

Modern Slavery Statement

1 Introduction

The Bankstown District Sports Club Ltd opened in 1958 and has a longstanding reputation in the community as a welcoming place for members and their guests to come together and use our registered club facilities and amenities. Over 60 years later, we are still serving the community by providing a social and sporting club and have extended our community engagement to significant capital investment and physical intervention in a range of community projects. These projects address a variety of community needs, from housing projects for at-risk community members to post-bushfire restoration projects to youth sport sponsorship.

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 recognise our moral responsibility to address evolving risks, such as Modern Slavery, by establishing a unified policy of action by our business alongside others throughout Australia and the world. We extend the acknowledgement of this need identified in the Modern Slavery Act – 2018 (Cth) and recognise the importance of safeguarding human rights through ethical and reasonable business practices.

We recognise the responsibility all businesses have to promote a high standard of operation that acts with integrity. Our size and potential to impact our stakeholders obliges us to strive towards attitudes and processes that have a positive footprint behind the goal of supporting the community and maintaining a positive reputation based in actions.

This Modern Slavery Statement documents our commitment to understanding emerging and established Modern Slavery risks relating to our business. We are committed to a consistent approach to Modern Slavery across all entities we manage and continually improve our response as our business grows.

This Statement reflects our commitment to address the ethical challenges of Modern Slavery, minimise our impact to these challenges and promote the importance of regularly reviewing our policies and practices. This statement relates to the 2020/2021 financial year and is the foundation of an evolving focus and priority for all stakeholders part of and engaging with the Bankstown District Sports Club Ltd and our entities.

2 Our Structure and Operations

Bankstown District Sports Club Ltd has approximately 526 employees in fulltime, parttime and casual roles across the business. We engage agency and labour hire staff on the occasion when maintaining our operation headcount is stretched; a challenge growing in the post-COVID employment market.

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
- Lady Banks Rooftop

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
- 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

3 Our Impact

A major part of our business involves engagement in the hospitality industry. This industry has been identified as at a higher risk of Modern Slavery impacts due to the diversity of labour, entry skill level of many roles and prevalence of outsourced workforces (especially housekeeping, maintenance and security).

Upon investigation, the most significant area of risk of Modern Slavery associated with our operations and community impact arises out of our engagement with supply chains for goods, our contracting of operational services and our people management practices.

As a business process, we empower 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 line of influence)
- 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 maintain within our sphere of influence

We recognise that supply chains in the food and beverage industry are complex and the capabilities of a single business to assess the transparency of these supply chains is challenging. We recognise that the minimum standards established by principal governing bodies (such as FairWork, SafeWork, Food Safety Standards Australia, etc) are an essential tool that we can utilise to provide guidance in this space.

As part of our due diligence, we:

- Evaluate the risk of unethical and unreasonable business practices when engaging with new suppliers and, where possible, utilise suppliers with long standing positive reputations
- Favourably consider providers that are certified members of organisations that necessitate positive business practices and align with our own values in this space
- Will take action, by way of terminating a business relationship, if we have reason to believe that a supplier or provider is not compliant with a range of legislative or operational requirements that are core to our values, including Modern Slavery provisions

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 regularly develop progressive projects that help vulnerable members of our community with their immediate and long-term needs. A recent example is the pivotal role Bankstown Sports played in the development of a women's shelter during COVID lockdowns, directly assisting a group in our community which was highly exposed to the risks of modern slavery.

4 Our People and Policies

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

We ensure our people policies respect our employees' rights and they 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. In line with our Whistle-blower Policy, our employees have the capacity to raise concerns either openly or in confidence.

Bankstown Sports engages Agency/Labour Hire employees on occasion and ensure we regularly evaluate these contractual arrangements to ensure they are compliant with FairWork policies as well as our own standards and expectations. We recognise staff in this space are more at risk of exploitation and we will take action by way of terminating a business relationship if it does not align with our Code of Conduct or Ethics Policy Framework.

Regarding the risks arising from the procurement of goods and services:

- We acknowledge the Modern Slavery vulnerability of workers in the Trades industry and operate with an in-house Maintenance team that ensures the majority of internal works are controlled within employee arrangements consistent across the business.
- We acknowledge the Modern Slavery vulnerability of workers in the Cleaning industry and have a long-standing contract and close relationship with a relatively small cleaning company to ensure these workers have similar conditions to our own team. This relationship extends to specialised advice from our internal stakeholders to the benefit of their safety policies and assurance the company will maintain ISO certification exceeding their market peers.
- 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 publish and provide modern slavery reporting of their own and highlight their own procurement policies from developing nations (that tend to have less stringent rules and regulations regarding modern slavery). This helps with transparency and is considered at a

high level when renewing agreements with these partners. We recognise the need to more stringently monitor one-off or short-term engagements with smaller suppliers or providers to align with this standard of operations.

We have multiple committees that engage with employees at every level of our business to ensure collaboration and consultation standards are maintained and open communication is facilitated across departments. This ensures a consistent approach to policy, procedure and operational management needs as well as driving engagement with changes to business practices.

5 Our Controls

Bankstown Sports engaged an external WHS specialised consultant to develop a comprehensive WHS Management System that is the foundation behind a drive towards 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.

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

We ensure our longer standing suppliers are current members of industry specific organisations that ensure their business practices align with Australian and international trading standards that extend towards minimising the impact of that business to third or fourth tier suppliers in vulnerable or developing nations.

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.

We recognised the specific impact money laundering practices have on international Modern Slavery practices and engaged an external specialist to ensure our policy and practices facilitate a strict and diligent approach to minimise this practice and enable timely reporting of any concerns to Australian authorities to intervene.

6 Key Areas of Future Action

We recognise that the risk of our business to impact Modern Slavery practices, both locally and internationally, is a constantly evolving issue that needs to be a priority from both an ethical and operational standpoint. Modern Slavery considerations need to be a moral imperative that is included as an essential component in the development and ongoing review of policies, processes and business practices.

As part of this ongoing drive to work towards a zero-harm approach to Modern Slavery risks, Bankstown Sports will:

- Establish a committee to engage and consult with key internal and external stakeholders to mentor ongoing business practices and review procurement policies

- Engage with key internal stakeholders to ensure our internal business practices and policies continue to align with our efforts to address Modern Slavery risks
- Allocate internal resources specific to the governance of Risk and Compliance that is able to consult with all levels of the business on operations and strategic direction to address Modern Slavery risks
- Commit to increasing the training of our employees to identify hazards and report incidents that include Modern Slavery considerations. This process will include an escalation process to collaborate with a committee of peers
- Proactively engage external specialised consultants and organisations to promote positive and transparent business practices
- Regularly audit our people contracts to ensure they are compliant and protect our people at risk of Modern Slavery
- Continue to collaborate with Labour Hire and Agency workers to ensure the ongoing engagement of socially responsible labour with conditions aligning to our those of own employees
- Review our goods, material, and electrical suppliers against their industry counterparts to facilitate engaging with those committing to minimising Modern Slavery impacts
- Audit our practices and processes to adapt to identify and mitigate Modern Slavery risks. This extends to added provisions for when global disasters or events arise (such as COVID or supply chain blockages)

7 Board Approval

This Modern Slavery Statement was approved by our Interim Chief Executive Officer and Member of Bankstown District Sports Club Ltd Board of Directors on 23rd June 2022.

The Modern Slavery Statement was then ratified by the Bankstown District Sports Club Ltd Board of Directors on 13th September 2022 and will be regularly updated, as indicated, to ensure proactive compliance with the Modern Slavery Act – 2018 (Cth).



Michael Clancy

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