

CANTERBURY LEAGUE CLUB

MODERN SLAVERY STATEMENT

This statement is made pursuant the Modern Slavery Act 2018 (Cth) in relation to the operations and supply chains of Canterbury League Club Ltd (CLC) ABN 84 000 191 248 a controlled entity of Canterbury Bankstown Bulldogs Rugby League Club Ltd 38 001 869 405 to assess and address the risk of modern slavery in our business operations and supply chain for the financial year ending 31 October 2023. The purpose of this statement is to outline our approach to ensuring CLC has the frameworks and processes to identify, mitigate and manage the risk of modern slavery in our business operations and supply chains.

- Modern Slavery is a crime and violation of human rights and is defined under the Australian Modern Slavery Act 2018 (the Act) as including eight types of serious exploitation (Red Flag Indicators):
 - Human trafficking
 - Slavery
 - Servitude
 - Forced Marriage
 - Forced labour
 - Debt bondage
 - Deceptive recruiting for labour or services
 - Child labour

- CLC's Modern Slavery Policy designates its commitment to ensure modern slavery does not exist in its various supply chains. CLC's procurement policy specifies a risk assessment for Modern Slavery at the pre-procurement stage. In the event that Modern Slavery (Red Flag) indicators are recognised at any time in the procurement process CLC will investigate and work with the supplier to eradicate the Red Flag indicators, or CLC will discontinue supply.

Corporate Structure

- CLC is a consolidated entity of, and provides financial support to, Canterbury Bankstown Bulldogs Rugby League Club Ltd 38 001 869 405.

Scope

- CLC is a not-for profit member-based organisation that operates registered club facilities in in NSW. This policy applies to all persons working for CLC including: employees, directors, officers, volunteers, external consultants, third-party representatives and business partners.

Operations, & Supply Chains

- CLC operates registered club facilities at:
 - Canterbury League Club – 26 Bridge Rd, Belmore NSW 2192
 - The Lakemba Club – 26 Quigg St, Lakemba NSW 2195
 - Moxon Sports Club – 61 Moxon Rd, Punchbowl NSW 2196
 - Operational & Corporate Procurement: Is managed in accordance with CLC's Acquisition of Goods and Services Policy, the Board has oversight of this policy.
 - Capital Works: Is managed in accordance with CLC's Capital Expenditure – Building & Development Policy, Board has oversight of this policy.
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CLC's Purpose

- CLC provides community support to a broad range of community organisations (including Canterbury Bankstown Bulldogs Rugby League Club Ltd).

Supply Chains

- CLC supply chains acquire goods and services facilitating the provision of hospitality, gaming, health and fitness, and administration at CLC facilities.

Modern Slavery Risks:

- CLC has completed an analysis of its group spend for the year ending 31 October 2022. CLC's spend categories are:

Beverage	\$1,862,356.99	3.99%
Food	\$2,975,582.26	6.37%
Cleaning	\$2,797,402.56	5.99%
Gaming	\$8,780,623.79	18.81%
Bulldogs	\$5,368,601.19	11.50%
IT	\$1,108,241.05	2.37%
Other - Services	\$22,694,140.31	48.61%
Other - Staff/Customer payouts	\$1,101,226.24	2.36%
	<u>\$46,688,174.39</u>	

- CLCs exposure to the high risk categories:
 - industrial cleaning ,
 - meat works ,
 - hospitality ,
 - construction ,
 - manufacturing,
 - agriculture and fishing
- Key factors being considered when assessing suppliers risk include:
 - Is the Industry type recognised as high risk?
 - Is the geographical location of the supplier's production facilities in a high risk (prevalence) area?
 - are materials/products sourced in high-risk areas?
 - are supplier employee practices, policies and processes in order?
 - is there a history of modern slavery or related breaches?

Risks:

- Given the large volume of local suppliers, and the focus on the large businesses by the Modern Slavery Act, we see our overall risk as low. That said, we understand the need to fully investigate every aspect of our operations and supply chain.

CLC Response

- o Updates to the Procurement Policy to incorporate a modern slavery checklist.
- o CLC Policies on Equal Employment Opportunity, Discrimination, Harassment and Bullying, Employee Code of Conduct and Whistleblowing, to include a modern slavery check for Red Flags.
- o Training of procurement staff.
- o Inclusion of Modern Slavery clauses in supplier agreements.
- o A due diligence assessment to be included in the tender process for risk categories/services.
- o Supplier communications to create awareness on CLC’s position on modern slavery.

When renewing agreements for goods and services, anti-modern slavery clauses will be inserted into contracts tender documents.

Due Diligence

- self-assessment that the supplier complies with various provisions in the Act;
- a copy of the supplier’s most recent Modern Slavery statement (if applicable);
- details of structure and operations of their supply chain; and/or
- details of the actions taken by the supplier to manage and address modern slavery risks in their supply chain. If a proposed contract is included as part of the procurement, consideration must be given to a provision ensuring compliance with the Act.

Action Plan

- focus on risk categories and material expenditure (> \$50,000) associated with the supply of physical products/materials and some services (eg: cleaning).

FY2023	Existing Suppliers a. Introduce general communications regarding the Clubs Modern Slavery Policy and objectives to all CLC Group suppliers, to promote a joint effort to address identified risks. b. Validate the list of suppliers that fall in the recognised risk categories. c. Conduct education session(s) with suppliers, to explain CLCs commitment to this Policy New Suppliers (affected categories) d. For affected categories, modern slavery requirements will be included in the tender documentation and contract process e. Introduce the new supplier onboarding form incorporating Modern Slavery checkpoints f. New Suppliers will be required to complete a Modern Slavery Information form
Beyond FY2023	a. Suppliers in affected categories to complete a self-assessment questionnaire

Implementation and effectiveness of systems and processes:

- Procurement will assess the information shared in the self-assessment questionnaire for affected spend categories. Any material risks will be documented in the Procurement risk register for the attention of the Manager: Governance and Compliance and Chief Financial Officer.
- Procurement will be responsible to follow-up and facilitate resolutions of risks with respective suppliers, with support from the Management team charged with responsibility for Governance, Risk and Compliance.
- The Governance, Risk and Compliance team will monitor, and report progress to the Chief Financial Officer, pertaining to risk mitigation, resolutions and remaining risks.
- The Chief Financial Officer will review, intervene where necessary and report status to the Board Audit and Risk Committees for feedback and action(s) (where necessary).

Reporting

- The Act requires that an annual statement is prepared and approved for each financial year where the Company has a revenue of at least \$100 million. When required, the annual statement will be approved by a resolution of the Board and signed by the Chairman of the meeting where the statement is approved.

Assessment of Effectiveness

- CLC is committed to assessing the success of this document at each annual review.

Consultation

- CLC will consult with the Canterbury Bankstown Bulldogs Rugby League Club Ltd 38 001 869 405 (the lead entity) to ensure that this statement is in concert with the Modern Slavery Statement of that organisation.

Conclusion

The CLC Group is committed to ensuring the desired objectives on this important matter are granted the appropriate attention and effort.

This statement was approved by a resolution of the Board of Directors on 27 June 2023.

P J Winchester
25TH JUNE 2023

P Winchester
Chairman