

Modern Slavery Statement 2025

Victoria Amateur Turf Club (incorporating the Melbourne Racing Club)

ABN 96 267 203 634



MRC
Melbourne Racing Club



Introduction

This statement covers all activities of the Victoria Amateur Turf Club (incorporating the Melbourne Racing Club) and its related entities, hereinafter collectively referred to as the 'Melbourne Racing Club' and reflects our commitment to understanding, identifying, and actively implementing measures aimed at minimising the risk of modern slavery within our operations and across our supply chains. It underscores our ongoing efforts to uphold ethical standards and address modern slavery risks through responsible business practices, rigorous oversight, and continuous improvement across all aspects of our organisation.

This is the sixth modern slavery statement prepared by the Melbourne Racing Club in accordance with the Modern Slavery Act 2018 (Cth) (the "Act") and applies to the financial year ending 30 June 2025.

Modern slavery, as defined by the Act, manifests in various insidious forms such as slavery, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruitment for labour or services. At Melbourne Racing Club, we uphold a zero-tolerance policy towards any and all forms of modern slavery in our operations and supply chains. Our commitment goes beyond mere legal compliance, we aim to be proactive in safeguarding human rights.

Our Business

Beyond its core racing operations, MRC delivers a diverse calendar of functions and large-scale events, including lifestyle exhibitions, music and food festivals, trade expos and motorsport activities. The Club also maintains an active interest in property development, notably through its involvement in the Caulfield Village project and broader master planning initiatives at Caulfield Racecourse.

MRC oversees a substantial hospitality and gaming portfolio through its control of Pegasus Leisure Group (PLG), which manages multiple hotel and club venues across metropolitan Melbourne.

The MRC Foundation, established in 2014, operates as the Club's charitable arm. It supports a wide range of community groups and organisations, particularly those connected to the local areas surrounding MRC racecourses, PLG venues and participants within the racing industry.

The Foundation engages members, patrons and the broader Victorian community in fundraising initiatives and the provision of financial and in-kind assistance to charitable causes.

The Melbourne Racing Club employs approximately 1,300 staff, including around 340 permanent employees, with workforce numbers increasing to approximately 1,600 during the peak spring carnival period.

All Melbourne Racing Club operations are conducted within the State of Victoria, Australia.





Our Structure, Operations & Supply Chains

During the reporting period, the Victoria Amateur Turf Club (incorporating the Melbourne Racing Club) ("VATC") managed its various business divisions through a group organisational structure, including its primary subsidiaries: Melbourne Racing Club F&B Limited, MRC Investments Pty Ltd, Yadnum Pty Ltd, and MRC Foundation Limited.

The key operations of the Melbourne Racing Club's businesses and its associated major supply chains are set over the following pages.

Structure



Melbourne Racing Club

Entity:

Victoria Amateur Turf Club (incorporating the Melbourne Racing Club)

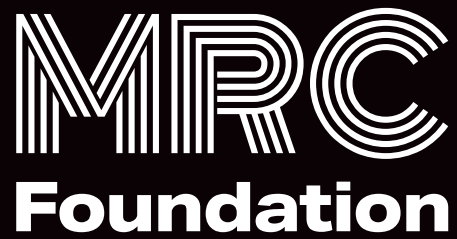
Operations

- Facilitating thoroughbred race meetings across three racecourses, at Caulfield, Sportsbet Sandown, and Mornington (including Spring Racing Carnival events)
- Operating thoroughbred training facilities
- Promoting, carrying on and encouraging the racing of thoroughbred horses in Victoria
- Management and operation of public entertainment events and festivals
- Hiring of its venues to external parties to host functions and events
- Property development, including the Caulfield Village development

Supply Chain

- Food and beverage suppliers (which operate in industries including agriculture, meat processing, viticulture) - 182 suppliers
- Services provided by external suppliers including cleaning, waste removal, security, maintenance, construction, and external advisors – 133 suppliers
- Supply of general operational goods and infrastructure equipment (including hires) - 90 suppliers
- Supply of merchandise - 29 suppliers
- Horticultural suppliers for the maintaining of racetracks, including labour - 27 suppliers
- IT services and office consumables - 46 suppliers

Structure



Entity:

MRC Foundation Limited as trustee for MRC Foundation and MRC Foundation Trust

Operations

- Hosting of events to raise funds for allocation and donation to charities

Supply Chain

- Sourcing of goods and services to host events to raise monies
- Suppliers of sponsored programmes

Structure



Entity:

Victoria Amateur Turf Club (incorporating the Melbourne Racing Club)

Melbourne Racing Club F&B Limited

Melbourne Racing Club Investments Pty Ltd

Yadnum Pty Ltd

Operations

- Management of 15 hotel and club venues (as of 30 June 2025)
- Providing gaming services as well as food and beverage offering at each venue

Supply Chain

- Food and beverage suppliers (which operate in industries including agriculture, meat processing, viticulture) - 42 suppliers
- Operational requirements including regular servicing of equipment as well as repairs and maintenance requirements - 59 suppliers
- Supply of general operational goods - 44 suppliers
- Services provided by external companies including gaming, security, waste removal, cleaning, and external advisors - 46 suppliers

Collaborative Approach

As outlined above, the Victorian Amateur Turf Club (VATC) is the sole reporting entity within the Melbourne Racing Club (MRC) Group required to prepare a Modern Slavery Statement in accordance with the Act.

Notwithstanding this formal reporting position, VATC and its subsidiary entities operate under an integrated governance framework, with shared Committee members, directors and senior executives across the broader MRC structure. In addition, a number of centralised corporate functions — including procurement, legal, risk management, Human Resources, information technology and finance — provide services across all entities within the Group.

Accordingly, while VATC is the designated reporting entity, the assessment and preparation of this Statement has involved active participation from all entities under its ownership or control. This coordinated, whole-of-group approach enables a comprehensive evaluation of modern slavery risks across the entirety of MRC's operations and supply chain, strengthening governance oversight and reinforcing the Club's commitment to transparency, accountability and respect for human rights.



Potential Risks of Modern Slavery

The Melbourne Racing Club has undertaken a comprehensive review of its key areas of expenditure across all operational divisions to identify parts of the supply chain that may present heightened exposure to modern slavery risk.

MRC's supply chain is predominantly domestic, comprising approximately 1,400 direct suppliers, with payments made to around 1,000 suppliers during FY25. With more than 95% of suppliers located within Australia, the Club acknowledges that, notwithstanding the largely local footprint, certain industries remain inherently higher risk and therefore require ongoing vigilance and active oversight.

Through this assessment, MRC has identified specific categories of directly contracted suppliers where the nature of the goods and

services procured may increase modern slavery vulnerability. These sectors include security services, cleaning services, electrical and technology procurement (including hardware, software and cloud-based services), and merchandise and apparel. In FY25, approximately 40 suppliers were identified within these higher-risk categories.

The Melbourne Racing Club remains committed to continual enhancement of its risk identification and mitigation frameworks. Each reporting period, the Club refines its processes, governance controls and monitoring systems to strengthen its ability to detect and address potential modern slavery risks, ensuring its approach remains proactive, robust and progressively more effective.

Our Actions in Addressing the Risk of Modern Slavery

Our response to modern slavery risk is structured, comprehensive and embedded across the organisation. It is underpinned by four interconnected pillars:

Governance:

We maintain a robust internal governance framework comprising clearly articulated policies, standards and procedural controls that define expectations regarding modern slavery risk management. These instruments establish a strong ethical baseline across our operations. Contractual provisions are deliberately structured to reinforce these obligations, requiring suppliers and business partners to adhere to our anti-slavery standards. Oversight is provided through our Modern Slavery Working Group, which monitors, reviews and continuously enhances our approach.

Empowerment:

We prioritise workforce capability through targeted education and awareness programs designed to strengthen understanding of modern slavery risks. Training initiatives equip employees with the knowledge to recognise indicators of exploitation, appreciate the broader human rights context, and respond appropriately where concerns arise. By embedding this learning organisation-wide, we promote informed vigilance and shared accountability.

Collaboration and Remediation:

Our approach extends beyond compliance to active engagement with suppliers. We foster transparent communication, constructive dialogue and ongoing collaboration to encourage responsible and sustainable practices throughout the supply chain. Where risks are identified, we work with suppliers to address and remediate concerns, recognising that effective risk management requires partnership, continuous improvement and a shared commitment to ethical conduct.

Due Diligence:

We apply structured due diligence processes to key suppliers, including risk-based assessments, supplier scorecards and targeted audits. These mechanisms support systematic evaluation of compliance performance and enable informed oversight of potential modern slavery exposure.



Actions Taken in FY25

This section outlines the Melbourne Racing Club's proactive steps in 2025 to assess and mitigate the risk of modern slavery across our operations and supply chain. Our primary focus has remained the continuous review of our supplier base, strengthened governance oversight, and enhanced due diligence processes.

Surveying our Suppliers

To strengthen our ability to identify and assess potential risks within our supply chain and to develop effective mitigation strategies, the Melbourne Racing Club introduced a Modern Slavery Survey in 2022 and has continued to deploy this annually.

The survey is issued to major suppliers and those designated as higher-risk categories.

- Since inception, 297 suppliers have been surveyed to ensure appropriate understanding and mitigation of modern slavery risk.
- 76 additional suppliers have been surveyed since the commencement of the current financial year.

From suppliers audited:

- 97% report no evidence of Modern Slavery within their supply chain
- 90% report no to minimal risk of Modern Slavery within their supply chain
- 54% have formal organisational policies addressing Modern Slavery risk
- 53% have designated personnel responsible for overseeing Modern Slavery risk and provide organisational training specific to risk identification, assessment and response

Survey findings indicate that key suppliers have undertaken internal reviews and, in many cases, implemented policies and processes addressing modern slavery within their own operations.

Building on prior-year frameworks, all new primary suppliers classified as medium or high risk are required to complete the Modern Slavery Survey or provide an equivalent Modern Slavery policy in FY25. Survey results are assessed prior to final supplier approval.

Understanding the Risk

Our interactive training program "Modern Slavery awareness", has become a core element of our staff's annual training regime. Designed to deepen employees' understanding of modern slavery risks and their role in prevention, this program combines engaging content, real-world scenarios, and practical guidance on identifying and addressing potential issues. All staff are required to complete annual refresher courses to stay current with best practices and updates in policies or regulatory requirements.

This training module is also a fundamental part of our onboarding process for new employees. From their first days with us, new team members gain essential knowledge on our commitment to ethical standards and their role in upholding these principles. By making this program an ongoing requirement, we form a culture of responsibility, and ethical awareness throughout the organisation, empowering staff to recognise and respond to modern slavery risks effectively.

Together with the Modern Slavery Working Group, the Procurement team continues to play a central role in supplier compliance monitoring and risk mitigation strategy development, embedding ethical accountability across the organisation.

Actions Taken in FY25

Policies

To uphold ethical business practices and human rights, the Melbourne Racing Club has implemented several key policies, including:

- Code of Conduct Policy
- Purchasing Policy
- Discrimination, Bullying and Harassment Policy
- Equality and Equal Employment Opportunity Policy
- Occupational Health and Safety Policy
- Whistle-blower Policy

Labour-Hire Compliance Audit (2025)

In FY25, MRC undertook an independent, randomised payroll audit of all active labour-hire providers servicing both MRC venues and the PLG joint venture.

Audit Scope:

- Eight active labour-hire providers
- 43 employees sampled
- Four-week review period (17 March – 27 April 2025)
- Benchmarking against applicable modern awards:
- Hospitality Industry (General) Award 2020
- Security Industry Award 2020

- Cleaning Services Award 2020
- Gardening & Landscaping Services Award 2020

Key Findings:

- 100% compliance with minimum hourly rates
- Full compliance with weekend and public-holiday penalty loadings
- Accurate overtime multipliers applied
- Full compliance with the statutory 11.5% Superannuation Guarantee
- No instances of underpayment, unpaid overtime, unpaid superannuation or unlawful deductions identified
- Payslips compliant with Fair Work Regulation requirements
- No modern slavery red flags (excessive hours, coercive practices, subcontracting opacity) identified
- Right-to-work documentation verified for all sampled staff
- 100% of active labour-hire providers are licensed under the Labour Hire Licensing Act 2018 (Vic)

These outcomes affirm the effectiveness of MRC's labour-hire compliance framework and vendor due-diligence processes, demonstrating strong adherence to statutory wage, superannuation and workplace-rights obligations.

Assessing the Effectiveness of Our Actions

The Melbourne Racing Club is committed not only to meeting its obligations under the Modern Slavery Act, but to actively identifying and addressing potential risks within its operations and supply chain. To strengthen this commitment, a senior executive working group was established in 2020 to guide and oversee the Club's anti-slavery initiatives. This group plays a central role in monitoring progress, refining controls, introducing enhanced measures and responding to emerging risks and regulatory developments.

We recognise that modern slavery risk can arise across industries and supply chains, including our own. Accordingly, we affirm our commitment to the protection of human rights and acknowledge that preventing modern slavery requires sustained, organisation-wide responsibility embedded in everyday decision-making and business practices.

Looking ahead, we will focus on further embedding our modern slavery commitments into core governance, procurement and operational frameworks. Strengthening integration across the business will

enhance our ability to manage risk systematically and to evaluate, in a more measurable way, the effectiveness of actions undertaken to date.

This Statement has been reviewed and approved by the Committee of the Victorian Amateur Turf Club (incorporating the Melbourne Racing Club), being the principal governing body of the reporting entity. Approval was granted on 30 November 2025.



Cameron Fisher
Chairman
Melbourne Racing Club