk classification and external dashboard reporting and monitoring. The risk management framework is essential to AOSMA's strategic priorities and long-term success.

- AOSMA has a work health and safety policy. AOSMA is committed to providing a safe and healthy environment for its employees, volunteers, contractors and other visitors. The objective of the policy is to promote, support and enhance employee health and wellbeing throughout the organisation.
- AOSMA has researched best practice principles that support partnerships with Aboriginal and Torres Strait Islander stakeholders and organisations as part of our Reconciliation Action Plan (RAP) deliverables.
- AOSMA is in the process of developing a business case for

procurement from Aboriginal and Torres Strait Islander owned businesses as part of our RAP deliverables.

- AOSMA is in the process of researching SA-based Aboriginal and Torres Strait Islander business directories and develop a list of Aboriginal and Torres Strait Islander suppliers as part of our RAP deliverables.
- The Modern Slavery requirements are monitored by several department managers (Finance, People and Culture and Brand). These cost centre representatives, in collaboration, review the modern slavery risk assessment process, oversee staff training, approve actions and planned actions undertaken by the business. They also ensure actions are reported through to executive level meetings, the Finance and Risk Committee, and the AOSMA Board as appropriate.

# Effectiveness of our actions and planned actions

**Now in our second year of reporting, AOSMA has moved from establishing foundations to implementing and assessing the effectiveness of our modern slavery and social responsibility initiatives.**

Throughout the current reporting period, AOSMA has undertaken a series of key projects and initiatives to strengthen our governance, risk management, and operational processes in relation to modern slavery and broader social responsibility commitments.

Our key initiatives and ongoing contributions in the not 'Addressing our modern slavery risk' section above reflect a clear transition from foundational planning in the first year to active implementation, monitoring, and governance in the second year. While no instances of modern slavery or labour rights concerns were reported through internal mechanisms during this period, AOSMA has embedded modern slavery considerations into routine operational and management practices, supplier engagement, and staff training. The integration of these initiatives demonstrates measurable progress towards our long-term objective of identifying, mitigating, and remediating modern slavery risks across the organisation and supply chain. Continued evaluation and refinement will be undertaken in

the next reporting period to track effectiveness and ensure ongoing compliance and improvement.

Business risk and governance is overseen by the Finance and Risk Committee, and the Board of Directors.

AOSMA reviews and evaluates the effectiveness of its management controls through its organisational risk management processes, internal audits and regular supplier engagement. AOSMA plans to assess the key controls within the Social Responsibility/Risk assessment process and expand the internal audit program.

The results of these activities are captured through our risk management process and are reported to the Senior Leadership Team, the Finance and Risk Committee and to the Board of Directors. Risks are reviewed annually by the Finance and Risk Committee, with a monthly report on the highest risks presented in dashboard form.

Modern slavery actions are integrated into our routine management practices and operational activities. Throughout this reporting period, no instances of modern slavery or labour rights concerns were reported through our internal whistleblower and grievance mechanisms.

## Continued actions include:

Formalise a questionnaire for suppliers who are deemed to be high-risk

Annual review of the human rights policy

Formalise our risk methodology and reporting process

Finalise our new supplier onboarding process and data collection for appropriate decision making and sustainability and safety requirements.

Continue to prepare for our upcoming sustainability requirements in line with the Corporations Act.

New DOA holders through their mandatory modern slavery compliance training and monitor the progress of completion.

Continued engagement with our business partners to conduct a supplier review and deliver screening results for the team to assess

Extend awareness of modern slavery considerations to our associated entities, business partners and stakeholders

Our supplier code of conduct will be distributed to suppliers once our new supplier process is finalised

Work on the October 2025 legal supplier review to ensure that we are engaging with appropriate suppliers and any highlighted risks are mitigated or eliminated.

SA-based Aboriginal and Torres Strait Islander business directories and develop a list of Aboriginal and Torres Strait Islander suppliers as part of our RAP deliverables.

Continue to develop a business case for procurement from Aboriginal and Torres Strait Islander owned businesses as part of our RAP deliverables.

Continue to advance our commitment to upholding human rights throughout our organisation and supply chain

Continue rolling out the next eight policies within the Social Responsibility Framework

# Consultation

AOSMA does not control any other entities. Therefore, the consultation criteria is not applicable to our organisation.

# Endorsement and approval

The statement has been prepared in collaboration with the key business units within AOSMA that are responsible for procurement, governance and risk compliance at AOSMA.

This statement was approved by the Board of Directors in their role as principal governing body of the Adelaide Oval SMA Limited, on March 2026.

This statement is signed by a responsible member of the Adelaide Oval SMA Limited.



**The Hon. Robert Kerin**  
Chair of the Adelaide Oval SMA Limited  
By authority of the Board of Directors  
March 2026