



**BankstownSports**

# Modern Slavery Statement

1 July 2023 - 30 June 2024

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## Introduction

Bankstown District Sports Club Ltd (collectively referred to in this document as '*Bankstown Sports*') has continued our community-focussed approach to proactively addressing Modern Slavery risks during the 2023-2024 Financial Year, reinforcing our commitment to ethical business practices and corporate responsibility.

Our goal for this Financial Year was to wholistically review our operational frameworks and identify those that had potential to positively or negatively impact Modern Slavery risk factors. This comprehensive group-wide internal Audit informed areas of opportunity to direct our strategic focus and uplift our Modern Slavery risk-management practices.

Key areas included:

- Risk Management and Contractor Management Frameworks
- Training initiatives
- Auditing and probity safeguards
- Social responsibility and ESG (Environmental, Social and Corporate Governance) Strategy
- People protections
- Overall systems of work and operational structures



The key to our approach was aligning our management of this Modern Slavery risk with our overall Risk Management Framework and business continuity strategy. Bankstown Sports' Board of Directors has a long-established Mission to ensure the organisation is '*Making a Difference*' within our community. This Mission directly informs our continuous improvement approach to Modern Slavery risk management (illustrated below).



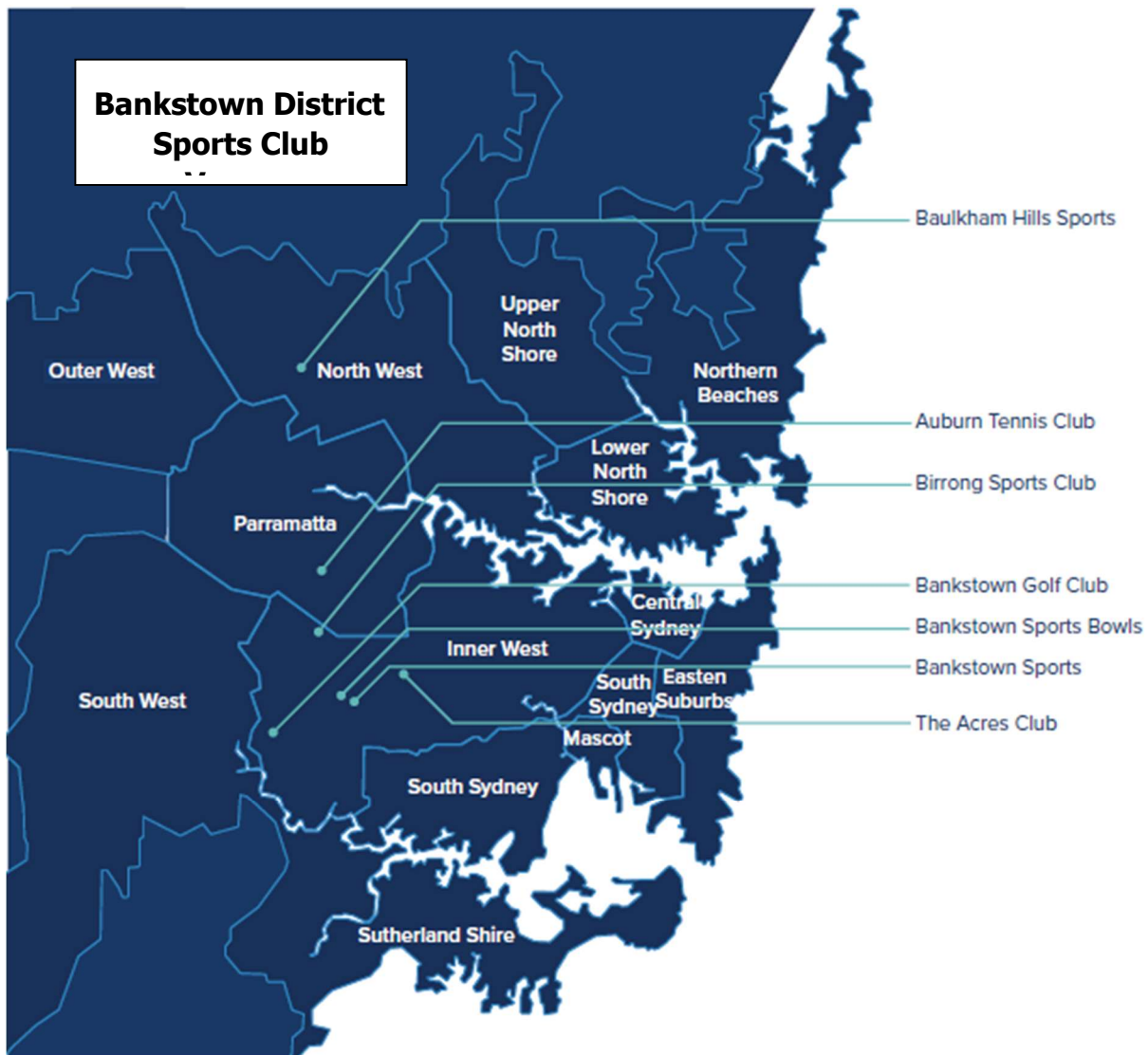
## Bankstown Sports' Modern Slavery Risk Management Process

## Operations and Structure

Bankstown District Sports Club Ltd had 567 employees in fulltime, parttime and casual roles across the business as of 30<sup>th</sup> June 2024. To ensure we maintain an operational headcount that appropriately addresses a given day's operational need, we also occasionally engage agency and labour hire workers. This process forms part of our Psychosocial hazard management practices to address potential work-demand fluctuations and temporary increases in job demands.

Bankstown Sports operated the following licenced and registered club premises during the 2022/2023 Financial Year:

- Bankstown Sports Club
- Baulkham Hills Sports
- Birrong Sports
- Bankstown Sports Bowls
- The Acres Club
- Auburn Tennis Club
- Lady Banks Rooftop
- Bankstown Golf Club





Bankstown Sports has a diverse range of entities under the Bankstown District Sports Club Ltd banner including restaurants, bars, a golf course, electronic gaming, a brewery, administration, community support, property management, facilities and security.

Bankstown District Sports Club Pty Ltd is the parent company of:

- Bankstown District Sports Club Agencies Pty Ltd
- Bankstown District Sports Club Licencing Pty Ltd
- Bankstown District Sports Club Properties Pty Ltd
- Bankstown District Sports Club Hotel Properties Pty Ltd
- LoyaltyCo Pty Ltd
- CoPact Pty Ltd
- DataConverge Pty Ltd
- Basement Distilling Pty Ltd
- Basement Brewing Pty Ltd
- Flinders Centre Properties Pty Ltd
- Facility Services Pty Ltd
- Complete Security Pty Ltd
- Clairemont Properties Pty Ltd
- Oceanic Education Pty Ltd

This Modern Slavery Statement reaffirms Bankstown District Sports Club's moral responsibility to uphold human rights and ensure that its operations align with and respects the principles outlined in the Modern Slavery Act 2018 (Cth). This statement relates to the 2023-2024 Financial Year and is prepared with regard to all stakeholders part of and engaging with Bankstown District Sports Club Ltd and its associated entities.



## People and Policies

Bankstown Sports continues to recognise the Modern Slavery risk factors associated with a business environment that operates 24 hours a day, 7 days a week. These risk factors require a clear governance framework that integrates safeguards and risk controls into operational policies and procedures.

A big focus for this financial year was on introspection, gap analysis and reviewing the effectiveness of our current risk management framework as it relates to Modern Slavery risks. As the nature of potential or actual Modern Slavery risks evolve, so too must our business evolve to understand our interaction with these risks. To assist with this, we expanded a number of teams and increased resourcing in key areas of the business that have touch points or have potential to impact Modern Slavery risk factors.

Bankstown Sports' reporting framework includes numerous accessible channels of communication and escalation, backed by policy and executive mandate, that work to protect worker rights and facilitate increased access to reporting and communication mechanisms. Key to these initiatives is Bankstown Sports' **T.R.U.S.T. Framework** that supports our Vision of harm minimisation, supporting our people, supporting our community, promoting corporate responsibility initiatives and maintaining a robust, risk-conscious and ethical governance framework.

## Bankstown Sports Club's T.R.U.S.T. Framework



The **T.R.U.S.T. Framework** supports and enables our Modern Slavery risk management practices. Key governance policies and procedures include:

- Group Risk Management and Contractor Management Framework
- Annual Psychosocial Risk Assessment and Control review
- Whistleblower Policy and Procedures
- Tender and Request for Quote Framework with specific Modern Slavery provisions
- Supplier Charter with specific Modern Slavery provisions
- WHS, Injury Management and Return to Work Policies and Procedures
- Risk Management, Hazard Management, and Incident Management Procedures

- Workplace Bullying & Harassment and Wellbeing Policies
- Equal Employment Opportunity and Working From Home Policies
- Environment and Sustainability Policy
- Liquor and Gaming Plans of Management
- People Management Policies and Procedures (including those specific to Minors and those that address potential vulnerabilities amongst cohorts of team members)
- Paid Parental Leave Policy with associated benefits
- Learning and Development Framework
- A.I. and Security & Workplace Surveillance Policies

Bankstown Sports shares administrative resources and operational support mechanisms across its Venues and entities, fostering consistency and strengthening risk management practices across the Group.

The 2023-2024 Financial Year saw the evolution of our Modern Slavery Committee into an expanded Senior Management Committee with a direct report to the Audit & Risk Board Sub-Committee. This Committee has a clear directive to wholistically identify, strategise, plan and review Modern Slavery, Environmental, Social and Corporate Governance risk factors and risk management controls. Our internal WHS Committee also remains open to all team members wishing to engage and is continually promoted within the business. These Committees are key mechanisms that support our continuous improvement approach to understanding and addressing Modern Slavery risks.

Bankstown Sports remains committed to extending the same level of rights as we provide to our internal Team Members also to our contractors, service providers, suppliers, and other external stakeholders.





## Potential Impacts

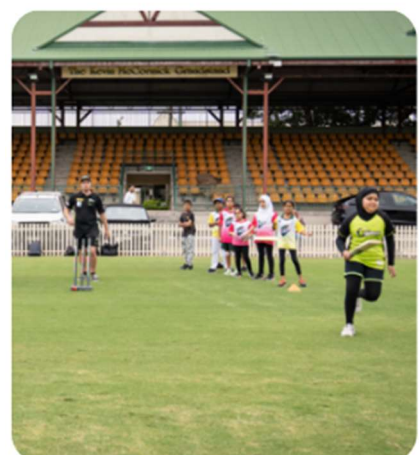
This Financial Year saw a marked increase in 'Cost of Living' challenges within our local communities, bringing with it the potential for increased Modern Slavery risk levels and impacts for both our team members, our service providers and our suppliers.

To ensure this is adequately addressed and Bankstown Sports minimises its potential impact to local suppliers, we formalised a Supplier Charter within a broader Tender and Request for Quote Framework. This framework allows for increased engagement and outlines a higher standard of ethical operations we expect to be supported by external stakeholders we engage. These screening processes are intended to integrate safeguards into our supply chain engagement to facilitate our commitment to fostering fair and ethical trading relationships. Our goal in this space is, whenever possible, to both support local sourcing initiatives and to establish stable, fair and long-term partnerships with accredited suppliers.

Bankstown Sports acknowledges the importance of fair market engagement in the local supply chain and minimising 'knock-on' Modern Slavery impacts that unethical business practices may have on Third and Fourth Tier suppliers. Similarly, 'Cost of Living' and lingering 'COVID-19' risk factors were assessed as having potential to increase the vulnerability of both internal and external workers with touch points impacted by Bankstown Sports.

Other potential Modern Slavery risk factors included:

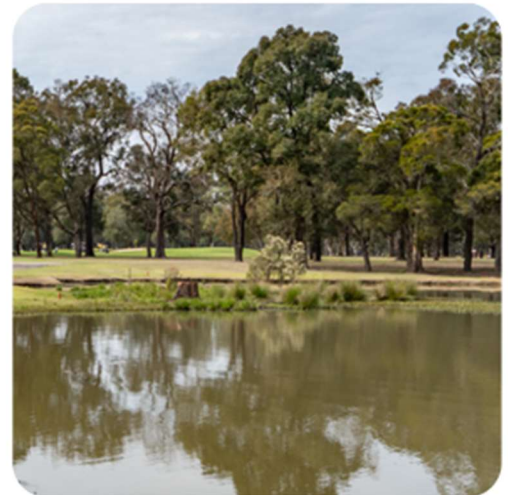
- Our structure and operations, including the diverse socioeconomic demographic within our wider-Group community footprint.
- Industry specific risks tied to the direct engagement of or impact to potentially vulnerable workers such as migrant workers, seasonal workers, financially struggling workers, those affected by Domestic or Family Violence and other marginalised individuals. This also includes the elevated levels of psychological distress and psychosocial risk often associated with vulnerable and disenfranchised workers.
- Ethical sourcing and engagement with secondary suppliers, where limited transparency may obscure the geographic origin of goods or the geopolitical distribution of funds. Our IT and communications equipment suppliers are reputable within the industry, however opportunities exist to further explore their Third and Fourth Tier supplier engagement.
- Engagement with workers in vulnerable industries, including the Cleaning, Security and Trades industries.
- Service-related risks from supply chain disruptions to previously stable trade agreements, resulting in altered market dynamics. These changes may expose service



providers to negatively impacting leverage factors and pressure, particularly through unrealistic cost targets, reliance on low-cost labour, or impractical delivery timeframes.

- The implications of Team Member demographics and backgrounds for our workforce, particularly if there was any association with current Geopolitical issues (such as international conflicts or wars)
- Corporate Governance risks stemming from gaps within business structure or due diligence processes.
- Outsourcing specific functions, such as payroll. Specific due diligence was taken to adequately risk assess Bankstown Sports' engagement with an Australian payroll provider with international subsidiary offices. We identified a low risk associated with this provider's worker vulnerability, industry risk, country risk and business risk factors.
- Environmental and sustainability concerns with more widespread, long-term impacts on developing nations and traditionally obscured Modern Slavery risk factors.

Bankstown Sports recognises the moral responsibility we have as a business to operate with integrity and maintain high operational standards that are resilient against market pressures, without compromising Modern Slavery risk levels. Bankstown Sports welcomes opportunities to collaborate with other Australian and international businesses to champion positive, risk-conscious practices in the Modern Slavery space, fostering local actions that contribute to a global impact.



## Governance and Risk Management

Bankstown Sports' commitment to continuous improvement and maintaining a high standard of Corporate Governance and Risk Management, extends to aligning Modern Slavery risk identification and risk control with this standard. As Modern Slavery is an evolving risk landscape, an organisation-wide approach to enhancing positive duty actions is essential. Bankstown Sports' Modern Slavery risk management framework undergoes annual review as part of an audit and assurance process. This Risk Management framework is then evaluated using key indicators such as training completion rates, risk assessments, incident reports, whistleblowing disclosures, surveys, and other relevant metrics.

Key Governance and Risk Management controls in place at Bankstown Sports to support our Modern Slavery risk identification and control framework include:

- Established and constantly monitored Whistleblowing channels. Bankstown Sports did not receive any reports of actual or suspected violations that gave rise to a concern relating to Human Rights or Modern Slavery risks during this reporting period.
- Uplifted Contractor Management processes that strengthen relationships with external stakeholders and increase transparency over an external party's business practices. This aligns with our commitment to assessing compliance with international and industry standards regarding Modern Slavery risks while being mindful not to overburden smaller businesses with unrealistic demands.
- Regularly auditing and uplifting Board, Senior Management and Executive Governance practices
- Mandatory investigation procedures that allow individuals to safely raise concerns, assured of protection by policy and Executive Management support.
- Ensuring key engagement, such as our engagement with Cleaning contractors, align with our policies and low tolerance to impacting Modern Slavery risk factors. We mandate that our Cleaning contractors maintain relevant International Standard certifications (ISO Certification) to support this.
- Utilising an in-house Maintenance team, where possible, that are under our People Management framework. Our Contractor Management processes extend these standards to third-party contractors and service providers engaged on an ad hoc basis to rectify complex or significant works.
- Increasing our engagement and transparency over second-tier retail suppliers (e.g., furniture, textiles, electrical equipment, catering supplies) to promote fair trading practices and reduce negative impacts on vulnerable regions where products are sourced or manufactured.
- Continuing to partner with reputable labour hire companies that themselves commit to socially responsible practices.
- Significantly enhancing the representation and scope of the Modern Slavery, WHS, and Risk Committees forums for greater oversight and strategic planning.
- Fostering relationships with local suppliers to ensure our purchasing power does not negatively influence their practices, including establishing fair delivery and payment timelines.



- Continuing to engage external specialists for contract, compliance, and financial auditing, including:
  - Independent financial audits aligned with Australian accounting and international standards.
  - Legal support for migrant workers and those on work visas.
  - Audits of employment contracts to ensure fair work and above industry pay standards.



In assessing the potential for our operations to contribute to or cause Human Rights impacts (including Modern Slavery), specific regard is given to the framework through which we engage with our Team Members, including:

- Clear and ethical recruitment practices
- Rostering and direct engagement with our workers regarding work patterns
- Strictly enforced Bullying and Harassment reporting and disciplinary practices to ensure both a safe work environment is afforded to our team as well as enable organisational justice.
- Equal opportunity practices
- Accessible and promoted People, WHS, Incident and Hazard reporting mechanisms
- Enhancing our People & Culture initiatives such as:
  - Paid Parental leave for full time and part time Team Members
  - Free access to feminine hygiene products

- Ongoing access to two days of Wellbeing leave in addition to other leave entitlements
- Discounted and subsidised access to nutritious meal options for shift workers
- Domestic and Family Violence support, such as emergency housing, for Team Members
- Supporting free access to psychological and EAP (Employee Assistance Program) health services
- Learning & Development initiatives that promote safe reporting, trades training, safe work practices, leadership development, and general wellbeing.

Bankstown Sports continues to recognise the role money laundering and terrorism financing plays in exacerbating Modern Slavery risks and continues to work with external specialists to minimise harm in those areas and promote Responsible Gaming practices. We continue to grow and enhance our dedicated resources to strengthen our positive practices in these areas, implementing industry-leading measures to proactively mitigate potential impacts.

## Community Initiatives

Since our foundation in 1958, Bankstown Sports has maintained a positive reputation within our local and wider club communities. Our commitment to supporting the needs of our local Communities, Members and local Organisations is deeply embedded within our Group's Strategic Goals.



Bankstown Sports recognises the responsibility we have to respond to emerging risks and the changing needs of our Community, including Modern Slavery risks. While this can be challenging, we remain dedicated to supporting and promoting initiatives that aim to protect vulnerable individuals who may be at risk of Modern Slavery.

Key Community initiatives during this reporting period included:

- Directly supporting 49 projects and providing in-kind support to over 50 projects that directly support those in need and those vulnerable within our Community. Initiatives addressing those at risk of Modern Slavery impacts included assisting women and children impacted by Domestic and Family Violence, people living with disability, migrants, at-risk youth and children.
- Continuing a 5 year committed partnership with a local Women's Shelter, Biyani House.
- Continuing to partner with and support key Community support providers such as Bankstown-Lidcombe Hospital, Little Wings, ReLove, Catholic Care, Beyond the Badge, the Fair Fight Foundation and Raise Foundation.
- Continuing to support practical programs aimed at youth mental health, employment support and youth mentoring.
- Significantly increasing our internal resources and Team Members with responsibilities to facilitate Responsible Gaming and Harm Minimisation initiatives to better support members and visitors.
- Inhouse Community Partnerships Team Members with a scope of duty that mandates proactive and direct interventions within our local Communities.



- Local sourcing of fresh food and produce with specific “meet the grower” days to provide additional transparency regarding a provider’s own processes and procedures that impact Modern Slavery risk factors within their sphere of influence.
- Continuing our long-term engagement with high-school level work experience providers to provide a safe and low-risk space to facilitate industry education



## Key Areas of Future Action

Bankstown Sports Board of Directors and Executive Management recognise that the ever-evolving landscape of Modern Slavery risk requires a flexible and diligent continuous improvement approach to its risk mitigation. It is our goal to integrate Modern Slavery risk controls, risk identification functions and assurance functions into our 'business as usual' practices at an organisation-design level.

Key areas of future focus for Bankstown Sports include:

- Implementing our Environmental, Social and Governance Strategy and associated Modern Slavery risk management actions as part of our commitment to adopting the International Sustainability Standards Board (ISSB) standards when they become applicable for us in 2027.
- Researching and implementing digital platforms to enable greater levels of due diligence, assurance and probity. Specific resourcing to be allocated to Enterprise Risk Management, computerising Maintenance Management and Contractor Management.
- Further increasing our practical support to vulnerable individuals, such as those fleeing Domestic and Family Violence, through the provision of *Escabags*.
- Increasing the resources and accessibility of training and education targeting the Modern Slavery, Wellbeing and Psychosocial Due Diligence spaces.
- Increasing the internal and external consultation practices regarding Modern Slavery risk impact, risk identification and risk management.
- Extending our engagement with external suppliers and promoting compliance with our Supplier Charter.
- Continuing to request additional assurances regarding external supplier and service provider Modern Slavery risk management compliance
- Exploring external consultants that could partner with Bankstown Sports to further uplift our Modern Slavery risk management practices and facilitate lower Modern Slavery risk levels.
- Committing additional resources to Risk Management and expanding the scope of our Corporate Governance framework uplift projects.
- Continuing to develop our supply and goods procurement practices to include greater ethical sourcing considerations.
- Assessing the effectiveness of the expanded and restructured Modern Slavery committee forum.
- Continuing our People Management due diligence and assurance practices.

## Board Approval

This Modern Slavery Statement was ratified by the Bankstown District Sports Club Ltd Board of Directors on 10<sup>th</sup> December 2024 and will be regularly reviewed and updated, as appropriate, to ensure proactive compliance with the *Modern Slavery Act 2018 (Cth)*.



**Michael Clancy**

Chief Executive Officer &

Member of Bankstown District Sports Club Ltd Board of Directors



Making a  
Difference