

BELGRAVIA GROUP  
2020 MODERN  
SLAVERY  
STATEMENT



# The Belgravia Group

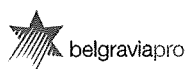
Belgravia Group (incorporated in the state of Victoria) is a private group of companies owned by the Geoffrey Lord Family Trust since 1980. The Belgravia Group has grown significantly and owns 15 businesses and employs up to 7,000 people across Australasia. Activities range across several industries such as health and fitness, leisure, tourism, clothing and wellbeing related equipment.

Belgravia Group condemns slavery of any form. This Modern Slavery Statement is prepared with reference to the Australian Modern Slavery Act 2018. The Statement is applicable to and describes the steps undertaken by Belgravia Group during the financial year ending 30th June 2020 with the aim of minimising the risk of modern slavery the Group's businesses or related supply chains.

This Statement is lodged as a joint statement on behalf of the following businesses within the Group:

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## Belgravia Health and Leisure Group



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## Belgravia Clothing Group



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## Belgravia Kids



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## NovoGroup



[www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reporting-entities.pdf](http://www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reporting-entities.pdf)

# Belgravia Group's Structure, Operations and Supply Chains



## Belgravia Health and Leisure Group

Belgravia Health and Leisure Group Pty Ltd "BHLG" (ABN 18 118 940 063) consists of two main operating entities Belgravia Leisure "Leisure" and Belgravia Health and Fitness "BHF".

Depending on season BHLG employs more than 5,500 people.

Leisure is the leisure management organisation of 170 government and private facilities across Australia and New Zealand including Tourism and Holiday Parks, Health and Wellness centre, Aquatics Sports and Leisure facilities Hospitality and Events venues.

BHF is the fitness industry franchiser of Genesis Fitness, Coaching Zone and Ninja Parc across 75 venues in Australia including wholly owned, joint ventures and franchisee clubs.



## Belgravia Kids

Belgravia Kids is a collective of two key entities, Belgravia Kids (ABN 97 614 398 668) and BK's Gym & Swim (ABN 80 632 108 724)

The business has three key brands: BK's Gymnastics, BK's Learn to Swim and Jump Swim Schools of which there are 61 facilities

BK's Gymnastics and Learn to Swim operations are wholly owned operations whilst Jump Swim Schools is primarily a franchised operation with a few wholly owned facilities

The facilities primary purpose is to deliver either private swimming or gymnastic lessons to customers but there is still some key supplier relationships required

Supply chains are made up of a mixture of corporate controlled contracts for common items across the wider Belgravia Group as well as local area suppliers that sites have the freedom to engage outside of the corporate controlled contracts



## NovoGroup

NovoGroup is a collective of NovoFit (ABN 55 610 480 483), NovoFit WA (ABN 79 917 515 244) and NovoActive (ABN 85 084 981 751).

While Belgravia Group has operational control of these entities there are external partners in the ownership structures.

NovoFit is a trust with a corporate trustee with 43 employees. NovoActive is a private company with 5 employees. NovoFit WA is a private company with 4 employees.

NovoFit and NovoFit WA have no manufacturing component. These entities import and distribute locally only. With a combined total of 3 warehouses located in Melbourne VIC, Sydney NSW and Malaga WA. Supply partners are located globally, predominantly in the USA and China. These supply partnerships are stable, long term, exclusive arrangements. Supply and distribution for these two entities is made up of commercial gymnasium equipment such as cardio and strength machines. Local NovoFit team members then distribute, install and service the equipment nationally.

NovoActive manufactures in its only warehouse, located in Dandenong South, Vic, Australia. Supply partners are located globally, predominantly in China. These supply partnerships are stable, long term, exclusive arrangements. NovoActive use its imported supply to manufacture sport stadium and gymnastics flooring and equipment components. NovoActive local teams then distribute and install the equipment nationally.



## Belgravia Clothing Group

Belgravia Clothing Group "BCG" is a collective of 4 registered business entities – Bizwear (ABN 75104080140), Profile (NZ – IRD 053479138 ), Option Systems (ABN 613172893 ) and Belgravia Sports Apparel (ABN - 14635241913 ). All businesses are 100% owned by Belgravia Group.

Bizwear and Profile design uniforms, manufacturer uniforms via offshore factory partners and manage corporate uniform programs for a variety of organisations, spread across several industry sectors.

Customer relationships are bound under contracts and we are contractually obliged to ensure ethical sourcing and adherence to modern slavery guidelines. Bizwear and Profile's manufacturing is outsourced to long term and trusted offshore factories. Historically, most of our uniforms are made in China. All factory partners engaged by Bizwear hold social and ethical compliance certification under global auditing standards e.g. BSCI, SEDEX etc.

Belgravia Sports Apparel (BSA) designs, manufacturer's and manages both school and sports apparel to several schools and sporting leagues/clubs/sports bodies in Australia. BSA have an internal factory located in Adelaide and place offshore production for its New Balance licensing agreement with a New Balance, globally approved factory in China. This approved New Balance factory holds social and ethical compliance certification under the global auditing standards e.g. BSCI, SEDEX etc

Option Systems is an Information technology company specialising in offering an enterprise software for the apparel industry. Option Systems have a collection of customers in Australia, New Zealand and overseas. All management and employees are based in Melbourne, Australia. All programming is completed in Melbourne Australia.

# Risks of Modern Slavery practices in Belgravia Group entities' operations and supply chains

Supply Category	How Modern Slavery may present itself
<b>Belgravia Health and Leisure Group Pty Ltd</b>	
<b>ICT Devices</b>	Manufacture and transportation in low-wage countries with limited labour market protections
<b>Retail and Kiosk</b>	Manufacture and transportation in low-wage countries with limited labour market protections
<b>Staff Uniform</b>	Manufacture and transportation in low-wage countries with limited labour market protections
<b>Fitness Equipment</b>	Manufacture and transportation in low-wage countries with limited labour market protections
<b>Contract Cleaning</b>	Wage Theft
<b>Belgravia Kids</b>	
<b>Contract Cleaning</b>	Wage Theft
<b>Franchisee Operations</b>	Wage Theft
<b>ICT Devices</b>	Manufacture and transportation in low wage countries with limited labour market protections
<b>Retail</b>	Manufacture and transportation in low wage countries with limited labour market protections
<b>Belgravia Clothing Group</b>	
<b>Fabric and Garment Manufacturing</b>	Child labour, Wage theft, Production passed to Non-factory Outworkers, Poor workplace conditions, Unsafe workplace (OHS), Working excessive hours, No or low overtime rates
<b>Transport &amp; Logistics</b>	Under payment to and/or exploitation of local subcontractors
<b>NovoGroup</b>	
<b>Equipment manufacturers</b>	Manufacture and transportation in low-wage countries with limited labour market protections
<b>Transport &amp; Logistics</b>	Manufacture in low wage countries, Forced labour, Human rights violations, Wage theft

## Actions taken by Belgravia Group to address Modern Slavery risks

To underpin its efforts combating Modern Slavery, Belgravia Group created the Modern Slavery Working Group ("MSWG) with senior executive representation from the business units as well as the Belgravia Group Board.

The MSWG implemented two guiding documents:

- Modern Slavery Policy
- Modern Slavery Supply Agreement Clause

The Modern Slavery Policy provides information about a number of reporting avenues including anonymous.

Any report will require the relevant business unit to appoint a senior executive to investigate and report findings to the Belgravia Board in the agreed format.

The Modern Slavery Supply Agreement Clause requires suppliers to take actions to prevent and report to Belgravia Group any identified risks and/or incidents of Modern Slavery in their supply chain.

During the reporting period covered by this statement Belgravia Group has not become aware of any Modern Slavery situations.

- Belgravia Clothing Group – Bizwear

Given Bizwear manufacturers overseas, Bizwear has approached its factory partners to sign the Modern Slavery Suppliers Agreement. All factories used by Bizwear have signed this agreement.

## Assessing the Effectiveness of Belgravia Group's Modern Slavery actions

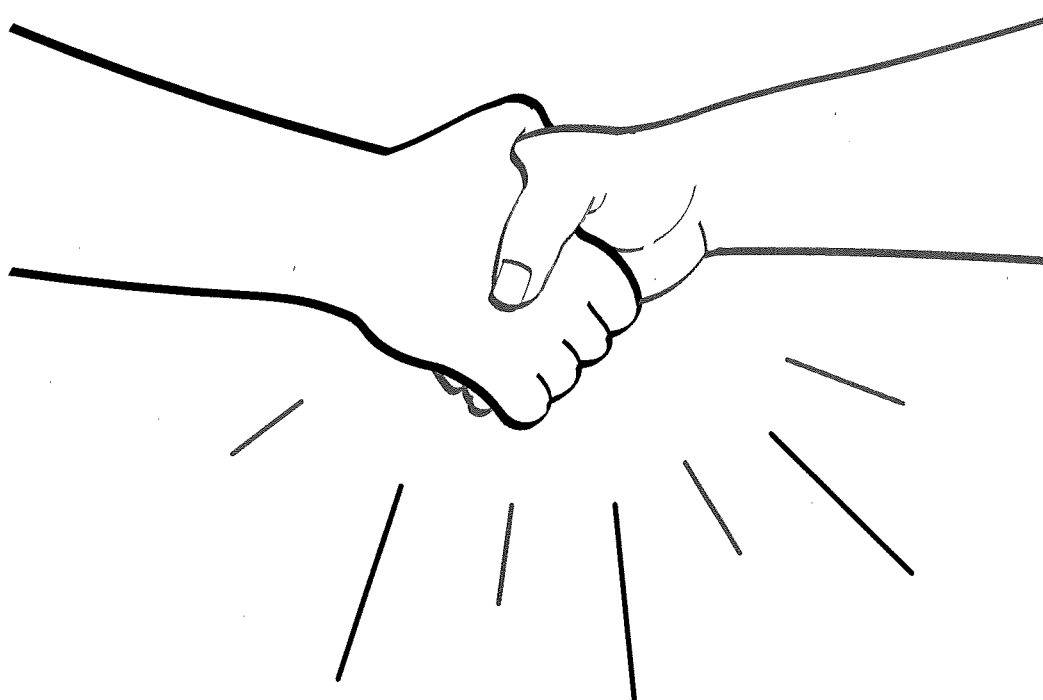
Modern Slavery forms part of Belgravia Group's Code of Conduct, which is provided to employees as part of their onboarding process.

The Modern Slavery efforts are part of Belgravia Group's published Social Responsibility approach, which can be found here: [www.belgraviagroup.com.au/social-responsibility/](http://www.belgraviagroup.com.au/social-responsibility/)

The Belgravia Group Board and the executives of all business units are regularly briefed on the activities of the Modern Slavery Working Group.

# Consultation across Belgravia Group entities

The first action by the Belgravia Group Board in relation to Modern Slavery obligations was to establish a working group with senior management level representation by all relevant business units exposed to risks of Modern Slavery in their operations and/or supply chains. This working group has jointly prepared this statement.



This statement was approved by the board of  
Belgravia Group on 26th March 2021

A handwritten signature in black ink, appearing to read 'Geoff Lord', written over a horizontal line.

**Geoff Lord**  
Chairman and CEO  
26th March 2021

