



		Issued by: Company Secretary	Approved by: Board
POLICY TOPIC Ethical Sourcing and Modern Slavery Policy	Issued on: 26 August 2020	Effective: 26 August 2020	Supersedes: N/A

INTRODUCTION

Ardent Leisure Group Limited, its wholly owned subsidiaries, businesses and divisions (collectively referred to as **Ardent**), are committed to the highest standards of ethical and responsible conduct and the protection of human rights. Ardent has zero tolerance for all forms of modern slavery and human trafficking.

Ardent expects that its suppliers share and demonstrate the same commitment and as such, it is our suppliers' responsibility to achieve and maintain these standards and to enforce them within their supply chain involved in supplying goods and services to Ardent.

PURPOSE

The *Modern Slavery Act 2018* (Cth) took effect on 1 January 2019 and requires Ardent to make an annual public Modern Slavery Statement on the actions of our organisation to address modern slavery risks in our operations and supply chains.

The purpose of this policy is to ensure that Ardent:

- is compliant with local, national and other applicable laws and regulations in the areas in which we operate;
- source products and services in accordance with legal obligations and community expectations;
- act to prevent, mitigate and where appropriate, remedy modern slavery in our operations and supply chains.

What is modern slavery?

Modern slavery includes eight types of serious exploitation including trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour (situations where children are subjected to slavery or similar practices, or engaged in hazardous work).

POLICY STATEMENT

1. Each division of Ardent must adopt policies and procedures to ensure that it is addressing modern slavery and ethical sourcing risks in its operations and supply chains in a way that is appropriate for the division.
2. Each division of Ardent must, as far as practicable, include in its operational and supplier contract terms and conditions, requirements that suppliers comply with all local, national and other applicable laws and regulations in the areas in which they operate.

3. Each division must, as far as practicable, ensure that its partners, suppliers and contractors comply with the following minimum standards:

Child Labour	<p>Suppliers will not use or condone the use of child labour. Child labour, as defined by the International Labour Organisation Convention 13, is work that deprives children of their childhood, interferes with the child’s education or work that is harmful to the physical, social and mental development of the child. ‘Child’ is defined as a person under the age of 15, or below the age at which school attendance is not compulsory under local law, whichever is older. ‘Young Person’ is defined as a person under the age of 18 but not classified as a child. Children and Young Persons must not be employed at night and in hazardous conditions.</p> <p>Suppliers must be able to verify the age of all employees to ensure no child labour is used. Suppliers must accept the principles of remediation of child and under-age workers, and where such labour is discovered suppliers must establish and implement appropriate remediation for such workers and introduce effective systems to prevent the use of child labour in the future.</p>
Forced or bonded labour	<p>Employment shall be freely chosen. Suppliers shall not use or condone any type of forced labour, forced marriage, bonded labour or indentured labour. Employees should not be required to lodge ‘deposits’ or their identity papers with their employer and are free to leave their employment after reasonable notice.</p>
Compensation, wages and benefits	<p>Suppliers will, at a minimum, comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime, maximum hours, and legally mandated benefits. Deductions from wages for disciplinary measures is not permitted. Deductions from wages not provided for by law shall not occur without the express permission of the employee concerned.</p>
Working hours	<p>Suppliers shall ensure that working hours comply with local and national laws. Employees should not be required to work more than the maximum hours per week as stipulated by local laws or in the absence of such law by the applicable International Labour Organisation Convention. Overtime shall be agreed, shall not be excessive, and shall not be used to replace regular employment. Overtime shall be compensated as prescribed by the applicable laws.</p>
Diversity and inclusion	<p>Suppliers must comply with all applicable discrimination laws. All conditions of employment must be based on an individual’s ability to do the job, not on the basis of personal characteristics such as gender, ethnic origin, religion, age, disability, personal beliefs, marital status, sexual orientation, union membership or political affiliation. Suppliers must treat each individual employee with dignity and respect and provide a workplace free from harassment, discrimination or any other inappropriate workplace behaviours.</p>
Health and Safety	<p>Suppliers will provide employees with a safe and hygienic workplace in compliance with all applicable laws and regulations and without risk to health taking into consideration knowledge of the relevant industry and any specific hazards.</p> <p>Employees shall receive adequate and regular health and safety training to perform their jobs in a safe manner. Employees shall have reasonable access to drinkable water and sanitary facilities, reasonable access to appropriate and adequate fire safety measures and facilities, and reasonable access to appropriate and adequate lighting and ventilation facilities. Employees must have easy and safe access to emergency exits and stairways which are clearly marked, unlocked and free of obstructions. Suppliers will also ensure that the same standards of health and</p>

	safety are applied in any accommodation that they provide to employees. Employees should also have the right to refuse work that is unsafe.
Environmental compliance	Suppliers will comply with all local and national environmental laws and regulations, and as far as practicable, comply with international environmental protection standards. Suppliers will conduct their businesses in ways that protect and preserve the environment.
Migrant workers	Migrant workers shall have the same entitlement as local workers as stipulated by local law. Any commissions and other fees in connection with employment of migrant workers must be covered by the employer. The employer must not require the worker to surrender identification documents. Workers employed through a third-party agent or contracts are the responsibilities of the suppliers, and are thus covered by these minimum standards.

COMPLIANCE

Suppliers are responsible for ensuring compliance with this Policy and shall maintain adequate records of all aspects of the ethical standards set out in this Policy.

Each division must undertake due diligence on new suppliers to determine their risk level and control procedures in relation to ethical sourcing and modern slavery.

Each division must implement appropriate audit and compliance verification processes commensurate for their operations, including but not limited to, compliance self-assessment questionnaires, surveys or compliance audits conducted by Ardent or third party auditors.

Suppliers may be required to demonstrate their compliance with requirements of this Policy at the reasonable and in good faith request of Ardent.

If a supplier is unable to demonstrate a commitment to comply with this Policy, Ardent may cease its relationship with the supplier.

RESPONSIBILITY OF EMPLOYEES

The detection and reporting of modern slavery is the responsibility of all employees.

Employees must report any knowledge or suspicion that any person or organisation in our business or supply chains may be subject to, or involved in, any form of modern slavery. If you are unsure about whether a particular act, the treatment of workers, or their working conditions within our supply chain constitutes any form of modern slavery or human rights abuse, you must raise it with your manager or People & Culture representative or Human Resources department.

Employees may also report any concerns in accordance with Ardent's Whistleblower Policy. Reports can be made via the whistleblower hotline:

Australia: Phone: 1800 945 264
Website: <https://ardentleisure.ethicspoint.com>

United States: Phone: 844 483 5563
Website: <https://mainevent.ethicspoint.com>

PUBLICATION

A copy of this Policy is available on Ardent's website.

REVIEW

The Board is responsible for reviewing and approving the Ethical Sourcing and Modern Slavery Policy periodically to ensure it remains effective and relevant to Ardent's business.