

MODERN SLAVERY STATEMENT

STAR CONSOLIDATED HOLDINGS PTY LTD

2025

STATEMENT OF THE REPORTING ENTITY

Star Consolidated Holdings Pty Ltd has prepared this Modern Slavery Statement in accordance with the Australian Modern Slavery Act 2018 (the Act) and having regard to the *Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities* (the Guidance) in relation to the financial year ending 30 June 2025.

This joint Statement outlines the approach taken during the financial year ended 30 June 2025 to identifying, assessing and addressing modern slavery risks in the operations and supply chains of Star Consolidated Holdings Pty Ltd and the subsidiaries and controlled entities covered by this Statement.

This is a joint modern slavery statement made by Star Consolidated Holdings Pty Ltd and covering the subsidiaries and controlled entities within its reporting scope. Actions described in this Statement relate to activities undertaken during FY25 unless expressly identified as future priorities.

Star Consolidated Holdings Pty Ltd opposes modern slavery in all its forms.

For the purposes of this Statement, “the Group” refers to Star Consolidated Holdings Pty Ltd and the subsidiaries and controlled entities covered by this Statement. “Modern slavery” is used to describe serious forms of exploitation where coercion, threats or deception are used to exploit people and deprive them of their freedom. Modern slavery can include slavery and servitude, forced labour, debt bondage, human trafficking, forced marriage, child labour and deceptive recruiting for labour or services.



DIRECTOR'S MESSAGE

The Group is committed to operating responsibly and with respect for human rights across its hospitality, retail liquor, gaming and accommodation operations in Australia. While our venues and teams are based in Australia, some goods and services used in our operations may involve extended supply chains, including imported products supplied through Australian distributors. We therefore take practical steps to help prevent, identify and address modern slavery risks connected to our business.

During FY25, we continued to refine our approach to understanding and managing modern slavery risks in our operations and supply chains. Oversight is provided by the Directors, supported by members of the executive team with operational responsibility. During the reporting period, this included maintaining governance oversight, supporting awareness across relevant teams, and applying a proportionate, risk-based approach to higher-risk procurement categories.

Our approach is proportionate to the Group's size and risk profile and is focused on practical steps that help identify and address modern slavery risks over time.

We take our obligations under the Modern Slavery Act seriously and are committed to improving our approach. Looking forward, the Group will continue to integrate modern slavery considerations into procurement, contractor management and venue operations, and to work with suppliers and service providers to promote lawful, fair and safe working conditions.

The Group presents this Statement and welcomes stakeholder feedback as we continue to improve our approach over time.

This Statement was approved by the Board of Directors of Star Consolidated Holdings Pty Ltd as the principal governing body of the reporting entity in December 2025 and is signed by Steven Shoobridge in his capacity as Managing Director and responsible member of Star Consolidated Holdings Pty Ltd.

Steven Shoobridge
Managing Director

STRUCTURE

The broader Star Group operates in Australia across hospitality, retail liquor, gaming and accommodation through a portfolio of entities. Star Consolidated Holdings Pty Ltd holds a majority ownership interest across the core Group. This joint Statement covers Star Consolidated Holdings Pty Ltd and the subsidiaries and controlled entities within its reporting scope for the reporting period. Some entities associated with the broader Star Group sit outside that scope and are not included in this Statement.

OPERATIONS

For the purposes of this Statement, the Group comprises Star Consolidated Holdings Pty Ltd and the subsidiaries and controlled entities covered by this Statement.

The Group operates venues and related businesses in Australia, primarily in Queensland.

At 30 June 2025, the Group employed approximately 2,200 team members across entities within the reporting scope in Australia. These staff were employed across the Group's venues and brands.

Core Brands



PORTFOLIO BUSINESS MIX

The Group's portfolio includes takeaway liquor retail, gaming, on-premise food and beverage and accommodation. This mix supports resilience across changing trading conditions and shapes key procurement categories, including liquor and beverage supply, food and consumables, venue operating supplies and contractor services.

SUPPLY CHAINS

The Group's supply chains support its hospitality, retail liquor, gaming and accommodation operations. Direct procurement is predominantly from Australian-based suppliers and service providers, but some goods are manufactured overseas and supplied through Australian distributors. The Group uses a risk-based approach to identify higher-risk parts of its supply chain and scope due diligence accordingly.

Key procurement categories include food and beverage supplies, uniforms and textiles, cleaning chemicals and consumables, security and cleaning services, labour hire, contractors, maintenance and repairs, fit-out and capital works, and technology and marketing services. For some categories, goods may be manufactured overseas and supplied through Australian wholesalers or distributors, making upstream risks harder to observe directly.

Some alcoholic beverages and related products may be sourced through international producers and upstream supply chains. These products can involve agricultural and manufacturing inputs where modern slavery risks may be higher in some regions.

Service providers also support venue and accommodation operations, including cleaning, security, maintenance, waste management, labour hire, logistics, marketing and technology services. Some of these sectors can carry elevated modern slavery risks due to subcontracting, low-paid work and vulnerable worker cohorts.

Although the Group's operations and direct suppliers are Australia-based, modern slavery risks may still arise in extended upstream supply chains and contractor-heavy service categories.

All products and services can carry modern slavery risks. In the Group's Australia-based operations, these risks can be harder to detect where goods are manufactured overseas and supplied through Australian distributors, or where services rely on subcontracting. The Group identifies potential risk areas by considering the key sources of those risks.

In identifying where modern slavery risks may arise, the Group considers geographic risk, sector and industry risk, product and service risk, and entity risk, consistent with the Guidance. While the Group's operations are Australia-based and Australia has strong workplace laws, exploitation can still occur in Australia, particularly in subcontracted or indirect labour arrangements.

These potential risks are reviewed periodically to support ongoing visibility of the Group's exposure and to inform further consideration across the business where appropriate.

SCOPING MODERN SLAVERY RISKS

The Group has undertaken scoping to identify which parts of its operations and supply chains may involve higher modern slavery risk, having regard to the Guidance and external risk sources. This scoping is revisited periodically to remain relevant to the Group's operating context and risk profile.

Sources may include publicly available modern slavery risk information, including the Walk Free Global Slavery Index and Australian Government publications.

Entity risk may arise where businesses have poor governance structures, a poor track record of treating workers fairly, or a history of human rights violations.

The scoping exercise included the following key activities:

1. Mapping of the overall operations and supply chain. This mapping was used to identify the general sectors and industries, types of products and services, and (where relevant) upstream origin countries that may be involved in extended supply chains for goods supplied through Australian distributors.
2. Completing a review of sectors, products and services, upstream origin countries and supplier types that may involve higher modern slavery risks. The level of risk associated with modern slavery does not correlate with the cost of products and services procured.
3. Assessing potential indirect supply chains which the business may have limited visibility of and/or control over, and considering the nature and severity of any potential modern slavery risks.

UNDERSTANDING MODERN SLAVERY RISK

- **Sector and industry risks:** Some sectors and industries may carry modern slavery risks because of their characteristics, products and processes. For example, extractives, textiles and fashion, electronics and cleaning are recognised as higher-risk industries globally.
- **Product and services risks:** Some products and services may carry modern slavery risks because of the way they are produced, provided or used. For example, cotton is recognised as a higher-risk product globally, while services such as cleaning often involve lower wages and manual labour and may be more prone to modern slavery practices.
- **Geographic risks:** Some countries may carry modern slavery risks due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors like poverty.
- **Entity risks:** Some entities may carry modern slavery risks because they have poor governance structures, a poor track record of treating workers fairly, or a history of human rights violations
- *Source: Modern Slavery Act 2018 Guidance for Reporting Entities*

MODERN SLAVERY RISKS CONTINUED

Considering these sources of modern slavery risks alongside the Group's hospitality, retail liquor and accommodation operations, we have identified the following potential risk areas within our operations and supply chains:

- **Deceptive recruiting for labour or services:** When a person is deceived about their work and the work involves exploitation through a type of modern slavery.
- **Forced labour:** When a person does not consider themselves free to stop working or to leave their place of work because of coercion, threat or deception.
- **Worst forms of child labour:** When children are engaged in work likely to harm them, including working in hazardous environments.

Although the Group's operations and direct suppliers are Australia-based, modern slavery risks may arise in extended upstream supply chains for certain goods and services, as well as in some contractor-heavy service categories. The areas of highest likelihood identified for the Group are outlined in the following table:

LOCATION	RISK DRIVER	CATEGORY (EXAMPLES)
Australia (operations and direct suppliers)	Vulnerable workers, subcontracting, low-paid work, labour hire, unclear employment arrangements	Cleaning and security services; labour hire; maintenance and repairs; food preparation and kitchen support services
Australia (extended supply chains via Australian distributors)	Lower visibility of upstream manufacturing and raw materials; complex subcontracting	Uniforms and textiles; venue equipment and consumables; certain packaged goods and promotional merchandise
Australia (projects and capital works)	Use of contractors and subcontractors; short-term workforces; wage compliance risks	Fit-out and refurbishment contractors; building maintenance; specialist trades engaged by venues
Australia (corporate and marketing services)	Outsourced services; offshore delivery by vendors; data and content supply chains	Marketing and data services; IT managed services; call centre or support services (where applicable)

In addition to the Group's risk assessment process, we consider relevant media reporting, regulator guidance and industry insights to stay informed of emerging human rights risks. Going forward, heightened risks may arise from economic pressures, labour shortages, increased use of subcontracting and extended supply chains for certain goods and services.

The Group is committed to protecting human rights in its operations and supply chains. During FY25, the Group continued to apply a practical, proportionate approach to identifying, assessing and addressing modern slavery risks, as described below.

GOVERNANCE AND POLICIES

Modern slavery risk oversight is provided by the Directors, supported by members of the executive team with operational responsibility. Modern slavery is considered within the Group's broader risk management approach, including periodic review of key operational and supplier risks.

Risk and compliance matters, including modern slavery considerations where relevant, are considered through regular management reporting and review. This includes consideration of higher-risk procurement categories and any issues escalated through internal reporting channels.

The Group maintains a practical risk management approach, supported by internal risk registers and periodic review by senior management. Modern slavery risks are considered within this broader process, with relevant matters escalated to the Directors where appropriate.

The Group maintains core workplace and operational policies and reviews them periodically to ensure they remain fit for purpose. Relevant risks identified through internal reviews and normal business processes are considered by senior management and, where appropriate, escalated to the Directors.

The senior management team supports the application of systems, processes and controls used to manage operational and supplier-related risks. Team members are expected to raise potential issues or concerns (including labour exploitation risks) to management as soon as they become aware of them.

The Group's expectations for day-to-day behaviour and decision-making are communicated through the policies, procedures and processes described below and reinforced through management oversight.

The documents and processes most relevant to reducing modern slavery risks within the Group are detailed below:

STATEMENT /POLICY/PROCEDURE	PURPOSE
Code of Conduct	Outlines how the Group expects team members to act, including acting lawfully, ethically and with respect. Supports a culture where concerns can be raised and addressed.
Occupational Health & Safety (OH&S) Policy	Articulates the Group's commitment to providing a safe, healthy and secure work environment for team members, contractors, visitors, and those affected by our operations.
Anti-Discrimination and Harassment Policy	Sets expectations for respectful behaviour and makes clear that discrimination, harassment and victimisation are not tolerated. Provides a basis for raising and managing workplace concerns.
Workplace Bullying Policy	Articulates the Group's expectation that all team members treat each other with dignity, courtesy and respect. The Group is committed to preventing workplace bullying, as far as is reasonably practical, as part of providing a safe and healthy work environment.

Incident and Complaint Reporting Process

Provides channels for team members (and relevant third parties) to raise concerns or incidents, including workplace conduct, safety issues, or suspected unlawful behaviour. Reports can be escalated to management and handled in line with applicable workplace policies and procedures.

Supplier Contracting Standards

Describes the use of standard contractual terms and practical onboarding checks (proportionate to risk) when engaging suppliers and service providers, including expectations around lawful and ethical conduct and cooperation with information requests.

Modern Slavery Supplier Expectations (Baseline)

The Group communicates baseline expectations to suppliers and service providers through standard contract terms and engagement. Over time, we intend to further document and formalise modern slavery expectations in a dedicated supplier guidance document.

The Group is committed to acting lawfully and responsibly in its business activities. We aim to maintain a culture of integrity and respect, supported by the policies and processes described in this Statement.

MANAGING RISKS THROUGH SUPPLIER AGREEMENTS AND DUE DILIGENCE

The Group's contracting and supplier engagement processes form part of its broader approach to identifying and addressing modern slavery risks. The Group generally uses standard supplier agreements and applies baseline supplier due diligence proportionate to its size and risk profile, including maintaining visibility over key suppliers and seeking relevant information where appropriate.

Where the risk profile of an engagement is higher, the Group may seek additional supplier assurance through practical steps such as supplier questionnaires, review of publicly available statements, or requests for information about labour practices, subcontracting and relevant controls. These steps are typically prioritised for higher-risk service categories and supply chains involving imported products.

Supplier agreements are intended to support lawful and responsible conduct. Where concerns are identified, the Group may engage with the supplier to understand the issue and consider appropriate follow-up. If concerns are not appropriately addressed, the Group may consider available contractual, commercial or operational responses, including reducing or ceasing engagement where proportionate.

ENGAGEMENT AND RELATIONSHIPS

The Group monitors relevant Australian Government guidance, regulator publications and credible industry and media reporting to stay informed of emerging modern slavery risks. Where appropriate, these insights are considered in the Group's risk assessment and supplier engagement activities.

TRAINING AND DEVELOPING CAPABILITY

The Group recognises the importance of building capability to identify and respond to potential modern slavery and labour exploitation risks. Teams involved in procurement, venue operations and contractor management are encouraged to be aware of common indicators and to escalate concerns through established reporting channels.

During FY25, the Group supported awareness and guidance for relevant teams through management briefings, induction content and practical discussions. This covered reporting requirements, indicators of exploitation and escalation pathways. The Group will continue to build capability over time, including through refresher guidance for higher-risk roles.

GRIEVANCE MECHANISMS

The Group maintains internal reporting and escalation processes that support team members in raising workplace concerns, including concerns about workplace conduct or potential exploitation. Reports can be raised through line management, venue management, HR, or via existing workplace policies (including Anti-Discrimination and Harassment and Workplace Bullying). Where concerns relate to suppliers or contractors, matters may be escalated through procurement or operational management channels for review and follow-up.

REMEDATION

Where concerns are identified in relation to a supplier or service provider, the Group may engage with the supplier to understand the issue, consider appropriate corrective actions and timeframes, and determine what follow-up is warranted having regard to the nature and severity of the concern. Where concerns are not appropriately addressed, or where the nature of the issue warrants it, the Group may consider available contractual, commercial or operational responses, including reducing or ceasing engagement where proportionate.

CURRENT HUMAN RIGHTS AND MODERN SLAVERY RISK DRIVERS

Modern slavery risks can be influenced by changing economic and social conditions. Cost-of-living pressures, labour shortages, increased reliance on subcontracting and labour hire, and shifting migration and workforce patterns can heighten vulnerability for some workers. These factors can increase the risk of underpayment, coercion, excessive hours or poor working conditions in certain industries, including hospitality-adjacent services.

The Group monitors emerging human rights risks through internal risk reviews, supplier and contractor engagement, and relevant regulatory, industry and media reporting. Where changes in risk are identified, the Group updates its due diligence approach, reinforces expectations with suppliers and service providers, and escalates issues through established governance channels.

During FY25, the Group considered labour practices and subcontracting arrangements as part of supplier and contractor engagement in higher-risk categories. It also reviewed internal guidance for teams involved in procurement and contractor oversight, and refreshed risk assessment assumptions for its operating context.

Assessing effectiveness remains an evolving area and there is no single measure that suits all organisations. In FY25, the Group considered a range of practical indicators to help monitor whether its approach remained appropriate to its risk profile and operating context. These indicators included:

During FY25, the Group assessed the effectiveness of its approach by reviewing whether modern slavery risk considerations were included in supplier engagement for higher-risk categories, whether relevant issues were escalated through existing reporting channels, and whether senior management had visibility of key risk areas. No confirmed modern slavery incidents were identified during FY25. The Group recognises that absence of reported incidents does not, of itself, confirm absence of risk, and will continue to improve supplier assurance and escalation processes in FY26.

GOVERNANCE

1. Oversight of modern slavery risk by the Directors, supported by members of the executive team with operational responsibility
2. Periodic review of the Group's risk profile and higher-risk procurement categories through management reporting
3. Periodic review and update of supplier agreements to ensure they remain fit for purpose and support the identification and management of modern slavery risks

SUPPLIER ENGAGEMENT AND ASSURANCE

- In higher-risk categories, the Group may seek additional information or assurance from suppliers to support its understanding of labour practices, subcontracting and relevant controls. Independent third-party review may be considered over time where proportionate and feasible.
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AWARENESS AND ESCALATION PATHWAYS

- The Group relies on existing workplace reporting channels (including venue management and employee processes) to identify and escalate concerns, and expects staff to raise issues through those channels. No confirmed modern slavery incidents were identified through the Group's existing reporting channels during FY25; however, the Group recognises that these risks can be difficult to detect and continues to support awareness and escalation pathways over time.

CONSULTATION WITHIN THE GROUP

In preparing this joint Statement, Star Consolidated Holdings Pty Ltd consulted with relevant team members across the subsidiaries and controlled entities covered by this Statement, including teams responsible for procurement, venue operations, and risk and compliance. Consultation was risk-informed and included entities with active business operations during the reporting period.

LOOKING FORWARD

The Group recognises that continuous improvement is central to responding effectively to modern slavery risks. It will continue to strengthen governance, supplier engagement and awareness activities in a way that is proportionate to its risk profile and operating context.

Priorities will continue to be informed by the Group's risk profile, operating context and the practical value of further improvements. Awareness-building and practical guidance on modern slavery risks will remain an ongoing focus in the next reporting period.

Priorities for FY26 will focus on practical improvements proportionate to the Group's risk profile, including:

- refreshing and maintaining the supplier register and identifying key higher-risk supplier categories for periodic review
- developing a short, plain-English supplier expectations guide to support the modern slavery clauses already in the Group's standard supplier agreements
- continuing informal training and guidance for supplier-facing and operational teams, including refresher discussion of risk indicators and escalation pathways
- reviewing how grievance and escalation channels are communicated so that concerns can be raised and addressed promptly, including where issues relate to contractors or suppliers