

MODERN SLAVERY STATEMENT

Australian Turf Club

1 August, 2022 – 31 July, 2023

I.O Introduction

This Modern Slavery Statement relates to all activities of the Australian Turf Club Limited (“ATC”, “We”) (ACN 148 157 288). This is the second statement prepared by ATC and applies to the reporting period from 1 August, 2022 to 31 July, 2023. This Statement sets out the measures taken to identify, assess and address modern slavery risks in our operations and supply chains.

ATC takes the obligations under the Commonwealth Modern Slavery Act 2018 (the **Act**) seriously, and we are committed to understanding and actively engaging in measures to reduce the risk of modern slavery in our supply chains or in any part of our business. We acknowledge our role and responsibility in seeking to safeguard human rights through ethical and sustainable business practice.

2.O Structure, Operations and Supply Chains

ATC has been an Australian registered club since 7 February 2011 with annual revenue that exceeds the mandatory reporting threshold of \$100 million.

About 1,500 employees, including 280 permanent staff, are employed by the ATC, peaking at approximately 1,200 casual employees during Spring Carnival.

ATC owns and operates four (4) thoroughbred racecourses and one (1) community-focused venue located in the Sydney metropolitan region, as well as the philanthropic and charity arm being the ATC Foundation (ABN 742 438 274 96).

We are committed to acting ethically and with integrity in all our business activities. We pride ourselves on being a driving force behind the sustainability and growth of racing in Sydney. We offer some of the world’s most desirable and exciting destinations for thoroughbred racing in a sociable, fun and friendly setting, whilst ensuring we continuously give back to the communities where we operate.

ATC has a predominately Australian based supply chain made up of approximately 1,245 direct suppliers. The ATC sources goods and services

from a range of different types of suppliers including the following supply chains:

- Alcohol and non-alcohol manufacturers and distributors
- Ambulance and patient transport
- Banking, Finance and insurance
- Broadcasting and recorded entertainment
- Building services
- Cleaning services
- Food, beverage manufacturing
- Market and business consultancy
- Meat, poultry and seafood processing
- Racing industry
- Security services
- Waste management

Supported by a strong board and senior leadership team, with extensive experience in racing and event business management, our long-standing team has proudly grown and developed ATC into the business it is today.

3.O Risks of Modern Slavery Practices in ATC's operations and supply chains

ATC complies with relevant Australian workplace, occupational health and safety and other legislation. To date, ATC has not identified any specific modern slavery practices in its operations. We consider ATC to be at low risk of being directly linked, involved in or contributing to any modern slavery practices in our business operations.

ATC's directors, management and employees are required to adhere to ATC's policies and undergo ongoing training. ATC has oversight of its operations and employees who are all employed locally. As a result, ATC's operations run by ATC staff are at a low risk of modern slavery.

ATC sources goods including, agricultural raw materials, machinery, equipment, food, beverage, uniforms, and other materials necessary to operate the business. Our staff are based in Sydney and due to the size of our business and geographic reach, we are required to outsource

services such as security and cleaners. We recognise that the services of cleaning and security and the goods from garment and agricultural sectors are generally recognised as being at a higher risk of modern slavery. Overall, the potential exposure of modern slavery in our supply chains is considered to be low, as there is an obligation on ATC's outsourced suppliers to confirm their compliance to the Modern Slavery laws, including the Act. There is continuous contact with suppliers to ensure modern slavery considerations are embedded into their business relationship and operations.

4.O Actions taken during the reporting period to assess and address modern slavery risks.

Aligned to our business values of 'Collaborate, Care, Achieve and Innovate' ATC is fully committed to operating responsibly and establishing and adhering to the highest ethical standards across the business. We will not tolerate any forms of modern slavery and are committed to evolving our processes and systems to effectively identify and address modern slavery risks. To identify and mitigate risk, ATC has the following in place:

I. Engagement with our suppliers

Our approach involves proactive engagement with our suppliers. This includes open dialogue, face to face meetings and collaborative efforts to ensure sustainability and ethical practices, focusing on modern slavery and other ethical concerns. ATC has implemented contractual clauses requiring service providers to comply with all relevant laws. ATC has included specific clauses relating to modern slavery risks in its service and supply agreements with service providers.

II. Governance

ATC is committed to ensuring ethical business practices throughout the business. This commitment is evident in the implementation of robust policies and procedures including:

- i) Anti-bribery and Corruption;
- ii) Bullying and Harassment;
- iii) Code of Conduct;
- iv) Procurement Policy;

- v) Whistle-blower; and
- vi) Workplace Health and Safety.

III. Training and Communication

All new employees are required to complete compliance training covering ATC's Code of Conduct, Anti Bribery and Corruption, and Whistle-blower policies before commencing their employment, thereafter, employees are required to complete these training modules regularly.

We are committed to empowering our staff through extensive training programs and awareness initiatives. This empowers our team to identify, understand, and take appropriate actions against modern slavery practices and promotes ethical and responsible behaviour within its operations.

I. Risk Management Framework

To oversee and manage risk, the Finance and Audit Committee provides guidance and direction on the management of risk related to ATC and states our commitment to the effective management of risk to reduce uncertainty in business outcomes.

ATC's employee engagement and third-party management processes are designed to assess ATC's network and highlight any modern slavery risks. Suppliers of high focus goods or services to ATC are required to disclose any modern slavery risks in their business and their supply chains as part of their response to ATC's category review request for proposal.

ATC Procurement monitors incumbent suppliers if it's believed there may be a possibility of modern slavery risks in their business and their supply chains and may initiate an engagement and escalation process to determine if corrective remedial actions are required. ATC will investigate and work with that supplier to remediate as appropriate.

IV. Supplier Contracts

ATC works continuously to update contracts with suppliers to comply with all applicable modern slavery laws, including the Act, to include relevant model modern slavery mitigating clauses. ATC requires our suppliers to report their adherence to the Act and on any improvements they may have

introduced to reduce the risk of modern slavery activity in their supply chain during quarterly review meetings.

5.O Assessing Effectiveness

Looking ahead, we have planned to work on developing frameworks and processes to ensure we can review the effectiveness of the actions we are taking to assess and address modern slavery risks in our operations and supply chains. This includes:

- Implementing training and educational resources for the Leadership Team and Senior Leadership Team;
- Annual review and update to the Code of Conduct and core business policies to ensure compliance and processes to reflect ATC's commitment to upholding human rights;
- Investigate the inclusion of modern slavery acknowledgement in the onsite accreditation software;
- Ongoing management of any suppliers who are identified as high risk; and
- Establishment of Modern Slavery Compliance Group, which will be responsible for overseeing and advising on:
 - i) processes used to monitor, communicate, and comply with ATC's policies, laws, regulations, ethical guidelines and other relevant requirements; and
 - ii) a regular review and assessment of the actions taken to assess and address modern slavery risks each reporting period.

To assist with assessing modern slavery risks, we continue to map our supply chain and through an analysis of data have organised our suppliers into industry categories. Data is continually analysed throughout each of the mandatory reporting periods.

6.O Consultation and approval process

The policies, processes and systems described in this Statement apply to ATC and the entities covered by this Statement. The ATC Board retain oversight of all major contracts, governance, risk management and modern slavery risks through our risk management framework.

7.0 Other Relevant Information

Looking Ahead

ATC is committed to continuously improving its practices, procedures and relevant education related to human rights and modern slavery to support its prevention.

Approval

This modern slavery statement was approved by ATC's Board of Directors on 25 November 24, pursuant to s 13 of the *Modern Slavery Act 2018* (Cth).



Peter McGauran
Chairman