

Modern Slavery Statement



1 JULY 2022 – 30 JUNE 2023

BankstownSports BirrongSports TheAcresClub BankstownSportsBowls

BaulkhamHillsSports AuburnTennisClub BankstownGolfClub

Lady Banks
MEMBER



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Introduction

The 2022-2023 Financial Year saw a positive transition away from the disruptions and challenges of COVID shutdowns, towards a more stable operational and trading environment for Bankstown Sports and our wider club community. Our focus on community was stronger than ever, with substantial support provided to numerous social and community organisations that provide support to vulnerable members of the community, including those exposed to Modern Slavery risks. Our commitment to ensuring “Making a Difference” was the mantra of our business extended to integrating ethical and sustainable business practices into the operational framework of our organisation.

Bankstown Sports Board of Directors and Executive Management continued to commit to prioritising the rights and freedoms of our team members, those potentially impacted by our operations and those in our supply chain. Adopting a continuous improvement approach to understanding and addressing Modern Slavery risks has allowed for the implementation of multiple systems and risk controls across the business to mitigate areas of potential impact.

Our Mission

Making a Difference

Bankstown Sports continues to acknowledge the moral obligation businesses have, to operate with integrity and uphold high standards of practice that are resilient to disruptive market pressures without needing to compromise risk-tolerance levels. We appreciate the opportunity Bankstown Sports has, to align with other Australian and International businesses to promote and display positive risk-conscious practices in the Modern Slavery space to make a difference that translates local actions to a global impact.

A big focus for this financial year was on introspection, gap analysis and reviewing the effectiveness of our current risk management framework as it relates to Modern Slavery risks. As the nature of potential or actual Modern Slavery risks evolve, so too must our business evolve to understand our interaction with these risks. This understanding informed multiple community initiatives, organisational design improvements and allowed for more targeted training programs to educate our team on identifying potential Modern Slavery risks.

This Modern Slavery Statement reflects Bankstown District Sports Club Ltd’s continuing commitment to minimising our impact to the risks of Modern Slavery as identified by the Modern Slavery Act 2018 (Cth) and relates to the 2022/2023 Financial Year. This statement pertains to all stakeholders part of and engaging with Bankstown District Sports Club Ltd and its associated entities (collectively referred to in this document as “Bankstown Sports”).



Our Structure and Operations

Bankstown District Sports Club Ltd had 554 employees in fulltime, parttime and casual roles across the business as of 30th June 2023. 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. This risk control is an important part of ensuring the psychosocial safety of our team members by aiming to address potential workflow fluctuations or temporary increases in job demand.

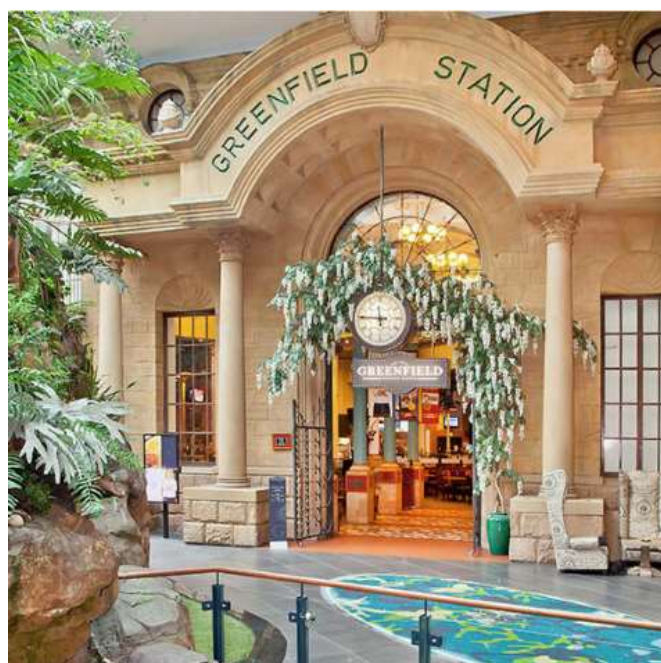
Bankstown Sports operated the following licenced and registered club premises during the 2022/2023 Financial Year:

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

Bankstown Sports has 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
- Eleon Pty Ltd
- Athlitikos Pty Ltd
- Clairemont Properties Pty Ltd
- Dootkare Pty Ltd
- Bandour Greenfield Pty Ltd
- Oceanic Education Pty Ltd



Our People and Policies

Bankstown Sports acknowledges the importance of open and accessible lines of communication in a business environment that operates 24 hours a day, 7 days a week. A high priority must be placed on designing policies and procedures that integrate Modern Slavery risk controls into operational function. To facilitate this, our corporate governance structure utilises a variety of communication, collaboration, and escalation mechanisms to integrate safeguards into the framework of our workflow that enables the identification and escalation of potential Modern Slavery impacts.

All team members have the right and ability, safeguarded by policy, to report and raise any concerns they may have – including those relating to potential Modern Slavery risks. We commit to extending this right to our engagement with contractors, service providers, suppliers and other external stakeholders. We have developed, reviewed and updated multiple key internal policies and procedures to support a Risk Management framework that includes Modern Slavery risk controls, including:

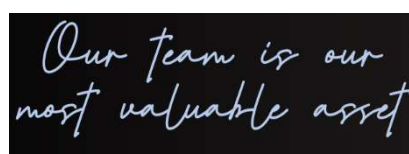
- Whistleblower Policy
- Work, Health and Safety Policy
- Risk Management, Hazard Management, and Incident Management Procedures
- Workplace Bullying and Harassment Policy
- Equal Employment Opportunity Policy
- Environment and Sustainability Policy
- Procurement Policy
- Leave and Roster Policy
- Junior Attendant Policy
- Minors on Club Premises Policy
- Learning and Development Framework

Bankstown Sports shares administrative resources and operational support mechanisms across its venues and entities. Through this consultation and collaboration framework, a consistent structure is maintained that also increases visibility and improves risk management practices across the organisation. A key component of this is readily accessible reporting pathways and collaborative committees with escalation pathways that enable the flow of information to cascade from Board to all team members and vice versa. The establishment of a Modern Slavery Committee, increase in WHS Committee representation and increased scope of our Risk Committee oversight are integral parts to our corporate governance framework in the Modern Slavery space.

Bankstown Sports has increased efforts towards improving engagement with suppliers and analysing the impact our flow of trade has on the markets we operate in. Bankstown Sports has a wide scope of businesses that we engage with as part of our Procurement processes, however, we aim to focus on establishing stable long-term relationships with accredited suppliers where possible.

Bankstown Sports continues our commitment to fair and ethical trading partnerships with our smaller and local community suppliers, while paying specific care to minimise our impact to Modern Slavery risks within this potentially vulnerable cohort of suppliers.

This year has seen a marked increase in the 'Cost of Living' challenges our local communities are currently facing and with this comes the potential for increased impact of Modern Slavery risks for our team members. Our team is our most valuable asset and we have a duty of care to safeguard their rights and freedoms, especially those relating to Modern Slavery.



Our team is our most valuable asset

A Look Into Our Potential Impact

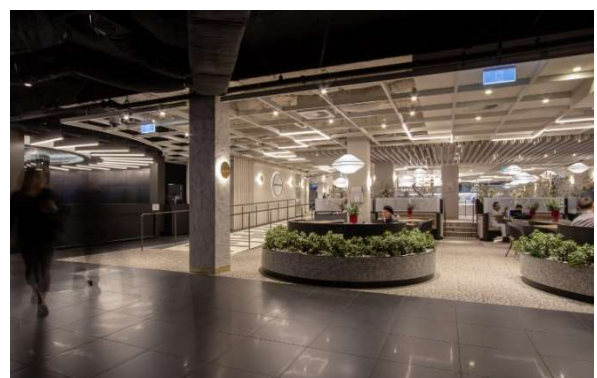
The return to a less disruptive pattern of trade, when compared to the previous years' COVID shutdown, allowed for our team to turn our focus inwards, and assess our policies, processes and procedures with a risk-conscious focus. The third and fourth quarter of this financial year saw the commencement of an extremely in-depth, widely consultative, and operationally focussed Internal Audit of our corporate governance framework and functional workflow. This included ethically driven and risk-focussed analyses of the impact our policies, processes and procedures had on key impacts, such as Modern Slavery risks. This risk based due diligence aimed to identify key areas of need through a gap analysis as well as inform the development and integration of additional risk controls into the operational function of our business.

Bankstown Sports acknowledges the level of potential Modern Slavery impact that accompanies a business of our size when it directly engages in the local supply chain or directly engages with local contractors. Having observed the exacerbation of human rights risks in the global supply chain during COVID-19, Bankstown Sports recognises the importance of analysing areas where it had potential to impact Modern Slavery risks and assess key factors we may need to consider in the current trading environment. These included:

- The engagement with workers in traditionally vulnerable industries, such as Cleaning and Trades industries.
- Ethical sourcing and engagement with second tier suppliers that afford decreased visibility regarding the geographical origin of goods or geopolitical benefit of monies paid.
- Industry risks through the engagement of vulnerable workers, such as seasonal workers, migrant workers, those impacted by financial hardship (COVID or cost of living related), those impacted by domestic violence and any disenfranchised or otherwise vulnerable people. This included the potentially increased level of psychological distress and psychosocial risk that traditionally accompanies vulnerable workers.
- Services risks through supply chain disruptions to previously stable trade agreements and the resulting changed market forces, thus increasing the vulnerability of service providers to potentially harmful leverage and pressure. Of particular significance, is the 'knock-on' impact of unrealistic cost targets, provision of cheap labour or impractical delivery timeframes.
- Implications of the background and demographic of our team and our team members.
- Entity risks associated with gaps in an organisation's corporate governance structure.
- Environment and sustainability factors that have a more global and long-term impact on developing countries.

In addition to an Internal Audit and increasing the scope of our consultation functions, the 2022-2023 Financial Year saw multiple initiatives that aimed to assess risk and operational impact. These included:

- Psychosocial Risk Due Diligence and Risk Assessment.
- Cost of Goods analyses.
- Contractor and Customer impact analyses.
- People Surveys.
- Training-needs gap analyses.
- Analysis of the effectiveness of past Modern Slavery initiatives.
- Contractor Management process audit.



Our Risk Controls

Bankstown Sports' continuous improvement approach to reviewing and updating our Modern Slavery risk controls aims to match the evolving nature of those risks with a business-wide target of improving our positive duty actions. Our Modern Slavery framework is reviewed annually as part of our regular audit and assurance processes. The framework is then assessed against other key indicators such as relevant training completion numbers, risk assessments, incident numbers, whistleblowing reports, surveys and other metrics.

Key risk controls in place at Bankstown Sports include:

- Contractor Management processes that aim to build on existing relationships by requesting additional information to improve people-procedure transparency and product traceability. This is part of our commitment to analysing how these businesses comply with international and industry standards regarding Modern Slavery risks without excessively burdening smaller businesses with unrealistic job demands.
- Updated reporting mechanisms with improved accessibility and mandatory investigation processes. These procedures ensure all people can raise concerns safely, securely and with the confidence they will be protected by policy and supported by Executive Management.
- Updated incident and grievance investigation pathways with increased due diligence, improved escalation framework, diligent remediation procedures and increased accessibility.
- Maintaining a long-standing and trusting relationship with a Cleaning contractor company. This extended to ensuring their operation aligned with our policies and they remain certified compliant with the relevant International Standard (ISO Certification).
- Minimising our impact to the Trades Industry by operating with an in-house Maintenance team that is supported within the same People Management and Employee Arrangement framework consistent across the business. Our Contractor Management process aims to extend this code of conduct and expectation to third party contractors and service providers that may be engaged on an ad hoc basis.
- Engaging with second tier and retail suppliers (such as furniture, textiles, electrical equipment, catering equipment, dry/wet goods suppliers, etc) to promote fair trading practices 'down the chain' and minimise the knock-on impact third/fourth tier suppliers have on traditionally vulnerable geographical areas where a product may originate or is manufactured.
- Utilising socially responsible labour hire and agency workers with companies that are established and reputable.
- Improved committee representation, scope and oversight (particularly Modern Slavery, WHS and Risk Committees).
- Maintaining relationships with suppliers, where possible, to ensure the leverage created by our size and purchasing power does not negatively influence their business practices. These included retainers or establishing reasonable delivery and payment timeframes.
- Closely engaging with smaller suppliers and providers within our local community to ensure normal fair-trading market conditions were in effect during transactions.
- Engaging external specialists and organisations to review our contracts, conditions and financials. Key work in this space included:
 - Independent auditing of financials to ensure compliance with Australian accounting and International financial reporting Standards.
 - Legal assistance for our vulnerable migrant workers and those on working visas to support them with this complicated process.
 - Auditing our people contracts to ensure fair work and fair pay conditions.

- Building meaningful and collaborate partnerships with key contractors vulnerable to Modern Slavery risks (such as contracted Cleaners and Security Operatives).
- People & Culture initiatives in the Wellbeing space such as provision of an additional two days of Wellbeing Leave for all Full Time and Part Time employees, free female sanitary products, free healthy food options, supporting an Employee Assistance Program and the provision of an additional meal allowance.
- Learning & Development initiatives such as safe reporting pathways, Trades training, safe work practices, safe operating procedures, leadership pathways, leadership development and general Wellbeing initiatives.
- Employment of additional team members in the procurement and supplier analysis space to facilitate additional due diligence practices.
- Partnering with community hotels and living facilities to support employees experiencing temporary homelessness in response to Domestic Violence and situations at high risk of potential Modern Slavery impacts.

Bankstown Sports continues 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 allocated additional internal resources to comprehensively audit our business practices in this space and proactively implemented industry-leading practices to address potential impacts.



Our Community Actions

Bankstown Sports has held a positive reputation within the local community and wider club community since foundation in 1958. Our longstanding commitment to developing and supporting initiatives that address the emerging needs of our evolving community remains ingrained in our operational and strategic priorities.

Bankstown Sports acknowledges that the associated impacts of Modern Slavery risks within a community such as ours, can often be difficult to fully identify. As such, we continue to support and promote initiatives within the community that aim to address vulnerable people who may be at risk of Modern Slavery.

Key initiatives during this period included:

- Supporting the operations of Biyani House, a Women’s Shelter in Revesby.
- Supporting programs aimed at helping people in crisis or victims of violence such as Re-Love and Sweet Dreams Foundation.
- Supporting programs aimed at supporting mental health and wellbeing for vulnerable people such as Together We Can.
- Supporting services aimed at helping Immigrants and Asylum Seekers such as Bridge for Asylum Seekers.
- Supporting services aimed at helping vulnerable children with disabilities such as Morris Children’s Foundation, Fit Kidz Foundation, Fair Fight Foundation, Solve-TAD Limited and International Therapy Alliance.
- Significant funding for multiple youth mental health, employment support and mentoring programs such as Be Unstoppable Foundation, BariStars, and Raise Foundation.
- Partnering with community organisations to support employment pathways for vulnerable members of the community such as WISE Employment.
- Partnering with Bankstown-Lidcombe Hospital to provide significant funding for nursing scholarships, improved medical equipment and services.
- Significant contribution to Forbes Shire Council flood appeal to help their local community recover and rebuild.
- Responsible Gaming initiatives to better support members and visitors.



In addition to these initiatives, Bankstown Sports' Board and Executive Management maintain long-term stable relationships with key community groups that have a proven record of positive impacts 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 free in-the-air and on-the-ground transport for vulnerable children and their families in regional areas to access medical treatment.
- Supporting Bankstown City Aged Care and Bankstown-Lidcombe Hospital.
- Local emergency accommodation, transitional housing and support services for vulnerable people.
- Significant support to community organisations and grassroots sports associations through ClubGRANTS.
- Employing an internal wellbeing stakeholder with a scope of duty that mandates proactively reaching out to facilitate mental health and wellbeing care to vulnerable community members flagged during their engagement with our club facilities.



Key Areas of Future Action

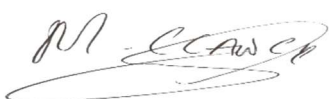
Bankstown Sports Board of Directors and Executive Management recognise that an essential component to a Corporate Governance and Risk Management framework is to continue to review its effectiveness and ensure it is updated in line with an ever-evolving landscape of risk. Modern Slavery risk management requires an equally diligent approach, with a moral imperative that risk controls that mitigate Modern Slavery risks are integrated into our operational framework at the 'organisation design' level.

Bankstown Sports will continue to adopt a continuous improvement and harm minimisation approach to managing Modern Slavery risks and will focus on:

- Developing an Environmental, Social and Governance framework that includes a broad consultation process and a focus on responsible business practices (including addressing Modern Slavery risks).
- Increasing the accessibility, scope and availability of training and education resources in the Modern Slavery, Wellbeing and Psychosocial Due Diligence space.
- Committing to increasing educational resources available for our team members to better identify hazards and report incidents that may impact Modern Slavery risks.
- Enhancing existing internal risk management frameworks with a focus on educating line management on identifying and addressing Modern Slavery risks.
- Developing supply and goods procurement practices to include greater ethical sourcing considerations.
- Continuing to integrate risk identification and risk management processes into operational procedures.
- Extending our partnership with community organisations to support employment pathways for vulnerable members of the community.
- Increasing our internal specialised resources to strengthen our Corporate Governance and Risk Management framework.
- Extending the scope of the Modern Slavery committee to evolve into a working group with the objective of pursuing initiatives that focus on addressing Modern Slavery risks.
- Regularly auditing our People contracts and arrangements to ensure they protect our vulnerable team members who may be at risk of Modern Slavery impacts.
- Evaluating our supplier and service provider engagement processes to ensure they align with our overall standard of operation.
- Progressing our Internal Audit to its Phase Two Stage (Corrective Action and Implementation).

Board Approval

The Modern Slavery Statement was ratified by the Bankstown District Sports Club Ltd Board of Directors on 14th November 2023 and will be regularly reviewed and updated, as indicated, to ensure proactive compliance with the Modern Slavery Act 2018 (Cth).



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