

## **MODERN SLAVERY STATEMENT**

### **Who we are**

West HQ Limited (**West HQ**) is an Australian Public Company Limited by Guarantee, ACN 000 842 375. West HQ is based in Rooty Hill, New South Wales and is the legal entity operating the following businesses under business names owned by West HQ:

- (a) ONE55 Health & Fitness (**ONE55**)
- (b) Sydney Gymnastic & Aquatic Centre (**SGAC**)
- (c) Novotel Sydney West HQ (**Novotel**)
- (d) Sydney Coliseum Theatre (**SCT**)
- (e) Club Operations (including restaurants and gaming activities) (**Club**)

West HQ does not have any subsidiary companies.

West HQ currently has 700 employees.

### **Our operations**

West HQ is Sydney's leading landmark destination for Entertainment, Fitness, Lifestyle and Accommodation in the Western Sydney Region. All of West HQ's operations are conducted on a single 8 hectare site located at 33 Railway Street Rooty Hill, NSW, 2766. Our operations include:

- (a) **ONE55**  
A health and fitness facility with 2,865 members
- (b) **SGAC**  
A gymnastic and aquatic facility with 1,700 gymnastic members and 3,400 aquatic members
- (c) **Novotel**  
164 room hotel operated under Franchise Agreement with AAPC Properties Pty Limited ABN 17 065 560 885 (**Accor**)
- (d) **SCT**  
2000 seat lyric theatre
- (e) **Club**
  - (i) **Restaurants/Outlets**
    - PizzAperta
    - Steak & Oyster Co
    - Chu Restaurant by China Doll
    - Harriet's Chicken
    - New Town Thai

- Gelatissimo
  - Corner Café
  - The Terrace
  - Sports Bar
- (ii) **Conferencing/Events:**
- 5 separate function spaces utilised for various conferences and events
- (iii) **Entertainment**
- 720 Gaming Machines

West HQ also has the following leases in place:

(f) **Zone Bowling**

A single storey building located on the premises is leased to TEEG Australia Pty Limited ACN 003 710 110.

(g) **Sydney West Sports Medicine**

Premises located within the SGAC building is leased to WSSMRC Pty Limited ACN 154 529 030 which conducts a sports medicine clinic.

(h) **Gymnastics NSW**

Premises located within the SGAC building is leased to Gymnastics NSW Limited ABN 42 404 151 760 which conducts a men's high performance gymnastics centre.

### **Our supply chains**

Our supply chain consists predominantly of goods and services procured for the purpose of enabling West HQ to provide the community with access to accommodation, conferencing, dining, entertainment and fitness services. The main goods and services that West HQ procures are:

- (a) plant, equipment and machinery:
  - (i) audio visual equipment;
  - (ii) gaming machines;
  - (iii) air conditioning services
- (b) security services;
- (c) food and beverages;
- (d) cleaning services;
- (e) professional services (eg auditor);
- (f) entertainers/promotional comperes/bingo operators;
- (g) services associated with the running of the Novotel;
- (h) financial, insurance and real estate;
- (i) building and construction;
- (j) consumables.

West HQ acknowledges that its supply chains include the manufacture, transport and procurement of source materials used in making the goods that are supplied to it. For example, its supply chain includes the manufacturers of the plant equipment and machinery identified above, as well as the source materials used in those items.

The vast majority of West HQ's suppliers have been long term suppliers, who are based within Australia, including a small portion of whom are local (NSW based) suppliers.

In terms of global suppliers, from the top 50% of West HQ's suppliers based on costs, global suppliers were headquartered in the UK, the USA, France and Japan, all with operations within Australia.

### **Modern slavery risks**

For the few suppliers used by West HQ that are global companies, all of these are long term suppliers who have modern slavery statements registered with the Australian Government.

On the basis that West HQ's suppliers are either:

- (a) Australian based; or
- (b) large global companies who:
  - (i) are headquartered in low-risk countries in terms of a modern slavery geographical risk rating; and
  - (ii) have demonstrated a commitment to assessing and addressing risks of modern slavery in their operations and supply chains,

West HQ considers the risk of modern slavery in its first tier suppliers to be low.

However, West HQ acknowledges that there may be higher risks of modern slavery that exist in areas where West HQ lacks insight into the second (and further) tier suppliers and source materials sitting behind products and services supplied directly to West HQ. For example, particular food products, if sourced from particular global regions, may be produced with the use of modern slavery practices. However, our major supplier of food and beverage products, Foodbuy, has taken substantial steps to identify and address risks of modern slavery in its supply chain, including through partnering with SEDEX (see modern slavery statements for Compass Group for further details). This significantly reduces this risk.

Additionally, some source materials (including particular metals) are generally understood to be associated with people working in slave like conditions in some circumstances. There is a risk that such materials have been used to make products that are supplied to West HQ, for example, our gaming machines.

The steps West HQ is taking to address these risks are set out below.

### **Our approach to modern slavery**

West HQ has a number of mechanisms in place with the aim of ensuring a safe, respectful workplace where employees receive pay and entitlements at least in accordance with the minimum standards required by law. West HQ has a HR team of 8 employees and it obtains legal advice from external employment law specialists as and when required.

Many West HQ employees are covered by the Registered and Licensed Clubs Award and West HQ observes the minimum standards provided in the Award.

West HQ has various policies in place (which are regularly reviewed and updated) including:

- Bullying, Harassment and Discrimination Policy; and
- Recruitment and Equal Employment Opportunity Policy.

In addition, West HQ has a WHS Committee that is comprised of various representatives including the Group Health & Safety Manager and employees from the separate business operations.

Since December 2020 West HQ has had in place a whistleblower program which enables and encourages eligible whistleblowers (as defined in the Corporations Act 2001 (Cth)) to report suspected or actual

reportable misconduct (which may include human rights breaches or other illegal activity indicative of modern slavery).

In terms of addressing risks in its supply chain, West HQ conducted a high level review of its first tier suppliers to assess the risk of modern slavery associated with each supplier. This review considered geographical location, the nature of the product or service supplied and any public commitments to addressing risks of modern slavery made by the business (for example, whether the business has recently prepared a modern slavery statement). West HQ has completed this review for the top 60% of its suppliers by cost.

### **Reviewing our systems**

West HQ's internal policies and procedures (including those listed above aimed at ensuring a safe and respectful workplace) are regularly reviewed and updated. The Board of West HQ ultimately reviews and approves any policies and/or decisions of the various committees.

West HQ will introduce a questionnaire for new suppliers to complete prior to approval for procurement. West HQ will also target training to management and staff who are directly involved in procurement activities.

### **Consultation**

West HQ does not own or control any other entities and therefore, did not need to consult with other entities in the preparation of this statement.

### **Other information**

The Novotel is operated under a Franchise Agreement with Accor. As part of the ongoing audit and certification process which West HQ is required to comply with under the Franchise Agreement, West HQ is required to comply with Environmental, Social and Governance requirements required by Accor as amended from time to time. Further information about Accor's commitment to corporate social responsibility can be found here: <https://group.accor.com/en/commitment> .

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