



AFL Responsible Business Policy

2023-2024

Introduction

This Responsible Business Policy (**Policy**) sets out the minimum standards of behaviour expected of any organisation that does business with the Australian Football League or any wholly owned subsidiary of the Australian Football League (**AFL**), including Melbourne Stadiums Limited. The AFL is committed to conducting its business safely, ethically and sustainably, including by procuring goods and services in compliance with our AFL Procurement Policy and AFL Indigenous Procurement Policy. We expect organisations that we do business with to uphold our high standards of business principles including through their relationships, practices, procurement, and operations.

This Policy is intended to supplement any contractual arrangement with the AFL. AFL business partners should review their contractual arrangements with the AFL, including the AFL's policy on safeguarding children, as they may contain obligations in addition to those set out in this Policy. All AFL business partners must also ensure they are aware of and comply with all applicable laws, rules and regulations of the relevant jurisdictions in which they do business. This Policy is not intended to take precedence over or alter any contractual or regulatory obligations.



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KANGAROO BRAND 

Policy Application

This Policy applies to any organisation or individual who contracts with the AFL, and includes, but is not limited to, consultants, licensees, IT providers, event and hospitality providers, corporate partners and other suppliers of goods and services to the AFL (AFL business partners). All such organisations should read and understand their obligations under this Policy. A commitment to this Policy is a condition of doing business with the AFL.

The AFL expects that all AFL business partners will communicate this Policy to their employees, contractors, agencies, related entities and their own suppliers, to the extent they are involved in business arrangements with the AFL, to assist with effectively addressing and mitigating against supply chain risks.

The AFL takes compliance with this Policy seriously and a breach or inability to meet the standards set out in this Policy will impact the AFL's procurement decisions. In some cases, a breach of this Policy may result in the termination of the relevant business arrangement.

Raising Concerns

Any breach of this Policy or other unsafe, unethical or inappropriate behaviour that is known or suspected in the supply of goods or services to the AFL or AFL business arrangements more broadly should be reported to the AFL. The report should be made to the AFL Integrity & Security Department via the AFL's Incident Management System, available at: <https://eafl.austfoot.com.au/afl-makeareport/en/#/home>.

Once an online report is received through the secure Incident Management System, the AFL Integrity & Security Department will:

- contact the reporting person (unless the complaint has been made anonymously);
- conduct an assessment of the disclosed information;
- ensure adequate support services are provided to all relevant persons; and
- assist with reporting to the relevant law enforcement agencies if criminality has been identified.

The AFL commits to investigating all reports carefully and thoroughly, and will comply with confidentiality obligations under the applicable laws and regulations. Where a report falls within the scope of the AFL's Whistleblower Policy and Reporting Procedure, which includes a report made by a supplier of goods or services to the AFL, the report will also be treated in accordance with those documents, available here: <https://www.afl.com.au/policies>.

AFL business partners are also expected to provide a means for their employees, contractors and suppliers to speak up if they observe anything that is unsafe, unethical or potentially harmful.



Integrity and Ethics

BRIBERY, CORRUPTION AND MONEY LAUNDERING

AFL business partners are expected to exhibit high standards of integrity and are strictly prohibited from making or accepting any bribes or influencing to obtain an improper advantage including of government officials. This applies even where it may be considered legal or common practice in another jurisdiction.

AFL business partners must not engage, directly or indirectly, in money laundering, or illegal funds with links to terrorism or criminal activity. The AFL expects AFL business partners to be alert to signs of potential illegal activity, such as offers for cash payment, unusual fund transfers or unusual payment terms.

AFL business partners must use all commercially reasonable endeavours to actively prevent bribery and corruption from occurring in all forms in their business including across their supply chains.

CONFLICTS OF INTEREST

AFL business partners must avoid situations where an actual, perceived or potential conflict of interest with the AFL arises, including but not limited to between personal and business interests or where AFL information and resources are used for improper gains. Robust professional and ethical judgement is expected to be exhibited by AFL business partners in all dealings with third parties.

In the event any actual, perceived or potential conflict of interest arises, the AFL business partner must immediately notify and declare such conflict to the AFL.

PROVISION OF GIFTS, ENTERTAINMENT, OR HOSPITALITY

AFL business partners must not offer or accept gifts, entertainment or hospitality in exchange for an improper advantage, or where a reasonable person would likely perceive has the intent to obtain an improper advantage.

CONFIDENTIAL INFORMATION

AFL business partners must respect the proprietary and intellectual property rights of the AFL, adopt industry best practices on collecting, sharing and securing information and observe all data privacy legal requirements on the collection, use, storage and transfer of personal information and other sensitive data.

The AFL expects AFL business partners to take necessary steps to prevent unauthorised people from accessing confidential information, and to report any suspected or actual information security incidents that impact AFL information or systems to the AFL.

Environment

AFL business partners shall seek to protect and minimise any harm to the environment as a result of their operations, including by way of reducing resource consumption, waste production and improving resource efficiency. Where contractually required by the AFL, AFL business partners shall abide by any AFL reporting framework requirements to accurately track and report environmental impacts from business partner activity in connection with the AFL.

AFL business partners are expected to seek to continuously improve their practices in reducing harm to the environment and to actively adopt environmentally friendly innovations.



Labour and Human Rights

AFL business partners must respect and uphold the human rights and dignity of their people. This includes ensuring there is no use of modern slavery practices, such as forced or compulsory labour, human trafficking, child labour or slavery or servitude, in their operations, and taking appropriate measures to mitigate the risks of such practices occurring in their supply chains. AFL business partners are expected to proactively identify, address and report on risks of modern slavery practices in their business operations and supply chains in accordance with all applicable laws, rules and regulations and this Policy.

The AFL expects AFL business partners to comply with the following labour and human rights requirements:

- a. Health and safety:** A safe and healthy work environment must be provided, which includes taking the necessary precautions to prevent and mitigate against any accidents and injury. All relevant health and safety laws and regulations must be identified and complied with including with respect to providing workers with appropriate protection from exposure to hazardous materials, access to potable water and clean sanitation facilities and the proper maintenance of equipment. The AFL expects AFL business partners to have the appropriate systems, training and equipment to respond to and manage any health and safety incidents, which are updated and responsive to changing needs.
- b. Forced labour:** Any forced, involuntary, indentured labour or labour demanded under threat of penalty must not be used (either directly or indirectly). Identification or immigration documents must not be withheld from workers or dealt with in any way that has not been freely authorised by a worker.
- c. Child labour:** The minimum employment age limit defined by national law or by International Labor Organization Convention 138, whichever is higher, must be complied with.
- d. Wages and working hours:** Workers are not required to work unreasonable hours, hours beyond legal limits, or without appropriate breaks and leave periods. Workers must receive their legal entitlements to minimum wages (including any required premium payments for overtime work), benefits, superannuation, leave entitlements and legally recognised holidays. Payment of wages must be made in a timely manner and in accordance with all applicable laws.
- e. Anti-discrimination:** AFL business partners must hire, compensate, promote, discipline, and provide other conditions of employment based solely on an individual's performance and ability to do the job. AFL business partners must not discriminate based on race, gender identity, sexuality, age, nationality, marital status, pregnancy status, disability, ethnic origin, or any other legally protected status.

Labour and Human Rights

f. Anti-harassment: A workplace free from harassment (either in person, online or through telecommunications), which can take many forms, including sexual, verbal, physical or visual behaviour that creates an offensive, hostile, or intimidating environment, must be provided.

g. Freedom of Association: The rights of workers to legally organise, join (or refrain from joining) and be represented by industrial organisations or associations should not be hindered.

h. Grievances and non-retaliation: A clear channel to communicate, including anonymously, grievances without threat of retaliation, discrimination, or harassment must be provided.

AFL business partners should implement appropriate processes and controls to monitor and remediate identified deficiencies in their operations and supply chains with regard to the above labour and human rights expectations.

AFL business partners must respond to any reasonable requests for information in respect of its modern slavery practices made by the AFL.



