



AUSTRALIAN TURF CLUB

# MODERN SLAVERY STATEMENT FY24

1 AUGUST 2023 - 31 JULY 2024



# 1.0 INTRODUCTION

This statement relates to all activities of the Australian Turf Club Limited (“ATC”, “We”) (ACN 148 157 288) and cements our commitment to identifying, assessing and actively implementing measures aimed at minimising the risk of modern slavery within our operations and supply chains. This is the third statement prepared by ATC and applies to the reporting period from 1 August, 2023 to 31 July, 2024.

**ATC takes the obligations under the Commonwealth Modern Slavery Act 2018 (the Act) seriously.** We acknowledge our role and responsibility in seeking to safeguard human rights through ethical and sustainable business practice and across all aspects of our organisation.

## 2.0 STRUCTURE, OPERATIONS & SUPPLY CHAIN

ATC has been an Australian registered club since 7 February 2011 with excess of 11,500 racing members. We exceed the mandatory reporting threshold with over \$100m of annual revenue.

We employ about 280 permanent staff, as well as 1,200 casual staff during our peak Spring Carnival racedays.

ATC owns and operates four (4) thoroughbred racecourses, with over 100 race meetings each year at Royal Randwick, Rosehill Gardens, Canterbury Park and Warwick Farm. We manage and operate one (1) community-focused venue located in the Sydney metropolitan region, Rosehill Bowling Club. In addition, the philanthropic and charity arm of the business is the ATC Foundation (ABN 742 438 274 96). All business operations take place in New South Wales, Australia.

In addition to horse racing, the ATC holds functions and events across its venues, including conference, food festivals and trade shows. We are committed to acting ethically and with integrity in all our business activities, whilst ensuring we continuously give back to the communities where we operate.

During the reporting period, ATC procured goods and services from approximately 1,200 suppliers. Our supply chain supports the business across a range of different types of suppliers including:

- Ambulance and patient transport
- Broadcasting and recorded entertainment
- Corporate Services
- Energy and utilities
- Event equipment
- Facilities including cleaning and waste management
- Food & Beverage
- IT Services
- Professional Services including banking and Insurance
- Racing Industry including Horticultural suppliers





## 3.0 RISKS OF MODERN SLAVERY PRACTICES IN ATC'S OPERATIONS & SUPPLY CHAINS

ATC is committed to upholding ethical and responsible business practices and complies with all relevant Australian workplace, occupational health and safety, and other applicable legislation. All direct employees of the ATC are based in NSW and hired locally. ATC considers the modern slavery risks of its controlled operations to be low, particularly where activities are carried out directly by ATC employees under established internal policies and procedures.

Employees of the ATC are based in NSW and are employed under the appropriate awards. All ATC employees are required to comply with internal policies and participate in ongoing training including but not limited to Workplace Health and Safety, Bullying and Harassment, Procurement Policy and Whistleblowing.

Given our business size and geographic footprint, we have undertaken a comprehensive assessment of our supply chain and key areas of expenditure to identify potential exposure to modern

slavery practices.

Through this assessment, ATC has identified certain outsourced services specifically security, procurement of technology (including hardware, software and cloud-based services), uniforms and merchandise, agricultural raw materials, machinery, food and beverage and equipment as areas that may carry an elevated risk of modern slavery due to the nature of the goods and services involved. We acknowledge that these sectors, as well as the garment and agricultural supply chains are generally recognised as higher-risk areas for modern slavery.

While the overall risk of modern slavery across ATC's supply chains is assessed to be low, we remain vigilant. All suppliers are required to confirm their compliance with relevant modern slavery legislation including "the Act". We maintain ongoing communication with our suppliers to ensure that modern slavery considerations are embedded into our business relationships.

## 4.0 ACTIONS IN ADDRESSING THE RISK OF MODERNS SLAVERY IN FY24

Aligned with our core business values of **collaborate, care, innovate, and achieve**, ATC is committed to operating responsibly and upholding the highest ethical standards across all areas of our business. We maintain a zero-tolerance stance on all forms of modern slavery. As part of our commitment to continuously evolving our processes and systems and proactively identify, assess, and address modern slavery risks within our operations and supply chains, we have adopted a structured approach based on four key pillars:

### I. Governance

Strong governance underpins our approach to managing modern slavery risks. We have established the Modern Slavery Compliance Group which plays a key role in ensuring compliance with relevant legislation and guiding the organisation's strategy to identify, assess, and address modern slavery risks. The Group provides oversight, implementation, and advisory support in applying ethical standards across all five of ATC's venues.

In the reporting period, the following policies were reviewed and updated to further embed our commitment to ethical practices:

- Anti-Bribery and Corruption Policy
- Bullying and Harassment Policy
- Code of Conduct
- Procurement Policy
- Whistleblower Policy
- Workplace Health and Safety Policy

In addition, ATC has incorporated specific modern slavery compliance clauses into service and supply contracts. These provisions require all service providers to comply with the Act including modern slavery laws and to demonstrate their own commitments to ethical sourcing and labour practices.

### II. Training and Communication

ATC is committed to raising awareness and equipping employees with the knowledge and tools to address and raise modern slavery risks effectively. All new employees are required to complete compliance training before commencing employment. Ongoing training is mandatory and is delivered regularly to all employees. These programs are designed to foster ethical decision-making and reinforce our commitment to human rights.

During the reporting period, ATC also integrated a modern slavery legislation recognition function to the onsite accreditation system. All casual staff members, third-party contractors and media representatives must complete this accreditation and confirming understanding in order to gain venue access, ensuring widespread awareness and alignment to our ethical standards.

## 4.0 ACTIONS IN ADDRESSING THE RISK OF MODERNS SLAVERY IN FY24

### III. Risk Management Framework

ATC's risk management practices are overseen by the Finance and Audit Committee, which provides strategic guidance to ensure effective management of risks that could impact business operations, including those related to modern slavery.

Our employee engagement and third-party management processes are designed to identify and assess potential risks across our network. As part of ATC's procurement practices, suppliers of high-risk goods or services are required to:

- Disclose any identified modern slavery risks in their operations and supply chains; and
- Respond to category review and request-for-proposal (RFP) processes with relevant compliance documentation

Where a potential risk is identified, ATC Procurement initiates a structured engagement and escalation process, which may involve working closely with the supplier to investigate the issue and, if necessary, implement corrective or remedial actions.

Conducting regular reviews and evaluations of the effectiveness of actions taken to manage modern slavery risks during each reporting period.

During the FY24 reporting period, no instances of modern slavery were identified in our operations or supply chain.

### IV. Supplier Engagement and Collaboration

ATC completes services audits with suppliers deemed to be in a risk category, which includes checking their employment methods, and management of their teams. In doing so, reviewing their compliance with the obligations for their businesses under **"the Act"**.

We actively engage and collaborate with our suppliers to promote ethical practices and reduce the risk of modern slavery. In FY24, this included a focused assessment of our cleaning services, a sector recognised as a higher risk. Our supplier engagement strategy involves open, transparent communication, including regular face-to-face meetings and ongoing dialogue.

Key elements of our supplier engagement approach include:

- Regular contract updates to incorporate model modern slavery clauses
- Requiring suppliers to report on their compliance with the Act and to disclose any improvements made to mitigate risks
- Conducting quarterly supplier reviews to monitor and assess modern slavery compliance

We believe that building a socially responsible supply chain requires more than compliance—it demands partnership, education, and a shared commitment to human rights.

## 5.0 ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

ATC plans to further explore and initiate key strategies to ensure we continuously identify and manage risks of modern slavery in our supply chain and operations including:

- Continuous identification of potential modern slavery risks in our supply chains and operations.
- Engage with suppliers on modern slavery risks through the quarterly supplier review process.
- Annual review and update to the Code of Conduct and core business policies to ensure compliance and processes to reflect ATC's commitment to upholding human rights;
- Reviewing subcontractors and their modern slavery practise. This includes labour hire providers and agency staff that we engage through a casual workforce.
- Explore educational seminars or training for Modern Slavery Working Group.





## 6.0 CONSULTATION & APPROVAL

The policies, processes and systems described in this Statement apply to ATC.

The ATC Board retain oversight of all major contracts, governance, risk management and modern slavery risks through our risk management framework.

This modern slavery statement was approved by ATC's Board of Directors on 29 September, 2025, pursuant to s 13 of "the Act".

Tim Hale SC

Australian Turf Club Chairman