



Panthers Group 2024 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-2024. 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 149,000 members across the group. Employing 786 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.

During the reporting period this statement covers, we actively engaged and consulted with all companies we own or control in the development of this statement as shown below. We discussed details of the Modern Slavery Act 2018's reporting requirements; information regarding the actions we intend to take address these requirements and provided them the relevant materials and updates. 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-2024.

Our Business & Supply Chain

Panthers Group supplies food and beverage, gaming, hospitality, sporting facilities, and other entertainment facilities, and supports the Penrith Panthers Rugby League Team. Panthers Suppliers include large national corporations, a couple of international suppliers, and large number of our suppliers are Australian based small businesses (as defined under PTRS) accounting for approximately 40% 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



Panthers Group 2024 Modern Slavery Statement

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.

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. All New suppliers are also required to complete a New Supplier Application, which covers a Modern Slavery Assessment, and includes our updated Terms and Conditions. If the assessment indicates a High Risk of modern slavery, this will trigger a discussion with the supplier, and a more detailed understanding of the reason for the risk. The Board has taken a stance that no high-risk supplier will be allowed to supply to Panthers Group.

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 month given to new starters to complete training, those who do not complete within specified time have their access removed). 2024 saw Panthers update the mandatory training modules with up to date information from the International Labour Organisation (ILO.org), including Risk Products, Medium & High-Risk Countries. We also mandated Modern Slavery refresher courses to all personnel using the procurement systems – this training will be on a 2-year refresher 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 This training ensures Panthers Policies are kept relevant.

Panthers Group 2024 Modern Slavery Statement

Supply Chain

An analysis of our group expenses by supplier has been conducted for the financial year ending 31-Oct-2024. Since the implementation, our total suppliers were separated into Three 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 Three (implemented 2022) saw the inclusion of all suppliers through our purchasing channel. 2024 saw the recent clarification on Credit Card Transactions and the inclusion of direct debit transactions. Panthers Group has included these into the scope, and will continue to improve reporting via Phase Four of our analysis. Previously 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.

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 personnel to ensure compliance is a consideration in all key decisions. These individuals are accountable to the Board, and work with individuals who make procurement decisions. Ongoing responsibility is managed by the C.F.O. and the Financial Controller, who manage the day to day processes.

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

Changes in 2024

Following Australian Government Statutory Review of the *Modern Slavery Act* in 2023. Panthers Group completed a review of our processes. This review also included discussions with one of Panthers Group major suppliers. This resulted in a changed direction on managing risk, to a supplier-based risk model, rather than an annual survey of suppliers. We have seen that the majority of our large suppliers are registered and report via the Modern Slavery Act, so there is more reliance on their compliance to the Act. This change has also included a more rigorous supplier on-boarding process, where we evaluate the supplier prior to engaging with them, either through the tender process, or supplier qualification.

This review effectively gives the supplier a risk rating. At this point, if we evaluate the risk as High we then look for an alternate supplier. To reduce the risk of using a supplier who has not been screened we removed 2,240 suppliers who had no activity in the year, therefore requiring them to engage through the new on-boarding and evaluation process. Purchases outside of the regular supply chain, while generally of a significantly smaller



Panthers Group 2024 Modern Slavery Statement

value, will be managed outside of the on-boarding process. Policies are being updated to reduce the risk in this area. Panthers has changed its policies to not allow direct purchases via credit card, or employee expenses for any products or services procured directly from High or Medium risk countries.

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.

Our Reviews have found;

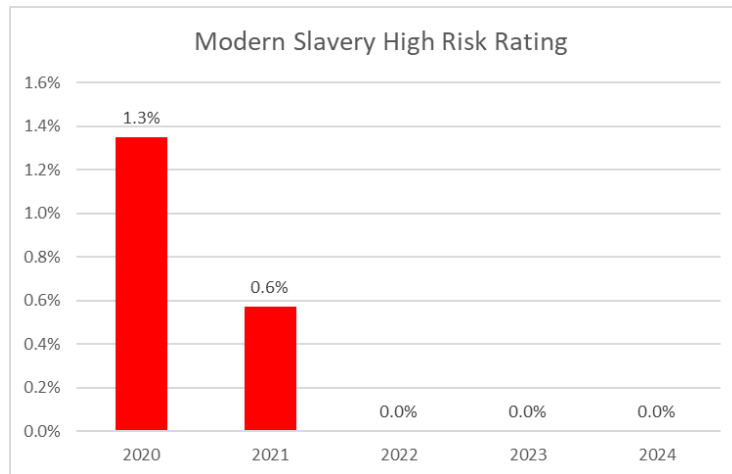
- Small Business generally does not understand the requirements imposed by the government, so they are resistant to provide the assessment information.
- Our decision to not trade with any supplier that is high risk has met internal frustration, due to the limitation of supply. Generally, this is overcome with education on the needs for this.
- 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, many of these suppliers have policies & procedures in place to mitigate risk.
- As part of the Risk Assessment Panthers is focused on inherent risk, and what the supplier is doing to mitigate this.
- Many of our small business suppliers include individuals, who have no inherent risks. These suppliers generally supply the service themselves, which we have noted is a risk level below low, and are reporting this as negligible.
- 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, as there is a lack of guidance from the authorities to these organisations.

High Risk Assessments

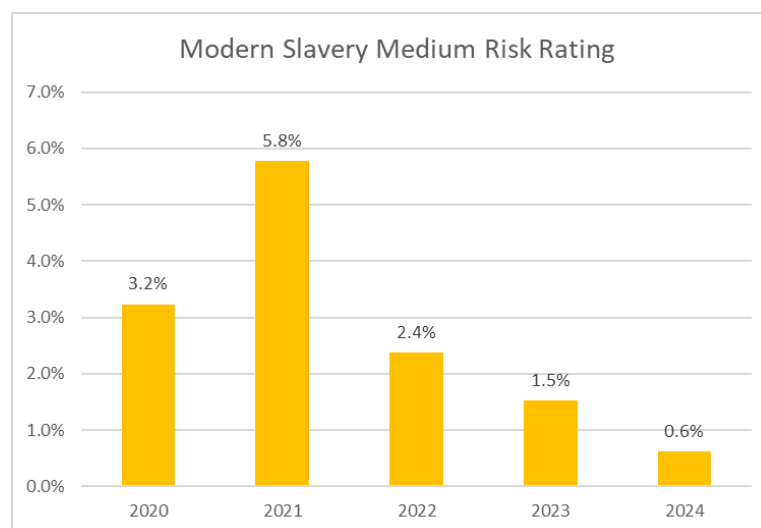
Panthers has worked with a number of high-risk suppliers over the years, this has included; working with the supplier to further understand their risk rating and reducing this rating to Medium risk, or discontinuing business with those suppliers. At this point we do not recognise any suppliers that pose a High Risk.

Panthers Group 2024 Modern Slavery Statement



Medium/Minor Risk Assessments

Panthers will continue to monitor suppliers for changes and follow Border Force & International Labour Organisation (ILO) guidance on risk products and countries when making assessment on suppliers. We will endeavour to continue to reduce the Medium risk suppliers via ongoing discussions. Panthers classifies the risk associated with the product supplied and/or product comes from a Medium or High-Risk Country, and there is some risk mitigation conducted by the supplier, however this may not fully negate the inherent risk of the supply.



Low & Negligible - Risk Assessments

Dealing with large corporations subject to Australian and overseas Modern Slavery legislation, and a large portion of sole suppliers and small business leaves the majority of supply chain in the low to negligible risk category.

Panthers Group 2024 Modern Slavery Statement



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, overseas regulations, 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.

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 to negligible 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 2025