



AUSTRALIAN TURF CLUB

# MODERN SLAVERY STATEMENT FY25

1 AUGUST 2024 - 31 JULY 2025





# 1.0 INTRODUCTION

This Modern Slavery Statement is submitted on behalf of Australian Turf Club Limited (“ATC, “We”) (ACN 148 157 288) for the reporting period 1 August 2024 to 31 July 2025 in accordance with the requirements of the Modern Slavery Act 2018 (Cth) (the Act).

This statement outlines the actions taken by ATC to identify, assess and address risks of modern slavery in its operations and supply chains. ATC recognises its obligation to uphold human rights and is committed to operating in a lawful, ethical and responsible manner.

# 2.0 STRUCTURE, OPERATIONS & SUPPLY CHAIN

ATC is an Australian registered Club with annual revenue exceeding the reporting threshold under the Act. The Australian Turf Club (ATC) owns and operates four premier thoroughbred racecourses including Royal Randwick, Rosehill Gardens, Canterbury Park and Warwick Farm. In addition to owning and operating thoroughbred racecourses, ATC also manages extensive stabling, training and event facilities. We host more than 100 race meetings annually and conduct over 300 events annually, reflecting the full scale and diversity of our activities.

In addition, ATC manages Rosehill Bowling Club, a community-focused venue located in metropolitan Sydney. Rosehill Bowling Club is included as part of this Statement. The organisation's philanthropic arm, the ATC Foundation (ABN 74 243 827 496) is dedicated to delivering positive community impact through its charitable initiatives.

All ATC operations are based in New South Wales, Australia. ATC employs approximately 280 permanent staff and engages up to 1,200 casual workers during peak operational periods, which includes Rosehill Bowling Club.

ATC's supply chain consists of approximately 1,200 suppliers providing goods and services including catering, facilities management, security, technology, professional services and merchandise.





## 3.0 RISKS OF MODERN SLAVERY PRACTICES IN ATC'S OPERATIONS & SUPPLY CHAINS

ATC is committed to maintaining the highest standards of ethical conduct and responsible business practices across all operations. ATC complies with all relevant Australian laws and regulations including workplace, employment and occupational health and safety legislation. We continue to strengthen our governance frameworks to support transparency, accountability and risk management. All direct employees are based in New South Wales and are engaged locally under Australian regulatory protections.

ATC assesses the risk of modern slavery within its controlled operations as low, particularly where activities are undertaken directly by employees in accordance with established internal policies, procedures and oversight mechanisms. This includes Code of conduct, Anti-bribery and Corruption policy, and Bullying and Harassment policies. This framework provides a strong foundation for identifying, managing and mitigating

potential risks across the organisation.

Independent of the broader assessment, ATC recognises that particular sectors within its supply chain exhibit elevated exposure to modern slavery risks. These include cleaning services, security, merchandise, food production and technology hardware supply, where factors such as labour intensity, complex supply chains, and offshore production may increase vulnerability.

No new categories of modern slavery risk were identified in our supply chain during the current reporting period. We continue to maintain robust processes to monitor, assess and respond to potential risks across our operations and supply chains.

This continuous monitoring supports the ATC's ongoing commitment to responsible sourcing, ethical business practices and collaborative commercial relationships.

# 4.0 ACTIONS IN ADDRESSING THE RISK OF MODERN SLAVERY IN FY25

ATC recognises that effectively addressing modern slavery risks requires actively engaging with employees, suppliers and key stakeholders to strengthen awareness, promote responsible practices and support continuous improvement in risk management. Underpinned by the internal corporate values of **collaborate, care, innovate and achieve**, the ATC upholds a commitment to ethical conduct, accountability and transparency in the delivery of its operations.

This is managed by the structured framework built around four key pillars - **Governance, Training and Communication, Risk Management and Supplier Engagement and Collaboration**. Together, these pillars enable ATC to maintain a proactive and responsive approach, ensuring that modern slavery risks are effectively identified, assessed and addressed across its operations and supply chains.

## I. Governance

Governance structures remain in place to oversee modern slavery risk, including regular meetings of the Modern Slavery

Compliance Group.

During FY25, ATC continued to strengthen its governance framework to support the effective identification, assessment and management of modern slavery risks. The Modern Slavery Compliance Group remained central to this approach, providing oversight and advisory support to ensure alignment with legislative requirements and best practice. The Group continued to oversee the implementation of initiatives and promote the consistent application of ethical standards across all ATC venues.

Building on prior work, ATC undertook further reviews of its key policies to ensure continued relevance, alignment with regulatory expectations and reinforcement of its zero tolerance stance on modern slavery.

These policies included:

- Anti-Bribery and Corruption Policy
- Bullying and Harassment Policy
- Code of Conduct

In addition, ATC continued to embed modern slavery considerations into its procurement and contracting processes. 100% of all tender responses confirmed compliance to the Act.

## II. Training and Communication

ATC continued to prioritise awareness, education and capability building across its workforce in FY25. Mandatory compliance training remained in place for all new employees at the ATC. These programs support ethical decision making and promoted the understanding of human rights risks, including modern slavery.

During the reporting period, ATC further strengthened its approach to communication and education across the racing industry by creating and distributing a Modern Slavery Legislation Guide for Trainers. The document is a business resource for Trainers in the racing industry who lease stables from the Australian Turf Club.



## 4.0 ACTIONS IN ADDRESSING THE RISK OF MODERN SLAVERY IN FY25

ATC also continued to enhance internal communications to reinforce expectations and encourage the reporting of concerns, supporting a culture of transparency, accountability and shared responsibility in identifying and addressing modern slavery risks.

### III. Risk Management Framework

ATC operates within a structured and formally governed risk management framework designed to identify, assess, and mitigate risks that may affect its operations, including those associated with modern slavery. Oversight of this framework is provided by the Finance and Audit Committee, which exercises governance through the provision of strategic direction, review, and assurance to ensure that risks are effectively managed and aligned with the organisation's risk appetite and compliance obligations.

No instances of modern slavery were identified within ATC's operations or supply chain during FY25.

### IV. Supplier Engagement and Collaboration

ATC implements a range of actions to address identified modern slavery risks across its operations and supply chain. In FY25, this included a targeted assessment of our security services, a sector recognised as presenting a higher inherent risk with background checks conducted on all subcontractors to strengthen due diligence. We actively engage with suppliers to reinforce expectations regarding ethical labour practices, supported by open and transparent communication, regular in person meetings and ongoing dialogue.

During FY25, ATC assessed approximately 80% of the supply of services and products for modern slavery risk and 100% of newly onboarded suppliers were subject to pre-engagement screening. These measures are designed to mitigate risk, enhance supplier accountability and drive continuous improvement in the prevention of modern slavery.

# 5.0 ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

ATC recognises that managing modern slavery risk requires ongoing monitoring, review and continuous improvement of the effectiveness of its modern slavery risk management through ongoing supplier reviews, internal compliance mechanisms and policy review processes.

ATC will continue to improve supplier risk assessment by adopting a more consistent risk based review process for new and existing suppliers. Suppliers will be assessed against qualitative and quantitative risk indicators, including category of supply contract value, business criticality, labour intensity, use of sub-contractors and reliance on temporary migrant or lower skilled labour.

As we look to the future, ATC will continue to strengthen the integration of its modern slavery commitments across key business functions through the 4 key pillars - *Governance, Training and Communication, Risk Management Framework and Supplier Engagement and Collaboration.*

Training and communication will be a key focus in FY26 as ATC work to empower team members and stakeholders with practical knowledge to identify and respond to modern slavery risks. ATC will also review opportunities to engage with external advisers, industry bodies, auditors or subject matter experts to further explore and improve its framework. This continuous improvement approach will assist ATC to better understand the effectiveness of its mitigation measures, improve transparency across its supply chain and strengthen the organisation's capacity to manage modern slavery risks over time. This approach will improve the organisation's capacity to manage risks in a systematic manner and provide greater transparency.



## 6.0 CONSULTATION & APPROVAL

The policies, processes and systems described in this Statement, apply to ATC.

This Modern Slavery Statement has been approved in accordance with section 13 of the Modern Slavery Act 2018 (Cth) by Morgan Kelly (Administrator) as the persons responsible for the management and control of the affairs of the Company during the administration period.



Morgan Kelly  
Administrator  
Australian Turf Club

