

Modern Slavery Policy

Viva Leisure Limited

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1. Purpose

Viva Leisure Limited ACN 607 079 792 (**Company**) is committed to operating responsibly and in accordance with to the highest ethical standards, including compliance with all applicable laws and other obligations.

On 1 January 2019, the Modern Slavery Act 2018 (Cth) (**the Act**), commenced which requires certain business entities to report on the risks of modern slavery in their operations and supply chains. The Company is required to report under the Act.

The purpose of this Policy is to:

- a. demonstrate the Company's commitment to eliminating modern slavery;
- b. delegate responsibility for management of modern slavery risks across the Company;
- c. prevent, detect and respond with mitigating controls to the risks of modern slavery occurring within the Company; and
- d. demonstrate the Company's commitment to only doing business with those who fully comply with the Act.

2. Policy Application

This Policy applies to:

- a. Viva Leisure Limited (ACN 607 079 792), its subsidiaries and controlled entities (**the Group**);
- b. all employees and officers of the Group;
- c. any contractor, consultant, supplier or other third party related to the Group.

3. Modern Slavery

The Company acknowledges that modern slavery can occur in many forms as detailed in the Act, including:

- a. human trafficking: the recruitment, harbouring, or movement of a person for the purpose of exploitation via slavery. This includes sexual exploitation, forced labour, servitude, or the removal of organs;
- b. slavery: the exercise of powers of ownership over the victim;

- c. servitude: significant restriction of personal freedom over the victim. In a workplace setting, this is commonly reflected by the inability for the individual to stop working or leave the workplace;
- d. forced marriage: the use of threats, coercion, or other deception to make a victim marry, or marriage where the victim does not understand (or is incapable of understanding the nature and effect of a marriage ceremony);
- e. forced labour: restriction on the victim's ability to stop work or leave their place of work;
- f. debt bondage: pledge of a victim's services as security for a debt (and the debt is excessive or the victim's services are not used to liquidate the debt, or the length and nature of services required to liquidate the debt is unclear);
- g. child labour: exploitation of any kind of children through slavery or similar practices, engagement of children in unsafe or hazardous work, or use of children to produce or traffic illicit substances; and
- h. deceptive recruiting: use of deception in relation to whether the person will be exploited through a type of modern slavery.

4. Board Commitment

The Board of the Company is committed to treating all our employees with respect and following the highest ethical labour standards and creating a respectful and safe work environment for our employees globally.

The Company condemns and actively prohibits the use of modern slavery of any kind in business and our supply chain, including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting.

The Board has principal responsibility for modern slavery reporting under the Act and is required to approve a Modern Slavery Statement (**Statement**) annually which is to be compliant with the Act and signed by a director.

5. Role of the Executive and Senior Management

Management is responsible for designing and implementing a modern slavery framework and internal compliance and control systems, which identify and mitigate the key risks facing the Group.

Management must regularly monitor and evaluate the effectiveness of these controls, processes and risk plans. Management is also responsible for monitoring the performance of employees implementing such controls, including through operating or updating procedures created.

The Chief Operating Officer (COO) is responsible for ensuring that an appropriate framework is created, adopted and managed by the Group and reported to, and approved by, the Board as appropriate.

The Company currently has the following policies in place that support awareness of acceptable practices and behaviours, and provide reporting mechanisms to raise concerns of inappropriate behaviour including modern slavery practices:

- Anti-Bribery and Corruption Policy;
- Code of Conduct; and
- Whistleblower Policy.

Along with the Company's new modern slavery framework and internal compliance and reporting mechanisms, these policies reduce the risk of modern slavery within our supply chain and operations.

6. Addressing Modern Slavery risks in our business

The Company has worked proactively to reduce modern slavery within our supply chains and operations, and we expect all organisations we engage with to do the same.

The Company has established a reportable modern slavery management framework. The Group where reasonably appropriate, implements the following structures in their business models:

- a. mapping the organisation's structure, businesses and supply chains;
- b. formulating policies and procedures in relation to modern slavery – this involves collating current policies, identifying gaps, adapting existing policies and formulating new policies, as needed;
- c. conduct risk assessments – identify those parts of the business operations and supply chains where there is increased risk of modern slavery taking place;
- d. assess and manage identified risks – this may include carrying out further due diligence in the entity's operations and supply chains and reviewing and adapting contract terms with suppliers;
- e. consider and establish processes and KPIs to monitor the effectiveness of the steps taken to ensure that modern slavery is not taking place in the business or supply chains;
- f. carry out remedial steps where modern slavery is identified;
- g. develop training for staff on modern slavery risks and impacts;

- h. establish appropriate reporting mechanisms for internal and external reporting on incidents of modern slavery; or
- i. consider and, where appropriate, respond to any reasonable queries, concerns, or information suggesting elevated risks of modern slavery in accordance with this policy.

7. Reporting

In accordance with the Act, within 6 months from the end of the financial year, the Company must submit an annual Statement to the Commonwealth Government through the Minister for Home Affairs. The statement will:

- a. be a joint statement, made on behalf of the Group and will be prepared in consultation across the Group;
- b. comply with the contents requirements of the Act, from time to time, tailored as appropriate; and
- c. be approved by the Board of the Company and signed by a Director.

8. Response to Reports of Modern Slavery

All of the Group's employees, directors, and contractors must report any concerns of a breach of this Policy to the Group's COO as soon as reasonably practicable. The COO will consider whether any such report requires further investigation. In considering any further action required, the COO may consider:

- a. further investigation of the allegation;
- b. escalation of the report;
- c. consultation with the reporting individual and any other relevant persons;
- d. the impact of any actions on the suspected victim/s;
- e. whether additional action is required to verify the effect of any actions;
- f. whether it is necessary to escalate the matter to law enforcement;
- g. the sensitivities of the situation;
- h. that the Group may not be aware of all victims involved, or the extent of any exploitation; and
- i. the impact of ending any relationship with the affected entity.

9. Policy breaches

If a director, officer, employee or contractor is found to have breached this policy, he or she may face disciplinary action, including dismissal in serious cases.

If a contracted company, contractor, sub-licensee or other related party breaches this policy, the Company will take immediate action to assess the breach and take all reasonable steps to prevent further breaches of the policy (and, where relevant, the Act).

10. Review of Policy

This Policy will be reviewed regularly by the Board, having regard to the changing circumstances of the Company. All new management or other relevant staff will be provided with a copy of this Policy as part of their induction into the Company.

Any updates or amendments as approved by the Board will be notified to appropriate officers and staff by the Secretary and corresponding updates and amendments will be made to this Policy and contained on the corporate governance page on the Company's website.