



Modern Slavery Statement

1 July 2024 – 30 June 2025

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Introduction

Bankstown District Sports Club Ltd (*Bankstown Sports*) has maintained a community-focused approach to Modern Slavery risk management during the 2024–2025 Financial Year, with a foundational alignment to our Group Governance and Risk Management Frameworks. Our mission – *Making a Difference* – remains the driving force behind our continuous improvement approach and our Board and Senior Management reaffirm our commitment to ethical business practices and corporate responsibility.

This Financial Year, our focus has been on deepening our integration of Modern Slavery risk management actions and controls into our broader Environmental, Social and Corporate Governance (*ESG*) Strategy and Roadmap, ensuring that our actions not only meet compliance requirements but also drive positive change for our people, suppliers and the wider community.

Our Mission

Making a Difference

This Modern Slavery Statement aims to reaffirm Bankstown District Sports Club Ltd’s commitment to upholding the rights of its people and model this moral imperative to uplift our community. Our Board and Senior Management are committed to aligning our operational footprint to the principles outlined in the *Modern Slavery Act 2018 (Cth)*. This statement relates to the 2024-2025 Financial Year and is prepared with regard to all stakeholders part of and engaging with Bankstown District Sports Club Ltd and its associated entities.



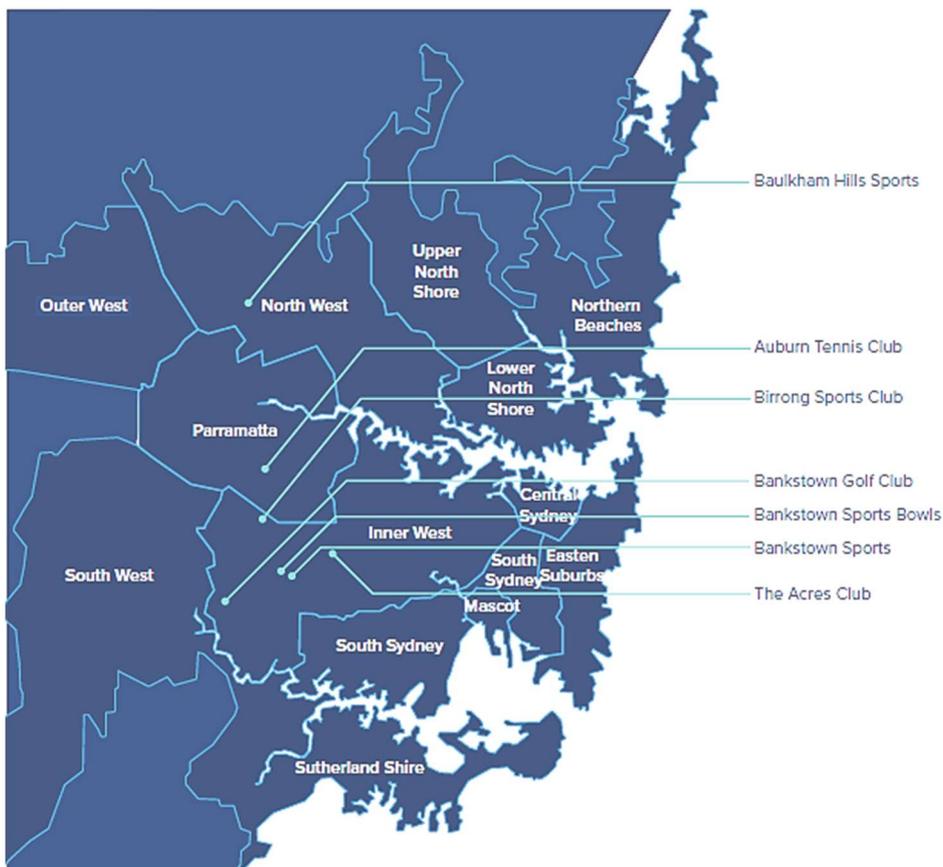
Our Continuous Improvement approach to Modern Slavery Risk Management

Operations and Structure

At the end of this Financial Year, Bankstown Sports employed 605 staff in full-time, part-time, and casual roles across our venues and entities. We continue to engage agency and labour hire workers on an ad hoc basis as part of our psychosocial hazard management practices to address potential work-demand fluctuations and temporary increases in job demands.

Bankstown Sports operated the following licenced and registered club premises during the 2024/2025 Financial Year:

- Bankstown Sports Club
- Baulkham Hills Sports
- Birrong Sports
- Bankstown Sports Bowls
- The Acres Club
- Auburn Tennis Club
- Lady Banks Rooftop
- Bankstown Golf Club



Our Venues

Our diverse entities include restaurants, bars, electronic gaming, golf, a brewery, administration, property management, community support, facilities and security.

Bankstown District Sports Club Pty Ltd is the parent company of:

- Bankstown District Sports Club Agencies Pty Ltd
- Bankstown District Sports Club Properties Pty Ltd
- Flinders Centre Properties Pty Ltd
- Facility Services Pty Ltd
- Clairemont Properties Pty Ltd
- Eleon Pty Ltd
- Athlitikos Pty Ltd
- Doontkare Pty Ltd
- Bandour Greenfield Pty Ltd

People and Policies

Bankstown Sports recognises the risk factors associated with a business environment that operates 24 hours a day, 7 days a week. The multitude of risk factors that accompany our operating footprint require clear people-focussed governance frameworks that integrate bespoke safeguards and risk controls into policies and procedures.

As the nature of potential or actual Modern Slavery risks evolve, we recognise that it is essential that we too increase our capacity to identify, discuss and collaborate on risk mitigating activities. To support this approach, we expanded our Compliance team and elevated the capacity of our Risk stakeholders, creating Chief of Risk and Compliance Officer roles to champion uplifted risk management practices across the Group.

Our Modern Slavery strategy, operating within a wider ESG Strategy, is supported by a risk-conscious community and people focussed corporate governance framework – our **T.R.U.S.T. Framework**.

Bankstown Sports Club's T.R.U.S.T. Framework

Thoughtful Interventions that help real people

Responsibility to our Community

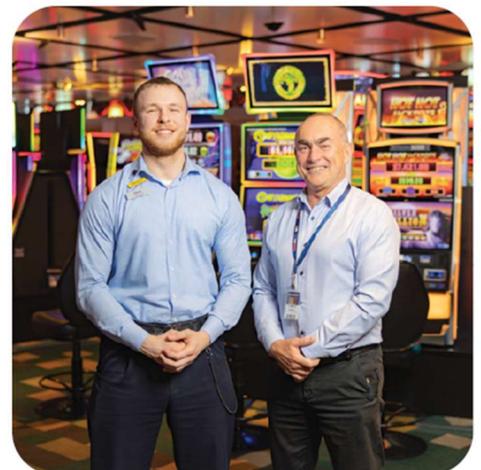
Unify to support diversity and inclusivity

Sustainability and environmental resilience

Trust & Integrity as a business

The **T.R.U.S.T. Framework** supports our vision of harm minimisation, supporting our people, supporting our community, promoting corporate responsibility initiatives and maintaining an ethical governance framework. Key governance policies and procedures within the **T.R.U.S.T. Framework** that wholistically address Modern Slavery risk factors include:

- Enterprise Risk Management and Contractor Management Frameworks
- Annual Psychosocial Risk Assessment and Control review
- Probity Policies and Procedures, including Whistleblower, Tender and Request for Quote Framework, Supplier Charter, Security and Workplace Surveillance Policies
- People Management Policies and Procedures (including ones specific to minors and vulnerable and at-risk individuals)
- WHS, Injury Management and Return to Work Policies and Procedures
- Hazard Management & Incident Management Procedures
- Workplace Bullying & Harassment and Wellbeing Policies
- Equal Employment Opportunity, Working from Home Policies
- Environment and Sustainability Policy
- Harm Minimisation Procedures and
- Liquor and Gaming Plans of Management
- Paid Parental Leave Policy with associated benefits
- Learning and Development Framework
- Numerous Committee Charters



The 2024-2025 Financial Year saw the evolution of our consultative Committees into a defined WHS & Community Committee and expanded ESG Committee, both with increased representation and specific direction to wholistically identify, strategise, discuss, plan and review Modern Slavery risk factors and risk management controls. Our WHS & Community Committee remains open to all team members wishing to engage and is continually promoted within the business, with a direct escalation pathway to Senior Management and the Board. These Committees are key mechanisms that support consultation to inform our continuous improvement approach to understanding and addressing Modern Slavery risks.

Bankstown Sports has a centralised administrative function with operational support mechanisms across its Venues and entities that foster collaborative and mindful risk management practices.

Backed by our Supplier Charter and Tender Frameworks, Bankstown Sports remains committed to promoting the same level of rights to our contractors, service providers, suppliers, and other external stakeholders as we do to our team members.



Potential Impacts

Bankstown Sports acknowledges its ethical obligation to operate with integrity and uphold robust operational standards that remain resilient under market pressures, while ensuring Modern Slavery risk management is not compromised. We actively embrace opportunities to collaborate with Australian and international organisations to promote responsible, risk-aware practices in addressing Modern Slavery by driving local initiatives that contribute to a meaningful wider community impact.

Key potential Modern Slavery risk factors specific to Bankstown Sports include:

- Ethical sourcing and supplier engagement, particularly where limited transparency may obscure the origin of goods or the geopolitical allocation of funds. While our IT and communications equipment suppliers are considered reputable, additional enquiry into obfuscated Third- and Fourth-Tier supplier practices is an ever-present risk.
- Interaction with workers in sectors considered vulnerable, such as Cleaning, Security, and Trades industries.
- Our organisational structure and operations, encompassing the diverse socioeconomic profile within our broader Group community footprint.
- Corporate governance risks resulting from gaps in organisational structure or shortcomings in due diligence processes.
- Service-related risks arising from supply chain disruptions to previously stable trade agreements, which have altered market dynamics. Such changes may expose service providers to adverse leverage factors and pressures, including unrealistic cost targets, dependence on low-cost labour, or impractical delivery timelines.
- The potential implications of workforce demographics and backgrounds, particularly where any association with current geopolitical issues (such as international conflicts or wars) may exist.
- Environmental and sustainability considerations with broader, long-term impacts on developing nations and traditionally obscured Modern Slavery risk factors.
- Industry-specific risks linked to direct engagement with, or impact on, vulnerable workers such as migrant and seasonal workers, individuals experiencing financial hardship, those affected by Domestic or Family Violence, and other marginalised groups. These risks also include heightened psychological distress and psychosocial challenges often faced by disenfranchised workers.
- Outsourcing of specific functions, such as payroll. A risk assessment has been undertaken to assess Bankstown Sports' engagement with our Australian payroll provider operating international subsidiary offices. This review identified a low level of risk relating to worker vulnerability, industry exposure, country risk, and business risk factors.



Governance and Risk Management

Bankstown Sports is committed to driving continuous improvement and upholding robust Corporate Governance and Risk Management standards. Recognising that Modern Slavery represents a dynamic and evolving risk landscape, Bankstown Sports Senior Management and Board adopt a whole-of-organisation approach to strengthening proactive compliance measures and positive duty actions.

Our Modern Slavery risk management practices are subject to regular review as part of our audit and assurance controls. These practices investigate key performance indicators such as training completion rates, risk assessment results, incident reports, whistleblower disclosures, staff surveys and other relevant metrics.

Bankstown Sports maintains a suite of Governance and Risk Management controls designed to ensure rigorous identification and management of Modern Slavery risks, including:

- **Robust Whistleblowing and Reporting Framework** - Secure and continuously monitored channels enable team members to raise concerns confidentially, supported by clear investigation protocols and Executive oversight. No reports relating to Human Rights or Modern Slavery risks were received during this reporting period.
- **Enhanced Contractor and Supplier Management** - Strengthened processes ensure transparency in external business practices and alignment with international standards, while avoiding undue burden on smaller enterprises. This includes mandating ISO certification for high-risk engagements such as our contracted cleaning services and extending our People Management principles to tenants and external contractors engaged through onboarding and compliance checks.
- **Ethical Sourcing and Tiered Supply Chain Oversight** - Increased scrutiny of second-tier suppliers promotes fair trading practices and mitigates risks in vulnerable regions. Partnerships with reputable labour hire firms further reinforce socially responsible workforce practices.
- **Governance Uplift and Strategic Oversight** - Regular audits of Board and Executive governance processes, coupled with expanded representation and scope of Modern Slavery, WHS, and Risk Committees, helps provide stronger oversight and informed strategic planning.
- **Fair Engagement and Local Supplier Support** - Active collaboration with local suppliers ensures purchasing power does not create adverse impacts, supported by fair delivery schedules and payment terms to maintain ethical business relationships.
- **Independent Assurance and Specialist Expertise** - Ongoing engagement, where applicable, with external experts for contract reviews, compliance audits and financial assurance ensures adherence to Australian and international standards. This includes legal support for migrant workers and verification of employment contracts to uphold fair work principles and above-industry pay benchmarks.
- **Integration with ESG Strategy and Future Standards** - In line with our ESG Roadmap, Modern Slavery risk management actions have been embedded into our sustainability framework, preparing for adoption of International Sustainability Standards Board (ISSB) standards in 2027. Key initiatives include:
 - Resource allocation for digitalising Enterprise Risk and Contractor Management
 - Uplifted training in Modern Slavery and psychosocial due diligence
 - Expanded consultation practices

- Promotion of supplier compliance with our Modern Slavery and broader ESG criteria
- Exploration of partnerships with external consultants to further strengthen risk management practices.

Bankstown Sports places strong emphasis on safeguarding Human Rights and endeavouring to prevent Modern Slavery risks within our operations. This commitment is reflected in the frameworks and initiatives through which we engage our team members:

- **Ethical Recruitment and Fair Employment** - Transparent hiring practices ensure integrity in recruitment and equal access to opportunities for all candidates.
- **Workforce Engagement and Rostering** - Direct communication with team members regarding work patterns promotes fairness and flexibility in scheduling.
- **Zero Tolerance for Bullying and Harassment** - Strict reporting and disciplinary procedures uphold a safe and respectful workplace, reinforcing organisational justice.
- **Equal Opportunity and Inclusive Practices** - Policies and programmes are designed to foster diversity and equity across all levels of the organisation.
- **Accessible Reporting Channels** - Comprehensive mechanisms for People, WHS, Incident, and Hazard reporting are actively promoted to encourage safe and timely disclosures.
- **Enhanced People & Culture Initiatives** - including
 - Paid parental leave for eligible full-time and part-time employees
 - Free access to feminine hygiene products
 - Two additional Wellbeing leave days
 - Subsidised nutritious meal options for shift workers
 - Domestic and Family Violence support, including emergency housing
 - Free psychological services and Employee Assistance Programme (EAP) access
- **Learning and Development Programmes** - Training initiatives focus on safe reporting, trade skills, leadership development, wellbeing and safe work practices to empower our workforce.

Bankstown Sports acknowledges the link between money laundering/terrorism financing and the amplification of Modern Slavery risks. To address these challenges, we actively collaborate with external experts to minimise harm and advance Responsible Gaming practices. Our organisation continues to heavily invest in and expand dedicated resources in this space, implementing industry-leading practices designed to proactively mitigate potential harmful impacts and strengthen ethical standards across our operations.



Community Initiatives

We recognise the responsibility to address emerging risks and adapt to the evolving needs of the communities we serve, including Modern Slavery. While these challenges are complex, we remain steadfast in our dedication to championing initiatives that safeguard vulnerable individuals and reduce the risk of exploitation.

Since opening our doors in 1958, Bankstown Sports has built and sustained a strong reputation across both local and broader club communities. Our unwavering commitment to meeting the needs of our Members, local organisations and the wider community is firmly embedded in the Group's strategic objectives and core business values.



Our commitment to community support is reflected in a diverse range of initiatives designed to assist those most vulnerable and address emerging social risks, including Modern Slavery. Over the past year, we have:

- **Direct Community Impact** - Delivered support to nearly 100 projects, including programmes for women and children affected by domestic and family violence, individuals living with disability, migrants, at-risk youth and children.
- **Direct Community Investment** - Invested over \$1 million in community projects across three local government areas, prioritising disadvantaged and vulnerable groups.
- **Domestic and Family Violence Support** - Ensured all venues stock Escabags, providing essential items for individuals fleeing domestic violence and rolled out a dedicated staff support plan offering emergency accommodation, resources, and referrals to local DFV services.
- **Strategic Partnerships and Collaborations** - Maintained a six-year partnership with Biyani House Women's Shelter and continued collaborations with organisations such as Bankstown-Lidcombe Hospital, Little Wings, ReLove, Catholic Care, Beyond the Badge, Fair Fight Foundation, and Raise Foundation. We also supported practical programmes focused on youth mental health, employment pathways, and mentoring.
- **Employee Engagement and Volunteering** - Introduced a structured volunteering programme with organisations tackling homelessness (ReLove), child hunger (Eat Up), and disability inclusion (Disability Sports Australia). We expanded the remit of our WHS Committee to include a Community focus to facilitate a safe forum to share ideas and raise concerns.
- **Fundraising for Vulnerable Communities** - Hosted an annual Golf Day supporting the Supertee project and organised Christmas and Easter raffles for charity.
- **Responsible Practices and Transparency** - Increased internal resources dedicated to Responsible Gaming and Harm Minimisation, ensuring proactive support for members and visitors. Promoted ethical sourcing through local procurement of fresh produce and "meet the grower" events, enhancing transparency and reducing Modern Slavery risk factors. Initiated an apparel supplier programme, reinforcing responsible partnerships in the sporting sector.
- **Education and Youth Development** - Sustained long-term engagement with high-school work experience programmes, providing safe, structured opportunities for industry education.



Key Areas of Future Action

The Board of Directors and Executive Management at Bankstown Sports acknowledge that Modern Slavery risks are dynamic and demand a proactive, adaptable approach to mitigation. Our commitment is to embed robust risk controls, identification processes, and assurance mechanisms into the organisation's core operations, ensuring these measures become an integral part of our standard business practices.

Key areas of future action include:

- **Corporate Governance Framework Uplift** - Commit additional resources to Modern Slavery risk management and expand governance initiatives under the **T.R.U.S.T. Framework**.
- **Embed ESG and Modern Slavery into Core Governance** - Fully integrate ESG principles and Modern Slavery risk controls into organisational design and everyday operations. Continue to design frameworks aligned to the International Sustainability Standards Board (ISSB) standards ahead of their 2027 applicability.
- **Digital Transformation for Modern Slavery Risk Management** - Research and implement advanced digital platforms for due diligence, assurance, and probity. Prioritise automation to better facilitate Modern Slavery and Enterprise Risk Management actions.
- **Strengthen Support for Vulnerable Individuals** - Expand practical assistance programmes and explore partnerships with specialist organisations to enhance community outreach. Review the effectiveness of the Escabag initiative and opportunities for enhanced support.
- **Enhance Training and Education** – Continue to uplift and develop accessible, multi-channel learning resources focused on Modern Slavery awareness, psychosocial risk management and wellbeing.
- **Deepen Supplier Engagement and Ethical Sourcing** – Extend the governance framework behind compliance monitoring and with additional assurances being required from suppliers regarding Modern Slavery risk management. Look to embed ethical sourcing standards across procurement practices. Continue to mandate fair work practice assurances from tenants and contractors
- **Expand Consultation and Collaboration** - Increase internal and external stakeholder engagement on Modern Slavery risk identification and mitigation strategies.
- **Governance and Committee Effectiveness** - Review and optimise the structure and performance of the ESG Committee to ensure robust oversight and accountability of Modern Slavery Risk Management.
- **People Management and Workforce Assurance** - Continue rigorous due diligence in recruitment and workforce management to minimise exploitation risks. Review escalation pathways and action plans arising from psychosocial risk assessments.
- **Measure, Monitor and Report Progress** - Establish clear metrics to measure performance of Modern Slavery Risk Management and ESG initiatives. Enhance processes to regularly update the Board and Senior Management to demonstrate continuous improvement and accountability.

Board Approval

This Modern Slavery Statement was ratified by the Bankstown District Sports Club Ltd Board of Directors on 9th December 2025 and will be regularly reviewed and updated, as appropriate, to ensure proactive compliance with the *Modern Slavery Act 2018 (Cth)*.

A handwritten signature in black ink, appearing to read 'M. Clancy', with a large, sweeping underline.

Michael Clancy

Chief Executive Officer and Member of Bankstown District Sports Club Ltd Board of Directors



Making a Difference

**BankstownSports BirrongSports TheAcresClub BankstownSportsBowls
BaulkhamHillsSports AuburnTennisClub BankstownGolfClub**