

Mulawa Holdings Pty Ltd

Modern Slavery Statement

FY2022-2023

This is the fourth Modern Slavery Statement published pursuant to the *Modern Slavery Act 2018 (Cth) (Act)* by Mulawa Holdings Pty Ltd and its subsidiaries, known collectively as Federal Group, being an entity based and operating in Australia and having an annual consolidated revenue of more than A\$500 million.

Federal Group remains fully supportive of the Act and this fourth statement reinforces its continued commitment to implementing and enforcing policies, systems and controls that endeavour to identify and stop modern slavery practices occurring in its supply chains.

Federal Group's structure, operations and supply chains

Mulawa Holdings Pty Ltd is the ultimate holding company in the Federal Group and is an Australian-owned private company which manages and operates casinos, hotels, gaming networks, tourist services and a national sensitive freight company.

Federal Group is Tasmania's largest private sector employer with employees located right across the entire state of Tasmania. Including COPE Sensitive Freight, a national sensitive freight company, Federal Group employs approximately 2,400 people, located in every State and Territory of Australia.

The hotel operations continue the proud history of Federal Group as the oldest continually operating hotel group in Australia with its origins able to be traced back to Melbourne in the 1880s.

Federal Group's operations include:

- **Wrest Point** – Australia's first casino that offers accommodation, dining and entertainment services;
- **Country Club Tasmania** – Australia's first resort-style casino development that offers accommodation, dining and entertainment services, including an 18 hole, par 72 golf course;
- **Saffire Freycinet** – An international award-winning luxury coastal resort that offers accommodation, a day spa and dining services;
- **MACq 01 Hotel** – An award-winning storytelling hotel that offers accommodation, dining and activities services;
- **The Henry Jones Art Hotel** – Australia's first dedicated art hotel that offers accommodation, dining and art tour services;
- **Vantage Group** – Operates and manages Federal Group's 12 community-based hotels and 21 retail liquor stores across Tasmania providing bar, gaming, bistro, entertainment and retail goods;
- **Taskeno** – Manages the distribution of Keno in hotels and clubs throughout Tasmania;
- **Odyssey Gaming** – A leading technology developer of programs and services which allows venues and Licensed Monitoring Operators to effectively manage and understand player activity; and
- **COPE Sensitive Freight** – Australia's largest independent specialist sensitive transport company that provides fragile equipment handling and distributing and warehousing services for clients across Australia.

To enable its operations, Federal Group procures goods and services from a wide variety of Australian based suppliers. This includes products provided directly to Federal Group such as food, beverages, gaming equipment, vehicles and cleaning products, services provided such as laundry, consultants and subcontractors and products and services used by indirect suppliers in Federal Group's supply chains such as fuel, components of gaming and IT equipment, furniture and fabrics. Entities within the Federal Group may also lease out parts of owned premises to a variety of commercial tenants and may purchase and dispose of land and property from time to time. Federal Group rarely purchases goods and services directly from non-Australian based suppliers.

Risks of modern slavery practices in the operations and supply chains

During this reporting period, Federal Group continued to monitor and review the likely risks of modern slavery practices across our operations and supply chain.

Federal Group Values include our most important principle, leaving it better than how you found it which applies to all our dealings with all those we encounter. We strive to champion and better our suppliers, customers, staff, venues and partnerships. As part of this we are committed to using our influence to prevent and mitigate all forms of modern slavery within our operations and supply chain. Not only is it the right thing to do, it supports our values, and our ambition to leave a positive imprint on the communities we're part of, the people we connect with, and the world we all share.

Federal Group businesses have been influenced or affected by many factors over the last financial year, including the emerging risk factors of:

- rising cost of living across the world has increased costs for our suppliers and their workers. Sustainable price modelling then becomes even more important; and
- labour shortages which can perpetuate poor human rights practices in industries or regions where sourcing labour is difficult.

There also remains continuing delays from the impact of COVID in the re-establishment of some supply chains.

However, the risks of modern slavery practices in Federal Group's operations and supply chains is still assessed as being low.

Operations

All of Federal Group's operations are located within Australia. Although there is a risk of causing or contributing to modern slavery, this risk is decreased by all of Federal Group's employees and virtually all of its direct suppliers being based in Australia.

Supply chain

The main types of good and services that contribute to Federal Group products and services include:

- food, beverage and retail;
- utilities, rates and rent;
- consumables such as cleaning supplies;
- insurance and banking services;
- laundering, cleaning and maintenance services;
- professional services;
- repairs and maintenance services and supplies;
- vehicle fleet;
- ICT related hardware, software and services;
- marketing services;
- travel services

Federal Group recognises that the risk of modern slavery exists in its supply chain due to the sectors and industries, the types of products and services procured, the location of some of the suppliers or their suppliers/manufacturers and that some other entities may have poor governance structures in relation to modern slavery.

Federal Group continues to work with its suppliers to build meaningful relationships, to promote the use of Tasmanian produce and purchasing from local partners and suppliers for its Tasmanian based businesses, as it has done for many years, and actively demonstrates its support for its communities through purchasing policies that prioritise local businesses and suppliers.

Actions taken to assess and address these risks

Federal Group's Modern Slavery Policy requires Federal Group businesses to acknowledge they are accountable for addressing modern slavery risks and to map their supply chains to assess any identified risks and the principles of the Policy must be incorporated into all Federal Group business's policies, guidelines and procedures. Since this date, the Policy has been referenced as required to customers and suppliers to comply with procurement requirements.

In the procurement space, mapping and risk assessment of supply chains have not progressed and the development of a Federal Group Supplier Code of Conduct remains outstanding actions that will become priority initiatives next financial year.

However, Federal Group template agreements for goods, services and consultancy arrangements were reviewed and updated to include a Modern Slavery clause which requires our Suppliers to acknowledge and commit to supporting ethical practices and warrant that a supplier has not engaged in Modern Slavery practices and that it does and will continue to comply with all relevant laws in relation to Modern Slavery. Our Request for Proposal (RFP) template documents has also had a Modern Slavery clause added which also requires applicants to include in their RFP policies and additional information on their assessment and management of modern slavery risks in their supply chains.

In addition, our COPE Sensitive Freight business includes a similar clause in its standard terms and conditions, customer and linehaul contracts, emphasising their commitment to ethical practices and laying out its expectations that all contractors and suppliers comply with all modern slavery laws.

Also, an initiative has been identified whereby a Federal Group statement on modern slavery and an acknowledgement from contractors entering our premises will be developed to be included in our new contractor management platform.

Along with promoting Federal Group values in the Code of Conduct, the Federal Group Whistleblower Policy was reviewed in December 2022 and the suite of supporting documents was expanded to include a step-by-step Guide for Disclosers. The revised Policy and Guides were rolled out again to staff along with a reminder of the updated contact details of Disclosure Officers who are available across the business to assist those wanting to use the scheme.

Assessing the effectiveness of these actions

Federal Group continues to see an increase in clauses relating to modern slavery and the requirement for a policy in our third party agreements which illustrates the importance of modern slavery to our suppliers and customers.

Tangible outcomes of our modern slavery policy was illustrated this year with the awarding of the contract for the uniforms for one of our businesses to an Australian contractor, not just for the price, excellence and suitability of their product but because they are made in Australia with the supply chain being more visible and open to us as the end consumer.

There have been no known instances of reporting of issues of risk of modern slavery from either through HR/management reporting channels or via our whistleblowing mechanism. The next step remains to be reviewing the risk mapping of the supply chain to develop the best measurement of effectiveness of Federal Group's management of modern slavery risks such as KPI's for suppliers, employee engagement and issues raised through our grievance and complaint and whistleblowing processes.

Process of consultation

This statement has been produced on behalf of all of Federal Group. It has been produced by the Federal Group Governance team who perform a Group-wide function in consultation with the relevant people in each of its businesses.

This Modern Slavery Statement is approved by the Board of Directors for Mulawa Holdings Pty Ltd on 13 December 2023.

Greg Farrell

Greg Farrell (Dec 20, 2023 15:14 GMT+11)

Gregory Farrell
Managing Director
Mulawa Holdings Pty Ltd

REPORTING ENTITIES

The following entities are considered reporting entities under the *Modern Slavery Act 2018* (Cth) and are covered by this statement:

Mulawa Holdings Pty Ltd (ACN 000 259 834)
Janala Pty Ltd (ACN 003 672 839)
Federal Holdings Tasmania Pty Ltd (ACN 097 627 677)
Australian National Hotels Pty Ltd (ACN 009 477 552)
Tasmania Country Club Casino Pty Ltd (ACN 009 516 189)
Tasmanian Country Club Properties Pty Ltd (ACN 647 888 873)
Federal East Coast Holdings Pty Ltd (ACN 099 918 715)
Vantage Hotel Group Pty Ltd (ACN 087 546 245)
Halsata Pty Ltd (ACN 120 619 123)
Odyssey Gaming Services Pty Ltd (ACN 061 363 139)
Mulawa Arabian Stud (ACN 001 738 076)
Mulawa Management Pty Ltd (ACN 009 598 896)
FHR Support Services Pty Ltd (ACN 100 541 606)
Mulawa Superannuation Pty Ltd (ACN 070 099 375)
Mulawa Properties Pty Ltd (ACN 075 034 150)
Mosavar Pty Ltd (ACN 110 473 571)
Palborn Pty Ltd (ACN 133 698 049)
Tal Holdings Pty Ltd (ACN 002 594 121)
The Federal Hotels Pty Ltd (ACN 004 108 249)
Odyssey Gaming Pty Ltd (ACN 074 735 452)
Bounty Pty Ltd (ACN 096 276 292)
Bounty Systems Pty Ltd (ACN 090 692 489)

