

Modern Slavery Statement 2024

Victoria Amateur Turf Club (incorporating the Melbourne Racing Club)

ABN 96 267 203 634



MRC
Melbourne Racing Club



Introduction

This statement covers all activities of the Victoria Amateur Turf Club (incorporating the Melbourne Racing Club) and its related entities, hereinafter collectively referred to as the 'Melbourne Racing Club' and reflects our commitment to understanding, identifying, and actively implementing measures aimed at minimising the risk of modern slavery within our operations and across our supply chains. It underscores our ongoing efforts to uphold ethical standards and address modern slavery risks through responsible business practices, rigorous oversight, and continuous improvement across all aspects of our organisation.

This is the fifth modern slavery statement prepared by the Melbourne Racing Club in accordance with the Modern Slavery Act 2018 (Cth) (the "Act") and applies to the financial year ending 30 June 2024.

Modern slavery, as defined by the Act, manifests in various insidious forms such as slavery, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruitment for labour or services. At Melbourne Racing Club, we uphold a zero-tolerance policy towards any and all forms of modern slavery in our operations and supply chains. Our commitment goes beyond mere legal compliance, we aim to be proactive in safeguarding human rights.

Our Business

The Melbourne Racing Club, beginning in 1875, is a not-for-profit members' club with over 14,000 racing members. In 2024, Melbourne Racing Club held 79 thoroughbred horse racing meetings across Caulfield, Mornington, and Sportsbet Sandown racecourses.

In addition to horse racing, the Melbourne Racing Club hosts various functions and events at its venues, including lifestyle and leisure shows, music and food festivals, trade shows and motorsport racing. The club is also engaged in property development, including involvement in the Caulfield Village development and masterplan projects at Caulfield.

Managing a broad range of venues, the Melbourne Racing Club controls the Pegasus Leisure Group, which operates a portfolio of hotel and club venues located across greater Melbourne.

Lastly, the MRC Foundation, established in 2014, is the Melbourne Racing Club's philanthropic arm. The MRC Foundation assists a diverse range of groups and organisations, particularly those within the local areas of the Melbourne Racing Club's racecourses, Pegasus Leisure Group Venues, and participants within the racing industry. The MRC Foundation engages the Melbourne Racing Club's customers and the broader Victorian community in raising charitable funds and providing various forms of support to individuals and worthwhile causes in need.

About 1,300 staff, including 350 permanent staff, are employed by the Melbourne Racing Club, peaking at approximately 1,600 staff during spring carnival.

All operations of the Melbourne Racing Club take place in Victoria, Australia.



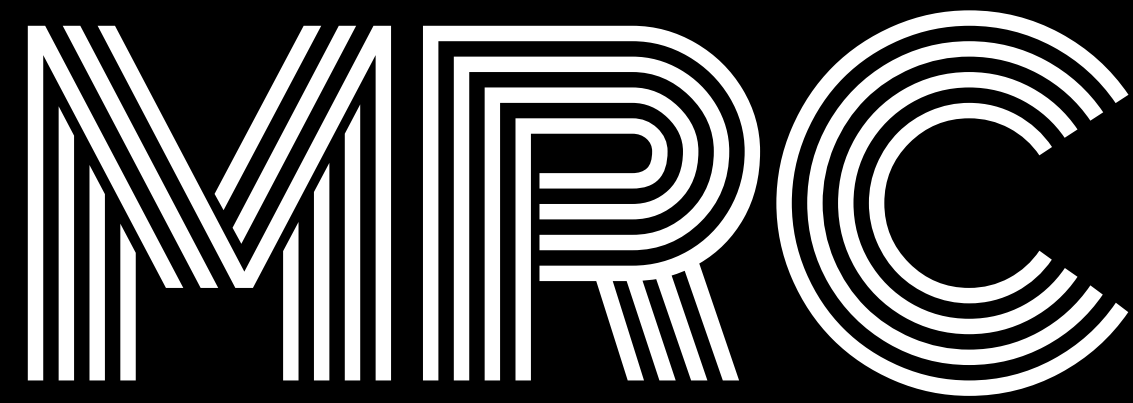


Our Structure, Operations & Supply Chains

During the reporting period, the Victoria Amateur Turf Club (incorporating the Melbourne Racing Club) ("VATC") managed its various business divisions through a group organisational structure, including its primary subsidiaries: Melbourne Racing Club F&B Limited, MRC Investments Pty Ltd, Yadnum Pty Ltd, and MRC Foundation Limited.

The key operations of the Melbourne Racing Club's businesses and its associated major supply chains are set over the following pages.

Structure



Melbourne Racing Club

Entity:

Victoria Amateur Turf Club (incorporating the Melbourne Racing Club)

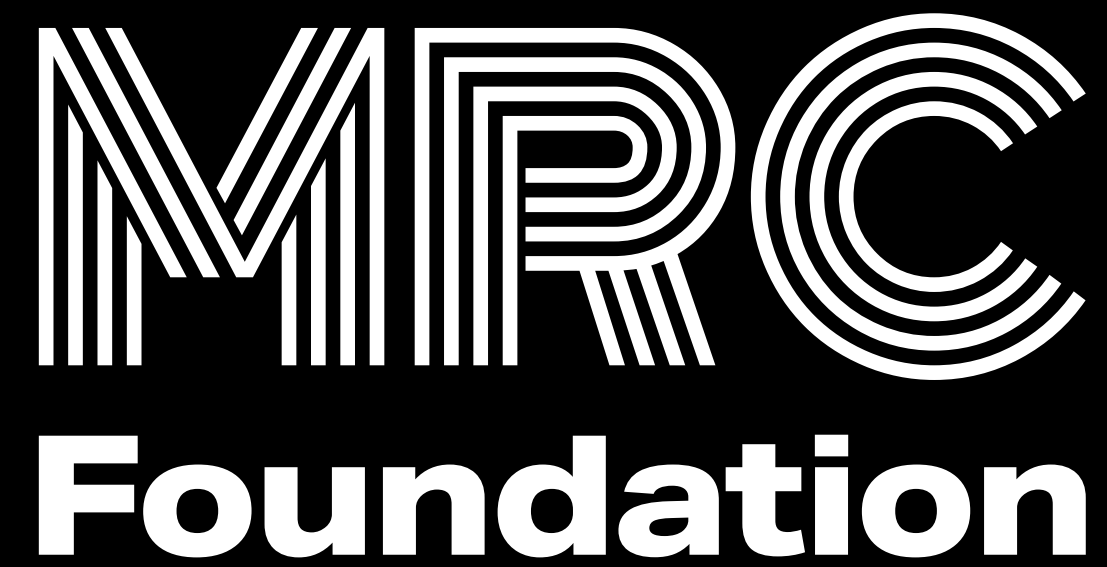
Operations

- Facilitating thoroughbred race meetings across three racecourses, at Caulfield, Sportsbet Sandown, and Mornington (including Spring Racing Carnival events)
- Operating thoroughbred training facilities
- Promoting, carrying on and encouraging the racing of thoroughbred horses in Victoria
- Management and operation of public entertainment events and festivals
- Hiring of its venues to external parties to host functions and events
- Property development, including the Caulfield Village development

Supply Chain

- Food and beverage suppliers (which operate in industries including agriculture, meat processing, viticulture) - 310 suppliers
- Services provided by external suppliers including cleaning, waste removal, security, maintenance, construction, and external advisors – 345 suppliers
- Supply of general operational goods and infrastructure equipment (including hires) - 195 suppliers
- Supply of merchandise - 45 suppliers
- Horticultural suppliers for the maintaining of racetracks, including labour - 35 suppliers
- IT services and office consumables - 65 suppliers

Structure



Entity:

MRC Foundation Limited as trustee for
MRC Foundation and MRC Foundation
Trust

Operations

- Hosting of events to raise funds for allocation and donation to charities

Supply Chain

- Sourcing of goods and services to host events to raise monies
- Suppliers of sponsored programmes

Structure



Entity:

Victoria Amateur Turf Club (incorporating the Melbourne Racing Club)

Melbourne Racing Club F&B Limited

Melbourne Racing Club Investments Pty Ltd

Yadnum Pty Ltd

Operations

- Management of 14 hotel and club venues (as of 30 June 2024)
- Providing gaming services as well as food and beverage offering at each venue

Supply Chain

- Food and beverage suppliers (which operate in industries including agriculture, meat processing, viticulture) - 70 suppliers
- Operational requirements including regular servicing of equipment as well as repairs and maintenance requirements - 60 suppliers
- Supply of general operational goods - 33 suppliers
- Services provided by external companies including gaming, security, waste removal, cleaning, and external advisors - 50 suppliers

Collaborative Approach

As referred to above, VATC is the only entity within the Melbourne Racing Club group required to produce a modern slavery statement pursuant to the Act.

However, the VATC and its subsidiaries share common committee members, boards, and executives across the Melbourne Racing Club. In addition, there are several shared services departments across the Melbourne Racing Club that work for all entities, included but not limited to procurement, legal, risk management, P&C, IT and finance.

Therefore, while the VATC is the primary reporting entity for this statement, all entities under VATC's ownership or control have actively contributed to the assessment and preparation phases of this statement. This collaborative approach ensures a thorough assessment of modern slavery risks across the full scope of the Melbourne Racing Club's entire operations and supply chain, reinforcing our commitment to accountability and respect for human rights.



Potential Risks of Modern Slavery

The Melbourne Racing Club has conducted a thorough assessment of its primary expenditure areas within the supply chain across all operational sectors to identify any areas potentially vulnerable to modern slavery risk.

Melbourne Racing Club has a predominantly Australian-based supply chain made up of approximately 1,400 direct suppliers, with payments being made by Melbourne Racing Club to approximately 1,000 suppliers in FY24. With over 95% of our supply chain Australian-based, Melbourne Racing Club recognises higher-risk sectors and remains committed to proactive risk management and ethical standards.

Melbourne Racing Club has identified that some areas of its supply chain, who are directly

contracted suppliers to Melbourne Racing Club, may be at risk of modern slavery practices due to the nature of the goods and services to be purchased. These include security services, cleaning services, purchase of electrical and technology (hardware, software, and cloud services), and merchandise and clothing. We have identified approximately 40 suppliers within these sectors in FY24.

The Melbourne Racing Club remains firmly committed to continuous improvement, consistently advancing our processes and systems to more effectively identify and mitigate modern slavery risks. Each year, we work to strengthen our capabilities in this vital area, ensuring our approach to modern slavery risks is both proactive and increasingly resilient and effective.

Our Actions in Addressing the Risk of Modern Slavery

Our approach to mitigating the risks associated with modern slavery is multi-faceted and comprehensive, guided by four key pillars:

Governance:

This includes establishing and maintaining strong internal policies and standards that clearly outline our expectations and responsibilities concerning modern slavery risks. These policies provide a firm foundation for ethical practices across all facets of our operations. Additionally, we have carefully drafted contract terms that reinforce these standards, ensuring our suppliers and partners uphold the same values and comply with our anti-slavery commitments. Our dedicated Modern Slavery Working group oversees, implements, and refines anti-slavery efforts.

Empowerment:

We are dedicated to empowering our staff by providing comprehensive training programs and awareness initiatives designed to build their knowledge and skills in recognising and addressing modern slavery risks. Through these educational efforts, we aim to equip every team member with the necessary tools to detect signs of exploitation, understand the broader implications of modern slavery, and confidently take appropriate actions when issues arise.

Collaboration and Remediation:

Our strategy emphasises proactive engagement with our suppliers to ensure comprehensive responsibility across the supply chain. This involves fostering open, transparent dialogues, regular communication and working collaboratively with our partners to promote sustainable and ethical practices. We encourage our suppliers to align with our standards and support them in implementing measures that strengthen their compliance. We emphasise addressing modern slavery risks and other critical ethical issues, recognising that building a socially responsible supply chain requires more than just policies.

Due Diligence:

We perform due diligence on our key suppliers, incorporating supplier scorecards and audits to evaluate compliance and assess risk levels.



Actions Taken in FY24

This section outlines the Melbourne Racing Club's proactive steps in 2024 to assess and mitigate the risk of modern slavery in our supply chain. Our main focus has been the continuous review of our supplier base, primarily through the distribution of a Modern Slavery Survey.

Surveying our Suppliers

To strengthen our ability to identify and assess potential risks within our supply chain and to develop effective strategies to mitigate modern slavery risks, the Melbourne Racing Club introduced a Modern Slavery survey for its suppliers in 2022 and has continued to use this survey each year since. The survey is issued to both major suppliers and any suppliers designated as higher-risk for modern slavery. From the suppliers who have completed the survey:

- 96% report no evidence of Modern Slavery within their supply chain
- 86% report no/ to minimal risk of Modern Slavery within their supply chain
- 53% of organisations audited have organisational policies to manage Modern Slavery risk
- 54% have a person/s responsible for overseeing Modern Slavery risk & provide organisational training specific to risk identification, assessment & response

The survey revealed that our key suppliers have conducted reviews of their supply chains and, in many cases, have implemented processes and policies addressing modern slavery within their operations.

Building on the policy and approach from the prior year, we continue to require all new primary suppliers under the categories of medium or high risk must complete the Modern Slavery Survey or provide a Modern Slavery policy in FY24. The survey results are assessed prior to final approval for these suppliers to commence work with the Melbourne Racing Club.

Understanding the Risk

Our interactive training program "Modern Slavery awareness", has become a core element of our staff's annual training regime. Designed to deepen employees' understanding of modern slavery risks and their role in prevention, this program combines engaging content, real-world scenarios, and practical guidance on identifying and addressing potential issues. All staff are required to complete annual refresher courses to stay current with best practices and updates in policies or regulatory requirements.

This training module is also a fundamental part of our onboarding process for new employees. From their first days with us, new team members gain essential knowledge on our commitment to ethical standards and their role in upholding these principles. By making this program an ongoing requirement, we form a culture of responsibility, and ethical awareness throughout the organisation, empowering staff to recognise and respond to modern slavery risks effectively.

Together with our Modern Slavery Working Group, the procurement department continues to play a crucial role in ensuring compliance and developing strategies to address modern slavery risks.

Actions Taken in FY24

Policies

To uphold ethical business practices and human rights, the Melbourne Racing Club has implemented several key policies, including:

- Code of Conduct Policy
- Purchasing Policy
- Discrimination, Bullying and Harassment Policy
- Equality and Equal Employment Opportunity Policy
- Occupational Health and Safety Policy
- Whistle-blower Policy

Contracts

The Melbourne Racing Club continues to include specific obligations in all new formal contracts with suppliers identified as having a potential modern slavery risk within its supply chain. These obligations focus on reducing modern slavery risks and ensuring compliance with the Act, where applicable.

Labour

The Melbourne Racing Club seeks to ensure ongoing compliance with the requirements of the Labour Hire Licensing Act 2018 (Vic), by putting processes in place to ensure all current and new suppliers of the Melbourne Racing Club's labour hire providers are appropriately licensed.

Future Actions

Looking beyond 2024, our plans to continuously identify and manage risks of modern slavery in our supply chain and operations include:

- Industry engagement to collaborate with key partners for best practices
- Implementation of regular supplier audits to assess compliance with anti-slavery policy
- Continuous management of suppliers identified as high risk
- Comprehensive reviews of key categories

Assessing the Effectiveness of Our Actions

The Melbourne Racing Club is dedicated not only to complying with the Modern Slavery Act but also to proactively addressing potential modern slavery issues within its supply chain. To reinforce this commitment, an internal working group made up of senior executives was established in 2020. This group is essential in driving our anti-slavery efforts forward, overseeing progress, introducing new strategies, and adapting our approach to address evolving risks and industry developments effectively.

While acknowledging the risk of modern slavery exists within our operations and throughout our supply chain, we are committed to upholding human rights and believe that eliminating modern slavery begins with our daily actions, a shared responsibility in our entire organisation.

Moving forward, our focus will be on finding a better way to integrate our modern slavery commitment across the business. This will allow us to manage modern slavery risks more effectively and assess the impact of our actions to date in a measurable manner.

The Committee, as the principal governing body of the Victoria Amateur Turf Club (incorporating the Melbourne Racing Club), has approved this statement. The approval was granted on 30 November 2024.



John Kanga
Melbourne Racing Club Chairman
30 November 2024