



Modern Slavery Statement

Introduction

Modern slavery is the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Modern slavery can be represented in many forms (e.g. slavery, servitude, forced and compulsory labour and human trafficking) and is a violation of fundamental human rights.

This statement is made pursuant to the *Modern Slavery Act 2018* and covers the activities of Western Suburbs League Club (Campbelltown) LTD ABN 43 000 841 958 (**West's**) and our controlled entities to assess and address the risk of modern slavery in our business operations and supply chain for the financial year ending 31 October 2024 (FY2024). The purpose of this statement is to outline our approach in ensuring our business has robust procedures and processes in place to minimise the risk of modern slavery within our operations and supply chains.

Our Business

West's is a not-for-profit organisation that prides itself in supplying quality service and facilities for our members and offering substantial support for our broader community, giving generously to schools, charities, and local sport. West's currently operates four hospitality venues across the Macarthur region and plays an integral part in the local community, offering various forms of entertainment including live music, restaurants, bars, function spaces, golf, and tennis facilities.

West's employs around 450 staff within a diverse workplace of varied gender, age, race, sexual orientations, religions, and abilities. West's strongly believes that our staff are the jewel of our business, who embrace West's core values, namely:

- Customer Focused
- Community Minded
- Teamwork
- Respect
- Integrity
- Progressive

Our Commitment

West's core values guide the direction of our operations and set the standard for our interactions within the community. We firmly believe that when people and our community come first, business success will follow. We aim to ensure that all people, including those in our broader community, are afforded human rights.

West's is committed to:

- Operating its business in accordance with the Modern Slavery Act 2018 (Cth).
- Ensuring our people understand modern slavery and the risk it presents to our operations.
- Providing our people with appropriate avenues for reporting potential instances of modern slavery within our operations, or the operations of our suppliers and/or clients.

- Mitigating modern slavery risk within our operations.
- Eliminating potential and/or actual modern slavery practices from our operations and supply chain.
- Utilising the due diligence completed to date to facilitate effective action plans and 'next steps' in the pursuit of modern slavery risk mitigation and elimination using a proactive approach.
- Ensuring appropriate transparency with our people, clients, suppliers and stakeholders regarding the maturity of our modern slavery due diligence process, and the findings arising from this.
- Enhancing our plan for measuring the effectiveness of our existing modern slavery risk framework.

Our Structure, Operations and Supply Chain

Wests is a public company limited by guarantee, incorporated and domiciled in Australia under the *Corporations Act 2001* (Cth). Wests business operations include registered clubs, hospitality, sporting facilities, corporate, administration and property assets across the Macarthur region.

Wests is a member of ClubsNSW, the peak representational body for the NSW club industry, whose purpose is to lead a sustainable industry and to support the local community we serve. Wests is committed to working with ClubsNSW to ensure ethical commitments to fight modern slavery are being adhered to.

Wests registered office is located 10 Old Leumeah Rd, Leumeah, NSW and, at the date of this statement, has over 450 employees.

Wests supply chain predominantly relates to the sourcing of goods and services for the provision of food and beverage, hospitality, gaming, sporting facilities, corporate and administrative services. Wherever possible, Wests strives to utilise local, Australian-based suppliers.

Our Governance

Wests is committed to employing corporate governance practices that support our compliance with applicable standards and legislative instruments, and also align with community expectations. In pursuit of this end, our Board of Directors plays the principal role in the direction of corporate governance. Board responsibilities include governing, guiding and directing the organisation towards the satisfaction of company objectives, in the interests of our employees, our members and the broader community.

The Board is accountable for ensuring the appropriate management of modern slavery risk, by providing appropriate governance and direction to operational leadership. Operational leadership is represented by the Chief Executive Officer (CEO), as well as the Executive team who represent their various departments. Each Executive member is responsible for the facilitation of the respective location's operational and strategic risk management.

The Executive team and those to whom they delegate authority, enforce the varied policy and procedure that mitigates the risk concerning modern slavery.

Modern Slavery Risk Areas

After careful consideration of our operations and supply chains, we have classified our modern slavery risks into three distinct areas:

Highest Risk	Moderate Risk	Lowest Risk
Our Suppliers <p>West's engages suppliers both locally and globally. We believe our suppliers present the highest risk of modern slavery.</p> <p>This arises from the unique risk complexities which suppliers present including high risk jurisdictions, geographies, commodities, vulnerable workforce composition and exploitive business models.</p>	Our Contractors <p>West's engages numerous contracted services for day to operations, e.g. cleaning and security.</p> <p>West's acknowledges that such contractors may not share our commitment to preventing or abstaining from modern slavery practices.</p> <p>As such, we have classified the risk of modern slavery in our contractor base as moderate.</p>	Our People <p>The knowledge, skills and integrity of our people is paramount to our continued success as a business.</p> <p>By virtue of our extensive internal policy framework, our core value mantra and the nature of our workforce in general, we have classified the risk of modern slavery in relation to our people as low.</p>

Our Modern Slavery Due Diligence and Actions

- West's has six defined core values, namely:
 - Customer Focused
 - Community Minded
 - Teamwork
 - Respect
 - Integrity
 - Progressive

These values are instilled in our team and collaborators via mandatory orientation, periodic training and staff addresses. West's believes that these core values embrace and actively reduce the risk of modern slavery exposure in our operation and supply chains.

- This statement, for the financial year ending 31 October 2024, will be made available on West's venue websites.
- West's has established a Modern Slavery Working Group (WSWG). This working group consists of representatives from various key departments across the organisation. The WSWG is tasked with

identifying key risks and requirements, overseeing implementation and increasing business awareness of modern slavery risks.

- Wests has an established Work, Health and Safety (WHS) Committee that meets monthly. The WHS Committee work closely with all employees and contractors to ensure that we offer a safe place of work and systems of work. This committee is enthusiastically endorsed by the Board and are afforded resources accordingly.
- Wests has an established Finance, Risk, Audit & Compliance (FRAC) Committee, composed of several Directors of the organisation, with invitations extended to the CEO and various executive level representatives. The FRAC Committee meets quarterly to consider, amongst other things, any matters relating to risk management.
- Wests has a number of internal policies/procedures in place to ensure that business is conducted in an ethical & transparent manner. These policies include:
 - Fair Workplace Policy: This policy outlines the guidelines and expectations surrounding discrimination and harassment in the workplace. The fair workplace policy very much embraces the expectation that all people are afforded human rights and are treated equally.
 - Whistleblower policy: All employees and directors are made aware of their right to disclose wrongdoing within the business. This policy affords protection to any employee who discloses such information.
 - Diversity & Inclusion reporting: Diversity reports submitted annually.
 - Robust mandatory orientation training: All facets relating to risk management are addressed including a module on modern slavery awareness and expectations.
- These established policies/procedures demonstrate our commitment to addressing modern slavery risks, while ensuring we have fair and ethical practices in place and are compliant with workplace legislation.
- Regular contractors (security, cleaners, contracted dining caterers, contracted tennis management) who control their own labour on Wests premises must periodically submit a signed 'subcontractor statement' to Wests, declaring that all relevant remuneration, payroll tax and insurances have been paid per legislation.
- Wests has identified 'our suppliers' as the highest risk of being conducive to modern slavery practices. As such, the MSWG will have a strong focus on who we conduct business with and how we ensure that they embrace our same core values. Starting with our top billers, suppliers will be expected to digitally upload their own modern slavery statements (when appropriate) or acknowledge their understanding of ours and complete a modern slavery questionnaire.
- Wherever possible, Wests strives to utilise local, Australian-based suppliers.

Assessing the Effectiveness of Actions

During the 2024 financial year:

- Wests did not identify any instances of modern slavery or human trafficking associated directly with its own operations.
- There were no complaints relating to modern slavery received through our whistleblower policy.
- No concerns were raised by customers, contractors, or members of the general public in relation to modern slavery.

Key Performance Indicators (KPIs): The following (KPIs) are in place to measure the effectiveness of our modern slavery and human trafficking program:

- Completion rate of modern slavery training of personnel within the Group.
- Completion rate of key 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.
- Payments to employees 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.

Consultation

West's has an established Modern Slavery Working Group. The MSWG will bring together representatives from a range of areas and departments within the business to allow for a collaborative and effective approach to minimising risk. The MSWG will also consult with other stakeholders within the business, such as those in charge of procurement and/or contractors and their staff.

The MSWG will also consult with the FRAC committee when required.

This Modern Slavery statement will be made available to all employees of West's, while those in charge of procurement or high-risk contractor engagement will be required to acknowledge their understanding of this document.

Approval

This statement has been approved by the Board of Directors of Western Suburbs League Club (Campbelltown) Limited ABN 43 000 841 958

Signature:



Date: 24/02/2025

Full Name: Alan Buxton

Title: Chairman of the Board of Directors