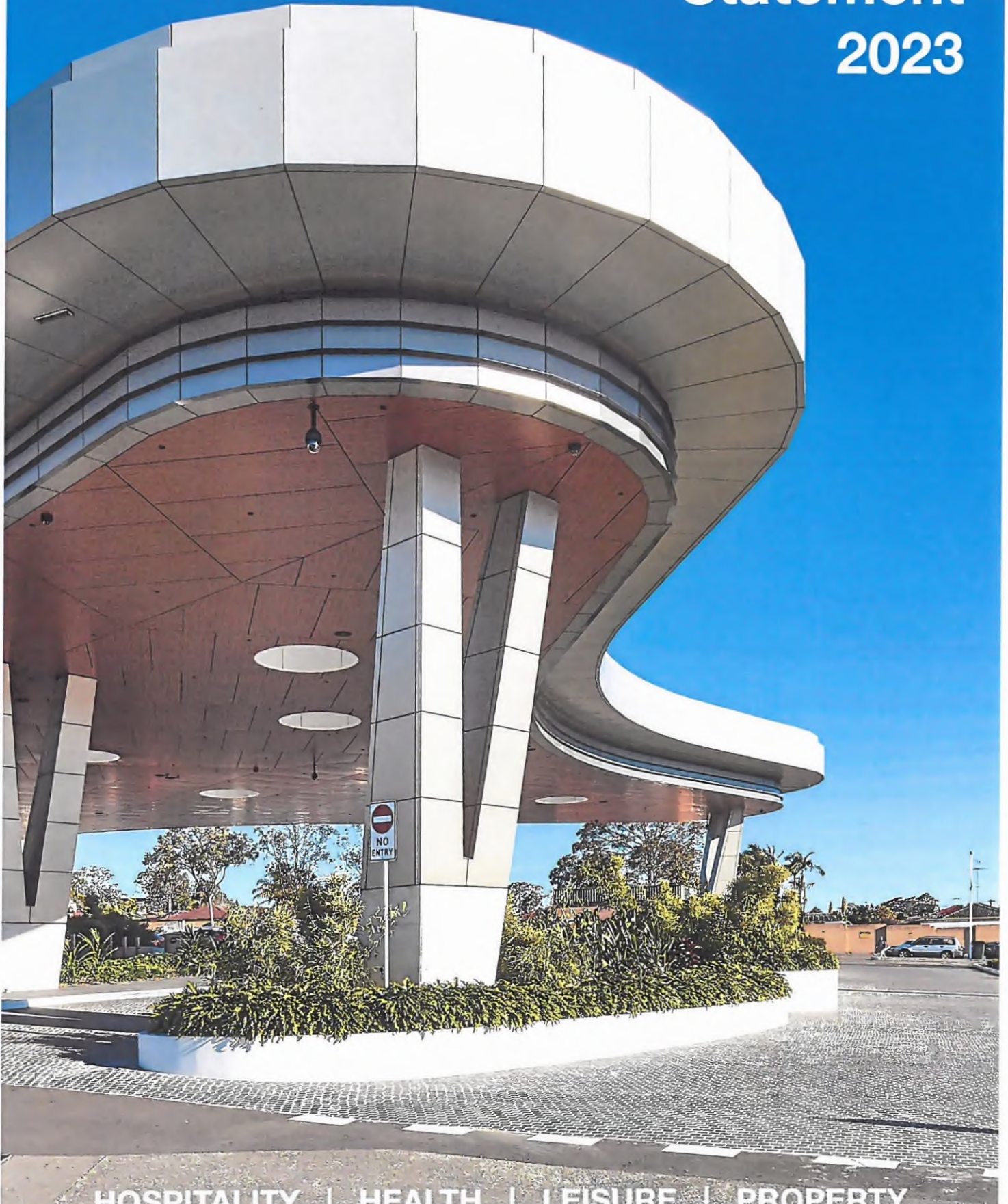




Mount Pritchard and District Community Club Ltd

Modern Slavery Statement 2023



HOSPITALITY | HEALTH | LEISURE | PROPERTY



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1. INTRODUCTION

This statement is made pursuant to section 13 of the Modern Slavery Act 2018 (cth) and covers the activities of Mount Pritchard and District Community Club Limited (Mounties Group) ACN 000 458 622 and its control entities for the year ended 30th June 2023. The statement outlines Mounties Group's commitment to identifying, mitigating, and managing modern slavery risk in its operations and supply chains.

Mt Pritchard & District
Community Club Ltd
ACN 000 458 622
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2. OUR BUSINESS

Mounties Group is "profit for purpose" membership based limited liability Australian domiciled company, principal activities of which is focused on local communities by encouraging in sports participation from grassroot to elite, provision of accommodation, health care services and facilities by operating club licensed venues in NSW under the provision of the Registered Clubs Act 1976.

2.1 Key Brands and business Names

Mount Pritchard and District Community Club Limited, Mounties Group, Mounties Health & Fitness, Carers and Companions, Breakers Country Club, Invitation to health, M Brasserie, ClubCare, Spinners Restaurant, Mounties Flamez Hair Design, Halekulani Bowling Club, Club Wyong, The Oven at Mounties, Jumbo Seafood Restaurant, Mounties Academy of Excellence, Major Fun, Major Fun - Freshwater, Major Fun – Mount Pritchard, Mounties Delivers, Mounties Centre of Excellence, Watermark Freshwater, Manly Bowing Club, Club Italia, Festa Di San Eurosia, Festa Di San Marco, Festa Di SS Martini, Fogolar Furan Sydney, The Veneto Club of Sydney, Ignite Health & Fitness, Mekong Club Mounties Group, Mekong Mounties Group, Triglav Club Mounties group, Triglav Mounties Group, Club Italia Mounties Group, Harbord Diggers Club, Harbord Diggers, Guildford Road Medical Centre, Mounties Bowling Club, Mounties, Mount Pritchard & District Community and Bowling Club. Mounties Care Pty Ltd, New Diggers Car Park Co Pty Ltd, New Diggers Service Co Pty Ltd, New Diggers Land Co Pty Ltd, Mekong Lease Co Pty Ltd, Ozcott Pty Ltd, Mounties @ Sussex, Mounties Wanderers FC.

3. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

3.1 License Venue – Mounties Group

- Mounties at Mount Pritchard.
- Mounties Mekong at Cabramatta.
- Mounties Harbord at Freshwater.
- Mounties Triglav at St. Johns Park.
- Mounties Manly Bowling Club at Manly.
- Mounties Halekulani @Budgewoi.
- Mounties Breakers Country Club at Wamberal.
- Mounties Club Wyong @ Wyong.

3.2 Other business interests – Health Leisure and Accommodation

- Health, Home & Disability - Mounties Care, ESP Health Care, Home Care, Carers and Companions, Care Mobility & Independence,
- General Practice and Specialist Medical Care.
- Resort - Mounties at Sussex. Retirement living at Freshwater.
- Childrens Play Centre- Major Fun at Mount Pritchard and Fresh Water.
- Education – Street University.

3.3 Sports and Community Engagement

As a “profit for purpose” organization, giving back to the communities is at heart, and by keeping the tradition, generous funding is provided to subsidize the sporting and community activities, some as follows:

- Football – Mounties Wanderers Super and Youth League.
- Footy – Mounties Ron Massey and Sydney Shield.
- Cricket – Shires Cricket.
- Other Sports – 43 Social Sports Sub clubs.
- Others – 11 Non-Sports Social Sub Clubs.

Financial information on community contribution is available on the group website: www.mountiesgroup.com.au/annualreport2023

3.4 Mounties group is a member of the ClubsNSW, the peak representational body for the clubs in NSW, the purpose of whom is to lead a sustainable industry, seek to strengthen conditions for those working within the industry and to support the local community we serve. Mounties is committed to working with ClubsNSW and embraces ethical



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engagement and professional guidance to fight modern slavery within its business cycle.

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3.5 Mounties Group Operation - Mounties Group has over 1,000 employees working across different venues as of 30th June 2023, administered from its registered office at 101 Meadows Road, Mount Pritchard. All Mounties employees are engaged under one of the many industry awards such as modern awards, common law employment contracts, etc that is, all employees are paid at least at the industry award rates as a minimum.

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3.6 Supply Chain – For the reporting period, Mounties Group had approximately 900 suppliers predominantly supplying good and services for the operation of food and beverage, hospitality, accommodation, gaming, gymnasium, health and care, sports, and community care businesses.

4.0 Risk of Modern Slavery in our operations and supply chain.

4.1 In our operations

To continue monitoring and identify any potential exposure to modern slavery risk in our operations and supply chain in the current reporting year, we sought to continue investigate our potential contribution directly or indirectly to modern slavey. Being an Australian domiciled and business operations, monitored by centrally located head office, we consider our risk of modern slavery as low. Moreover, as the employees are employed under one of the awards, such as common law employment contracts, modern awards, etc, it is evident staff are paid in line with or above the minimum industry rates. As Mounties Group also engages some contracted employee in areas of maintenance, cleaning, and security, it always ensures local registered companies are used and comply with Australian employment standards. Most of our workforce are recruited from the local community.

4.2 In our supply chain

For this reporting period, Mounties Group acquired goods and services from suppliers all of whom are Australian domicile, hence the modern slavery risk in our supply chain is considered low. Though our local suppliers have a competitive advantage, every business is given fair opportunity to transact with us. Whilst its preferred using locally produced goods and services, we are mindful modern slavery is inherited in the supply chain behind some of the essential items, such as chemicals, cleaning materials, sports and corporate merchandise, technology



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products, stationery, furniture, and equipment by local suppliers sourced overseas.

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4.2 (1) Supplier Analysis – Controlled Entity.

Mounties Group has one operating controlled entity, Mounties Care Pty Limited, for this reporting period, the entity is also committed to detecting and addressing modern slavery risk in its supply chain.

Mt Pritchard & District
Community Club Ltd
ACN 000 458 622
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The operations and supply chain of the controlled entity (Mounties Care Pty Limited) is managed by the Management and Staff of Mounties Group and its supply chain process.

For all other businesses listed in the appendix, is managed by Mounties Group operations and there is no supply chain involved.

Supply chain summary

Though our supply chain is dominated by local suppliers, the following products used in quantity volume in our business are of foreign origin, countries with high global slavery index.

- Sports and Corporate Merchandise – We have sourced our sports, corporate and staff uniform from our local supplier, however manufactured in China and Malaysia. Being classified as high-risk countries, we have issued modern slavery questionnaires to get our understanding of the process.
- Software and Hardware – We have various software development and support agreements with Australian origin entities and considered as low risk. For the hardware supplier, its sourced from Australian based entities and considered as low risk.
- iPhones - Mounties Group purchases apple iPhones from its outlets or a major supplier directly. Further to media report that Apple hardware production have be impacted with child labor in China, Apple has stepped up control measures and eradicate this from its supply chain.

5.0 Our actions to assess and address modern slavery risks.



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Mounties Group has well defined core values that we pride ourselves about, through which we thrive to improve the lives of our members. As a local member based corporate citizen, we embark to employ from local communities on various industry award pays and every cent of our profit given back to our members and local communities through donations infrastructure and support, and therefore every reason to reduce the exposure or risk in our operation and supply chain.

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5.1 In our operations

- Our People and Culture team conducts various checks to ensure that those we recruit are of legal standing and working of their own free will. Our ethical standards do not tolerate discrimination or harassment and ensure to provide health, safety, and wellbeing to our human capital without whom we do not exist.
- We are committed to ensuring our employees are paid nothing below the market rates, and to achieve it, performance-based and relevant industry awards are used as benchmarks to attract and retain high-calibre team members.
- Mounties Group has a Remuneration Committee comprises of multiple independent directors and CEO, delegated to ensure staff are employed and paid according to the terms and conditions of employment, provided with safe working environment (WH&S) and adhere to industrial legislative compliance.
- We also provided additional incentives as follows:
Employee Assistance Program – The purpose of the employee assistance program (EAP) through a third-party provider is to assist employees in dealing with personal issues in confidence, that affect their lives or performance at work. Some issues that EAP regularly assist staff with are:
 - Stress - dealing with work related stress.
 - Relationship – for example, in an effect to avoid a breakup or dealing with issues resulting from breakup.
 - Mounties Perks – Is the home of employee benefits, discounts, and wellbeing where staff can access information on health and fitness, take advantage of employee benefits as well as being able to enjoy heaps of great exclusive discounts at hundreds of retail outlets.
- Mounties Group also has a well-established Audit, Risk and Governance Committee comprises of directors, the CEO, and an independently appointed chairperson, who meets quarterly to address any matters of governance, risks, and audit.

5.2 In our supply chain

Mounties has established numerous policies and procedures to guide the employee conduct business ethically and in transparent manner such as:

- Mounties Group code of conduct - founded upon its values and sets out the minimum behavioral standards expected from its suppliers and employees it deals with and ensures its followed.
- Our Whistleblower Policy: reaffirms our commitment to Modern slavery as the employees and suppliers are encouraged to report any concerns freely and without fear of victimization. Since the facilities have been in place for the last two years, not a single report has been received which demonstrates modern slavery has been embraced seriously at Mounties Group.
- Procurement Policy: has been revised to stringent the procurement procedures including conflict of interest and delegation of procurement approval authority leading up to Board as required. Further, we are in the process of updating the "Supplier Code of Conduct" which will be implemented in coming months.
- Due Diligence and Audit: We internally review and evaluate our supply chain to identify any possible risk therein and ensure the suppliers are compliant with the Modern Slavery act retrospectively. During this reporting period, Mounties updated the supplier on-boarding questionnaire provided to new suppliers to include mandatory modern slavery related questions. Any breach by a supplier of our modern slavery terms permits Mounties Group to immediately terminate business dealings – zero tolerance to modern slavery.

5.3 In the current reporting period, an online module on Modern Slavery awareness training was rolled out for senior staff and others directly involved with procurement of goods and services throughout the Mounties Group businesses with a 75% completion rate.

5.4 Mounties Group policies, and procedures reflects strong commitment to act ethically and with integrity in all our operations and supply chain and to implementing and enforcing effective systems and control to ensure slavery and human trafficking never happens.

6.0 Assessing the effectiveness of the action taken.

For the reporting period, there have not been any concerns or incidents brought to our attention, including through our whistle blower policy mechanism to address modern slavery in our group's operations and supply chain.

Had any adverse report or incident been received, it would have been treated with utmost urgency and referred to the Audit, Governance and Risk Committee who has the ultimate power to review the matter and issue directive to minimize or eliminate risk. Any non-compliance matter is also referred to the Audit, Governance and Risk Committee to address.

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Key Performance Indicators (KPIs)

The following key performance indicators (KPIs) are in place to measure the effectiveness of our modern slavery and human trafficking in our operations and supply chain:

- Completion rate of modern slavery training of personnel within the Group.
- Completion rate of supplier modern slavery questionnaire in lieu of modern slavery statement.
- Promotion of whistle blower policy managed by an agent and protection of whistle blowers without the fear of identification or victimization.
- Payment to employee according to industry awards which are audited at least annually by external party.

We will continue to monitor, assess, and adjust our approach in the changing environment to be most effective in managing modern slavery risk.

7.0 Consultation with Entities.

Mounties Group has consulted its other controlled entities (ref appendix) and addressed its due diligence and reporting requirement in this (Group's) Modern Slavery statement.

The Management team and staff involved with the supply chain have been trained in Modern Slavery requirements and to ensure that the supplier questionnaire is completed as a condition of doing business at group level.

This statement was approved by the Board of Mount Pritchard & District Community Club Limited ACN 000 458 622 trading as Mounties Group.



Dale Hunt

ACCM; AMAMI; AIMM; MAICD

Chief Executive Officer, Mounties Group

30th October 2023

Appendix

Reporting Entities

Mount Pritchard & District Community Club Ltd	ACN 000 458 622
Mounties Care Pty Ltd	ACN 639 697 171
New Diggers Car Park Co Pty Ltd	ACN 607 170 767
New Diggers Service Co Pty Ltd	ACN 601 376 238
New Diggers Land Co Pty Ltd	ACN 601 376 229
Ozcott Pty Ltd	ACN 110 609 517
Mekong Lease Co Pty Ltd	ACN 619 040 845