

# MODERN SLAVERY STATEMENT

REPORTING PERIOD YEAR ENDED 30 JUNE 2020



**Racing  
Victoria**

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The RV Group  
Racing Victoria Limited ABN 88 096 917 930  
RVL Media Pty Limited ABN 64 137 208 809 (RVLM)  
RVL Media International Pty Limited ABN 69 612 838 418 (RVLMI)  
400 Epsom Road  
Flemington VIC 3031



**Racing  
Victoria**



## 1 | Introduction

Racing Victoria Limited (**RV**) is a public company limited by guarantee, which was established in 2001 to provide independent governance of the Victorian thoroughbred racing industry.

RV's objectives are to develop, encourage, promote and manage the conduct of thoroughbred racing in Victoria by encouraging broad participation and sustainably growing the industry's economic and social value.

RV is a reporting entity for the purposes of the Modern Slavery Act 2018 (Cth) (**Act**), as are some of its members (for instance, the Victoria Racing Club).

This Modern Slavery Statement (**Statement**), prepared under section 16(1) of the Act in respect of RV and RV group operations for the year ended 30 June 2020 (**Reporting Period**), has been approved by the RV Board, is signed by the Chief Executive Officer at page 18 and has been submitted in accordance with the Act.



## 2 | RV's Strategic Framework and Risk Management

Racing Victoria has adopted a Strategic Framework that considers the current state of the industry and some of the longer-term issues and opportunities impacting the sport, while outlining a path for future growth and success.

Our Strategic Framework identifies RV's vision of "Racing for All" and its purpose of championing great horse racing in Victoria through a financially sustainable thoroughbred racing industry. Further detail on our Strategic Framework is available in the Racing Victoria 2020 Annual Report, from page 13, available on Racing Victoria's website at <https://www.racingvictoria.com.au/about-us/annual-reports>.

In order to achieve its Strategic Framework, RV has put in place risk management processes and procedures to ensure that it appropriately identifies, assesses, evaluates and treats risks that could impact its operations and achievement of its vision and purpose.

RV's assessment of its modern slavery risks, the subject of this Statement, has been considered with reference to the above and through the prism of integrity, sustainability and accountability.

# 3 | RV Structure, Operations and Workforce

## 3.1 STRUCTURE

### 3.1.1 RV AND ITS MEMBERS AND SUBSIDIARIES

RV has 14 constituent members, comprising Club Members and Industry Body Members as provided below. Some of these members are also reporting entities for the purposes of the Act. All members are responsible for releasing their own modern slavery statements.

#### CLUB MEMBERS



#### INDUSTRY BODY MEMBERS



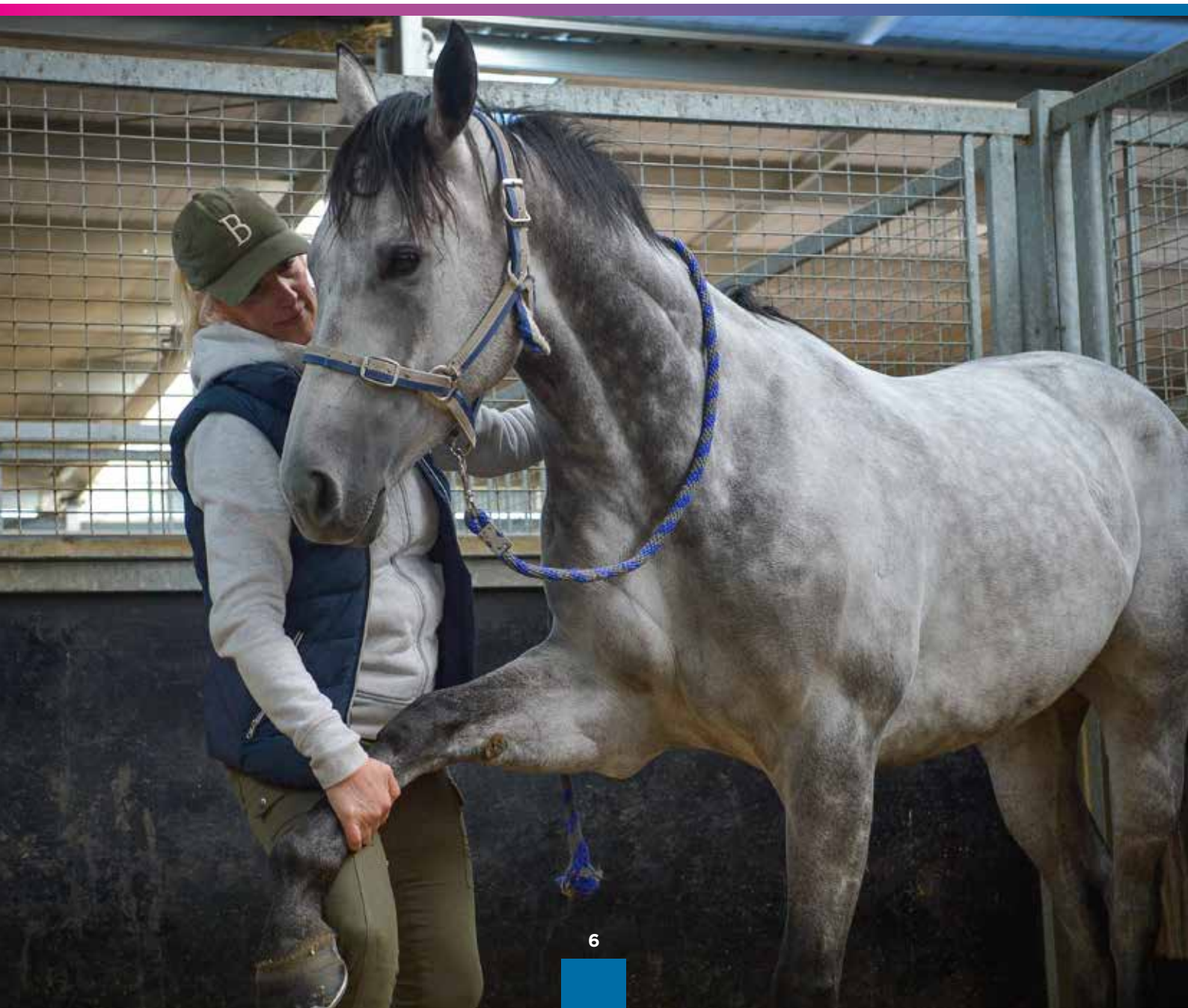
During the Reporting Period, RV was the sole shareholder of two proprietary companies RVL Media Pty Limited (**RVLM**) and RVL Media International Pty Limited (**RVLMI**). Each of these entities are involved in the Victorian thoroughbred racing industry media supply chain.

RV, RVLM and RVLMI are collectively referred to in this Statement as the **RV Group**.

Following the end of the Reporting Period, the RV Group acquired a controlling interest in Racing.com Pty Limited (**RDC**). This interest will be reflected in future reporting periods.

The RV Group had a common governance and management structure during the period, provided however the Integrity function at RV (in particular, the roles and responsibilities of the Stewards) is independent of the commercial function of RV.

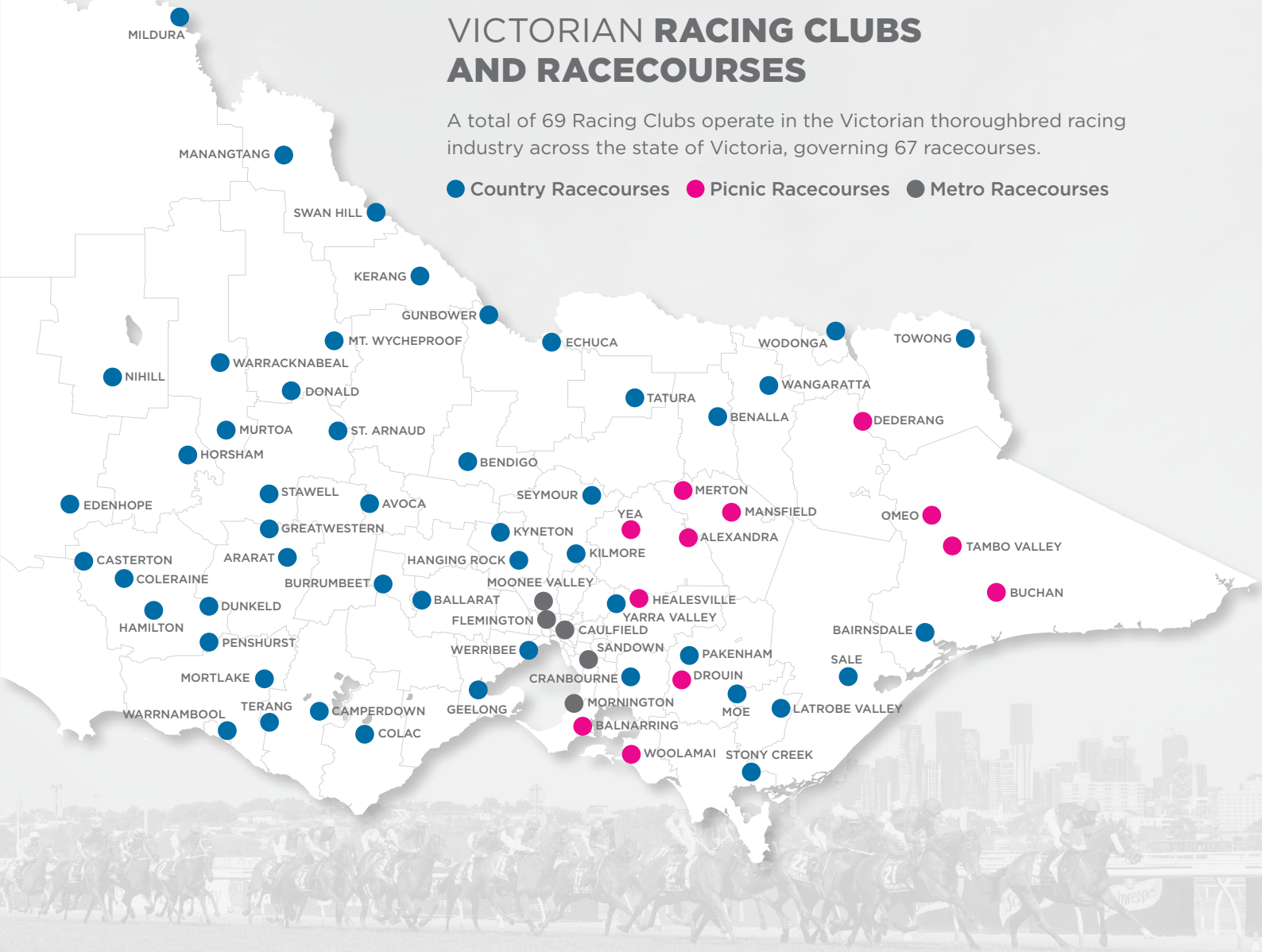
As all entities within the RV Group operate under this common structure, they apply a consistent approach to the identification, assessment and management of modern slavery risks. For this reason, consultation between the entities in the RV Group was not required during the preparation of this Statement.



## VICTORIAN RACING CLUBS AND RACECOURSES

A total of 69 Racing Clubs operate in the Victorian thoroughbred racing industry across the state of Victoria, governing 67 racecourses.

● Country Racecourses ● Picnic Racecourses ● Metro Racecourses



### 3.1.2 RV'S INTERACTION WITH VICTORIA'S RACING CLUBS AND PARTICIPANTS

Each Racing Club has its own governance structure and membership and is responsible for the operations of each of its racecourses, including the maintenance of its premises and racetrack, membership of its Club and the hosting of the general public on raceday.

Some Racing Clubs also have horse training centres on their premises, occupied by individual trainers. These training centres are overseen by those Racing

Clubs, who also manage trackwork and 'jump outs' at their facilities.

Under the Rules of Racing, the RV Stewards operate racedays at racecourses operated by the Racing Club hosting the raceday, with the support of RV staff in respect of the racing activity.

During the Reporting Period, 4,367 races were held in Victoria.

The Rules of Racing establish the participation of others in the sport of thoroughbred racing.

These persons and businesses are referred to in the industry as “licensed participants” (as they apply or renew their licence with RV each year) and include jockeys, trainers and certain others involved on raceday.

Each of these licensed participants has responsibility for its own business operations and supply chains. Where appropriate, RV may seek to influence or guide these licensed participants as part of its role in upholding the integrity of the industry.

271 jockeys, 953 trainers and 3,408 stable employees were licensed or registered participants during the Reporting Period.

### 3.2 OPERATIONS AND WORKFORCE

#### 3.2.1 OPERATIONS

RV’s operations can be summarised as follows:

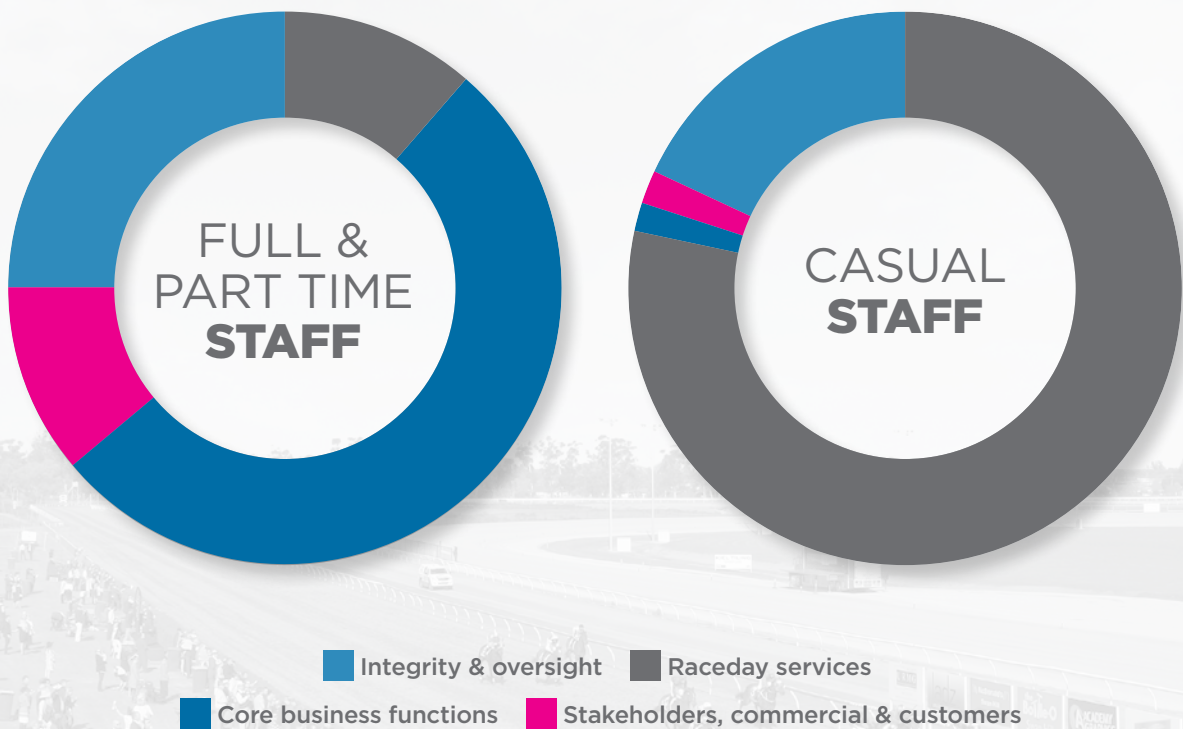
Business Area	Operations
Integrity and oversight	Principal Racing Authority - Regulation of Victorian thoroughbred horse racing Integrity and licensing Horse owner registration and review of product disclosure statements (syndicates)
Stakeholders, commercial and customers	Representation of Racing Clubs and the industry (e.g. lobbying, marketing and promotion) Racing Club funding and loans Wagering – Universal race field approvals and licensing of Victorian bookmakers Media rights management Major projects and capital works management
Raceday operations	Delivery of races at Racing Clubs and programming Distribution of prizemoney Employment of core business employees Employment of casual raceday employees (raceday officials, barrier attendants, clerks of the course, sampling assistants, judges) Provision of certain services to jockeys (who are free agents) – workcover and superannuation
Core business functions	Corporate functions, including finance, legal, risk and compliance, human resources Landlord Employment of core business employees



### 3.2.2 WORKFORCE

RV has a workforce comprised of 184 full time and part time employees, as well as a casual workforce of 200 that is predominantly involved in raceday operations activity (for example, barrier attendants and officials).

## WORKFORCE





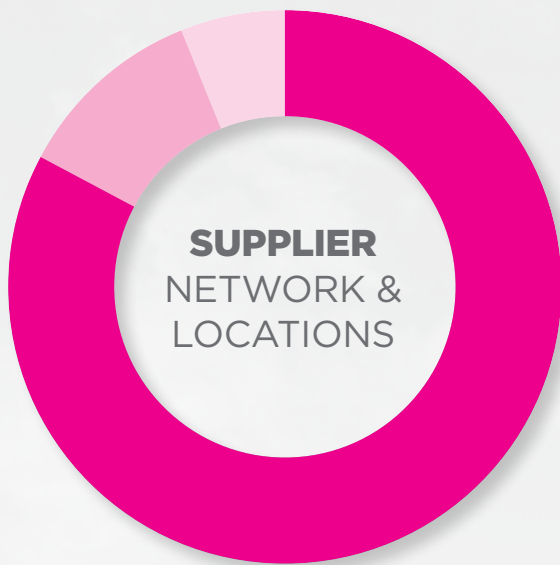
## 4 | RV's Supply Chain

RV has conducted a review into its supply chain for the Reporting Period and has identified the following goods and services acquired to support its operations:

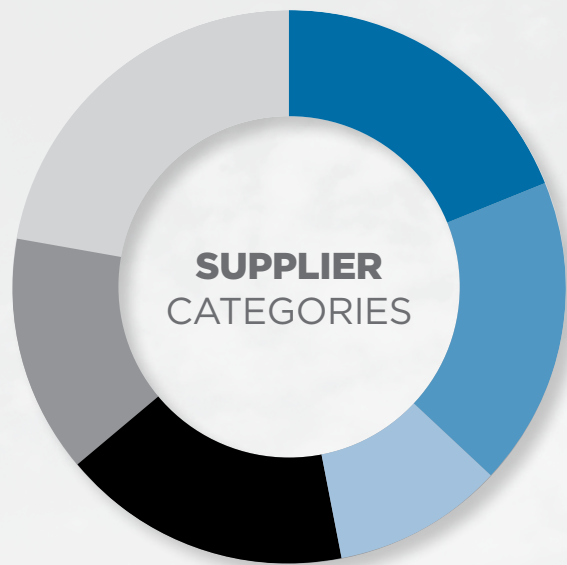
Business Area	Goods and/or services purchased to support operations
Integrity and oversight	Professional services (e.g. specialist consultants, lawyers & accountants) Technology (e.g. Hawkeye)
Stakeholders, commercial and customers	Media, advertising and journalism Engineering services and construction Wagering administration Merchandise (e.g. Spring Racing apparel)
Raceday operations	Equine welfare and veterinary Engineering services and construction Security Raceday services and racing administration Racing photography Medical services (including Chief Medical Officer, consultancy services in response to COVID-19)
Core business functions	Information Technology (e.g. software, licenses) Transport Insurance Utilities Trade services and maintenance, such as electrical and plumbing Telecommunications Finance Payroll Recruitment services

Wherever possible, RV procures goods and services from Victorian (or failing that, Australian or New Zealand) vendors. During the Reporting Period, RV procured goods and services from just under 250 suppliers as follows:

## SUPPLIERS



- Australia (Victoria)
- Australia (Other States)
- International



- Media, Advertising and Journalism
- Equine Welfare and Veterinary Services
- Tech Platform & Support Services
- Raceday Services & Medical
- Construction & Utilities
- Other  
(Includes primarily consumables and merchandise, transportation, legal and recruitment services)



## 5 | Identification and Assessment of Modern Slavery Risks

### THE MODERN SLAVERY RISKS ASSESSMENT PROCESS

#### CATEGORY MAPPING

Identified key operations and supply chain categories

#### INHERENT RISK IDENTIFICATION

Considered supplier industry and country risks and operational activities

#### RELATIONSHIP ANALYSIS

Could we be causing, contributing to or linked to modern slavery

RV has conducted an assessment of its operations and supply chain for potential modern slavery risks during the Reporting Period.

In so doing, and with the assistance of an independent advisor, RV implemented the above process.

Due to the nature of RV's operations (as outlined in section 3 above) modern slavery risks are assessed by RV as low.

The factors that lead to this risk rating are that all of RV's operations are performed in Australia, RV's corporate employees are skilled professionals that largely perform office-based roles and raceday employees are generally employed under EBAs).

For categories that RV identified as being of higher risk, RV performed an assessment to better

understand its relationship to these risks. This assessment considered whether RV was likely to be causing, contributing to or linked to modern slavery practices, the presence of mitigating factors and controls, and RV's ability to influence other parties connected to the activity, good or service.

The results of this assessment are provided in the table below.

Aspect	Category	Modern slavery risk factors
Supply chain	Engineering and construction	Inherent risks of modern slavery in construction and the extended construction materials supply chain are associated with the employment of lower skilled and migrant employees, as well as potentially dangerous working conditions.
	Security	Inherent risks of modern slavery in asset security services are associated with the employment of lower skilled and migrant labour.
	IT services and software	Inherent risks of modern slavery are present in IT equipment manufactured in higher risk countries, most prominently forced and bonded labour. A lower level of inherent risk was identified in the provision of IT services and software delivered in Australia.
	Trade services and maintenance	Inherent risks of modern slavery are associated with the use of lower skilled or migrant labour and in the use of labour hire services. Additional risks within the extended materials supply chain are again associated with the use of lower skilled or migrant employees, as well as potentially dangerous working conditions.
	Apparel, uniforms and merchandise	Inherent risks of modern slavery may be associated with the extended and complex apparel, uniforms and merchandise supply chain. These risks have a higher likelihood of occurrence offshore and include deceptive recruitment practices, forced or bonded, child labour and human trafficking.

Whilst RV may acquire goods and services from vendors that operate in higher-risk industries (albeit infrequently), RV does not believe that it is causing or contributing to these risks.

## 6 | Evaluation and Treatment of Modern Slavery Risks

RV's approach to managing its modern slavery risks is detailed below. In 2020, RV has evaluated the risks identified at section 5 above to understand the appropriateness and the maturity of its existing risk management practices and to identify opportunities for continuous improvement.

### 6.1 POLICIES

RV has in place policies and procedures that outline RV's expectations of its employees and its vendors.

A number of these policies and procedures are relevant in efforts to prevent modern slavery risk at RV as outlined in the table over:

Policy or Procedure (or Agreement)	Purpose
Code of Conduct	It defines the actions, behaviours and practices expected of and required by Racing Victoria employees.
Whistleblower Policy	To encourage RV officers, employees and contractors to report dishonest or illegal activity by RV and its officers, employees and contractors, through the provision of education and awareness raising, procedures and protections.
Anti-Discrimination Policy	Outlines our commitment to ensure our workplace is free from discrimination and enables equal opportunity.
Harassment and Sexual Harassment Policy	Outlines our commitment to providing a work environment which is free of all forms of harassment.
Participant Protection Policy	Outlines RV's commitment to eliminating discrimination, harassment, child abuse and other forms of inappropriate behaviour and/or conduct from its workplace and the Victorian thoroughbred racing industry.
Safeguarding Young Persons Policy	Outlines our commitment to young persons engaged and participating in the Victorian thoroughbred racing industry are safeguarded from abuse and neglect.
Grievance and Disputes Policy	This Policy provides an avenue for non-EBA employees to raise grievances relating to their employment.
Anti-Bribery and Corruption Policy, Compliance Policy	Outlines our commitment to ensuring compliance with laws and regulations addressing fraud, bribery and corruption in Australia and in overseas jurisdictions in which we do (or contemplate doing) business.
Enterprise Agreements (EBAs)	The Racing Victoria Raceday Officials Agreement sets out the employment conditions for approximately 50% of RV's workforce.

## 6.2 OTHER CONTROLS AND PRACTICES

In addition to the policies outlined above, RV has controls in place to mitigate modern slavery risks. These include as follows:

- RV's human resources management system includes controls to prevent scheduling of excessive hours for casual employees and logs the check-in and check-out times of employees to monitor potential instances of excessive working hours.
- Training, education and advice is provided to RV staff on fair employment practices.
- The management of remuneration, employment agreements, conditions and benefits are centralised at RV, meaning that no employee is engaged without an employment agreement generated by People and Culture and which meets our statutory obligations.
- A supplier induction and management system that requires suppliers to provide evidence that they can meet the legal and performance obligations set out by the standard terms and conditions in RV's service agreements.

RV plans to review and implement additional appropriate supplier due diligence practices (including in respect of modern slavery risks and adverse media queries) in future reporting periods.

## 6.3 ADDITIONAL PRACTICES FOR LICENSED PARTICIPANTS

RV's integrity and licensing function supports the maintenance of RV's licensing standards, and promotes a responsible culture of fair play, ethical behaviours and response.

Whilst not within the direct remit of RV, from time to time RV conducts initiatives and awareness campaigns to encourage and influence positive behaviours in our licensed and registered participants as they relate to participant and equine welfare.

In addition, RV's integrity function has implemented broad controls to ensure that licensed and registered participants exhibit ethical behaviours to ensure the reputation of the industry is upheld, including as follows:

- due diligence checks during the participant licensing and registration process;
- the introduction of education modules for participants, which includes in respect of expected behaviours;
- making available avenues for participants to raise concerns about conduct (for example, the Integrity Hotline); and
- the appointment of a Participant Protection case manager, whose role it is to assist participants and direct them in accessing appropriate support and dispute resolution mechanisms and to ensure that all complaints reach a just and fair conclusion.



## 7 | How RV assesses whether its controls are effective

To date, RV has conducted an assessment on the current state of its modern slavery risk management practices and to identify any key gaps in our approach, and potential areas for improvement.

This involved the formation of a working group, engaging an independent expert advisor and the provision of regular updates to the Executive and to the Board as to progress.

In future reporting periods, the effectiveness of our controls will be assessed in accordance with RV's Enterprise Compliance and Risk Management Frameworks, with our approach benchmarked against our peers on a triennial basis.





## 8 | The impact of COVID-19

RV notes the impact of the COVID-19 pandemic on the operations of the racing industry during the Reporting Period (specifically, on and from 14 March 2020 when racing went “behind closed doors”).

During the Reporting Period, RV’s operations were disrupted as RV sought to strictly limit the number of essential personnel in attendance at each raceday.

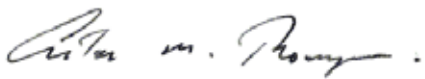
Due to the uncertainty during the Reporting Period, RV implemented Board, Executive and

Senior Management Team salary reductions, and was required to stand down employees during the period. Where possible, RV required its staff members to take existing leave.

It is noted that many of the Racing Clubs had significant impacts to their operations during the Reporting Period, as the public and members were unable to attend race meetings under Victorian public health directions.



## 9 | Version

Version	Description	Approved	Adopted	Signed
1	Modern Slavery Statement for the year ended 30 June 2020.	RV Board	31 March 2021	 <b>Giles Thompson</b> Chief Executive Officer

# Appendix

Policy or Procedure (or Agreement)	Purpose
s16(1)(a) Identify the reporting entity	1. Introduction
s16(1)(b) Describe the structure, operations and supply chains of the reporting entity	2. Our structure, operations and supply chains
s16(1)(c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	3. Racing Victoria's modern slavery risks
s16(1)(d) Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	4. Managing and mitigating risks of modern slavery
s16(1)(e) Describe how the reporting entity assesses the effectiveness of such actions	5. Measuring the effectiveness of our actions
s16(1)(f)(i) Describe the process of consultation with any entities that the reporting entity owns or controls;	2. Our structure, operations and supply chains
s16(1)(g) Include any other information that the reporting entity, or the entity giving the statement, considers relevant	6. Impacts of COVID-19



***Racing  
Victoria***

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