

MODERN SLAVERY STATEMENT

1. INTRODUCTION

This statement is made pursuant to the *Modern Slavery Act 2018* (Cth) and covers the activities of Western Suburbs (N'cle) Leagues Club Ltd ABN 24 000 973 919 (**Wests**) and our controlled entities to assess and address the risk of modern slavery in our business operations and supply chain for the financial year ending 31 January 2023 (**FY2022**). The purpose of this statement is to outline our approach to ensuring Wests has robust frameworks and processes in place to minimise the risk of modern slavery in our business operations and supply chain.

2. OUR BUSINESS

Wests is a Newcastle not-for-profit membership based organisation that provides entertainment, accommodation and dining, function and fitness facilities across the region. At the core of Wests' operation is a dedication to providing quality venues, food and entertainment for our members and guests. Wests is one of the largest private employers in the area, and an economic driver for the Hunter region. Wests is an integral part of the local community and offers substantial support for schools, sporting teams and charities.

3. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

3.1. Wests is a public company limited by guarantee, incorporated and domiciled in Australia under the *Corporations Act 2001* (Cth) (**Corporations Act**). Wests' business operations include registered clubs, hospitality, gymnasiums, corporate and administration, and property assets across the Hunter region.

3.2. Wests is a member of ClubsNSW, the peak representational body for the NSW club industry, whose purpose is to lead a sustainable industry, seek to strengthen conditions for those working within the industry and to support the local community we serve. Wests is committed to working with ClubsNSW to ensure ethical commitments to fight modern slavery are being adhered to.

3.3. Wests has two controlled entities, being:

(a) The Executive Inn Pty Limited ABN 82 080 880 691 - a proprietary limited company incorporated and domiciled in Australia under the Corporations Act. Its business operations include hotel accommodation in the Hunter region, and ancillary operations.

(b) Knights Rugby League Pty Limited ABN 83 169 964 523 - a proprietary limited company incorporated and domiciled in Australia under the Corporations Act. Its business operations include an Australian professional rugby league club based in Newcastle, and ancillary operations.

3.4. As at the date of this statement, Wests has over 900 employees and its registered office is 88 Hobart Road, New Lambton, New South Wales.

3.5. Wests' supply chains predominantly relate to the sourcing of goods and services for the provision of food and beverage, hospitality, gaming, hotel accommodation,

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gymnasiums, corporate and administration, and professional rugby league. Where possible, Wests' focus is on local, Australian-based suppliers.

4. RISKS OF MODERN SLAVERY PRACTICES

- 4.1. In FY2022, Wests continued to monitor its supply chain to identify potential exposure to modern slavery. We continued to consider and collaborate on new processes that we could implement to reduce the level of risk that arises in connection with modern slavery.
- 4.2. During FY2022, Wests continued to outsource recruitment, marketing and asset management services on an as-needs basis. Specifically, Wests outsources specialist trades to local suppliers.
- 4.3. All of Wests' employees are engaged under common law employment contracts, modern awards and/or registered industrial instruments, which means all employees are paid in line with or above the national minimum wage. Wests occasionally engage contracted security, cleaning, maintenance and kitchen staff on an ad hoc basis and in specific venues only. The large majority of the outsourcing companies engaged by Wests are local and comply with the Australian employment standards.
- 4.4. The majority of Wests' suppliers are Australian based. Through everyday business operations there is also an obvious flow-on effect in the Hunter region as we maintain our operations over eight sites. We do our best to purchase locally when we can, and we provide hundreds of auxiliary positions in this region. However, we recognise that Wests could be indirectly exposed to the risk of modern slavery and human trafficking through our supply chains due to sector and industry risks and geographical risk.
- 4.5. We identified potential risk 'hotspots' in our business due to certain sectors and industries that may have higher modern slavery risks. This is where a local supplier may source a product, such as food products, uniforms and jerseys, building and construction materials, stationary, merchandise and furniture, from overseas sources, which may have a record of having modern slavery practices still in place. In FY2022, we entered into an agreement with a new supplier for the provision of jerseys and sportswear. As part of this process, we required the contractual commitment from that supplier that it will comply with all modern slavery laws and take reasonable steps to ensure there is no modern slavery in its supply chains or in any part of its business. We also introduced a modern slavery clause into our sponsorship agreement for Newcastle Knights with third party sponsors, requiring contractual commitment from the sponsor.
- 4.6. Wests now procures bulk orders of office stationery through one global importer and distributor of goods and it has obtained a Modern Slavery Prohibition Policy from this supplier. Wests also uses one central supplier for other merchandise, rather than ad hoc purchases. Again, it has obtained a Code of Vendor Conduct and Ethical Sourcing Policy from this supplier.

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5. ACTIONS TO ADDRESS MODERN SLAVERY RISKS

5.1. Wests has five defined core values including:

- (a) people and safety;
- (b) community;
- (c) innovation and change;
- (d) business growth; and
- (e) service.

Through these values, we pride ourselves on professionalism and aim to exceed customer expectations, and as such actively reduce the risk of modern slavery exposure in our operation and supply chains.

5.2. As at the date of this statement, Wests has registered its modern slavery statement for the financial years ending 31 January 2020, 31 January 2021 and 31 January 2022 with the Australian Border Force and have made these statements available on Wests' website.

5.3. Wests has an established Modern Slavery Working Group which is composed of representatives across Wests and its controlled entities. The Working Group's aim is to continue to identify key risks and requirements, oversee integration into existing compliance functions and increase business awareness of modern slavery risks.

5.4. Wests has an established Audit, Risk and Compliance Committee which is composed of multiple Directors of Wests, with invitation extended to the CEO and various executive-level representatives of Wests. This committee meets bi-annually (or as required) to consider any matters relating to audit and risk management.

5.5. Wests has a Remuneration and Nominations Committee which is composed of multiple Directors of Wests, with invitation extended to the CEO and the Group Chief People Officer. This committee meets bi-annually (or as required), and its duties include:

- (a) reviewing matters relating to remuneration, employment and work, health and safety within Wests;
- (b) developing a fair and consistent process for setting employee remuneration, using external consultants; and
- (c) ensuring compliance with relevant industrial legislation.

5.6. Wests utilises the 'Purchase Plus' procurement system and 'Lightyear' across its operations which provides a transparent and accountable method between its employees and suppliers to order and receive products and for accounting record keeping.

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5.7. Wests has a number of internal policies to ensure we are conducting business in an ethical and transparent manner, which include:

- (a) Code of Conduct: A set of guiding principles and minimum standards of behaviour that apply to all of our business activities and includes core principles such as safety, compliance and respect for people. In FY2022, a comprehensive online training module was rolled out to all employees across the Group, with a 83% completion rate.
- (b) Whistleblower Policy: All employees and directors are made aware of their rights to disclose any wrongdoing, and the policy provides protection for employees who disclose any such information.
- (c) Diversity and Inclusion Policy: A framework to embed and support a diverse workforce and inclusive workplace for all of our employees. It details our commitment to building a workforce that is representative of the communities in which we live, work, and serve.
- (d) Supplier Procedure: If a new supplier is introduced to Wests, the person requesting the use of a new supplier must confirm it does not have any conflict of interest, and that person must disclose any existing relationship with that supplier. This information must be recorded on our New Supplier Request Form. Also, gifts from suppliers cannot be personally accepted by our employees.

5.8. In January 2023, a comprehensive online learning module was rolled out to 38 senior managers and employees who are responsible for purchasing across the business. This module provides education on modern slavery and instructions for identifying and reporting modern slavery risks in connection with the workplace. At the date of this statement, the module has a 53% compliance rate, and Wests is actively working with this cohort to ensure 100% compliance.

5.9. In FY22, Wests revised its' corporate induction program to provide education about ethical purchasing and modern slavery to all new employees. In addition to this, Wests introduced Modern Slavery Act Awareness training to Wests' online learning suite, which is available to all employees.

5.10. These established practices and policies demonstrate our commitment to address modern slavery risks, as well as to ensure Wests have fair and ethical practices in place and is compliant with workplace laws.

6. ASSESSING THE EFFECTIVENESS OF THE ACTIONS TAKEN

In FY2022, Wests did not identify any instances of modern slavery or human trafficking associated directly with its own operations. No modern slavery or human trafficking concerns were raised with Wests about customers through our feedback channels. Also, in FY2022 there were no complaints through our whistleblower policy. Should any such concerns be identified, we would conduct any required investigations in accordance with regulatory requirements, policy and procedures.

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7. CONSULTATION

In FY2022, Wests continued to consider and assess modern slavery risks across the business, with focus on next stages of implementation of acknowledgement and commitment at the supplier level. The purpose of the working group is to take a collaborative approach between Wests and its controlled entities, and to prepare this statement.


This statement was approved by the Board of Directors of Western Suburbs (N'cle) Leagues Club Ltd ABN 24 000 973 919.

Date:

Signature:

Full name:

Title:


30.5.23
Geoffrey Robert Coburn
Chair / Director