



MODERN SLAVERY STATEMENT: FINAL

FOR YEAR ENDED 30 JUNE 2023





1 Introduction

Greyhound Racing Victoria (GRV) is a State Government entity established under the *Racing Act (Victoria) 1958* to provide independent governance and regulation of the Victorian greyhound racing industry. GRV's objectives are to develop, encourage, promote and manage the conduct of greyhound racing in Victoria by encouraging broad participation and sustainably growing the industry's economic and social value.

GRV is a reporting entity for the purposes of the *Modern Slavery Act 2018 (Cth)* (Act).

This Modern Slavery Statement (Statement), prepared under section 16(1) of the Act in respect of GRV operations for the Reporting Period has been approved by the GRV Board, is signed by the Chief Executive Officer, and has been submitted in accordance with the Act.

The Appendix outlines and reconciles the relevant mandatory reporting requirements incorporated in Modern Slavery Act 2018 that must be addressed in an Annual Modern Slavery Statement.

2 GRV's Strategic Plan and Risk Framework

GRV has adopted a Strategic Plan that considers both the current state of the industry and the longer-term issues and opportunities impacting greyhound racing and greyhound welfare, while outlining a path for future growth and success.

Our Strategic Plan identifies GRV's Enablers of: **Future Focussed: Enabled People: and Meaningful Engagement.** Further detail on our Strategic Framework is available in [GRV's Annual Report, via this link.](#)

In order to deliver on its Strategic Plan, GRV has put in place a Board approved Risk Appetite (which outlines the extent and nature of risk which GRV will take on when delivering its strategy and operational outputs) and risk management processes and procedures to ensure that it appropriately identifies, assesses, evaluates and treats risks that could impact its operations and achievement of its vision and purpose.

GRV's assessment of its modern slavery risks, the subject of this Statement, has been considered with reference to the above and through the prism of integrity, sustainability and accountability.

3 GRV Structure Operations and Supply Chain

3.1 Overview

GRV operates as a stand-alone entity and conducts no subsidiary activities. Greyhound Adoption Program (GAP) is operated as part of GRV. GRV conducts races at 13 Tracks which are managed by 13 Individual clubs with their governance structure (independent of GRV).



3.2 GRV's Interaction with Greyhound Racing Clubs

As at 30 June 2023, there are 13 Registered Greyhound Racing Clubs in Victoria. Each Greyhound Racing Club has its own governance structure and membership and is responsible for the operations of each of the tracks, including the maintenance of its premises and racetrack (in accordance with GRV Track standards), members of its Club and the hosting of the general public on race-days. During the year ended 30 June 23, 1283 race meetings were held in Victoria.

Under the Rules of Greyhound Racing, the GRV Stewards administer race-days at tracks operated by the Registered Greyhound Racing Clubs. GRV also provides veterinary services in respect of the race-day activity.

The Rules of Racing establish the participation of others in the sport of greyhound racing. These persons and businesses are referred to in the industry as "registered participants" and include trainers; breeders and others involved on race-day. In total some 13,600 participants, support staff and volunteers are involved in Greyhound Racing in Victoria, with a full time equivalent of 4700 persons. Greyhound racing in Victoria contributed \$643 million economic activity in the past financial year.

Each of these registered participants has responsibility for its own business operations and supply chains. Where appropriate, GRV may seek to influence or guide these registered participants as part of its role in upholding the integrity of the industry eg use of model template trainer agreements.

3.3 Operations

GRV's operations can be summarised as follows:

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Business Function	Goods and/or services purchased to support operations
Greyhound Racing Integrity Unit and Greyhound Welfare and Rehoming	Regulation of Victorian greyhound racing Racing Integrity Veterinary services Greyhound welfare including operation of adoption program sites
Stakeholders, commercial and customers	Representation of greyhound Racing Clubs and the industry to Government and other Stakeholders Registration of participants and greyhounds Media, advertising and journalism Wagering administration Merchandise (including apparel)
Race Day Operations	Delivery of races at Racing Clubs and programming Box Draws Distribution of prizemoney
Core Business Functions	Corporate functions, including finance, legal, policy and regulatory advice, risk and compliance, information and registration services, human resources, facilities; procurement and Major projects and capital works management Landlord of Head Office



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4 Greyhound Racing Victoria's Supply Chain

GRV has conducted a review into its supply chain for the Reporting Period and has identified the following goods and services acquired to support its operations:

Business Function	Goods and/or services purchased to support operations
Greyhound Racing Integrity	Technical services Technology (reporting and Tracking Software) Apparel (Track Uniforms)
Stakeholders, commercial and customers	Media, marketing, advertising and journalism Wagering administration Merchandise (including apparel and track uniforms) Racing photography Racing video coverage and production Professional and technical services
Race Day Operations	Greyhound welfare and veterinary Veterinary supplies Security Raceday services and racing administration Maintenance and repairs of Race-day equipment Professional and technical services Apparel (track uniforms and racing rugs)
Greyhound Adoption Program	Greyhound welfare and veterinary services Veterinary (including medical) supplies Greyhound food and bedding supplies Transportation (including vehicles) Merchandise (including apparel and uniform)
Core Business Functions	Information Technology (e.g. software, licenses). The types of goods and services here are all unique, but in practise would overlap between business areas. That is, other business areas use professional services, not just integrity. Professional services Transport Travel requirements Insurance Utilities Trade services and maintenance, such as electrical and plumbing Telecommunications Finance Payroll Recruitment service Legal service Cleaning services Waste removal Security Engineering services and construction



GRV has over 700 suppliers providing a broad range of goods and services. Wherever possible, GRV procures goods and services from Australian vendors.

Where possible, GRV makes use of Victorian Government State Purchase Contracts (which incorporate Modern Slavery provisions) and for contracts above \$100,000 Supplier Code of Conduct requirements are incorporated into the procurement process (also addresses Modern Slavery provisions).

GRV currently sources goods and services from 30 offshore suppliers. These items are generally proprietary in nature and cannot be sourced from within our shores. GRV does not source raw materials from offshore.

5 Identification and assessment of Modern Slavery Risks at GRV

GRV undertook a focused assessment of relevant GRV activities to determine the impact of *Modern Slavery Act 2018* obligations on GRV. This assessment involved the completion of workshops with impacted functions and the completion of impact tables, and presentation to Senior Executive. The key outcomes are identified in Table 1 “Identification and assessment of Modern Slavery Risk at GRV”

Table 1 - Identification and assessment of Modern Slavery Risk at GRV

Component	Key Observations re GRV Practice	Identified Improvement Actions
Employment of Staff	<p>GRV Staff are employed subject to Individual Contracts; Enterprise Bargaining Agreements. Terms do not contravene <i>Modern Slavery Act 2018</i> provisions. Only Australian based staff are employed.</p> <p>GRV does not employ staff under 15 years of age. Stewards at Greyhound Racing Tracks must be above 18 years of Age</p>	None
Suppliers	<p>GRV makes use of State Government of Victoria Purchase Contracts (which incorporate Modern Slavery provisions) and for contracts above \$100,000 Supplier Code of Conduct incorporated (also addresses Modern Slavery).</p> <p>GRV Purchase Orders below \$100,000 also incorporate Supplier Code of Conduct and Procurement is reviewing its strategic supplier engagement to develop long term contracts greater than \$100,000 for a pre-determined period (so that Supplier Code of Conduct is incorporated in these contracts)</p> <p>GRV also makes use of listed suppliers on State Government of Victoria Registers that address Modern Slavery requirements ie Construction; garments; e-services</p> <p>GRV also accesses local suppliers/employees in accordance with Local Jobs First and Labor Hire Provisions of the State Government of Victoria.</p>	Management continued support for initiatives to develop long term strategic relationships with key suppliers so that Supplier Code of Conduct becomes the normal assessment process for procurement relationships.



6 Continuation of Business Enhancements

GRV will continue to focus its efforts on ensuring employees are employed under Enterprise Bargaining Agreements that comply with relevant industrial awards and/or employment contracts reflecting market rates of remuneration in the Australian market.

In terms of Procurement, GRV Management continue to support initiatives to:

- make strategic use of State Purchase Contract (which incorporate Modern Slavery provisions) and listed suppliers on State Government of Victoria Registers that address Modern Slavery requirements i.e. construction garments; e-commerce; and
- develop long-term strategic relationships with key suppliers so that Supplier Code of Conduct (which addresses Modern Slavery obligations) becomes the normal assessment process.

7 Evaluation and Treatment of Modern Slavery Risks

GRV operates a comprehensive policy framework addressing Modern Slavery Act 2018 obligations. Table 1 "GRV Policy Framework that addresses Modern Slavery Act 2018 obligations" summarises relevant policies.

Table 1 GRV Policy Framework that addresses Modern Slavery Act 2018 obligations.

Policy	Compliance with <i>Modern Slavery Act 2018</i> obligations
Modern Slavery	Outlines obligations of GRV and employees re Modern Slavery Act 2018 compliance
Code of Conduct	Employees are employed in accordance with a Code of Conduct whereby employees must comply with both Federal and State legislation
Conflicts of Interest	Outlines employee obligations to declare any conflicts of interest as an employee including situations where a supplier may entice the employee to enter in contract to supply goods and services
Respect in the Workplace – Sexual Harassment Respect in the Workplace	Outlines GRV's commitment to providing a work environment which is free of all forms of harassment. GRV has in place a Respect in the Workplace - Sexual Harassment Policy, and a Respect in the Workplace Policy addressing bullying
Whistleblower Policy	Enables employees to report instances of legislative non-complying behavior to both designated internal and external stakeholders
Procurement Policy and Framework	Outlines employee obligations to comply with Victorian Government Purchasing Board requirements that incorporate compliance with Modern Slavery Act 2018 provisions
Fraud Policy	Outlines obligations of employees re engagement of employees and suppliers on terms which could benefit each party at the expense of GRV

As noted in Section 6, GRV employs staff under Enterprise Bargaining Agreements that require employees to be employed in accordance with designated Industry awards relevant to staff roles. Under Enterprise Bargaining Agreements, rostering arrangements are in operation for stewards to ensure that staff are rostered in accordance with a 38-hour week and have appropriate break times between race meetings and have access to meal allowances and breaks. Further, staff are employed under employment contracts reflecting market rates of remuneration in the Australian market



8 GRV Compliance - Controls Assessment

Core controls (ie those which play material role in operating GRV activities) are recorded in GRV's risk registers which are subject to review and updated on a six- monthly basis, in conjunction with business owners. GRV conducts a compliance framework and annual approved audit plan under the Financial Management Act 1994, that incorporates an internal plan of core controls testing that addresses policies outlined at Section 7; and allows for testing of controls addressing Modern Slavery obligations. Review findings re core controls are reported to Senior Management and Audit and Risk Committee, and closure of any these review findings are tracked and reported to the Audit and Risk Committee on a quarterly basis.

For the year ended 30 June 2023, internal audit reviews were conducted on core Procurement; Finance and Fraud controls. These tested application by GRV on the use of State Purchase Contracts and Supplier Code of Conduct with no adverse findings identified re application of these, re compliance with Modern Slavery provisions.

Appendix

The table below reconciles the relevant mandatory reporting requirements incorporated in Modern Slavery Act 2018 that must be addressed in an Annual Modern Slavery Statement.

Legislative Provision	Section
s16(1)(a) Identify the reporting entity	1. Introduction
s16(1)(b) Describe the structure, operations and supply chains of the reporting entity	4 Greyhound Racing Victoria's Supply Chain
s16(1)(c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	5 Identification and assessment of Modern Slavery Risks at GRV
s16(1)(d) Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	4 Identification and assessment of Modern Slavery Risks at GRV 6 Continuation of Business Enhancements
s16(1)(e) Describe how the reporting entity assesses the effectiveness of such actions	7 Evaluation and Treatment of Modern Slavery Risks 8 GRV Compliance - Controls Assessment
s16(1)(g) Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Not applicable