



AUSTRALIAN TURF CLUB

AUSTRALIAN TURF CLUB MODERN SLAVERY STATEMENT

1. Introduction

This is the first Modern Slavery Statement for the Australian Turf Club Limited (“ATC”, “We”) (ACN 148 157 288). This statement is for the financial year 2021 reporting period and sets out steps to identify assess and address modern slavery risks in our operations and supply chains.

ATC is committed to ensuring that there is no modern slavery in our supply chains or in any part of our business and acknowledge our role and responsibility in seeking to safeguard human rights through ethical and sustainable business practices.

We are committed to acting ethically and with integrity in all our business relationships and taking reasonable steps to ensure slavery is not taking place in any business or organisation that has any sort of business relationship with our organisation.

2. Structure, Operations and Supply Chains

ATC has been an Australian registered club since 7 February 2011 with annual revenue that exceeds the mandatory reporting threshold of \$100 million.

ATC is a leading horse racing and events business which employs 290 full time employees and up to 1,200 casual employees, who passionately serve different communities across metropolitan Sydney.

ATC owns and operates four (4) thoroughbred racecourses and one (1) community-focused venue located in the Sydney metropolitan region, as well as the philanthropic and charity arm being the ATC Foundation (ABN 742 438 274 96).

We make it our mission to provide sociable, fun, friendly and safe racing and event experiences within the communities we operate. It’s this focus on people and communities that sets us apart from other race clubs, and we believe has helped make us the successful business we are today (and will continue to be).

ATC’s source goods and services from the following supply chains;

- i) Alcohol and non-alcohol manufacturers and distributors
- ii) Ambulance and patient transport
- iii) Banking, Finance and insurance
- iv) Broadcasting and recorded entertainment
- v) Building services
- vi) Cleaning services
- vii) Food, beverage manufacturing
- viii) Market and business consultancy
- ix) Meat, poultry and seafood processing
- x) Racing industry
- xi) Security services
- xii) Waste management

Supported by a strong board and senior leadership team, with extensive experience in racing and event business management, our long-standing team has proudly grown and developed ATC into the growth business it is today. Established and ready to provide further successful investment opportunities, we continue to pioneer sustainable growth within the racing and event industry.

3. Risks of Modern Slavery Practices in ATC’s operations and supply chains

We consider ATC to be at low risk of being directly linked, involved in or contributing to involved in modern slavery practices in our operations.

ATC’s directors, management and employees are required to adhere to ATC’s policies and undergo training (referred to below). ATC has oversight over its operations and employees who are all employed locally. As a result, ATC’s operations run by ATC staff are at a low risk of modern slavery.

ATC sources the majority of its goods and services from within Australia. We source goods including, agricultural raw materials, machinery, equipment, food, beverage, uniforms, and other materials necessary to operate the



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business. Due to the size of our business and geographic spread across venues, we need to outsource services such as security and cleaners. We recognise that the services of cleaning and security and the goods from garment and agricultural sectors are generally recognised as being at a higher risk of modern slavery. Overall, the potential exposure of modern slavery in our supply chains is considered to be low.

Whilst not always easily recognisable, once modern slavery has been identified, it can be addressed. ATC is fully committed to operating responsibly and establishing and adhering to the highest ethical standards across the business. We will not tolerate any forms of modern slavery.

4. Actions taken during the reporting period to assess and address modern slavery risks.

ATC expects all those in our supply chain to comply with our zero tolerance to modern slavery. To identify and mitigate risk, ATC has the following in place:

I. Policy Framework

ATC is committed to ensuring ethical business practices throughout the business and this commitment is evident in our policies for:

- i) Anti-bribery and Corruption;
- ii) Bullying and Appropriate Behaviour;
- iii) Code of Conduct;
- iv) Modern Slavery;
- v) Whistle-blower; and
- vi) Workplace Health and Safety.

II. Employee Assistance Program

ATC's Employee Assistance Program (EAP) provides employees and eligible immediate family members with a range of services and support. It is voluntary, confidential, and easy to access, with support available for personal and work-related issues including performance, dealing with grief, stress management and career paths.

III. Risk Management Framework

To oversee and manage risk, the Board and its Safety and Welfare Committee provides guidance and direction on the management of risk related to ATC and states our commitment to the effective management of risk to reduce uncertainty in the Group's business outcomes.

ATC's employee engagement and third-party management processes are designed to assess ATC's network and highlight any modern slavery risks. Suppliers of high focus goods or services to ATC are required to disclose any modern slavery risks in their business and their supply chains as part of their response to ATC's category review request for proposal.

ATC Procurement monitors incumbent suppliers if it's believed there may be a possibility of modern slavery risks in their business and their supply chains and may initiate an engagement and escalation process to determine if corrective remedial actions are required. ATC will investigate and work with that supplier to remediate as appropriate.

IV. Training and Communication

ATC will ensure executive management, senior leaders and employees are aware of and understand the policies which reflect ATC's commitment to promote ethical and responsible behaviour within its operations.

New employees are required to complete compliance training covering ATC's Code of Conduct, Anti Bribery and Corruption, and Whistle-blower policies and programs before commencing their employment, thereafter, employees are required to complete these training modules regularly.



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V. Supplier Contracts

ATC work continuously to update contracts for suppliers to comply with all applicable laws including modern slavery legislation to include relevant model modern slavery-mitigating clauses.

5. Assessing Effectiveness

During this reporting period, our focus was to gain a better understanding of our modern slavery risks and how such risks may be present in our operations and supply chains. At this early stage, we are unable to adequately assess the effectiveness of measures we have undertaken. However, we have commenced and will continue to work on developing frameworks and processes to ensure we can review the effectiveness of the actions we are taking to assess and address modern slavery risks in our operations and supply chains.

To assist with assessing modern slavery risks, we continue to map our supply chain and through an analysis of data have organised our suppliers into industry categories. Data is continually analysed throughout each of the mandatory reporting periods.

ATC management is committed to establishing an Operations Risk and Compliance group, which will be responsible for overseeing and advising on:

- i) processes used to monitor, communicate, and comply with ATC's policies, laws, regulations, ethical guidelines and other relevant requirements; and
- ii) employee behaviour with respect to governance, risk and compliance,
- iii) a regular review and assessment of the actions taken to assess and address modern slavery risks each reporting period

6. Consultation and approval process

The policies, processes and systems described in this Statement apply to ATC and the entities covered by this Statement. The ATC Board retain oversight of our human rights and modern slavery risks through our risk management framework.

7. Other Relevant Information

I. Managing COVID-19 Impacts

In 2021, there has been a continued focus on supporting the safety, health and wellbeing of employees and contractors given the health and economic impacts of the COVID-19 global pandemic. ATC implemented a COVID-19 management plan which complied with all NSW Health orders that were appropriate at the time, and included additional paid leave, robust safety and hygiene practices, and enhanced mental health and wellbeing programs.

II. Looking Ahead

ATC is committed to continuously improving the practices, procedures and relevant education related to human rights and modern slavery to support its prevention.

Looking ahead we plan to progress the following in FY23 and beyond:

- i) continue to update core policies and processes to reflect ATC's commitment to upholding human rights;
- ii) continue to build expertise of our people through training and communication, especially those who work directly with third parties, so they can better identify and act on any indications of modern slavery; and
- iii) further enhance our Supplier Management and review processes.



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8. Approval

This modern slavery statement was approved by ATC's Board of Directors on 30 May 2022 pursuant to s13 of the *Modern Slavery Act 2018* (Cth).

A handwritten signature in black ink, appearing to read 'M. McGrath', with a horizontal line extending to the right.

Matthew McGrath
Chairman