

2019-2020 Modern Slavery Statement

1 Introduction

Since first opening our doors in 1958, the Bankstown District Sports Club Ltd has grown into a resolute and steadfast pillar supporting and servicing the Bankstown and wider club community. We have grown from a small sporting club, designed solely as a place for members and their guests to come together, into multiple social and sporting venues with a diverse range of amenities and facilities. Sixty years after inception, we remain committed to extending our impact from providing social and sporting amenities towards meaningful engagement with our community by way of significant capital investment and physical intervention in a range of community projects to address a variety of needs.

The Bankstown Sports Board of Directors is proactive in engaging with the wider business in an ongoing process of review and improvement to our policies and practices. We promote a vision based around *'Making a Difference'* as we evolve and develop with a continuous improvement approach towards operations and management. We accept the moral responsibility to address evolving risks, such as Modern Slavery, by establishing policy that unifies our actions with the positive focuses of other businesses throughout Australia and the world. We extend the acknowledgement of this responsibility, identified in the Modern Slavery Act – 2018 (Cth), and recognise the importance of multiple large businesses working together to safeguard human rights through ethical and reasonable business practices.

The government mandated forced closure of our businesses for three months of this financial year as part of COVID-19 restrictions, whilst incredibly disruptive, provided an opportunity for our Board and Executive Management to shift focus away from day-to-day operations and towards forward thinking and progressive changes we could apply to the business. This Modern Slavery statement documents part of this renewed focus and commitment to investigating emerging and established risks, including Modern Slavery risks, as they relate to our business. We commit to proactively challenging our existing processes to develop an improved risk-conscious approach that mitigates these risks in a tangible way that functionally aligns with our business.

This statement relates to the 2019/2020 financial year and is the foundation of an evolving focus and priority for all stakeholders that are part of or engage with the Bankstown District Sports Club Ltd and our entities.

2 Our Structure and Operations

Bankstown District Sports Club Ltd had approximately 481 employees in full-time, part-time and casual roles across the business at the conclusion of the 2019-2020 financial year. We engaged agency and labour hire staff on the occasion when maintaining our operational headcount was stretched.

Bankstown District Sports Club operates the following licenced and registered club premises:

- Bankstown Sports Club
- Baulkham Hills Sports
- Birrong Sports

- Bankstown Sports Bowls
- The Acres Club
- Auburn Tennis Club

We have a diverse range of entities under the Bankstown District Sports Club Ltd banner including restaurants, bars, electronic gaming, 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
- Flinders Centre Properties Pty Ltd
- Facility Services Pty Ltd

We recognise our size necessitates a high standard of operational integrity as our potential to impact a range of stakeholders obliges us to strive towards attitudes and processes that have a positive footprint.

3 Our Impact

The primary focus of our business has involved engagement in the hospitality industry. Sectors of this industry (particularly food, kitchens, beverage and gaming) have been identified as being at a higher risk of Modern Slavery impacts due to the labour diversity, reduced entry skill level requirements of many roles and the diversity of team members from migrant or non-English speaking backgrounds.

Some of our operational services are contracted to external stakeholders and have been identified as being at a high risk to impact facets of Modern Slavery - particularly Housekeeping, Cleaning and Security. Initial investigation into our engagement with third-party stakeholders has identified:

- We contract our housekeeping and cleaning to a sole cleaning provider and recognise the financial importance of maintaining this contractual arrangement has with that company. This necessitates an operational approach that maintains an open and two-way communication pathway built on trust. This would reduce the chance that requirement changes we communicate with them may impact and increase risk indicators of modern slavery (such as increasing their workload, increasing chance of underpayment due to increased operational expenditure, increased need to hire additional workers which may result in decreased scrutiny of working documents/visas).
- We contract our security services to a sole security provider and recognise the importance of ensuring their operational, recruiting/screening and people policies align with our own. This will extend in the future to auditing their policies and procedures against a high standard.

Additional investigations into the Modern Slavery risks associated with our operational and community engagement has flagged a need to examine our supply chain arrangements with additional scrutiny. We recognise that supply chains in the food and beverage industry are complex and the capabilities of a single business to assess the different/removed levels of these supply chains is challenging.

We commit to maintaining an alignment between our procurement and engagement policies with the minimum standards established by principal governing bodies (such as FairWork, SafeWork,

Food Safety Standards Australia, etc) while we further examine the extent to which we impact Modern Slavery risks in this space. This due diligence will extend to:

- Evaluating the risk of unethical and unreasonable business practices when engaging new suppliers
- Utilising suppliers with long standing positive reputations and those that we have built positive relationships with already
- Audit providers for current certification or membership of organisations that necessitate positive business practices and align with low risk Modern Slavery impacts.

We proactively engage with the community by providing financial investment and practical intervention targeting those in need. We are passionate about going above and beyond our obligations to our community and recognise the knock-on effect vulnerability has on increasing the impact of Modern Slavery risks. As such, key interventions during the 2019/2020 period have been aligned with supporting areas of rural and southwest NSW that were impacted by the December/January bushfires and February floods in an effort to support these communities to mitigate any changes to workload, remuneration, work availability and general work practices that would cascade into an increased Modern Slavery risk.

As part of our community outreach program, we commit to investigating how we can support 'safe harbour' services/refuges and aim to support a practical solution for those in our community exposed to unsafe domestic environments. We recognise that such an environment increases the chance risks escalate into the realm of Modern Slavery for this demographic. The immediate importance of this has been highlighted by the increase in instances of women/children having to remove themselves from their domestic environments during the COVID-19 lockdown.

We recognise the challenges small businesses operate under in our Local Government Area and how this translates into an increased risk of Modern Slavery impacts. Consequently, we support a coworking space in our Flinders Centre that works to enable small businesses and start-ups to operate without significant overhead costs associated with administration, office space and amenities.

4 Our People and Policies

Bankstown Sports encourages all internal and external stakeholders to speak up and openly report through internal escalation channels any concerns they may have, including issues relating to Modern Slavery.

We ensure our people policies respect our employees' rights and empower a right to refuse or cease work if the environment is unsafe. We encourage open and daily reporting by individual departments and business units, to monitor workplace conditions and safety across all aspects of operations. As part of a continuous improvement approach in this space, we have flagged the importance of a wider project to update key policies and operational procedures (such as our Whistle-blower Policy).

Whilst our Agency/Labour Hire engagement has been relatively low this financial year, we recognise the importance of ensuring these contractual arrangements are regularly evaluated with safeguards to ensure they are compliant with FairWork policies. We recognise that not having specific oversight of the working rights and backgrounds of these workers has an inherent risk of exploitation by way of reduced freedom to refuse dangerous work and reduced empowerment to report dangerous work practices. We commit to take action by way of terminating a business relationship with an

Agency/Labour Hire provider if they do not align with our Code of Conduct or Ethics Policy Framework with regard to Modern Slavery indicators.

We largely partner with second tier suppliers who operate as a conduit between third/fourth tier suppliers and the Australian market. Many of our largest partner companies are required to publish and provide Modern Slavery reporting in their own right. We recognise that an important part of a continuous improvement approach in this space would be to examine these Modern Slavery reports in conjunction with a provider's own procurement policies from developing nations (that tend to have less stringent rules and regulations regarding Modern Slavery). An important first step in this space would be to increase transparency of our needs to address this at a high level when renewing agreements with these partners.

We have multiple committees that engage with our employees at every level of our business to ensure collaboration and consultation standards are maintained and open communication is facilitated across departments. Whilst the efficiency of these committees has been strained with the government enforced business closure, we recognise that this needs to be a prioritised part of policy, procedure and operational consultation moving forward.

5 Our Controls

Due to the size of our business and the stage of growth we find ourselves at in 2019/2020, we commit to empowering our individual departments to build direct, personalised, and on-going relationships with our suppliers in an effort to:

- Build trust to enable fair and reasonable business practices that do not require a wholesaler to transfer unreasonable costings or pressure to the detriment of their own suppliers (who fall outside our direct sphere of influence and may be vulnerable to Modern Slavery risks)
- Allow for open and honest communication of changes to market forces
- Expedite opportunities to discuss our needs directly with a supplier to address a range of issues important to our trade and operations, including those relating to Modern Slavery
- Ensure jurisdictional compliance is maintained

Bankstown Sports has engaged an external WHS specialised consultant to audit our WHS Management System and provide guidance on determining and maintaining progressive business practices and standards.

We recognise the leverage we may have with some suppliers due to our size and purchasing power and maintain established relationships that build long-term positive business practices where possible. This has the added benefit of reducing the risks a supplier will cascade Modern Slavery impacts 'down the chain' to their growers or wholesale suppliers.

We commit to engaging with smaller suppliers to support our community in line with more transactional needs but recognise the pressure this may place on a smaller supplier to price match. We acknowledge the need for this arrangement to trade in normal market conditions so as to support fair local pricing and trade conditions.

We regularly engage external specialists and organisations to review our people contracts as we acknowledge that fair pay and work conditions play a key role in preventing Modern Slavery practices from escalating.

We recognised the specific impact money laundering has on international Modern Slavery practices and commit to engaging an external specialist to ensure our policy and practices in this area

facilitate a strict and diligent approach to minimise this practice and enable timely reporting of any concerns to Australian authorities to intervene. We commit to extending our investment to include 'best practice' technology that would assist our strategy in this space.

We maintain compliance with the relevant Australian Accounting Standards, the Corporations Act and Corporations Regulations. This compliance extends to annual independent auditing of our financial dealings to benchmark our operational performance to industry standards.

We recognise the specific vulnerability of children and to address this we have provided our Sports Network members with specific enhanced child safety training. We commit to extending our continuous improvement approach to improving levels of training and communication of key messages to our wider business.

6 Key Areas of Future Action

We recognise the impacts large businesses have on Modern Slavery practices, both locally and internationally. We appreciate that this is an evolving issue that warrants an ethical priority that supports the moral imperative inherent with the consequence of inactivity in this space. Modern Slavery considerations will be included as an essential component in the development and review of our policies, processes and business practices.

Bankstown Sports Board of Directors and Executive Management recognise a zero-harm approach to Modern Slavery risks is vital to ensuring the success of a continuous improvement approach to our operational practices. As such, Bankstown Sports will:

- Diligently investigate and examine our policies and procedures with key internal and external stakeholders
- Audit our internal business practices to align with our efforts to address Modern Slavery risks
- Allocate additional resources specific to the governance of Risk and Compliance that would engage with all levels of the business on operations and strategic direction to address Modern Slavery risks
- Commit to allocating additional resources to facilitate inhouse training of our employees on key themes (including Modern Slavery considerations).
- Proactively engage external specialised consultants and organisations to promote positive and transparent business practices
- Audit our people contracts to ensure they are compliant and protect our people at risk of Modern Slavery
- Collaborate with our third-party contractors and providers to ensure the engagement of socially responsible labour with conditions aligning to our those of own employees and those at low risk of Modern Slavery impacts
- Identify and direct financial and operational support to areas of our community vulnerable to Modern Slavery risks.

7 Board Approval

This Modern Slavery Statement was endorsed by the Bankstown District Sports Club Ltd Board of Directors on 8th November 2022 and is an accurate representation of the club's actions and commitment during the 2019-2020 financial year towards addressing Modern Slavery risks in accordance with the Modern Slavery Act – 2018 (Cth).



Michael Clancy

Interim Chief Executive Officer and Member of Bankstown District Sports Club Ltd Board of Directors