



# Panthers Group 2023 Modern Slavery Statement



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This statement sets out the Panthers Group response to Modern Slavery as defined in the Commonwealth of Australia Modern Slavery Act 2018 in our business and supply chain for the year ending 31-Oct-2023. It summarises the steps taken by the Panthers Group to identify, mitigate and manage the risk of modern slavery in its operations and supply chains.

## Mandatory Criteria 1 & 2 – Covered entities, structure, operations and supply chains

Panthers Group is one of Australia's largest entertainment groups. Our main goals are the promotion of Penrith Panthers NRL team, providing entertainment, dining, function facilities and fun to our members. We have over 120,000 members across the group. Employing 584 staff across NSW, Panthers Group is made up of the following:

### Panthers Venues

- Panthers Penrith
- Panthers Port Macquarie
- Panthers Bathurst
- Panthers North Richmond
- Panthers Glenbrook
- Pullman Sydney Penrith
- Western Sydney Conference Centre
- Warami Community Centre

### Panthers Rugby League

- Penrith Panthers NRL team
- Panthers Rugby League Academy
- Panthers Stadium

As a not-for-profit organisation, giving back is the heart of what it means to be a Panther we work on local projects and with local services to assist people within our community.

The Panthers Group consists of the following organisations;

- Penrith Rugby League Club Ltd (ABN 57 000 578 398),
- Penrith District Rugby League Football Club Ltd (ABN 28 003 908 503),
- Mulgoa Land Trust (No. 1),
- Mulgoa Land Trust (No. 1) Pty Ltd (ABN 55 245 739 756),
- Panthers Catering Pty Ltd (ABN 55 125 979 393),

There has been no trading in Mulgoa Land Trust (No. 1) or Panthers Catering in the last 12 months to 31-October-2023.

## **Our Business & Supply Chain**

Panthers Group supplies food and beverage, gaming, hospitality, sporting facilities, and other entertainment facilities, and supports the Penrith Rugby League Team. Panthers Suppliers include large national corporations, a couple of international suppliers, and largest number of our suppliers are Australian based small businesses (as defined under PTRS) accounting for approximately 22% of all spend. Our focus has always been on local supply, supporting local business, charities, and organisations.

Panthers Group in its response to the introduction of the Modern Slavery Act has undertaken an extensive review of its policies, engagements with our staff, & our supply chain; to educate, inform and ensure a continual improvement process with our compliance obligations. This process has started in 2020 and will continue as we refine and improve our business response to this worldwide problem. Panthers Group started a project team (we consulted with the relevant companies we own or control in the development of this statement, including a representation from various divisions) to understand our position and to respond to the Modern Slavery Act.



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## **Policies**

Panthers Group in 2020 introduced a specific Modern Slavery Policy, which was been approved by the Board of Directors. This forms the corner stone of our changes but not the complete structure. Several policies have been amended to reflect the introduction of the Modern Slavery Policy including policies regarding procurement through to whistle blower policies.

- Modern Slavery Policy
- Panthers Procurement Policy
- Panthers Group Standard Terms & Conditions of Purchase
- Contract Management Policy
- Expense Claims Policy
- Delegated Authority Policy
- Fixed Asset Policy
- Whistle Blower Policy

Compliance is built into our purchasing systems by dealing with approved suppliers through our purchasing systems. As Panthers renews contracts with our suppliers we have been introducing specific Modern Slavery clauses into all our contracts, and our tender processes, to ensure our suppliers are assisting us to remove the risks of modern slavery in our supply chain. Panthers Group actively reviews its purchasing practices to review compliance with nominated approved suppliers enforcing purchasing policies.

Panthers policies also ensure all of our expenses are reviewed and authorised by people that have been subject to the mandatory Modern Slavery Training. Breaching of Panthers policies for employees can lead to disciplinary action and even termination. For our suppliers this can also result in action against them including ceasing supply from that organisation.

## **Staff Training**

Panthers Group has created an online education package covering; the basis for the Modern Slavery, a detailed review of our amended policies, risk areas, and consequences. The training has been made mandatory for all Board members, executives, senior managers, and everyone that has access to our procurement and finance systems. This will ensure maximum effect on our large and diverse organisation. 100% of all personnel with access to our purchasing systems have been trained (1 months given to new starters to complete training. Those who do not complete within specified time have their access removed). 2023 will also see the role out of a Modern Slavery refresher course to all personnel – this training will be on a 2-year rotation for staff.

The individuals leading the Modern Slavery Project also undergo ongoing training to ensure they are kept up to date, these include Boarder Force updates, and can ensure Panthers Policies are kept relevant.

## **Supply Chain**

An analysis of our group expenses by supplier has been conducted for the year ending 31-Oct-2023. From there our total suppliers were separated in 3 Phases. Phase One Review looked at all large value direct suppliers with a focus on suppliers of physical products (which constituted 85% of our total purchases). Phase Two Review looked at all medium value direct suppliers. Phase 3 (implemented 2022) saw the inclusion of all suppliers Through our purchasing Channel. With the recent clarification on Credit Card Transactions we will improve reporting via phase four to include all minor credit card purchases and other employee expenses not covered by purchasing systems, this will be implemented by 31-Oct-24. All Phase One, Two & Three suppliers were requested to complete a survey, which included questions on policies, reviews conducted within their organisations & supply chains, and to provide copies of their Modern Slavery Statements. Our reviews have included on-site visits, face to face meetings and other investigations. Once this was completed a further review by the project team was conducted to further analyse the risk within these organisations.



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Our Reviews have found;

- A small number of Suppliers have ceased trading with Panthers Group, so no further action has been taken.
- A small number of suppliers have been flagged as having a slight potential risk due the industries they belong to. However these suppliers have policies & procedures in place to mitigate some of the risk.
- No suppliers have been deemed high risk in the review.

As we continue to review the smaller suppliers we will need to spend increased time educating and assisting with processes for those small suppliers.

## Mandatory Criteria 3 - Risks

Given the large volume of small local suppliers, and the focus on the large businesses by the Modern Slavery Act, we see our overall risk as low. We understand that we need to fully investigate every aspect of our operations & supply chain.

## Mandatory Criteria 4 – Actions

Panthers established a project team including key senior management personal, that have responsibility across all of the Panthers Legal entities. This Project Team manages group wide procurement and finances, placing the Modern Slavery responsibilities within these key personal ensure compliance is a consideration in all key decisions. These individuals are accountable to the Board, and work with individuals who make procurement decisions.

Panthers will continue to investigate and review deeper into its supply chain, and continue to monitor those customers that are seen as medium risk or above with the intention to move the organisation to a position to minimise all risks of Modern Slavery associated with the Panthers Group. Principal actions that the Panthers Group will continue to engage and respond in include:

- Training and awareness
- Procurement processes
- Supplier mapping
- Response to Modern Slavery risks



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## COVID-19

COVID-19 has continued to effect Panthers Group suppliers, operations and sourcing. World-wide COVID-19 has increased pressure on suppliers to produce large quantities of goods in short timeframes, increasing the underlying drivers of all forms of modern slavery. Panthers continues to review and work with our suppliers on a regular basis to ensure susceptible supply chains risks remain low.

## Mandatory Criteria 5 – Effectiveness

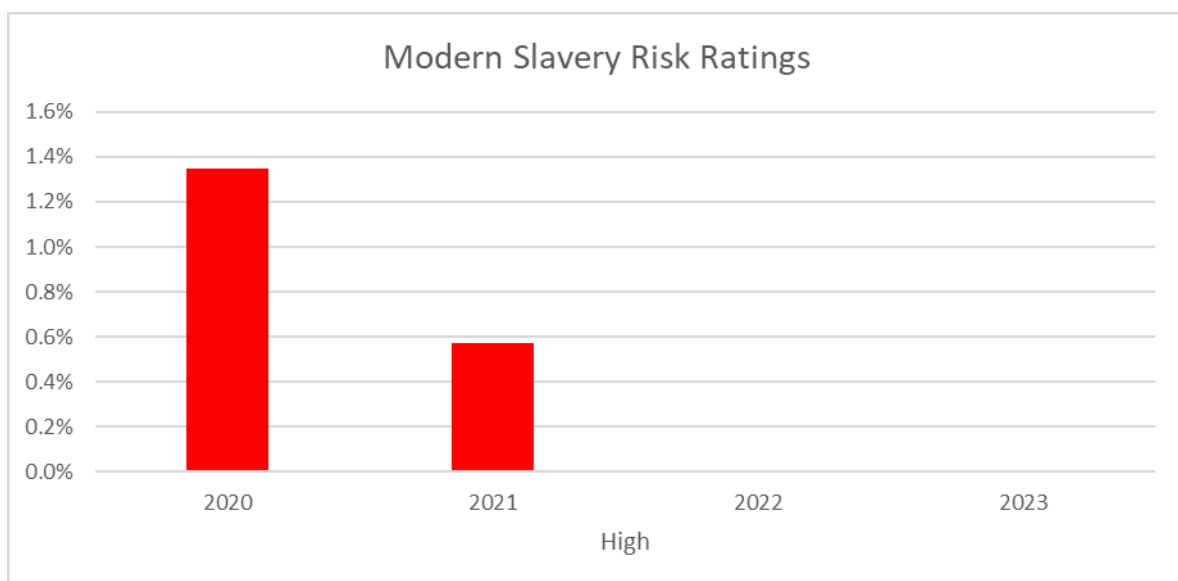
The Panthers Group recognises that judging the effectiveness of its actions to address Modern Slavery risks in its operations and supply chains is crucial. The Panthers Group has introduced specific reporting to assist in the collection of crucial data and information from their suppliers. Information required from suppliers include, but is not limited to:

- Do they have policies in place to deal with Modern Slavery?
- Do their contracts require adherence their Modern Slavery policies?
- Do they have team/s in place to oversee Modern Slavery risks?
- Level of visibility over their supply chains
- Audits
- Utilisation of recruitment/overseas employment agencies
- Staff training
- Raising awareness of potential Modern Slavery risks

To date, there has been a large completion of supplier surveys. Suppliers deemed 'High Risk' in previous years have been supported with face-to-face meetings to assist them in identifying their risks and creation of Modern Slavery policies and procedures, this has led to changes in each of our Risk categories from the prior year.

## High Risk Assessments

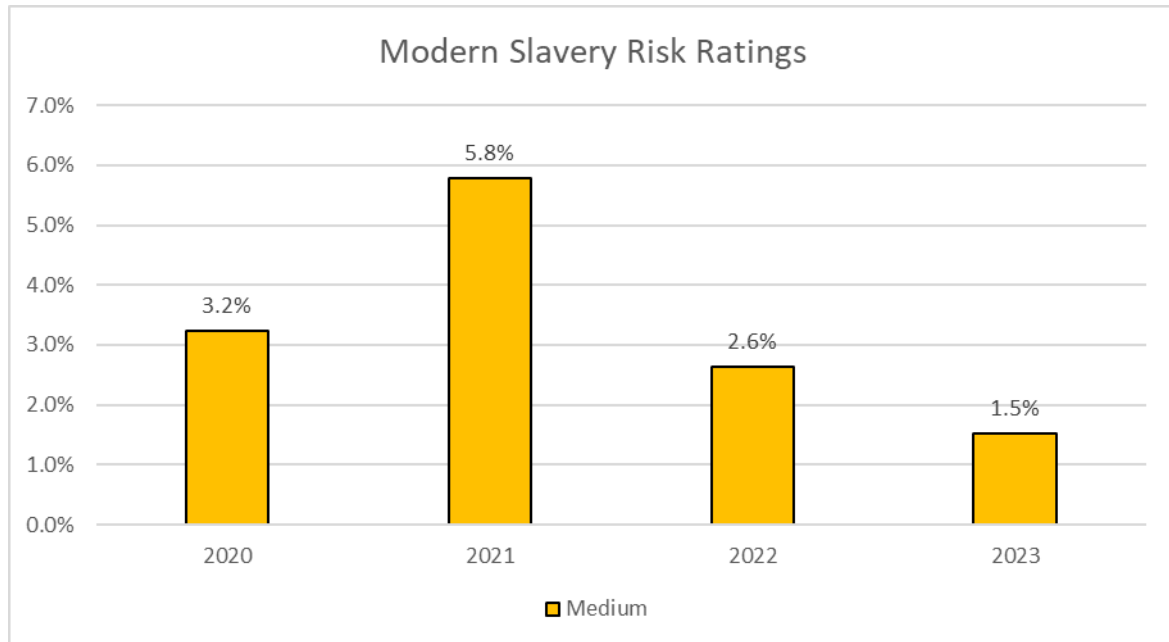
Panthers has removed the number of high-risk suppliers over the last 12 months, by discontinuing business, or working with the supplier to further understand their risk rating and reducing this rating to Medium risk.



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## Medium Risk Assessments

Panthers will continue to monitor supplier responses, and review Board Force Risk areas when making assessment on suppliers. And will endeavour to continue to reduce the medium risk suppliers via ongoing discussions.



## Low Risk Assessments

Delving further into our supply chain has added most suppliers to the low risk category.

## Mandatory Criteria 6 – Consultation

During the reporting period, the Panthers Group utilised the resources and knowledge of external organisations as to the way they meet the mandatory criteria of the *Modern Slavery Act 2018*. These organisations allowed discussions with Australian Border Force and other subject matter experts to develop our understanding. As further training is developed by specialist organisations the Panthers team will continue to utilise these resources.



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## Mandatory Criteria 7 – Related Activities

As the Panthers Group work to address Modern Slavery risks in their supply chains they have undertaken other related activities to address such risks:

- Work with key partners within our supplier network to strengthen the framework to battle Modern Slavery.
- Taking part in seminars/webinars and external training to gain knowledge in how other large companies are working to combat Modern Slavery and the policies they put in place.
- Supporting suppliers to meet their reporting obligations, along with our own through targeted direction and support.

## Conclusion

The Panthers Group are continuing their journey to being fully compliant with the Modern Slavery Act and integrating the requirements of the legislation into the organisation's operations and supply chain. Reviews have supported a position of low risk by the group due to our purchasing policies and focus on local suppliers.

This statement was approved by the Panthers Group Board.

Signed,

Brian Fletcher

**Panther Group C.E.O.**

27 March 2024