



MODERN SLAVERY **STATEMENT**

REPORTING PERIOD YEAR ENDED 30 JUNE 2021



**Racing
Victoria**

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The RV Group (as at 30 June 2021)

Racing Victoria Limited ABN 88 096 917 930

RVL Media Pty Limited ABN 64 137 208 809 (RVLMI)

RVL Media International Pty Limited ABN 69 612 838 418 (RVLMI)

400 Epsom Road, Flemington VIC 3031

Victorian Thoroughbred Racing IMB Pty Ltd ABN 55 643 473 376 (VTRIMB)

Racing.com Pty Ltd ABN 49 104 883 267 (RDC)

AFL House, 140 Harbour Esplanade, Docklands VIC 3008



**Racing
Victoria**



1 | Introduction

Racing Victoria Limited (**RV**) is a public company limited by guarantee, which was established in 2001 to provide independent governance of the Victorian thoroughbred racing industry.

RV's objectives are to develop, encourage, promote and manage the conduct of thoroughbred racing in Victoria by encouraging broad participation and sustainably growing the industry's economic and social value.

RV is a reporting entity for the purposes of the Modern Slavery Act 2018 (Cth) (**Act**), as are some of its members (for instance, the Victoria Racing Club).

During the period of the year ended 30 June 2021 (**Reporting Period**), Racing Victoria acquired Victorian Thoroughbred Racing IMB Pty Limited (VTRIMB) and Racing.com Pty Limited (**RDC**).

These two entities are now part of the RV group, are media entities and have separate governance and management arrangements. Following the Reporting Period, Racing Victoria acquired the interests in Thoroughbred Racing Production (Vic) Pty Limited.

This Modern Slavery Statement (**Statement**), prepared under section 16(1) of the Act in respect of RV and RV group operations for the Reporting Period has been approved by the RV Board, is signed by the Chief Executive Officer, and has been submitted in accordance with the Act.



2 | RV's Strategic Framework and Risk Management

Racing Victoria has adopted a Strategic Framework that considers the current state of the industry and some of the longer-term issues and opportunities impacting the sport, while outlining a path for future growth and success.

Our Strategic Framework identifies RV's vision of "Racing for All" and its purpose of championing great horse racing in Victoria through a financially sustainable thoroughbred racing industry. Further detail on our Strategic Framework is available in the Racing Victoria 2021 Annual Report, from page 11, available on Racing Victoria's website at <https://www.racingvictoria.com.au/about-us/annual-reports>.

In order to achieve its Strategic Framework, RV has put in place risk management processes and procedures to ensure that it appropriately identifies, assesses, evaluates and treats risks that could impact its operations and achievement of its vision and purpose.

RV's assessment of its modern slavery risks, the subject of this Statement, has been considered with reference to the above and through the prism of integrity, sustainability and accountability.

3 | RV Structure, Operations and Supply Chains

3.1 STRUCTURE

3.1.1 RV AND ITS MEMBERS AND SUBSIDIARIES

RV has 14 constituent members, comprising Club Members and Industry Body Members as provided below. Some of these members are also reporting entities for the purposes of the Act. Where applicable, members are responsible for releasing their own modern slavery statements.

CLUB MEMBERS



INDUSTRY BODY MEMBERS



During the 2021 Reporting Period, RV continued as the sole shareholder of two proprietary companies it held throughout the 2020 Reporting period – **RVLM** and **RVLM I**. Each of these entities were involved in the Victorian thoroughbred racing industry media supply chain.

In addition to this, there were several changes to the consolidated entity throughout the Reporting Period.

On 13 August 2020, a new subsidiary entity joined the RV corporate group, the VTRIMB. VTRIMB commenced operation on 1 July 2021, shortly following the end of the Reporting Period. VTRIMB was established to be the holder and/or manager of the various media assets within the RV Group.

RV, RVLM, RVLM I, VTRIMB and RDC are collectively referred to in this Statement as the **RV Group**.

Following the end of the reporting entity, the RV Group acquired TRP. This acquisition will be reflected in future reporting periods.

With the exception of RDC, the RV Group operated under a common governance and management structure during the period, provided however the Integrity function at RV (in particular, the role and responsibilities of the Stewards) is independent of the commercial function of RV.

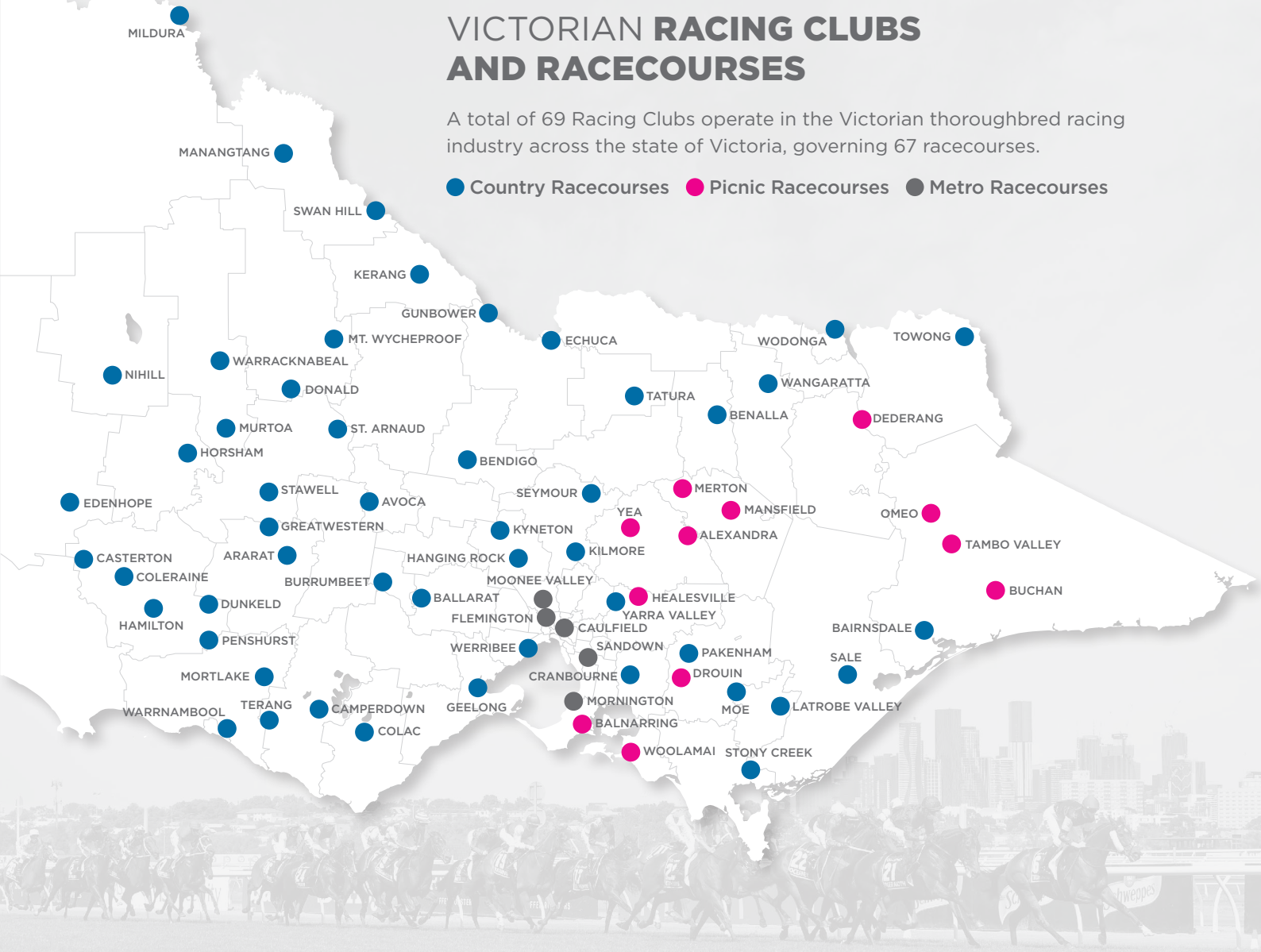
The media operations – VTRIMB, RDC and TRP, operate under a separate governance and management structure, with RV providing services to these businesses on arm's length terms during the period and on an ongoing basis. This Statement includes the policies and practices adopted by the media entities in respect of modern slavery risks.



VICTORIAN RACING CLUBS AND RACECOURSES

A total of 69 Racing Clubs operate in the Victorian thoroughbred racing industry across the state of Victoria, governing 67 racecourses.

● Country Racecourses ● Picnic Racecourses ● Metro Racecourses



3.1.2 RV'S INTERACTION WITH VICTORIA'S RACING CLUBS AND PARTICIPANTS

Each Racing Club has its own governance structure and membership and is responsible for the operations of each of its racecourses, including the maintenance of its premises and racetrack, members of its Club and the hosting of the general public on raceday.

Some Clubs also have horse training centres on their premises, occupied by individual trainers.

These training centres are overseen by those Clubs, who also manage trackwork and 'jump outs' at their facilities.

Under the Rules of Racing, the RV Stewards administer racedays at racecourses operated by the Racing Clubs. RV provides additional raceday staff in respect of the racing activity.

During the 2020-21 racing season, 4,325 races were held in Victoria.

The Rules of Racing establish the participation of others in the sport of thoroughbred racing. These persons and businesses are referred to in the industry as "registered participants" or "licensed participants" (as they apply or renew their licence with RV each year) and include jockeys, trainers and others involved on raceday. 226 jockeys, 911 trainers and 3,431 stable employees were licensed participants during the 2020-21 racing season.

Each of these licensed and registered participants has responsibility for its own business operations and supply chains. Where appropriate, RV may seek to influence or guide these licensed and registered participants as part of its role in upholding the integrity of the industry.

3.2 OPERATIONS AND WORKFORCE

3.2.1 OPERATIONS

RV's operations can be summarised as follows:

Business Area	Operations
Integrity and oversight	<ul style="list-style-type: none"> Principal Racing Authority – Regulation of Victorian thoroughbred horse racing Integrity and licensing Veterinary Services Equine Welfare Horse owner registration and review of product disclosure statements (syndicates)
Stakeholders, commercial and customers	<ul style="list-style-type: none"> Representation of Racing Clubs and the industry (e.g. lobbying, marketing and promotion) Racing Club funding and loans Wagering – Universal race field approvals and licensing of Victorian bookmakers Media rights management Major projects and capital works management
Race day services and operations	<ul style="list-style-type: none"> Delivery of races at Racing Clubs and programming Distribution of prizemoney Employment of core business employees Employment of casual race-day employees (race day officials, barrier attendants, clerks of the course, judges) Provision of certain services to jockeys (who are free agents) – workcover and superannuation
Core business functions	<ul style="list-style-type: none"> Corporate functions, including finance, legal, risk and compliance, information services, human resources, facilities and procurement Landlord Employment of core business employees

3.2.2 RV GROUP OPERATIONS - MEDIA BUSINESSES

During the Reporting Period, RDC workforce matters were centralised under its own management structure. The media businesses are involved in media matters including rights management, production and distribution of coverage and the Racing.com television channel.

Following the conclusion of the Reporting Period, VTRIMB now wholly-owns the media businesses and assets. This will be reflected in future reporting periods.

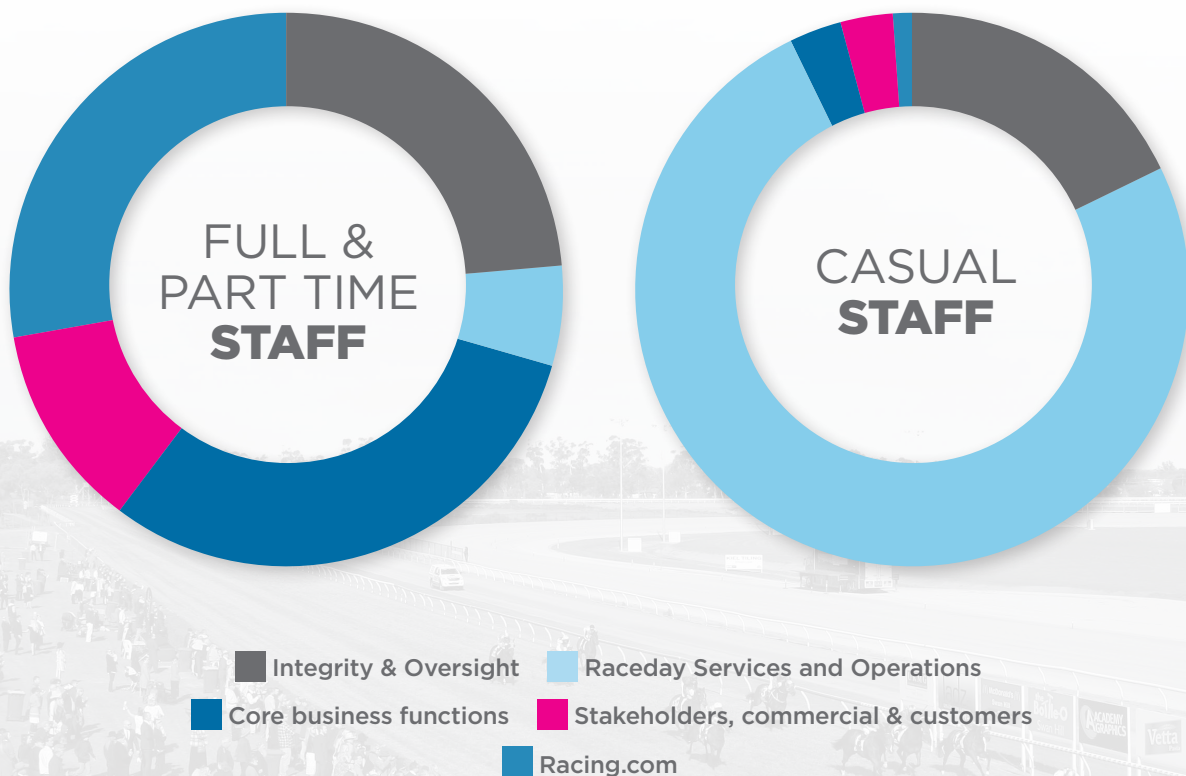
3.2.3 WORKFORCE

As at the close of the Reporting Period on 30 June 2021, the RV Group had a workforce comprised of 262 full time and part time employees (including 73 RDC employees), as well as a casual workforce of 195 (including 1 casual RDC employee).

The RV casual workforce is predominantly involved in raceday operations activity (for example, barrier attendants and officials).

The RDC workforce is solely involved in media operations matters.

WORKFORCE



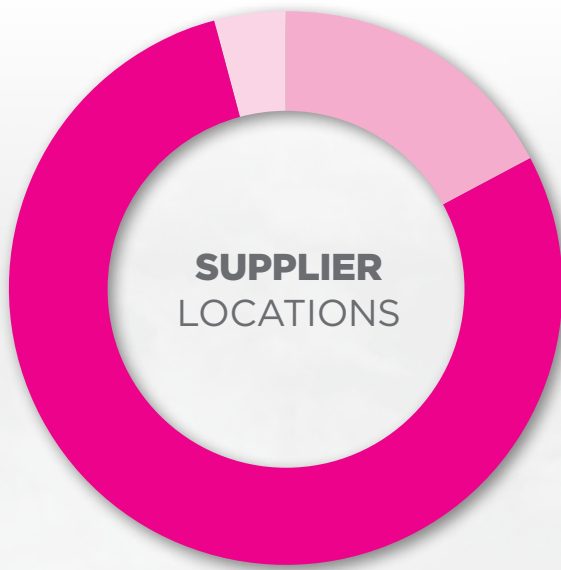
4 | RV's Supply Chain

RV has conducted a review into its supply chain for the Reporting Period and has identified the following goods and services acquired to support its operations:

Business Area	Goods and/or services purchased to support operations
Integrity and oversight	Professional services (e.g. specialist consultants, lawyers & accountants) Technology (e.g. Hawkeye)
Stakeholders, commercial and customers	Media, advertising and journalism Engineering services and construction Wagering administration Merchandise (e.g. Spring Racing apparel)
Raceday operations	Equine welfare and veterinary Engineering services and construction Security Raceday services and racing administration Racing photography Medical services (including Chief Medical Officer, consultancy services in response to COVID-19)
Core business functions	Information Technology (e.g. software, licenses). The types of goods and services here are all unique, but in practise would overlap between business areas. Ie. other business areas use professional services, not just integrity. Transport Insurance Utilities Trade services and maintenance, such as electrical and plumbing Telecommunications Finance Payroll Recruitment services
Racing.Com	Tech platform and support services Media and journalism Utilities Merchandise Office lease

Wherever possible, RV procures goods and services from Victorian (or failing that, Australian) vendors. Less than 4% of suppliers used during the Reporting Period were based outside of Australia. These international suppliers were based in a total of 8 other countries or Special Administrative Regions (Germany, Hong Kong, Ireland, New Zealand, Singapore, Sweden, United Kingdom and United States). During the Reporting Period, the RV Group (including RDC) procured goods and services from 898 suppliers as follows:

SUPPLIERS



- Victoria
- Australia (Other States)
- International

- Media, Advertising and Journalism
- Equine Welfare and Veterinary Services
- Tech Platform & Support Services
- Raceday Services & Medical
- Construction & Utilities
- Merchandise/Goods Supply
- Industry Funding (eg. Race Clubs, Industry Groups)
- Other
(examples include professional services and consultancy, transport, training and education)



5 | Identification and Assessment of Modern Slavery Risks

THE MODERN SLAVERY RISKS ASSESSMENT PROCESS

CATEGORY MAPPING

Identified key operations and supply chain categories

INHERENT RISK IDENTIFICATION

Considered supplier industry and country risks and operational activities

RELATIONSHIP ANALYSIS

Could we be causing, contributing to or linked to modern slavery

RV has conducted an assessment of its operations and supply chain for potential modern slavery risks. In so doing, and with the assistance of an independent advisor, RV implemented the above process.

The factors that lead to this risk rating are that all of RV's operations are performed in Australia, RV's corporate employees are skilled professionals that largely perform office-based roles and raceday employees are generally employed under EBAs.

For categories that RV identified as being of higher risk, RV performed an assessment to better understand its relationship to these risks. This assessment considered whether RV was likely to be causing, contributing to or linked to modern slavery practices, the presence of mitigating factors and controls, and RV's ability to influence other parties connected to the activity, good or service.

The results of this assessment are provided in the table below.

Aspect	Category	Modern slavery risk factors
Supply chain	Engineering and construction	Inherent risks of modern slavery in construction and the extended construction materials supply chain are associated with the employment of lower skilled and migrant employees, as well as potentially dangerous working conditions.
	Security	Inherent risks of modern slavery in asset security services are associated with the employment of lower skilled and migrant labour.
	IT services and software	Inherent risks of modern slavery are present in IT equipment manufactured in higher risk countries, most prominently forced and bonded labour. A lower level of inherent risk was identified in the provision of IT services and software delivered in Australia.
	Trade services and maintenance	Inherent risks of modern slavery are associated with the use of lower skilled or migrant labour and in the use of labour hire services. Additional risks within the extended materials supply chain are again associated with the use of lower skilled or migrant employees, as well as potentially dangerous working conditions.
	Apparel, uniforms and merchandise	Inherent risks of modern slavery may be associated with the extended and complex apparel, uniforms and merchandise supply chain. These risks have a higher likelihood of occurrence offshore and include deceptive recruitment practices, forced or bonded, child labour and human trafficking.

Whilst RV may acquire goods and services from vendors that operate in higher-risk industries (albeit infrequently), RV does not believe that it is causing or contributing to these risks.

6 | Evaluation and Treatment of Modern Slavery Risks

RV's approach to managing its modern slavery risks is detailed below. In March 2021, RV has evaluated the risks identified at section 5 above to understand the appropriateness and the maturity of its existing risk management practices and to identify opportunities for continuous improvement.

6.1 POLICIES

RV has in place policies and procedures that outline RV's expectations of its employees and its vendors.

A number of these policies and procedures are relevant in efforts to prevent modern slavery risk at RV as outlined in the table over:

Policy or Procedure (or Agreement)	Purpose
Code of Conduct	It defines the actions, behaviours and practices expected of and required by Racing Victoria employees. RDC has its own Code of Conduct in place which meets the above purpose.
Whistleblower Policy	To encourage RV officers, employees and contractors to report dishonest or illegal activity by RV and its officers, employees and contractors, through the provision of education and awareness raising, procedures and protections.
Anti-Discrimination Policy	Outlines our commitment to ensure our workplace is free from discrimination and enables equal opportunity. RDC has its own Anti-Discrimination Policy.
Harassment and Sexual Harassment Policy	Outlines our commitment to providing a work environment which is free of all forms of harassment. RDC has in place a Sexual Harassment Policy, and a Workplace Bullying Prevention Policy.
Participant Protection Policy	Outlines RV's commitment to eliminating discrimination, harassment, child abuse and other forms of inappropriate behaviour and/or conduct from its workplace and the Victorian thoroughbred racing industry.
Safeguarding Young Persons Policy	Outlines our commitment to young persons engaged and participating in the Victorian thoroughbred racing industry are safeguarded from abuse and neglect.
Grievance and Disputes Policy	This Policy provides an avenue for non-EBA employees to raise grievances relating to their employment. RDC has documented its own Grievances and Disputes Process.

Procurement Policy	Outlines our commitment to ensuring the procurement of all goods and services is conducted in an honest, competitive, fair and transparent manner that demonstrates a fit for purpose solution and the delivery of value for money outcomes, whilst protecting the reputation, commercial and legal position of Racing Victoria.
Anti-Bribery and Corruption Policy, Compliance Policy	Outlines our commitment to ensuring compliance with laws and regulations addressing fraud, bribery and corruption in Australia and in overseas jurisdictions in which we do (or contemplate doing) business.
Enterprise Agreements (EBAs)	The Racing Victoria Raceday Officials Agreement sets out the employment conditions for approximately 50% of RVL's workforce.

6.2 OTHER CONTROLS AND PRACTICES

In addition to the policies outlined above, RV has controls in place to mitigate modern slavery risks. These include as follows:

- RV's human resources management system includes controls to prevent scheduling of excessive hours for casual employees and logs the check-in and check-out times of employees to monitor potential instances of excessive working hours.
- Training, education and advice is provided to RV staff on fair employment practices.
- During the Reporting Period, with the exception of RDC employees, the management of remuneration, employment agreements, conditions and benefits was centralised at RV. This means that no employee was engaged without an employment agreement generated by People and Culture and which met our statutory obligations.
- During the Reporting Period, RDC adopted a similar approach to RV, with the centralisation of all employment matters within its own management structure, and regular consultation with RV's People and Culture team. No employee is engaged without an employment agreement generated by the RDC People team.
- A supplier induction and management system that requires suppliers to provide evidence that they can meet the legal and performance obligations set out by the standard terms and conditions in RV's service agreements.

RV plans to review and implement additional appropriate supplier due diligence practices (including in respect of modern slavery risks and adverse media queries) in future reporting periods.

RV will also be implementing a staff training module relating specifically to modern slavery awareness.

6.3 ADDITIONAL PRACTICES FOR LICENSED PARTICIPANTS

RV's integrity and licensing function supports the maintenance of RV's licensing standards, and promotes a responsible culture of fair play, ethical behaviours and response.

Whilst not within the direct remit of RV, from time to time RV conducts initiatives and awareness campaigns to encourage and influence positive behaviours in our licensed and registered participants as they relate to participant and equine welfare.

In addition, RV's integrity function has implemented broad controls to ensure that licensed and registered participants exhibit ethical behaviours to ensure the reputation of the industry is upheld, including as follows:

- due diligence checks during the participant licensing and registration process;
- the introduction of education modules for participants, which includes in respect of expected behaviours;
- making available avenues for participants to raise concerns about conduct (for example, the Integrity Hotline);
- the appointment of a Participant Protection case manager, whose role it is to assist participants and direct them in accessing appropriate support and dispute resolution mechanisms and to ensure that all complaints reach a just and fair conclusion;
- as part of the industry's review of the working week, RV trialed a race-free week at the conclusion of the 2020-21 Racing Season; and
- no race meetings were scheduled in Victoria on 24 December 2020, in order to give participants a two-day break over the Christmas period. This trial will be repeated in 2021.



7 | How RV assesses its controls are effective

In March 2021, RV conducted an in-depth assessment on the current state of its modern slavery risk management practices and to identify any key gaps in our approach, and potential areas for improvement.

This involved the formation of a working group, engaging an independent expert adviser and the provision of regular updates to the Executive and to the Board as to progress.

Progress to date on some of the identified actions has been impacted by the redirection of resourcing (employee and management time) to RV's COVID-19 response and efforts to ensure the safe continuation of racing throughout the pandemic.

There will be a continued focus on assigning accountabilities and implementing potential improvements in our modern slavery approach.

In future reporting periods, the effectiveness of our controls will be assessed in accordance with RV's Enterprise Compliance and Risk Management Frameworks, with our approach benchmarked against our peers on a triennial basis.



8 | The impact of COVID-19

RV notes the impact of the COVID-19 pandemic on the operations of the racing industry during the Reporting Period with racing largely taking place “behind closed doors”.

During the Reporting Period, RV’s operations were disrupted as RV sought to strictly limit the number of essential personnel in attendance at each raceday.

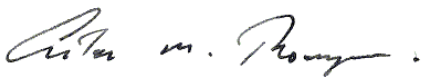
Significant efforts were undertaken by RV during the Reporting Period to respond to risks relating

to COVID-19. This had a consequential impact on employee and management time, and the availability of resourcing across other initiatives.

It is noted that many of the Racing Clubs had significant impacts to their operations during the Reporting Period, given their inability to host spectators under Victorian public health directions and under RV COVID-19 protocols.



9 | Version

Version	Description	Approved	Adopted	Signed
1	Modern Slavery Statement for the year ended 30 June 2021.	RV Board	16 December 2021	 Giles Thompson Chief Executive Officer

Appendix

Policy or Procedure (or Agreement)	Purpose
s16(1)(a) Identify the reporting entity	1. Introduction
s16(1)(b) Describe the structure, operations and supply chains of the reporting entity	2. Our structure, operations and supply chains
s16(1)(c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	3. Racing Victoria's modern slavery risks
s16(1)(d) Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	4. Managing and mitigating risks of modern slavery
s16(1)(e) Describe how the reporting entity assesses the effectiveness of such actions	5. Measuring the effectiveness of our actions
s16(1)(f)(i) Describe the process of consultation with any entities that the reporting entity owns or controls;	2. Our structure, operations and supply chains
s16(1)(g) Include any other information that the reporting entity, or the entity giving the statement, considers relevant	6. Impacts of COVID-19



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