

MODERN SLAVERY STATEMENT

OCTOBER 1ST 2020



INTRODUCTION

This is the first Modern Slavery Statement made by the Victoria Racing Club Limited (VRC) under the *Modern Slavery Act 2018* (Cth) (the *Act*).

In this statement, the VRC will outline our responsibilities to mitigate the risk of slavery, servitude and forced or compulsory labour and human trafficking, within our businesses or our supply chains. The VRC acknowledges that modern slavery is a broad term, and can take several forms, including: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour and child labour.

The VRC is fully committed to eliminating all forms of modern slavery throughout our operations and those of our suppliers. It is our social responsibility to achieve the highest ethical standards as presented by the Act.

ABOUT THE VRC

Horse racing started at Flemington Racecourse in 1840, when Melbourne as a town was five years old. The Victoria Racing Club was established in 1864 and since 1871, with the establishment of the Victoria Racing Club Act, the racecourse has been managed by the VRC under a Crown land lease arrangement. Flemington Racecourse – Australia's oldest racecourse in continuous use – is located about seven kilometres north-west of Melbourne's CBD along the Maribyrnong River.

Occupying an area of 320 acres, it is one of the largest racecourses and longest racetracks in Australia, and is home to the Lexus Melbourne Cup – the Race that Stops a Nation™.

Governed by a board elected by its members, Victoria Racing Club is a not-for-profit organisation. Surplus funds are reinvested into Flemington Racecourse and its operations.

The racecourse site operates 24 hours a day, 365 days of the year. We employ more than 200 people throughout the year as well as 2,000 casual staff on a Melbourne Cup Carnival race day (directly and through our catering operations). The Club hosts around 500,000 racegoers a year across 25 race days, over 300,000 of whom come to the four days of the Melbourne Cup Carnival – these four days were the highest attended race days in Australia last year. With around two million racegoers a year, racing is still the second largest live-attended sport in Australia behind Australian rules football.

Although we are known primarily as the custodians of Australia's greatest racing carnival, the VRC also hosts events ranging from business conferences to music festivals, weddings, school and university graduations, fun runs, craft markets, charity events and parties on the grounds of Flemington. The broader Flemington Racecourse site comprises of a wider community than just a racetrack. On the site are around 20 resident trainers and facilities for 600 horses. The site is home to the largest public rose garden in the southern hemisphere (over 16,000 rose bushes), a heritage centre, four grandstands, Headquarters Tavern, park land, a nursery, wetlands, car parks, a train station, administration offices and an operational workshop, as well as a rich tapestry of heritage assets.



The Melbourne Cup Carnival generates social and economic benefits on a large scale, and has a global reach which presents Melbourne, Victoria and Australia to the world in a positive way. Our overall economic impact over Melbourne Cup Carnival was measured by IER Pty Ltd as generating around \$450 million in gross economic impact for Victoria, and \$930 million nationally.

Our vision is to be treasured by all as a world leader in racing and event entertainment, guaranteeing an unrivalled experience. To achieve that vision, the Club is focused on short, medium and long-term activities, and we monitor our progress in each of these areas.

We are the custodians of a unique race, which is part of an amazing Carnival and year round premium racing at an exceptional venue. We recognise the importance of this to our members, stakeholders and all who engage with us, and seek to ensure the primacy of the event.

We envisage a future where the Victorian racing industry is the world-leading racing jurisdiction, where the VRC is globally acknowledged for delivering racing and event entertainment, offering innovative and unrivalled experiences for all. The VRC aims to be recognised as a leader in supporting the wellbeing of equine athletes during their racing career and their retirement, and to be considered an employer of choice where our team are able to continually develop and achieve their career goals.

AREAS OF RISK

To assist with identifying the potential risks of modern slavery practices in our operations and supply chains for this first statement, we referred to the Australian Government's *Guidance for Reporting Entities* and the Walk Free Foundation - Global Slavery Index 2018. These sources outlined specific risk factors relating to particular industries or sectors, particular goods and/or services, and geographic locations of products and supply chains models that carrier a higher risk of modern slavery in Australia. Based on this guidance and a review completed by the VRC in 2020, there are several known areas of high risk with the potential to impact us via our operations and supply chain that will take priority in the implementation of VRC's mitigation strategies.

The VRC has also identified areas of no or low risk, including, processes which VRC's employees directly complete and which are covered by VRC's internal policies and procedures. All direct employees of the VRC are based in Australia and are employed under appropriate awards. We train our staff in VRC's processes and policies, including but not limited to, OH&S, bullying & harassment, whistleblowing, equal opportunity and now, modern slavery.



VRC'S SELF-AUDIT AND MITIGATION STRATEGY

The VRC is actively engaged with external consultants to ensure that the business is fulfilling its obligations under the *Act*. We are continually taking steps to review our supply chain policies and procedures to ensure that they are sufficiently robust to mitigate the risk of modern slavery occurring in our business and supply chains, and implement appropriate and proportionate responses across the business where we identify risks and any current or potential exposure.

The VRC has already introduced several key strategies to combat the risk of modern slavery in our operations and supply chain. These include:

- Educating internal staff on the Act and future compliance;
- Contracting against modern slavery in all external supply contracts;
- Implementing a new supplier questionnaire in our procurement process; and
- Continually working with suppliers in our supply chain to better understand and assess the highest potential risk areas, in relation to modern slavery and as referenced by the *Global Slavery Index 2018*.

MOVING FORWARD

The VRC plans to further explore or initiate other key strategies to ensure our future operational compliance, and the compliance of external third party suppliers. These strategies include:

- Internal and external staff training and capability development;
- Expanding on the goods and services risk type identification as more information is obtained;
- Implementing a modern slavery assurance policy in all tender procurement processes;
- Developing a supplier code of conduct;
- Developing a Corporate Governance Statement;
- Developing an Ethical Sourcing Policy; and
- Increasing the auditing of external third party suppliers.

It is necessary that this work to minimise and eliminate modern slavery will need to be managed in accordance with the VRC's financial framework, priorities and work allocation principles throughout this COVID-19 pandemic. Some of the above listed mitigation strategies may be achievable in the short-term, while others may be deferred until 2021-22 and beyond.

This statement was approved by the Board of the VRC.

Amanda Elliot Chairman

Victoria Racing Club

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