



# Modern Slavery Statement

For the Financial Year Ended 31 October 2024

## Introduction

This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth) ('the Act') and outlines the steps taken by Canterbury League Club Ltd ABN 84 000 191 248 (**Canterbury**) to address and mitigate the risk of modern slavery in our operations and supply chains during the financial year ending 31 October 2024.

## Our Commitment

At Canterbury, we are committed to acting ethically and with integrity in all our business dealings and relationships. We are dedicated to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place within our own business or in any of our supply chains.

## Our Structure, Operations, and Supply Chains

Canterbury is based in Sydney, Australia and operates as a Registered Club. We have 405 employees and have three venues located in:

1. 26 Bridge Road, Belmore NSW 2229
2. 26 Quigg Street, Lakemba NSW 2195; and
3. 61 Moxon Road, Punchbowl NSW 2196.

Canterbury's primary business activities involve entertainment, hospitality, gaming and fitness services.

Our supply chains include the sourcing of raw materials, procurement of goods and services, and partnerships with third-party service providers. Our major suppliers are all located in Australia, and we work closely with them to ensure compliance with our ethical standards.

## Labour Practices

Canterbury engages the direct employment of workers in the hospitality, administration, cleaning, fitness and gaming industries. The risk of modern slavery is particularly high in hospitality and cleaning industries due to the reliance on low-skilled labour, temporary workers, and migrant workers. These groups are often vulnerable to exploitation, including underpayment, excessive working hours, and poor working

conditions. To mitigate these risks, Canterbury implements robust labour practices, including Award based remuneration and working hours, as well as nationally recognised safe working conditions.

## Identifying and Addressing Modern Slavery Risks

### Risk Assessment

We have conducted a thorough risk assessment of our operations and supply chains to identify and evaluate potential risks of modern slavery. This assessment considered factors such as the nature of the industry, geographic locations, and the type of workforce involved.

Canterbury's exposure to high-risk industries via its supply chains and operations include:

- Industrial cleaning
- Meat works
- Hospitality
- Construction
- Manufacturing
- Agriculture and fishing

Canterbury's Acquisition of Good and Services Policy specifies a risk assessment for Modern Slavery at the pre-procurement stage and its Procurement Policy incorporates a modern slavery checklist. In the event that a Modern Slavery indicator is recognised at any time in the procurement process, Canterbury's Chief Legal and Risk Officer will investigate and work with suppliers to eradicate the indicators, or where this is not possible, Canterbury will discontinue the relationship.

### Due Diligence

Canterbury's supply chains can be complex and multi-tiered, making it challenging to monitor every link. To mitigate the risks identified, we conduct due diligence on our suppliers and partners. This due diligence process includes:

- Requiring our major suppliers to complete a modern slavery risk assessment questionnaire (which includes obtaining details of their structure/supply chains as well as details of actions taken to manage and address modern slavery)
- Obtaining a copy of the supplier's most recent Modern Slavery statement (where applicable)
- Ensuring ethical business practices, including the prohibition of modern slavery, is included in tender requests for suppliers
- Monitoring supplier compliance with our Modern Slavery Statement

A majority of Canterbury's suppliers are Australian based companies where transparency of operations is feasible and industries are regulated by industrial relations laws. Consequently, Canterbury has classified its overall Modern Slavery risks as low but remain committed to ensuring our suppliers meet our expectations in relation to Modern Slavery standards.

## Long-Term Supplier Relationships

Canterbury strives to build long-term relationships with our suppliers to help ensure compliance with ethical standards despite meeting expectations of cost targets and delivery timeframes. Modern Slavery clauses are included in Canterbury's supplier agreements, as existing agreements are renewed, or new agreements are entered into.

## Training and Awareness

We provide regular training to our employees on the risks of modern slavery and how to identify and report any concerns. This includes understanding the indicators of forced labour and knowing how to report suspicious activities. This training ensures that our team is equipped with the knowledge and tools to combat modern slavery effectively.

## Continuous Improvement

Canterbury is committed to continuous improvement in our efforts to combat modern slavery. We regularly review and update our policies, procedures, and training programs to ensure they remain effective and aligned with best practices.

Canterbury's focus is on high-risk industry suppliers and material expenditure (>\$50,000) associated with the supply of physical products/materials and services. Where any material risk is identified through the self-assessment questionnaire for affected spend categories, Canterbury's Chief Legal and Risk Officer will follow-up and facilitate resolutions pertaining to risk mitigation and will intervene where necessary.

## Reporting, Whistleblowing and Consultation

Canterbury encourages its employees, suppliers, and other stakeholders to report any concerns related to modern slavery through its confidential Whistleblowing Service. This confidential whistleblowing mechanism allows individuals to report suspicions or incidents without fear of retaliation and the details of the service and contact is made publicly available on the Canterbury website.

Canterbury will consult with the Canterbury Bankstown Bulldogs Rugby League Club Ltd ABN 38 001 869 405 (the lead entity) to ensure that this statement is in concert with the Modern Slavery Statement of that organisation.

## Conclusion

Eradicating modern slavery from Canterbury's business operations and supply chains is a continuous effort that requires vigilance, transparency, and collaboration. By identifying and evaluating the potential risks, implementing robust measures to mitigate these risks, and regularly monitoring our progress, we can uphold our commitment to ethical and compliant practices.

## Approval

This Modern Slavery Statement has been approved by the board of directors of Canterbury League Club and is signed by:

A handwritten signature in black ink, appearing to read 'Peter Winchester', is written over a horizontal line.

Peter Winchester

Chairman of the Board of Directors

Date: 25/03/2025

## Contact Information

For any queries related to this statement or our approach to modern slavery, please contact:

Canterbury League Club  
26 Bridge Road, Belmore NSW 2229  
[info@canterbury.com.au](mailto:info@canterbury.com.au)  
(02) 9704 7777

# Modern Slavery Risk Assessment Questionnaire

For Canterbury Suppliers

## General Information

Supplier Name	
Address	
Contact Person	
Phone Number	
Email Address	
Nature of Business	

## Policies and Procedures

Does your company have a policy on modern slavery?	Yes/No (If Yes, please provide a copy of the policy)
How often is this policy reviewed and updated?	Annually/Every 2 years/Every 5 years/other
Do you have procedures in place to ensure compliance with labour laws?	Yes/No
Describe the steps your company takes to prevent modern slavery in your operations and supply chains.	

## Recruitment Practices

Do you use recruitment agencies?	Yes/No
If yes, how do you ensure they follow fair labour practices?	
What measures do you have in place to prevent unethical recruitment practices?	

## Training and Awareness

Do you provide training on modern slavery for your employees?	Yes/No
If yes, how often is this training conducted?	Quarterly/Annually/Other

## Supplier Due Diligence

Do you conduct due diligence on your suppliers?	Yes/No
How often do you review your suppliers' compliance with modern slavery policies?	Quarterly/Annually/Other

## Grievance Mechanisms

Do you have a grievance mechanism in place for employees to report concerns related to modern slavery?	Yes/No
If yes, please describe the process for reporting and addressing grievances.	

## Audits and Monitoring

Do you perform regular audits of your operations and supply chains?	Yes/No
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## Continuous Improvement

What steps does your company take to continuously improve its approach to preventing modern slavery?	
How do you build long-term relationships with suppliers to ensure ongoing compliance and improvement?	

# Additional Comments

<p>Please provide any additional information or comments regarding your company's efforts to combat modern slavery.</p>	
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Thank you for completing this questionnaire. Your responses will help us assess and improve our collaborative efforts to address the risk of modern slavery in our operations and supply chains.