

MODERN SLAVERY

STATEMENT

1 November 2024 to 31 October 2025





Foreword from the President

The Richmond Football Club (**Club**) has been a member of the Australian Football League (**AFL**) for over 140 years and prides itself for its work both on and off the field. Alongside its football operations, the Club seeks to support its communities through initiatives focused on reconciliation, diversity and inclusion, education, health and wellbeing, and sustainability. Through its subsidiaries Aligned Leisure, the Bachar Houli Foundation and the Islamic College of Sport, the Club works to create opportunities for participation, learning and community connection across Australia.

The Club is anchored by:

- our Club's Purpose: ***Belonging, thriving and winning***; and
- our Club's Values: ***Aware, Disciplined, Relentless and United***.

At the Club, we value integrity, accountability, and continuous improvement. We strive to operate in a manner that is transparent, fair, and respectful, while fostering a culture that encourages learning, collaboration, and consideration of the impacts our decisions have on people and communities including creating sustainable outcomes across our operations and activities.

The Club recognises that modern slavery and human trafficking are complex and serious issues that can affect organisations and supply chains across many sectors. We acknowledge our responsibility to identify, assess, and address modern slavery risks within our operations and supply chains.

As we continue to strengthen our approach to modern slavery risk management, our efforts are guided by our Purpose and Values. We are committed to improving our practices, increasing awareness across our organisation, and working with suppliers and stakeholders to support ethical and responsible business conduct. As a large sporting organisation with a broad network of partners and suppliers, we recognise the role we can play in contributing to the prevention of modern slavery, promoting respect for human rights, and supporting sustainable and responsible business practices.

This is our *third* modern slavery statement (**Statement**) made under the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) and outlines how we have been assessing and addressing modern slavery risks in our operations and supply chains in the **reporting** period from 1 November 2024 to 31 October 2025 (**FY25 Reporting Period**).

This **Statement**:

- **outlines the progress made during the FY25 Reporting Period**, including the development of supplier questionnaires and reviews across priority suppliers;
- **describes the actions taken** to identify, assess and address modern slavery risks within our operations and supply chains;
- **highlights the key risk areas** that will continue to be prioritised, including facilities and operational service providers, and suppliers involved in the sourcing and manufacture of Club merchandise and apparel; and
- **sets out our priorities** for the next reporting period, including expanding supplier due diligence and reviews across a broader supplier network, staff education and training, and embedding modern slavery considerations into our procurement practices.

In preparing our third Statement, we have continued to align our approach with the Commonwealth Guidance and have drawn on this guidance to inform both our reporting and the actions we intend to take in future reporting periods.



Principal Governing Body Approval

This Modern Slavery Statement was approved by the Board of the Club in their capacity as principal governing body of the Club pursuant to section 13 of the Modern Slavery Act on 21st of July 2026.

Signature of Responsible Member

This Modern Slavery Statement is signed by Mr John O'Rourke in his role as President and Director of the Board of the Club in accordance with section 13 of the Modern Slavery Act) on 4th August 2026.

John O'Rourke, President

ACKNOWLEDGMENT OF COUNTRY

Richmond Football Club acknowledges the traditional owners of the land on which we work and play, the Wurundjeri and Bunurong people of the Kulin Nations. We pay our respect to their elders, past, present, and emerging and acknowledge that sovereignty was never ceded.



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1. About Richmond Football Club

The reporting entity is Richmond Football Club Ltd (ABN 25 679 793 340) of Punt Road Oval, Yarra Park, Richmond, Victoria 3121 (**Club**).

The Club is a reporting entity under the Modern Slavery Act and this Statement is submitted and published for the FY25 Reporting Period.

The Club makes this Statement in accordance with section 13 of the Modern Slavery Act as a single reporting entity.

In accordance with the Modern Slavery Act, this statement reports on the Club and entities which it 'owns' or 'controls for accounting purposes under the Modern Slavery Act (**subsidiaries**) being:

- (a) Aligned Leisure Pty Ltd (ABN 58 608 613 350)
- (b) Aligned Leisure Pty Ltd as trustee for the Aligned Leisure Trust (ABN 38 602 127 519) (**Aligned Leisure**);
- (c) Bachar Houli Foundation Ltd (ABN 96 637 693 406) (**Bachar Houli Foundation**); and
- (d) Islamic College of Sport Limited (ABN 99 668 331 664) (**Islamic College of Sport VIC**);
- (e) Islamic College of Sport (NSW) Limited (ABN 36 684 611 587) (Islamic College of Sport NSW)

For clarity, Aligned Leisure, Bachar Houli Foundation the Islamic College of Sport VIC and Islamic College of Sport NSW are not separate reporting entities under the definition of the Modern Slavery Act.

Our Statement covers all 7 mandatory criteria for reporting as set out in section 16 of the Modern Slavery Act. In preparing this Statement, we have used the Commonwealth Guidance for Reporting Entities and updated Modern Slavery Act Supplementary Guidance by the Attorney General's Department (together, the **Commonwealth Guidance**) to help inform and guide our approach.

2. Our Structure and Operations

2.1 Our Structure

The Club is a not-for-profit company limited by guarantee, incorporated and domiciled in Australia.

Established in 1885, the Club is based in Melbourne, Victoria

During the FY25 Reporting Period, the Club owned and controlled the subsidiaries.

The Club and its subsidiaries (**RFC Group**) operate across a range of business activities, including elite sport, community engagement, education, leisure facility management, and social impact initiatives. For more information, please refer to [RFC's 2025 Annual Report](#).

In the FY25 Reporting Period, the RFC Group employed approximately 2,260 people (comprising full-time, part-time and casual) across the group and is represented by 107 footballers (44 AFL players, 32 AFLW players and 31 VFL players). The Club had over 90,000 members, over 500,000 supporters nationwide, and over 30 commercial partners. The Club continues to maintain a significant presence within the community through its members, supporters, commercial partners and broader stakeholder network.



2.2 Our Operations

At its core, the Club's principal activity is operating as a sporting organisation and member of the AFL. Established in 1885, the Club has a proud history spanning more than 140 years and has won 13 AFL premierships, most recently in 2020. The Club also fields a team in the AFL women's competition and supports participation pathways across a range of football programs, including wheelchair football. Beyond elite sport, the Club is committed to delivering positive social and community outcomes through its broader operations and controlled entities.

Punt Road Oval has been the home of the Club since its establishment. During the FY25 Reporting Period, the Club continued to operate its football programs from Punt Road Oval, which serves as the primary training and administration facility for its AFL, AFLW, VFL and wheelchair football programs. The Punt Road Oval redevelopment continued in the FY25 Reporting Period as part of the Club's ongoing investment in its facilities and future growth.

While we are a sporting organisation at heart, we have also always been deeply involved and committed to serving our broader community. As such, we are a diversified sports organisation who has a wide range of key operations operated directly by the Club and via its subsidiaries. These are described below:

 Activity Area What we do	 Key Activities What we do	 Workforce Profile Who we employ	 Key Supply Chain Categories What we buy
 AFL Club & Sporting Operations	 Delivery of AFL, AFLW, VFL and Wheelchair Football programs, administration and corporate operations	 Professional, administrative, coaching, football operations and support staff	 Sporting equipment, apparel, technology, professional services, cleaning maintenance, security, facilities management, labour hire and event services
 Membership Operations	 Membership acquisition, administration and member engagement	 Corporate and customer service employees	 Marketing, printing, technology and fulfilment services
 Retail & Merchandise	 Sale and distribution of Club merchandise and member fulfilment items	Primarily managed through third-party arrangements	 Apparel manufacturing, promotional products, warehousing, logistics and distribution
 Infrastructure Development	 Redevelopment and maintenance of Club facilities, including Punt Road Oval	 Employees and contracted project personnel	 Construction, maintenance, building materials, engineering and specialist contractors
 Bachar Houli Foundation	 Delivery of community, education, leadership and employment programs	 Employees, contractors and volunteers	 Professional services, program delivery providers and event suppliers
 Aligned Leisure	 Management of leisure, aquatic and recreation facilities	 Predominantly casual workforce across multiple sites	 Third party contractors for cleaning, maintenance, security, labour hire, uniforms, chemicals and facility services
 Korin Gamadji	 Delivery of leadership, wellbeing and cultural programs	 Employees, contractors and facilitators	 Program delivery, travel, accommodation and event services
 Richmond Institute	 Delivery of sports industry education and training	 Education and administration staff	 Educational services, technology and professional services
 Islamic College of Sport	 Delivery of secondary education	 Teaching, administration and support staff	 Educational resources, uniforms, technology, facilities management and maintenance services
 Wantirna Club	 Hospitality, entertainment and gaming operations	 Hospitality and venue employees	 Food and beverage suppliers, cleaning, security, gaming services and facility maintenance

2.3 Our Supply Chains

As part of its FY25 commitments to strengthening supply chain governance, the Club conducted an review of key suppliers across its operations.

Of the RFC Group's more than 1,000 suppliers, approximately 10% by number account for the majority of procurement expenditure. A representative sample comprising more than half of these suppliers was



selected for review based on industry sector, and the extent of engagement across the Club and its subsidiaries. The sample considered higher-risk industries and procurement categories identified through the Club's modern slavery risk assessment.

The review included key sponsors and commercial partners and ensured representation across the RFC Group's operating entities and a broad range of procurement categories, including merchandise, venue hire, events and match day operations, utilities and facilities management, redevelopment and construction, information technology, food and beverage, and education and other strategic partners. These categories are broadly consistent with the AFL industry's supply chain profile and are considered indicative of the modern slavery risk exposures commonly associated with the Club's operations.

The review resulted in the following key findings:

Area	Finding	Insight / Risk Implication
Policy adoption	~74% of suppliers have modern slavery policies/procedures	Indicates strong baseline governance, but does not ensure effective implementation
Risk identification	~16–21% of suppliers identified modern slavery risks	Suggests likely under-reporting or lack of risk awareness rather than low exposure
Supply chain visibility	Majority limited to Tier 1 visibility	Significant blind spots across Tier 2–3 supply chains where risks are typically higher
Global operations	Majority operate or source internationally	Increased exposure to high-risk jurisdictions and complex supply chains
High-risk geographies	Multiple suppliers operate in Asia, Middle East, emerging markets	Elevated exposure to forced labour, child labour and weak regulatory environments
Labour hire & subcontracting	Several suppliers engage in third-party labour or agencies	Reduces oversight of workforce conditions and increases exploitation risk
Vulnerable workers	Some suppliers identified migrant, low-skilled or young workers	Higher susceptibility to modern slavery practices
Supplier due diligence	~42% require suppliers to comply with modern slavery commitments	Weak cascading of controls across supply chain tiers
Training & awareness	Majority provide modern slavery training to staff	Positive indicator of awareness, but effectiveness varies

3. Modern Slavery Risks

In this section we identify the 'risks of modern slavery practices', meaning the potential for the Club to cause, contribute to, or be directly linked to modern slavery through our operations and supply chains.



In this context, 'risk' means to people, rather than the risks to the Club (such as reputational or financial damage).

For the FY25 Reporting Period, our risk-mapping is set out **below**.

3.1 Key risk industries and activities

Based on the response data, higher inherent risks are concentrated in the following supply chain segments:

- (a) **Apparel, merchandise and raw material sourcing (*High risk*):** Suppliers operating in apparel and consumer goods identified exposure to child labour and forced labour risks, particularly in raw materials such as cotton, leather and rubber. Risks are heightened by complex, multi-tiered global supply chains and sourcing from higher-risk regions.
- (b) **Hospitality, events and service industries (*Moderate to High risk*):** Suppliers in events, venue services and related sectors indicated the use of casual, seasonal and younger workforces, sometimes supported by labour hire or recruitment agencies, increasing vulnerability to exploitation, underpayment and inadequate worker protections.
- (c) **Construction, maintenance and technical services (*Moderate risk*):** These sectors demonstrated reliance on subcontractors and labour hire arrangements, with risks driven by fragmented supply chains, limited oversight and indirect workforce engagement.
- (d) **Global sourcing and procurement of goods (*Moderate to High risk*):** Several suppliers source goods (e.g. materials, technology, equipment, food and beverages) from international markets, including regions associated with higher modern slavery prevalence. This introduces risks linked to manufacturing conditions, raw material extraction and third-party suppliers.

3.2 Key risk drivers identified

In addition to sector-based risks, the following systemic risk factors were identified:

- (a) **Geographic exposure:** A significant number of suppliers operate in or source from high-risk countries, particularly across Asia, the Middle East, and emerging markets. This increases exposure to forced labour, child labour and weak regulatory enforcement.
- (b) **Use of labour hire, agencies and subcontractors:** A subset of suppliers reported engaging labour hire firms or third-party contractors, reducing visibility over worker conditions and increasing risks of exploitative practices.
- (c) **Vulnerable worker cohorts:** Some suppliers identified the presence of migrant workers, young workers or low-skilled labour, which are known to face higher vulnerability to modern slavery risks.
- (d) **Limited downstream due diligence:** Only approximately 42% of suppliers require their own suppliers to comply with modern slavery commitments or codes of conduct, and relatively few conduct formal assessments of their supply chains beyond Tier 1. This indicates a significant control gap in risk cascading.

3.3 Supplier controls and maturity

Supplier responses demonstrate varying levels of maturity:

- (a) **Training and awareness:** A majority of suppliers provide **modern slavery training and awareness programs**, often as part of induction or annual compliance activities.
- (b) **Reporting mechanisms:** Most suppliers have whistleblower or reporting mechanisms in place for modern slavery concerns, indicating baseline governance controls.
- (c) **Policy adoption vs implementation gap:** While policy adoption is relatively high, there is inconsistent implementation, particularly in:
 - (i) supply chain mapping beyond Tier 1;
 - (ii) supplier onboarding due diligence; and
 - (iii) active risk identification and reporting.

4. Actions to assess and address Modern slavery risks

4.1 Actions taken during FY25 Reporting Period

Set out below is an overview of the key actions undertaken during the FY25 Reporting Period to assess and address modern slavery risks across the Club's operations and supply chains.

These actions build on the Club's existing governance framework and reflect a continued focus on strengthening supplier oversight and understanding our supply chains better to enable being able to better assess and/or address any modern slavery risks.

Action	Description	Relevance to addressing modern slavery	Assessing or addressing modern slavery risks
Supplier reviews (Tier 1)	External – Key Tier 1 suppliers: During the FY25 Reporting Period, the Club conducted reviews of its key Tier 1 suppliers across its operations to improve visibility of supplier practices and assess modern slavery risk exposure and control maturity. As part of the assessment, suppliers were evaluated against factors including company size, nature of employment, supply chain visibility, and the availability of resources to identify, assess, address and avoid modern slavery risks.	This review enhances the Club's ability to identify higher-risk suppliers, understand control gaps and prioritise mitigation actions. It also strengthens transparency across direct supplier relationships.	Assess risks
Anti-Modern Slavery Policy	Internal and external: The Club developed an RFC Group Anti-Modern Slavery Policy outlining its commitment to identifying, preventing and addressing modern slavery risks across the operations and supply chains of the RFC Group.	Establishes a formal governance framework and sets expectations for staff and suppliers, supporting consistent identification and management of modern slavery risks.	Assess and address risks

Action	Description	Relevance to addressing modern slavery	Assessing or addressing modern slavery risks
Workplace conduct training	Internal: All employees, contractors and volunteers of the RFC Group are required to complete workplace conduct training during onboarding and at periodic intervals. The training covers sexual harassment, workplace bullying, safeguarding children and young people, anti-discrimination and equal opportunity, work health and safety, Aboriginal and Torres Strait Islander Inclusion and Cultural Safety, and whistleblower rights and obligations.	Strengthens organisational awareness of ethical conduct and workplace rights, fostering a culture that minimises modern slavery risks in its business operations and supports the identification and reporting workplace behaviours which could be potential indicators of modern slavery.	Address risks
Risk management framework and modern slavery risk register	Internal: The Club commenced development and enhancement of a corporate risk register for contract management which will also involve a focus on improving procurement processes for new suppliers and oversight of existing suppliers.	Enables structured identification, assessment and monitoring of modern slavery risks, ensuring risks are tracked, prioritised and managed appropriately.	Assess and address risks
Review of third-party IT and software providers	External: During the FY25 Reporting Period, the Club undertook a review of its third-party information technology (IT) and software providers to better understand the structure of these supply chains and inform future modern slavery risk assessments and due diligence activities.	Improves visibility of supply chains in a higher-risk procurement category, supports future due diligence activities, and strengthens governance by embedding modern slavery considerations into supplier management processes.	Assess and address risks

5. Action effectiveness and roadmap

5.1 Assessment of effectiveness of actions

The Club is developing a range of key performance indicators (**KPIs**) to monitor and assess the effectiveness of its approach to mitigating modern slavery risks. The primary KPIs have been the:

- implementation of the modern slavery questionnaire;
- the percentage of high-risk suppliers that complete due diligence; and
- the number of modern slavery risks or instances raised through our reporting channels and addressed by the Club.

However, we will be developing other KPIs as the action items in the roadmap below are completed including, for example, the number of ancillary policies that include modern slavery consideration are developed (eg procurement policy and processes); the percentage of staff that complete modern slavery training; and the percentage of contracts that include modern slavery clauses; and the number of identified risks that are addressed within defined timeframes.

5.2 Our indicative future roadmap

The Club will focus on building on the foundations established during the FY25 Reporting Period by progressing from policy development and initial risk identification to policy implementation, deeper supply chain visibility, better due diligence processes and stronger supplier accountability mechanisms.

INDICATIVE MODERN SLAVERY COMMITMENTS ROADMAP



6. Consultation with subsidiaries

6.1 Engagement process

The Club prepares a single statement for the purposes of the Modern Slavery Act and is required to consult with its subsidiaries.

During the FY25 Reporting Period, the Club actively engaged and consulted with all subsidiaries in the development of this statement.

This consultation process involved active participation from these entities, including sharing information on the Modern Slavery Act's reporting requirements, discussing actions undertaken and planned to address modern slavery risks, and providing relevant materials, guidance and updates.



7. Other relevant information

7.1 Review of Modern Slavery Act

We are aware that the Modern Slavery Act is under review and the Australian Government published its response to the independent statutory review of the Modern Slavery Act in December 2024 which endorsed 25 of the review's 30 recommendations (including enforcement penalties). The Office of the Australian Anti-Slavery Commissioner was established shortly thereafter.

Since 21 July 2025 there has been a public consultation process involving various stakeholders on reforms to the Modern Slavery Act.

On 30 January 2026 the Office of the Australian Anti-Slavery Commissioner published an initial position paper setting out the recommendations to strengthen Australia's modern slavery laws including through the introduction of a:

- (a) mandatory risk-based modern slavery due diligence obligation for reporting entities; and
- (b) mechanism for the Anti-Slavery Commissioner to declare that a product, service or industry carries a high risk of modern slavery, and require entities to have regard to declarations in their due diligence and reporting obligations under the Modern Slavery Act.

7.2 Monitor statutory review

We will continue to monitor the progress of the review and any reforms that may be made to the Modern Slavery Act. Depending on what recommendations are implemented, we will review and adjust our modern slavery compliance roadmap accordingly.



MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

The table below helps illustrate where you can find the criteria for the Modern Slavery Act addressed in this Statement.

Mandatory criteria	Page number/s
a) Identify the reporting entity.	5 - 6
b) Describe the reporting entity's structure, operations and supply chains.	5 - 6
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	7
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	9
e) Describe how the reporting entity assesses the effectiveness of these actions.	10
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	11
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	12

If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement 'Do not own or control any other entities' instead of a page number.

** You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

1. Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.
2. Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the *Corporations Act 2001*—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.