

MODERN SLAVERY POLICY

1 PURPOSE

This modern slavery policy (**Policy**) is designed to assist G'day Group in complying with the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**).

The Policy reflects our commitment to respecting human rights and addressing Modern Slavery risks in our supply chains, ensuring that our operations are free from exploitation and slavery.

2 APPLICATION

This Policy applies to all individuals working for or on behalf of G'day Group or one of its subsidiaries. This includes the Board, employees, agency workers, interns, contractors, third party representatives, Suppliers, distributors and all other business partners.

3 DEFINITIONS

'G'day Group' or 'we' or 'our'	means Discovery Parks Holdings Pty Limited, and its related bodies corporate.
'Modern Slavery'	Describes situations of coercion, threats or deception used to exploit victims and undermine or deprive them of their freedom.
'Modern Slavery Statement'	Describes the actions taken by G'day Group to identify, assess and address Modern Slavery risks.
'Supplier'	All persons who do business with any related entity or business unit of G'day Group.
'Supply Chain'	Includes the product and services (including labour) that contribute to G'day Group. This extends to services sourced in Australia or overseas, and beyond direct Suppliers.

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4 POLICY STATEMENT

Slavery is a crime and a violation of fundamental human rights. G'day Group has a zero-tolerance approach. Modern Slavery takes various forms, such as those outlined in the *Modern Slavery Act*: slavery, servitude, forced and compulsory labour, forced marriage, debt bondage, human trafficking, deceptive recruiting for labour or services, and child labour.

G'day Group is committed to acting ethically and with integrity in all business dealings and relationships, and to implementing and enforcing systems and controls to address the risk of Modern Slavery practices within business operations or in any Supply Chains.

We are also committed to ensuring there is transparency in the business and in our approach to tackling Modern Slavery consistent with disclosure obligations under the *Modern Slavery Act*. We expect the same high standards from all contractors, Suppliers and other business partners.

5 OUR OPERATIONS

5.1 Governance and Compliance

The Board oversees and approves the Modern Slavery Statement annually. G'day Group has also implemented a cross functional working group to review and implement this Policy and related processes.

The Compliance Manager or authorised delegate will be responsible for the reasonable management and implementation of this Policy, monitoring its use and effectiveness and dealing with any queries about it.

The Compliance Manager is responsible for delegating the responsibilities associated with:

- monitoring, consulting and auditing internal controls and procedures to identify risks of Modern Slavery practices in operations;
- developing appropriate training materials and programs for employees to comply with this Policy; and
- submitting the annual Modern Slavery Statement in accordance with disclosure obligations under the *Modern Slavery Act*.

5.2 Code of Conduct

All employees are expected to adhere to the Code of Conduct which sets out our values and expected behaviour standards, including complying with all legislation and acting with integrity and honesty.

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Failure to act in accordance with the Code of Conduct may lead to disciplinary action up to and including termination of employment.

5.3 Communication and Awareness

We are committed to providing communication and regular training to all employees and contractors on this Policy. This includes training on how to identify Modern Slavery practices and specific Supply Chains which are subject to a greater risk of Modern Slavery practices. The training forms part of the induction process for all individuals who work for G'day Group.

5.4 Continuous Improvement

We are committed to evolving our approach and taking necessary steps to mitigate and address risks of Modern Slavery and labour-related harm within our operations.

In accordance with its reporting obligations under the *Modern Slavery Act*, G'day Group will publish a Modern Slavery Statement by 31 December annually, that describes the actions taken during the financial year to identify, mitigate and remediate the risks of Modern Slavery.

6 SUPPLY CHAIN

6.1 Supplier Code of Conduct

We expect Suppliers to mirror our Modern Slavery commitments and ensure the principles outlined in this Policy are adopted throughout their Supply Chain. As part of this expectation, G'day Group maintains a Supplier Code of Conduct ensuring all Suppliers, vendors and business partners adhere to the same ethical standards.

6.2 Risk Identification and Management

To monitor and act upon Modern Slavery risks, the General Manager, Procurement and Executives (where applicable) will have responsibility for:

- monitoring and consulting with Suppliers, contractors and business partners to identify risks of Modern Slavery practices in Supply Chains; and
- developing measures to assess and address any risks of Modern Slavery practices, including through due diligence in contractual relations.

6.3 Contractual Provisions

G'day Group make reasonable attempts to ensure that Modern Slavery clauses are included in agreements where appropriate.

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7 ROLES AND RESPONSIBILITIES

Board of Directors ('Board')	Responsible for approving this Policy and the annual Modern Slavery Statement.
Compliance Manager (Chief Financial Officer)	Responsible for ensuring this Policy complies with legal and ethical obligations, and that individuals within control, reasonably comply.
General Manager – Procurement	Responsible for consulting, addressing and monitoring risks of Modern Slavery practices with Suppliers in relation to procuring commercial dealings.
Executive and Management	Responsible for ensuring that direct reports understand and comply with this Policy and complete the required training on Modern Slavery, including any areas of our Supply Chains which are identified as at risk of Modern Slavery practices.
Legal	Responsible for providing advice on relevant legislation and assist the Compliance Manager with processes relating to Modern Slavery.

8 MONITORING AND REVIEW

The Legal team is responsible for reviewing this Policy and updating biennially unless there is a change in business practices or legislation.

9 RELATED AND SUPPORTING DOCUMENTS

Governing Legislation

- [Corporations Act 2001 \(Cth\)](#)
- [Criminal Code Act 1995 \(Cth\)](#)
- [Modern Slavery Act 2018 \(Cth\)](#)

Supporting Documents

- Code of Conduct
- Diversity and Inclusion Policy
- Human Rights Policy
- Supplier Code of Conduct
- Whistleblower Policy