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Mt Pritchard & District
Community Club Ltd
ACN 000 458 622
ABN 98 000 458 622

Mounties Group – Modern Slavery Statement FY2024

Introduction

Modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.

This statement is made pursuant to the *Modern Slavery Act 2018* (Cth) in relation to the Mount Pritchard and District Community Club Limited (ACN 000 458 622) and our controlled entities (**Mounties Group**), to assess and address the risk of modern slavery in our business operations and supply chains for the financial year ending 30 June 2024. The purpose of this statement is to outline our approach to ensuring Mounties Group has the frameworks and processes to identify, mitigate and manage the risk of modern slavery in our business operations and supply chains.

About Mounties Group

Mounties Group is a not-for-profit organisation, dedicated to improving the lives of its members and community in which they live. As a company limited by guarantee but created as a social enterprise, Mounties Group has no shareholders and therefore pays no dividends, instead using all profits to meet the core purpose of the organisation.

Membership of Mounties Group grew to 256,204 members in FY23-24, establishing a new record for membership of a registered club in Australia. Mounties Group operates across more than 10 industries, employs over 1,000 direct employees and serves more than three million people each year.

The licenced venues operating within the Mounties Group are as follows:

- Mounties, Mt Pritchard
- Mounties Mekong, Cabramatta
- Mounties Breakers Country Club, Wamberal
- Mounties Club Wyong, Wyong
- Mounties Triglav, St Johns Park
- Mounties Halekulani, Budgewoi
- Mounties Harbord, Freshwater
- Mounties Manly Bowling Club, Manly

Mounties Group also operates businesses in community care as Approved Home Care Providers, NDIS and General and Specialist Medical Practices, retirement living, health and leisure, resort accommodations and children's play centres as well as 52 sporting and social clubs. For a complete list refer to page 137 of the Mounties Group Annual Report (<https://www.mountiesgroup.com.au/2024-annual-report>).

Mounties Group consists of the following organisations:

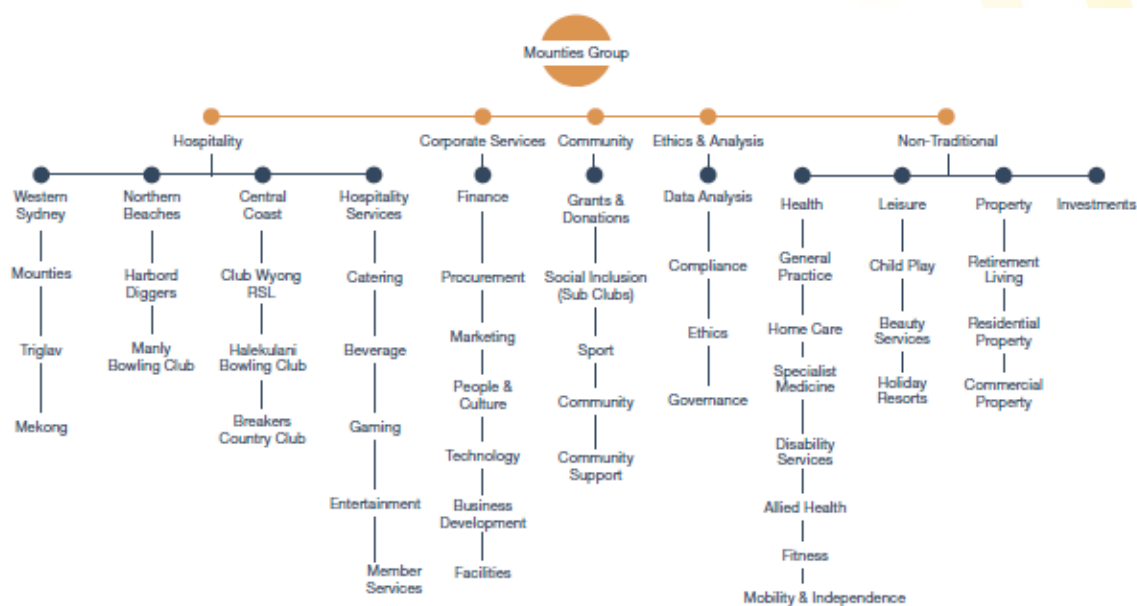
- Humphries-Pritchard Investments Pty Ltd, Service Company (ACN 676 183 805)
- Ignite Property Group Pty Ltd, Service Company (ACN 639 178 653)
- Meadows Commercial Pty Ltd, Service Company (ACN 676 182 700)
- Mekong Lease Co Pty Ltd, Service Company (ACN 619 040 845)
- Mounties Care Pty Ltd, Health and Home Care (ACN 639 697 171)
- New Diggers Car Park Pty Ltd, Service Company (ACN 607 170 767)
- New Diggers Land Co Pty Ltd, Service Company (ACN 601 376 229)
- New Diggers Service Co Pty Ltd, Service Company (ACN 601 376 238)
- Ozcott Pty Ltd, Home Care, NDIS, Retail and wholesale (ACN 110 609 517)

Our Structure, Operations and Supply Chain

Mounties Group is a company limited by guarantee, incorporated and domiciled in Australia under the *Corporations Act 2001* (Cth). Mounties Group's operations include registered clubs, hospitality, health and leisure, corporate, administration and property assets across South West Sydney, the Northern Beaches and the Central Coast as well as some non-core operations in other states.

Mounties Group 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. Mounties Group is committed to working with ClubsNSW to embrace ethical engagement and professional guidance to fight modern slavery within its business cycle.

The registered office for Mounties Group is located at 101 Meadows Road, Mount Pritchard NSW 2170 and employs over 1,000 people. The organisational structure is set out in the diagram below.



For the reporting period, Mounties Group utilised the services of over 1,300 suppliers for the provision of food and beverage, catering and hospitality, gaming, health care, maintenance, security, sporting facilities as well as corporate, technology and administrative services. Wherever possible, Mounties Group strives to utilise local, Australian based suppliers. A minimal number of suppliers are based overseas.

Our Governance

Mounties Group is dedicated to upholding corporate governance practices that ensure compliance with relevant standards and legislative requirements while reflecting community expectations. The Board holds primary responsibility for setting the direction of corporate governance, overseeing the organisation’s progress toward achieving its objectives in the best interests of employees, members, and the wider community.

The Board is specifically accountable for managing modern slavery risks by providing governance and strategic direction to operational leadership. This leadership is headed by the Chief Executive Officer (CEO) and supported by the Executive team, who represent their respective departments. Each Executive team member is tasked with overseeing operational and strategic risk management at their respective locations.

Through delegated authority, the Executive team ensures the enforcement of policies and procedures designed to mitigate modern slavery risks.

Modern Slavery Risk Areas

In relation to our employees, being an Australian domiciled organisation with a centrally located office, we consider our modern slavery risk to be low. Moreover, it is noted that Mounties Group employees are employed under award agreements or individual employment contracts, staff are paid in line with, or above the minimum industry rates.

Contractors also supply services to Mounties Group as part of our day to day operations and include security services, cleaning and maintenance, the majority of which are recruited from local areas. Mounties Group acknowledges that such contractors may not share our commitment to modern slavery prevention. We nonetheless classify the risk of modern slavery in our contractor base as low.

During the reporting period, Mounties Group acquired goods and services from suppliers, the majority of which are located in Australia. For that reason, we consider our modern slavery risk to be low. However, whilst using preferred Australian based suppliers helps to reduce modern slavery risk for Mounties Group, we are cognisant that modern slavery can be inherited in the supply chain from high risk jurisdictions, geographies and exploitative business models.

Our Modern Slavery Due Diligence and Actions

At Mounties Group, our values are Family, Caring, Loyalty, Innovative, Fun, Honesty and Outcome Driven. These values are instilled in our people, and we embrace them to actively reduce the risk of modern slavery exposure in our operations and supply chains.

Mounties Group prioritises employing people from local communities which we operate in, on industry awards and individual contracts. Mounties Group has a Remuneration Committee who ensure staff are employed and paid according to the terms and conditions of their employment, are provided with a safe working environment and adhere to legislative requirements. Additionally, Mounties Group provides its employees with an Employee Assistance Program and provides benefits to its employees via its Mounties Perks program.

Mounties Group also has a Workplace Health & Safety Committee, comprised of representatives from all businesses and business units, that meets quarterly.

Mounties Group has an established Audit, Risk and Governance Committee comprised of an independently appointed Chairperson, Directors, the CEO and various executive level representatives. The Committee meets quarterly to address risk management at Mounties Group.

Mounties Group has a number of internal policies and procedures to ensure that the organisation is run in an ethical, responsible and transparent manner. These policies include:

- **Modern Slavery Policy** – Supporting the organisation’s commitment to eliminating or limiting the risk of modern slavery.
- **Code of Conduct** – Founded upon Mounties Group’s values and sets out the minimum behavioural standards expected by employees as well as suppliers.
- **Whistleblower Policy** – Reaffirms Mounties Group’s commitment to modern slavery by way of encouraging employees to report concerns freely and without fear.
- **Procurement Policy** – Applies stringent procurement procedures to be adhered to with regard to the procuring of goods and services on behalf of Mounties Group.
- **Other Policy** – Including Discrimination, Bullying and Harassment, Right to Disconnect, Leave Standards and Cultural Diversity, Workplace Health & Safety, Respect and Awareness Policies.
- **Staff onboarding and training** – Mounties Group has a comprehensive mandatory orientation training program for all staff, covering all facets of risk management.
- **Diversity and Inclusion reporting** – WGEA reporting submitted annually.
- **Due diligence and audit** – We internally review and evaluate our supply chain to identify any possible risk, including to ensure compliance with modern slavery requirements. During the reporting period, Mounties Group revised the supplier onboarding questionnaire to include mandatory modern slavery questions.

These policies and procedures demonstrate our commitment to addressing modern slavery risks, whilst ensuring we have responsible and ethical practices in place, in compliance with relevant workplace legislation.

In 2025, Mounties Group is committed to uplifting its modern slavery risk management and intends to action the following:

- Formation of a modern slavery working group
- Updating the Mounties Group modern slavery policy
- Increased modern slavery training and awareness for staff
- Updated procurement policies and template documentation
- Supplier mapping and risk assessments
- Enhance engagement with suppliers on modern slavery risks

Assessing the Effectiveness of Actions

During the reporting period Mounties Group did not report any incidents or concerns with regard to modern slavery directly associated with its own operations. There were no complaints relating to modern slavery received through our whistleblower policy. Further, Mounties Group is not aware of any complaints raised by customers, contractors or members of the general public with regard to modern slavery associated with Mounties Group.

Mounties Group is committed to assessing the success of this statement at each annual review.

Consultation

Mounties Group has consulted with its other controlled entities for the purpose of this modern slavery statement.

Conclusion

Mounties Group is continuing its journey to being fully compliant with the Modern Slavery Act and embedding the requirements of the legislation into the organisation's operations and supply chain.

This modern slavery statement was approved by the Mounties Group Board of Directors.

Signed



Dale Hunt
Group Chief Executive Officer
18 December 2024