# EVT

## Contents

Introduction	2
Actions taken	3
Strategy, structure and operations	4
Modern slavery risks in our operations	6
Case study	7
Modern slavery risks in our supply chain	8
Our governance framework	10
Risk management and due diligence	11
Reporting and measuring effectiveness	12
Looking forward	13
Consultation and approval	14

EVT

## Introduction

This Modern Slavery Statement is made on behalf of EVT Limited ("**EVT**" or the "**Group**") and the reporting entities listed below:

- The Greater Union Organisation Pty Limited;
- Birch, Carroll & Coyle Limited;
- Rydges Hotels Limited; and
- QT Hotels and Resorts Limited.

This is EVT's fourth Modern Slavery Statement, which outlines the steps we have taken during the reporting year ended 30 June 2023 to continue to understand and address the modern slavery risks in our operations and supply chain.

In this fourth Modern Slavery Statement, we continued working and improving our processes to ensure that we help eliminate modern slavery where possible.

Modern slavery can have a significant impact within any community, and EVT opposes slavery in all its forms, which is why we endeavour to use reputable suppliers.

EVT's human rights strategy is underpinned by our purpose: to make the day better for ourselves, our customers, our team and our community. We are constantly considering new and better ways to achieve this purpose.

We recognise that the decisions we make within EVT and how we choose to provide our experiences to customers can impact the livelihoods of people and communities in which we operate. We appreciate that we have a responsibility and opportunity to help eliminate modern slavery through our own actions and by working with our reputable suppliers.

Responsible procurement is vital and we understand the importance of ensuring that environmental, social and ethical considerations are taken into account when making procurement decisions and, as such, we endeavour to interact with suppliers that also share that common understanding.

## Actions taken

For our fourth report, we:

- Continued to apply our Supplier Code of Conduct and our Procurement Policy.
- Began onboarding certain contracted Tier 1 suppliers to the Sedex platform and reviewed Self-Assessment Questionnaires (SAQs) completed by suppliers to identify potential modern slavery risks in our supply chain.
- Reviewed opportunities for further enhancements to our modern slavery risk management framework.

# EVT

## Strategy, structure and operations

The Group's business is comprised of:

- Entertainment including cinema operations in Australia, New Zealand and Germany, restaurants, bars and wellness offerings such as spas and golf courses.
- Ventures including the management and development of the Group's property portfolio, valued at around \$2.3 billion, hotel management solutions, joint venture partnerships, and business customers for media and entertainment technology.
- Travel including the Group's hotel operations, from luxury to budget accommodation, and Thredbo Alpine Resort for year-round recreation and adventure activities.

The Group's values of empowerment, possibilities and community enable it to drive positive employee engagement and fulfil its purpose, which is to be leaders in creating experiences that escape the ordinary. Measuring and improving customer sentiment, having a positive social impact in the communities in which the Group operates, and creating a better tomorrow through environmental sustainability initiatives are at the core of how the Group operates and creates value for its stakeholders.



The Group's strategy is visually represented below:

EVT is a public company listed on the Australian Securities Exchange with over 100 subsidiaries based in Australia, New Zealand and Germany. Further details for the entities in the EVT Group are disclosed in the 2023 Annual Report.

More information regarding EVT is available at <u>www.evt.com</u>.



### Modern slavery risks in our operations

EVT's employee numbers vary significantly throughout the year due to the seasonality of some divisions within the EVT Group.

As of 30 June 2023, we had a total of approximately **9,000 employees** across Australia (approximately 6,000), New Zealand (approximately 1,000) and Germany (approximately 2,000).

We work closely with our joint venture partners through regular meetings and communications to ensure that compliance with employment law and regulations is appropriately managed.

In Australia, EVT's employees can be engaged in any of the following employment types: full-time, part-time or casual work. Our employees are engaged under common law contracts, Modern Awards or Enterprise Agreements depending on what division within EVT they work. The majority of our younger workers (e.g. under 18 years of age) work in our Cinema businesses but their roles are limited to customer service and other low-risk activities. The Secure Jobs, Better Pay legislation has resulted in a reassessment of industrial instruments to ensure compliance by the required deadline in December 2023.

In New Zealand, the Group has both part-time and full-time employees and engage employees under either Collective Agreements or Individual Agreements. Our operations in Germany engages both temporary and permanent employees under applicable German employment laws.

EVT regularly reviews the composition of its workforce, including the controls implemented to manage compliance with employment laws and regulations. We consider that the risk of modern slavery in our operations is low. Specific assessments of EVT's supply chains are considered on the following pages.

## Case study - Sedex

The Group is implementing the Sedex platform to assist with the management of modern slavery risks in its supply chain.

Sedex is the world's largest data platform for supply chain assessment (see <u>www.sedex.com</u>).

The Group applies the requirement to register with Sedex to its material, Tier 1 suppliers when contracts are agreed or renewed. Where applicable, suppliers register with Sedex and complete the Self-Assessment Questionnaire (SAQ) process, which provides the Group with visibility of potential modern slavery risks in the supply chain.

Once SAQs are completed, Sedex provides various tools to assist in identifying and managing potential modern slavery risks in the supply chain. These include:

- Supplier audit status, including issues identified and resolutions.
- Risks identified are categorised as high, medium and low.

The Sedex platforms offer analytical tools to assist with modern slavery risk management. These tools include the Risk Assessment Matrix shown below:

#### Sedex **Risk Assessment Matrix** Sites: 127 Countries/Regions: 31 Companies: 32 FILTERS Х Audited in last 2 y View My Sup Count (All) Supplier (All) • (All) \* - (AID 35-11 \* Inherent risk vs site characteristics risk 4.0 teristic risk so 10.0

The Group is continuing to onboard material contracted Tier 1 suppliers to the Sedex platform, and identify and manage the modern slavery risks identified through this process.



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## Modern slavery risks in our supply chain

EVT works with approximately 5,250 suppliers across its operating divisions in Australia and New Zealand.

Key supplier categories include the following:

- 1. Food & Beverage
- 2. Information Technology
- 3. Property & Facilities
- 4. Consumable
- 5. Print Media
- 6. Film Hire, Utilities
- 7. Professional Services
- 8. Sales & Marketing
- 9. Travel

EVT's supply chain is diverse, complex, and geographically widespread. It encompasses a broad spectrum of very large global companies (for example, major Hollywood film studios), large local companies (for example, our cinema landlords, design and build firms), and local family businesses (for example, food and beverage suppliers; property services suppliers).

Our Group Procurement Team currently focused primarily on purchasing goods and services within categories 1-5. Whilst our operating divisions directly manage purchasing decisions in the corporate spend categories, which include categories 6-9, contracts will transition to be overseen by the Procurement Team.

Coupa, EVT's new Business Spend Management System, has been rolled out to our operating divisions and has provided enhanced visibility to our Tier 1 supplier spend, allowing for the consolidation of suppliers and their related entities. EVT plans to continue leveraging Coupa to assist in centralising our procurement activities. As a Buyer Member of Sedex, EVT has also begun to embed supplier Sedex membership and self-reporting requirements into our Group procurement process. Moving forward, we plan to leverage Sedex to evaluate the modern slavery risks and control measures of our contracted Tier 1 suppliers.

For this reporting year, EVT evaluated our spend across approximately 5,250 primary Tier 1 Suppliers. These suppliers' range in size from large public and private businesses based in Australia and abroad to small local family-run businesses. Of these suppliers, 12 reside in countries that rank as moderate on the Walk Free Global Slavery Index (GSI). Only two suppliers, both IT service providers, are based in a country (United Arab Emirates) considered a high risk on the GSI.

# EVT

GSI Risk	Country	Supplier Count	Percentage of Spend
	Australia	4,106	87.9%
	New Zealand	1,015	9.0%
Low	United States	55	0.8%
	United Kingdom	29	O.1%
	European Union <sup>1</sup>	24	1.3%
	Other <sup>2</sup>	16	0.5%
	China <sup>3</sup>	5	<0.1%
	Republic of Korea	2	0.1%
Moderate	Hong Kong	2	O.1%
	Israel	2	<0.1%
	Estonia	1	<0.1%
High	United Arab Emirates	2	O.1%

## Modern slavery risks in our supply chain (continued)

<sup>1</sup> Includes: Netherlands, Ireland, Germany, Austria, Sweden, France, Spain, Belgium.

<sup>2</sup> Includes: Switzerland, Norway, Singapore, Japan, Canada.

<sup>3</sup> Includes: China, Macau.

While EVT and our suppliers operate primarily in lower risk countries, we have identified the following areas as carrying a higher potential risk of modern slavery. Enhanced due diligence is applied when dealing with suppliers in these categories:

Industry Risks	Product & Services Risks	
Cleaning	Cleaning services*	Grains
Hospitality	Produce	Flatware & glassware
Food & agriculture	Coffee	Electronics
Construction	Construction materials	Merchandise
Information &	Fish	Textiles
Communications	Carpets & flooring	Packaging
Technology	Linen	Consumables
Electronics	Furniture	Stationary
Textiles	Garments	Amenities
Manufacturing	IT/programming services	Window coverings
Forestry	Maintenance*	Edible oils
Shipping & transport		

Note: Products and services marked with an asterisk (\*) may be outsourced.



## Our governance framework

EVT's <u>2023 Corporate Governance Statement</u> sets out the key corporate governance principles adopted by the EVT Board in governing the Group.

EVT has a robust corporate governance framework in place, with the Board overseeing the Group's risk management framework, including with respect to modern slavery risks, through the Audit and Risk Committee.



The Board has established a formal risk management framework for monitoring and managing material risks, including any material risks associated with modern slavery in the Group's operations and supply chains.

The Group applies a 'three lines of defence' methodology to risk management, including in respect of modern slavery risks, where it identifies higher levels of risk associated with a relevant supplier. This methodology is illustrated as follows:

1 <sup>st</sup> Line	2nd Line	3 <sup>rd</sup> Line	
Management controls and internal control measures	Internal risk management specialist support	Independent assurance activities	
For example, supplier due diligence conducted by the Group Procurement Team	For example, supplier surveys conducted by the Group Procurement Team	For example, independent external audits of identified higher risk suppliers	



## Risk management and due diligence

Our governance framework for managing modern slavery risks includes the following Group policies, which are approved by the Board:

Code of Ethics & Business Conduct	Provides standards of behaviour and corporate conduct which are expected to be applied within EVT and its operations.
Whistleblower Protection Policy	Provides a mechanism for all current and former employees, associates, and suppliers to anonymously report unethical or illegal concerns, including in relation to modern slavery.
Procurement Policy	Outlines EVT's approved principles and processes for the procurement of goods and services from suppliers. Ensures the Group obtains value for money from suppliers, while also upholding ethical procurement standards.
Supplier Code of Conduct	Outlines the minimum ethical business standards that EVT expects our suppliers and their employees and contractors to uphold in relation to compliance with laws, bribery and corruption, labour & human rights, modern slavery, health and safety, diversity and equality, and environmental sustainability.
Human Rights Policy	Communicates EVT's commitment to human rights issues and addressing the human rights impact of our business.

Our standard contractual terms include a requirement to comply with these policies, and we have further strengthened our modern slavery governance by embedding supplier Sedex membership and Self-Assessment Questionnaire (SAQ) requirements into our contracts and supply agreements.

Moving forward our Group Procurement Team is focuses on connecting with our material contracted Tier 1 suppliers via the Sedex platform which will enable us to provide better visibility to the modern slavery risk.



## **Reporting and measuring effectiveness**

EVT's <u>Whistleblower Protection Policy</u> provides a mechanism for the escalation of any concerns or grievances, including in relation to modern slavery. The policy is available on EVT's website and reports may be made by employees, associates, and suppliers.

Reports received under the Group's Whistleblower Protection Policy are reported to the Board, including the results of any investigation and actions taken in response to the investigation.

During the year ended 30 June 2023, no whistleblowing reports were received which alleged or related to instances of modern slavery. Any future claims will be managed in accordance with our established governance framework to ensure suitable action is taken to address and that the proper authorities are notified.



## Looking forward

Continuous improvement is a critical part of EVT's risk management framework. With that in mind, the Group has a modern slavery risk management roadmap to enhance its risk management activities in this area.

Activities planned for future years include:

- continuing to work with key stakeholders across our industries to develop a coordinated response to modern slavery risk;
- continuing to onboard material contracted Tier 1 suppliers to Sedex to identify modern slavery risk and consider appropriate actions in response;
- continuing to build strong, long-term relationships with key suppliers;
- an enhanced independent assurance program, including Internal Audit and external assurance with respect to key suppliers with an identified modern slavery risk factor; and
- development of a modern slavery effectiveness reporting framework and key performance indicators (KPIs), against which the performance of the Group can be measured and reported.



## Consultation and approval

This Statement is made pursuant to section 14 of the Australian Modern Slavery Act 2018 (Cth). It covers the reporting year ended 30 June 2023 and is a joint statement on behalf of EVT Limited and our named reporting entities.

In preparing this modern slavery statement, consultation was undertaken with representatives from EVT's Group Finance, Head of Operational Divisions, Legal, Procurement, and Risk functions who have oversight of the reporting entities and their controlled entities.

The statement was circulated to the Directors of each reporting entity prior to being reviewed and approved by the Board of EVT Limited on 6 December 2023.

Jane Hastings, CEO EVT Limited