

Modern Slavery Statement

2021-2022 Financial Year

1 Introduction

The 2021-2022 Financial Year began with hospitality businesses and the club community across Sydney still grappling with the challenges of an unprecedented government mandated shutdown and the knock-on effect of trading constraints, household income loss and travel restrictions. Still recovering from the previous year's lockdown, Bankstown Sports Board and Executive Management had to once again pivot operational practices and priorities to maintain their executive commitment to ensuring "making a difference" is the mantra of our business.

Since foundation in 1958, Bankstown Sports has earned a positive reputation within the local community and wider club community. This reputation has arisen from a longstanding commitment to developing projects and initiatives that meet the evolving needs of our evolving community. Despite the challenges of both this financial year and the previous financial year, our commitment to developing and strengthening a risk-conscious strategy to mitigate existing and emerging risks, including Modern Slavery risks, remains ingrained in our operational and strategic priorities.

This year saw community engagement continue to extend from substantial support to numerous sporting and social organisations towards developing wider reaching initiatives to support those most vulnerable within the community.

We continue to recognise the moral obligation all businesses have to develop high standards of operation that are flexible enough to weather periods of business instability without it negatively influencing how they impact the wider community (such as their contribution to Modern Slavery risks). This year's COVID-19 related challenges further highlighted that genuine action and intervention within the community can have a tangible effect in an extremely positive way.

The Bankstown Sports Board of Directors is proactive in engaging in a continuous improvement approach to policy development and policy review to ensure the ongoing success of community initiatives, including those that target Modern Slavery risks.

We recognise our moral responsibility to maintain a unified policy of action alongside other businesses throughout Australia and the world to address our collective impact on Modern Slavery risks. We extend the acknowledgement of this need identified in the Modern Slavery Act – 2018 (Cth) and recognise the importance of safeguarding human rights through ethical and reasonable business practices.

This Modern Slavery Statement reflects Bankstown District Sports Club Ltd's continuing commitment to minimising our impact to the risks of Modern Slavery and relates to the 2021/2022 financial year. This statement pertains to all stakeholders part of and engaging with the Bankstown District Sports Club Ltd and its entities.

**“Making a
Difference
is the
mantra”**

2 Our Structure and Operations

Bankstown District Sports Club Ltd has approximately 509 employees in fulltime, parttime and casual roles across the business. We continue to engage agency and labour hire staff on occasion, to ensure we maintain an operational headcount that is appropriate to address a given day's operational need - a challenge that also continues to persist across the industry in the post-COVID employment market.

Bankstown District Sports Club operates the following licenced and registered club premises:

- Bankstown Sports Club
- Baulkham Hills Sports
- Birrong Sports
- Bankstown Sports Bowls
- The Acres Club
- Auburn Tennis Club
- Lady Banks Rooftop

We have a diverse range of entities under the Bankstown District Sports Club Ltd banner including restaurants, bars, electronic gaming, brewery, administration, community support, property management, facilities and security. Bankstown District Sports Club Pty Ltd is the parent company of:

- Bankstown District Sports Club Agencies Pty Ltd
- Bankstown District Sports Club Licencing Pty Ltd
- Bankstown District Sports Club Properties Pty Ltd
- Bankstown District Sports Club Hotel Properties Pty Ltd
- LoyaltyCo Pty Ltd
- CoPact Pty Ltd
- DataConverge Pty Ltd
- Basement Distilling Pty Ltd
- Basement Brewing Pty Ltd
- Flinders Centre Properties Pty Ltd
- Facility Services Pty Ltd
- Complete Security Pty Ltd

3 Our People, Policies and Operations

Bankstown Sports is structured to encourage an open and collaborative approach to engagement between all departments. We continue to place a high priority on considering the unforeseen impact our policies and procedures may have and acknowledge that poorly designed policies can easily escalate into Modern Slavery impacts. Consequently, all internal stakeholders have the right and ability, safeguarded by bespoke policy, to 'speak up', report and openly raise any concerns they may have - including issues relating to Modern Slavery. We commit to extending this right to our engagement with contractors, providers, suppliers and other external stakeholders.

We utilise multiple committees to engage with team members at every level of our business to ensure collaboration and consultation standards are maintained and to facilitate open two-way communication across departments. Bankstown Sports is committed to ensuring a consistent

approach is maintained across the business and shares administrative and operational support and resources across venues and entities.

Bankstown Sports acknowledges the level of risk that arises from a business of our size engaging directly in the procurement of goods and services within local and international supply chains. Operational processes and procedures identified that relate to this facet of the business include:

- Acknowledging the vulnerability of workers in the Trades industry and operating with an in-house Maintenance team to ensure the majority of works are controlled within employee arrangements consistent across the business and are compliant with Australian Standards
- Acknowledging the vulnerability of workers in the Cleaning industry and operating a long-standing and trusting relationship with a relatively small cleaning company to ensure their operation aligns with Bankstown Sports and they are compliant with an International Standard (ISO Certification). This extends to sharing resources and specialised advice to facilitate a positive business relationship to reduce the risk of negative Modern Slavery impacts our influence may have on their operational stressors
- Acknowledging the lack of transparency down the supply chain and operating with second tier suppliers who can be a conduit between third/fourth tier suppliers and the Australian market. We recognise the importance of ensuring these companies are compliant with their Modern Slavery obligations as well as aligning themselves with the relevant international standard of trade

4 Our Impact

The first quarter of this financial year saw a government mandated total business shutdown across Local Government Areas we operate in, to help curtail the spread of COVID-19. Despite this restriction, the commitment Bankstown Sports made in previous years to proactively engage with the community to provide practical intervention to those in need and vulnerable to Modern Slavery risks remained a steadfast priority. Bankstown Sports sought to leverage our impact in a positive way to influence the actions of other businesses in the community to lessen potential impacts to Modern Slavery risks existing within the community at that time.

Key initiatives during this time included:

- Utilising our Bankstown Sports Club facilities, vacant due to lockdown, to establish a 'pop-up' Vaccination Hub in collaboration with NSW Health. This not only made vaccinations more accessible to vulnerable members of the community, but also provided income for those not able to be working due to the lockdown and not eligible for government assistance. This ultimately generated over 20,000 hours of paid work for vulnerable workers.



- Providing accommodation and sustenance to Australian Defence Force workers operating within our Local Government Area during lockdown so that this wasn't a barrier for NSW Health to intervene and help those most vulnerable in the most at-risk Local Government Area at the time. This resulted in 20,000 meals served and over 200 hours of paid work for vulnerable workers.
- Providing our facilities, at no charge, to vulnerable cohorts of students in local schools for their end of year exams so they could maintain their social-distancing requirements in a risk-controlled environment.
- Flood relief and community recovery support in severely impacted regional NSW, in an effort to help mitigate the knock-on impacts these conditions have towards increasing Modern Slavery risks.



Once Bankstown Sports reopened to usual trade in the second quarter, our strategic scope returned to considering how our day-to-day operational processes and general business practices impacted Modern Slavery risks. We determined that certain factors needed to be carefully considered in the 'post COVID-19' workplace environment and risk controls implemented to mitigate these newly arisen factors. Key factors in this space included:

- Workers potentially returning to work in a more vulnerable financial position due to the lockdown which could translate into an increased belief they cannot refuse work, increased risk they work excessive hours and possible barrier to reporting unsafe work practices
- Decreased foreign and seasonal workforce potentially resulting in increased workload for existing team members
- Supply chain disruptions resulting in changed market forces vulnerable to leverage and pressure from changes to previously stable service agreements
- Supply chain disruptions resulting in difficulties and delays in procuring equipment (such as Personal Protective Equipment or Manual Handling aids) or increased expenses in general
- Geographical and Geopolitical changes impacting material production and supply of goods
- Increased levels of psychological distress, anxiety and psychosocial risk towards team members and Patrons alike from the gamut of knock-on impacts COVID-19 has had and continues to have on the community

Bankstown Sports' commitment to 'making a difference' extends beyond our immediate club and local community. Our Board and Executive Management proactively encourage and provide support to a wide range of initiatives and interventions that have a positive impact on vulnerable members of the wider Australian community that are exposed to emerging risks of Modern Slavery, including:

- Supporting Little Wings, a not-for-profit organisation that provides transport to facilitate medical treatment for vulnerable children and their families in regional areas
- Initiatives supporting Aged Care facilities within the community

- Initiatives to facilitate emergency accommodation, transitional housing and support services for vulnerable women and children within the community
- Securing the future of community support for youth sporting and social programs
- Projects to implement improvements within local sporting facilities to increase disability access and improve female amenities
- Internal wellbeing stakeholder with a scope of duty that mandates proactively reaching out and intervening to facilitate mental health and wellbeing care to vulnerable community members flagged during their engagement with our club facilities

5 Our Risk Controls

The 2021-2022 financial year saw the inclusion of Modern Slavery considerations as part of our positive duty towards ensuring a risk-conscious approach to our operational processes and business practices. Risk initiatives developed during this period that specifically aim to address how Bankstown Sports impacts Modern Slavery risks include:

- Implementing an updated Contractor Management framework that mandated the provision of a greater detail of documentation and provision of key documents that outline risk considerations relevant to a contractor's sphere of influence. This is part of our commitment to analysing how these businesses comply with international and industry standards regarding Modern Slavery risks without excessive workload impact to those businesses
- Partnering with established external agencies to facilitate socially responsible labour hire with contracts and conditions that align to our own. This supplementary labour has bridged a key emerging gap in 'workload risk' brought on by COVID-19 related workforce shortages
- Establishment of a Modern Slavery committee that directly consults and collaborates with key internal and external stakeholders to integrate Modern Slavery risk assessment into business practices and review the effectiveness of corrective actions and strategy
- Development and implementation of comprehensive and accessible reporting, investigating, protection and remediation framework for Whistleblowing, psychological concerns, incidents, hazards and, Bullying and Harassment reports. This included development and implementation of specific mandatory training modules across the business to help identify these risks and train our team on the framework the business is committed to regarding implementing corrective actions
- Employment of a fulltime Risk, Compliance and Work, Health and Safety team member
- Increased resources for internal wellbeing stakeholder to build an additional escalation pathway for all levels of worker to receive and have access to support in addition to existing pathways built into our People & Culture and Operational frameworks

Other risk initiatives that Bankstown Sports identified as being key to the maintenance of a risk-conscious approach to Modern Slavery risks that matched the evolving nature of those risks included:

- Maintaining relationships with suppliers, where possible, to ensure the leverage created by our size and purchasing power did not negatively influence their business practices (especially goods, material and electrical suppliers deemed most at risk to knock-on Modern Slavery impacts down the supply chain)
- Ongoing audit and revision of our WHS Management System, involving multiple key internal and external stakeholders, to ensure a continuous improvement approach to ensuring progressive business processes become standard practice

- Increasing engagement with smaller suppliers and providers within our community, in normal fair-trading market conditions
- Engaging external specialists and organisations to review our contracts, conditions and bookkeeping to ensure there are no gaps or failings in these areas. Key work in this space included:
 - Independent auditing of financials to ensure compliance with Australian accounting and international financial reporting standards
 - Legal assistance for vulnerable migrant workers and those on a working visa to support them with this complicated process
 - Auditing our people contracts to ensure fair work conditions
- Building meaningful and collaborate partnerships with key contractors vulnerable to Modern Slavery risks (such as contracted Cleaners and Security Operatives). This included supporting them with training resources, clear communication with open two-way engagement and reinforcement of a zero tolerance for inaction when addressing Modern Slavery risks

We continue to recognise the specific impact money laundering practices have on international Modern Slavery practices and continue to engage external specialists to facilitate a diligent approach to harm minimisation in this area. We have allocated additional internal resources to audit other internal business practices that may be at risk to contributing to money laundering practices as part of a process of continuous review and improvement.

6 Key Areas of Future Action

We recognise that the extent for our business to impact Modern Slavery risks is something that will continue to evolve over time and requires a complementary strategy that ensures ongoing review and updating of risk controls. It remains a moral imperative that Modern Slavery risks are included as an essential component in the development and ongoing review of policies, processes, and business strategy.

As part of this ongoing drive to work towards a zero-harm approach to Modern Slavery risks, Bankstown Sports will:

- Commit to actively collaborating with our local and wider club community to identify emerging areas of need and risk. These areas will then be explored further to identify and implement future initiatives to help those vulnerable to Modern Slavery risks. Proposed future initiatives include targeting vulnerable community members who also have an intellectual disability, those struggling to find paid work, youth projects and mental health initiatives.
- Review supplier and provider engagement processes within the Contractor Management and tendering processes to ensure they align with our overall standard of operation. This extends to reviewing practices to more vigilantly monitor one-off or short-term engagements we have with smaller suppliers and providers.
- Extend our Contractor Management process to include reviewing our suppliers against their industry counterparts to facilitate engaging with those also committing to minimising Modern Slavery impacts. This information can then be used to develop a risk-based framework specific to this business practice
- Continue to engage and consult with key internal and external stakeholders with relevant committees to mentor business practices and operational standards

- Extend the consultation scope of the Modern Slavery committee to include additional key internal stakeholders to align overall business standards with a risk-conscious approach that considers Modern Slavery risks
- Commit to further increasing the levels of training for our employees to identify hazards and report incidents that include Modern Slavery considerations. This process will include promoting an escalation process to commit to investigating and implementing corrective actions.
- Increase the accessibility, scope and availability of training resources
- Commit to extending our internal specialised resources (such as Risk and Safety, Wellbeing, etc) towards initiatives that could tangibly impact the community and consequently contribute to minimising the impact others in the community have on Modern Slavery risks
- Audit our practices and processes to identify gaps that may impact Modern Slavery risks and proactively engage internal/external stakeholders to maintain positive business practices
- Commit to regularly auditing our people contracts to ensure they are compliant and protect our most vulnerable team members who are most at risk to Modern Slavery impacts

7 Board Approval

The Modern Slavery Statement was ratified by the Bankstown District Sports Club Ltd Board of Directors on 13th December 2022 and will be regularly updated, as indicated, to ensure proactive compliance with the Modern Slavery Act – 2018 (Cth).



Michael Clancy

Interim Chief Executive Officer and Member of Bankstown District Sports Club Ltd Board of Directors