

# MODERN SLAVERY STATEMENT

**1 November 2022 to 31 October 2023**  
*First Reporting Year*



**RICHMOND**  
EST 1885

*Richmond Football Club (ABN 25 679 793 340)*

# Foreword from the President

Richmond Football Club (the **Club**) has been an active competitor and member of the Australian Football League (**AFL**) for over 130 years. The Club prides itself for its work both on and off the field. More recently, the Club has worked to distinguish itself as a leading voice for social impact, reconciliation with Australia's First Peoples, diversity and inclusion, and sustainability throughout Australian Sport. The Club continues to positively impact its community through its subsidiary companies: Aligned Leisure, the Bachar Houli Foundation and the Islamic College of Sport.

The Club is anchored by:

- our Club's Purpose: ***Belonging, thriving and winning***; and
- our Club's Values: ***Aware, Disciplined, Relentless and United***.

In particular, we value awareness as an organisation and as individuals. We value a reputation as an authentic transparent, and fair football Club. This means that we challenge ourselves and others to support and care for our people and planet while seeking new ideas, perspectives, and continuous improvement.

The Club acknowledges that modern slavery and human trafficking is a complex and significant issue which requires an effective response. While we are at the start of our anti-modern slavery journey as a first-time reporting entity, our resolve to play our part in addressing this issue will be underpinned by our Purpose and Values outlined above. As one of the largest sporting organisations in the country, we recognise the role we have to play in combatting this issue. While there is still a lot to learn and do in this space, our inaugural Modern Slavery Statement is an important step in the Club's commitment to the thriving and prosperity of our people, planet and sport.

This is our first modern slavery statement (**Statement**) made under the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) and outlines how we have been assessing and addressing modern slavery risks in our operations and supply chains in the reporting period from 1 November 2022 to 31 October 2023 (**FY23 Reporting Period**). Our Statement:

- **outlines the steps we are already taking** to assess and address modern slavery risks in our operations and supply chains;
- **identifies our key risks that we will focus on moving forward in a prioritised risk-based approach**, which includes:
  - our facilities, maintenance and cleaning service providers in relation to the Swinburne Centre and the adjoining Punt Road Oval, the Richmond Institute sites, Wantirna Club, Aligned Leisure Centre sites and the Islamic College of Sport campuses; and
  - suppliers for our Club merchandise and apparel,
- provides an overview of the steps we intend to take in future reporting periods.

The Club acknowledges that anti-modern slavery compliance is an evolving area and that there have been significant developments in this space in the FY23 Reporting Period including the publication of the Australian Government's report for the review of the Modern Slavery Act and the publication of the updated Walk Free Global Slavery Index 2023.

We have followed the Commonwealth Guidance closely in preparing our inaugural Statement and informing the consideration of the steps we intend to take in future reporting periods.

We look forward reporting on our progress in our next statement.

**Principal Governing Body Approval**

This Modern Slavery statement was approved by the Board of Richmond Football Club (ABN 25 679 793 340) in their capacity as principal governing body of Richmond Football Club pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) on 15 October 2024.

**Signature of Responsible Member**

This Modern Slavery Statement is signed by Mr John O'Rourke in his role as President and Director of the Board of Richmond Football Club (ABN 25 679 793 340) in accordance with section 13 of the *Modern Slavery Act 2018* (Cth) on 21 October 2024.



John O'Rourke

**ACKNOWLEDGMENT OF COUNTRY**

*Richmond Football Club acknowledges the traditional owners of the land on which we work and play, the Wurundjeri and Bunurong people of the Kulin Nations. We pay our respect to their elders, past, present, and emerging and acknowledge that sovereignty was never ceded.*

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## 1. Criterion 1 Identify the reporting entity

- The reporting entity is Richmond Football Club (ABN 25 679 793 340), Swinburne Centre at Punt Road Oval, Yarra Park, Richmond, Victoria, 3121 (referred to as, **we, us, our, RFC or the Club** in this Statement).
- The Club is a reporting entity under the Modern Slavery Act and this Statement is submitted and published for the FY23 Reporting Period.
- The Club makes this Statement in accordance with section 13 of the Modern Slavery Act as a single reporting entity.
- In accordance with the Modern Slavery Act, this statement reports on Richmond Football Club and entities which it 'owns' or 'controls' for accounting purposes under the Modern Slavery Act. These entities include:
  - Aligned Leisure Pty Ltd (ABN 58 608 613 350) (**Aligned Leisure**)
  - Aligned Leisure as trustee for the Aligned Leisure Trust (ABN 38 602 127 519);
  - Bachar Houli Foundation Ltd (ABN 96 637 693 406) (**Bachar Houli Foundation**);. and
  - Islamic College of Sport Ltd (ABN 99 668 331 664) (**Islamic College of Sport**)

for clarity, Aligned Leisure, the Bachar Houli Foundation and the Islamic College of Sport are not separate reporting entities under the definition of the Modern Slavery Act.

- Our Statement covers all of the 7 mandatory criteria for reporting as set out in section 16 of the Modern Slavery Act. In preparing this Statement, we have used the Commonwealth Guidance for Reporting Entities and updated Modern Slavery Act Supplementary Guidance by the Attorney General's Department (together, the **Commonwealth Guidance**) to help inform and guide our approach.

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## 2. Criterion 2 Describe the reporting entity's structure, operations and supply chains

### Our Structure

- The Club is a not-for-profit company limited by guarantee that is incorporated and domiciled in Australia.
- Richmond Football Club was established in 1885 and is based in Richmond, Melbourne.
- As set out in section 1, the Club owns and controls four entities:
  - Aligned Leisure
  - Aligned Leisure in its capacity as trustee of the Aligned Leisure Trust;
  - Bachar Houli Foundation; and
  - Islamic College of Sport.

- The Club's has a number of business focus areas which are carried out by the Club and the entities its owns and controls.
- In the FY23 Reporting Period, the Club employed approximately 1530 staff (full-time, part-time and casual) across the group and is represented by 108 footballers (AFL, AFLW and VFL).<sup>1</sup> The Club had over 100,000 members, over 500,000 supporters nationwide, and over 27 commercial sponsors (including nib, Latitude Financial, Swinburne University and AG Coombs).

## Our Operations

- At its core, the Club's principal activity is operating as a sporting organisation which has been an active competitor and member of the AFL for over 130 years, winning 13 premierships, most recently in 2020. The Club has also fielded a women's team in the AFL Women's competition since 2020 and supports a wheelchair football team which has played in the VWFL competition since 2018 and has won two premierships.
- Punt Road Oval has been the home of the Club since its inception in 1885 and the Club operates from the "Swinburne Centre", which incorporates a training facility for its AFL, AFLW, VFL and VWFL teams.
- The majority of the Club's 1530 employees were, during the FY23 Reporting Period, casual staff employed by Aligned Leisure (78%). The Club has approximately 340 full time and part time staff.
- While we are a sporting organisation at heart, we have also always been deeply involved and committed to serving our broader community. As such, we are a diversified sports organisation who has a wide range of key operations operated directly by the Club and via its subsidiaries. These are described **below**.

No.	Activity undertaken by the Club	Description of activity
<b>Activities as an AFL Club and sporting organisation</b>		
1	<b>Operating as a sporting team</b>	The Club's original foundations as a sporting organisation started from its entrance in the AFL, and now, the Club proudly has teams in the AFLW, VFL, and VFLW (Wheelchair).
2	<b>Direct employment of workers to support the Club's functions and activities</b>	<p>We have a number of staff employed across a wide range of areas to support the Club's operations as a sporting organisation (as well as our other business focus areas). For example, we have staff who provide:</p> <ul style="list-style-type: none"> <li>▪ coaching and development services for our players;</li> <li>▪ medical and health services for our players;</li> <li>▪ front-office administrative support;</li> </ul>

<sup>1</sup> In this Statement, "AFL" refers to the Australian Football League, "VFL" refers to the Victorian Football League, "VFLW" refers to the Women's VFL, "VWFL" refers to the Victorian Wheelchair Football League.



		<ul style="list-style-type: none"> <li>▪ training and game activations and activities for members and fans;</li> <li>▪ hospitality events for members and fans;</li> <li>▪ sales support for our members;</li> <li>▪ professional services (marketing, legal, human resources etc).</li> </ul>
3	<b><i>Operating, marketing and administering of Club memberships</i></b>	Our operations also include the operation, marketing and administration of Club memberships. Our members, the Tiger Army, are over 100,000 members strong. We are proud to provide a membership program with a wide range of packages which supports all of our teams and gives our members the choice on how they would like to support the Club.
4	<b><i>Promotion and sale of merchandise &amp; apparel</i></b>	<p>We sell licensed merchandise and apparel on-site at the Swinburne Centre and through our online shop, the “Roar Store” accessible on our website sourced from suppliers which are licensed through the AFL’s commercial licensing regime.</p> <p>Our Club membership merchandise (ie fulfilment packages) is sourced, prepared and packaged with our trusted fulfilment supplier.</p>
5	<b><i>Re-development of Punt Road Oval</i></b>	The Club is in the process of preparing to undertake its most historic infrastructure upgrade in our history – the redevelopment of Punt Road Oval to provide state-of-the-art facilities for our AFL, AFLW and VFL programs, provide equitable access for our members and support our other business focus areas. The anticipated start of the construction part of the redevelopment is in December 2024 but this is subject to certain conditions.
<b><i>Charitable activities</i></b>		
6	<b>Bachar Houli Foundation (BHF)</b>	Supported by the Club, BHF is a not-for-profit organisation owned by the Club that aims to build young leaders within the Muslim community while supporting social cohesion through sport. BHF partners with the AFL to deliver a range of engagement, education, employment and talent programs to Muslim youth throughout Australia.
<b><i>Supporting Australian communities</i></b>		
7	<b>Aligned Leisure</b>	While Aligned Leisure is a subsidiary of the Club, Aligned Leisure operates as its own distinct health and leisure business separate to the Club. Aligned

		Leisure has contracts to operate leisure centres and aquatic facilities with 7 municipal councils and 1 private operator on their behalf which each include a range of community stadiums, pools, gyms, and other facilities at numerous sites across Victoria and New South Wales.
8	<b>Korin Gamadji (KG)</b>	KG is a department within the Club which supports the next generation of Aboriginal and Torres Strait Islander people. KG delivers programs that support leadership, cultural growth and social emotional and health wellbeing to Aboriginal and Torres Strait Islander youth primarily from Victoria.
<b><i>Educating our next sporting leaders</i></b>		
9	<b>Richmond Institute</b>	The Richmond Institute is an education business of the Club which is operated under a third party arrangement with Swinburne University, to develop the next generation of sports industry leaders. The Richmond Institute delivers sports related diplomas in sports leadership, management and development to students in Victoria.
10	<b>Islamic College of Sport</b>	Established by the BHF, the Islamic College of Sports is an independent senior secondary school, offering young Muslim students an opportunity to pursue their passion for sport in a religiously and culturally welcoming environment.
<b><i>Hospitality and gaming operations</i></b>		
11	<b>Wantirna Club</b>	The Club operates the Wantirna Club which is a hospitality (with restaurant and bar) entertainment and gaming venue (with restaurant and bar) in the east of Melbourne.

## Our Supply Chains

- As one of Australia’s largest sporting organisations with a diverse range of focus areas, our supply chain is global and complex made up of a range of Australian and overseas suppliers.
- Our suppliers may be:
  - **direct suppliers** – in that they directly provide us goods or services used in our business; or
  - **indirect suppliers** – in that they may supply goods or services to support our day-to-day operations, for example, marketing agencies and professional services.
- We have mapped out our supply chains at a high level in the following Table.

**Product / Service category****Key themes****Core key direct suppliers used in relation to Club goods and services**

**Club merchandise & apparel suppliers for Club merchandise sold in Roar Store (online and in store) which includes uniforms worn by Club staff (including players).**

**Sponsors of the Club who supply co-branded merchandise, apparel and other sporting products for Club staff (including players) to use under contra arrangements.**

**Fulfilment suppliers who source, warehouse, pack and distribute our Club merchandise to Club members.**

**Sporting apparel and products sold at Aligned Leisure centres.**

**Food and beverage suppliers to the Club for its business operations (including Richmond Institute and Wantirna Club), Aligned Leisure's centres and the Islamic College of Sport.**

**Catering and hospitality suppliers we use to provide catering and hospitality services in respect of staff and member/supporter functions and hospitality and match venues.**

**Suppliers of hired equipment for events.**

**Facilities and maintenance providers who take care of facilities of the Club (including the Swinburne Centre, Richmond Institute sites and the Wantirna Club); Aligned Leisure's centres and the Islamic College of Sport's in form campuses) – including gardening, landscaping, cleaning, electrical and plumbing providers.**

**Outsourced medical and health-services professionals to support our players.**

**Medical products and associated products for the Club's players.**

- We use a wide range of local and international suppliers to support our business activities.
- Many of these companies are based in Australia and a few are based in the USA. However, we also recognise that some of these direct suppliers have their own supply chains) and are based overseas including China and Vietnam (for Club merchandise).
- A number of our major suppliers are large global brands (including sponsors) who we have a long term relationship with and have undergone a supplier due diligence process. For official Club merchandise (ie any branded or co-branded merchandise), the suppliers must be licensed via the AFL's commercial licensing regime.
- It is possible that these suppliers also have reporting obligations under the Modern Slavery Act, which we intend to confirm as part of our ongoing risk assessment in future reporting periods (**see Section 4 below**).



<p><b>Sporting and fitness equipment suppliers at our Club and Aligned Leisure centres</b></p>	
<p><b>Vehicle suppliers, car hire suppliers and ride share suppliers for use by staff.</b></p>	
<p><b>Logistics and transport providers who transport our players and staff and their equipment to and from games and for pre-season camps.</b></p>	
<p><b>Architect, civil engineering, project management and other suppliers used in the planning of the re-development of Punt Road Oval project</b></p>	
<p><b><i>Indirect Suppliers</i></b></p>	
<p><b>Office, equipment and furniture supplies</b></p>	<ul style="list-style-type: none"> <li>▪ To support our operations, RFC also engages a range of other suppliers who supply goods or services that are not integrated or used in the distribution of Club goods and services.</li> <li>▪ These are suppliers from whom we purchase goods or services relating to, for example, utilities, facility management, office supplies and professional services and more.</li> </ul>
<p><b>IT equipment, IT managed service providers and communications</b></p>	
<p><b>Security services for our facilities</b></p>	
<p><b>Professional services including for legal matters, external audit, insurance investment advice, executive recruitment hire and property/lease management agents.</b></p>	
<p><b>Media, marketing, digital and advertising, fundraising and agencies who assist with producing, promoting and mailing our Club's membership and fan offerings or promotions.</b></p>	

**3. Criterion 3 Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.**

- In this section we identify the 'risks of modern slavery practices', meaning the potential for the Club to cause, contribute to, or be directly linked to modern slavery through our operations and supply chains.

- In this context, ‘risk’ means to people, rather than the risks to the Club (such as reputational or financial damage).
- In this FY23 Reporting Period, as this is our first-reporting period, we conducted a high-level risk mapping exercise of our operations and supply chains informed by the Commonwealth Guidance, known modern slavery indicators and the Global Slavery Index 2023. Our risk-mapping is set out **below**.
- At a high-level, our risk mapping showed that our modern slavery risks were higher in our **supply chain** and that our **operations** pose a relatively lower risk of causing, contributing or being directly linked to modern slavery risks. This is primarily due to how we run our operations, as:
  - our operations are based in and carried out within Australia only;
  - our employment practices generally involve directly employed staff and we do not use labour hire and multiple layers of subcontracting as a means of employment;
  - we generally do not employ vulnerable people such as low skilled temporary workers, migrant workers or laboured employers on temporary work visas; and
  - we generally do not operate in high-risk sectors, provide high-risk products and services or generally engage in high-risk business practices, as informed by the Global Slavery Index 2023.
- We intend to develop a more robust risk assessment process both at the initial procurement stage and ongoing in our business operations in order to both anticipate and identify additional risks to mitigate for future reporting periods.

### High level risk mapping exercise

Category of modern slavery risk indicator	Explanation	Risk Assessment Findings
<b>Sector and industry risks</b>	<p>A sector or industry that is informal and unregulated or has limited visibility over lower tier suppliers, is higher risk.</p> <p>A sector or industry that uses seasonal, low paying or low-skilled labour or dangerous work is higher risk.</p> <p>Electronics (hardware and devices), merchandising, medical equipment, cleaning and freight and logistics are sectors known to have higher risks of modern slavery as outlined in the Commonwealth Guidance due to factors such as documented reports of modern slavery, long supply chains, use of temporary labour and lack of visibility of working conditions.</p>	<p><i>Risk areas where the Club has leverage</i></p> <p>The Club uses several suppliers to procure and produce merchandise and apparel products. As noted above, for official Club merchandise, the suppliers must be licensed under the AFL’s licensing regime which requires due diligence to be conducted by the AFL which is also a reporting entity under the Modern Slavery Act (see the latest AFL Modern Slavery Statement <a href="#">here</a>).</p> <p>In addition, the Club and its subsidiaries uses facilities cleaning and maintenance services at a number of its sites primarily across Victoria and in parts of New South Wales. We understand that workers in</p>

		<p>the cleaning and maintenance industry may come from vulnerable or lower socio-economic communities within Australia (and globally).</p> <p><i>Risk areas where the Club has limited leverage</i></p> <p>We also procure electronics (devices and other hardware), IT services (including software) and medical equipment to support our staff and players. However, it is likely that the Club and its subsidiaries is 'one of many' customers to these suppliers and that these suppliers may rely on offshore supply chains which the Club has limited visibility over.</p>
<p><b>Product and service risks</b></p>	<p>Certain products and services may have high modern slavery risks because of the way they are produced, provided or used.</p> <p>Labour exploitation in the cleaning and construction industry is well-documented, and cleaning services have been identified by the Government as a key risk area for modern slavery in Australia.</p> <p>Electronics and garments are also on the list of goods produced by child labour or forced labour.</p>	<p><i>Risk areas where the Club has leverage</i></p> <p>As above we have identified merchandise products and cleaning services as higher risks where we have leverage.</p> <p><i>Risk areas where the Club has limited leverage</i></p> <p>The Club also procures sports and fitness equipment for our Club facilities. Aligned Leisure procures sports and fitness equipment for use in the Aligned Leisure centres (but which is ultimately owned by the Councils or private owner of the centres). Fitness equipment is typically made up of materials like steel and iron. The raw materials used to make this equipment may also contain modern slavery risks.</p>
<p><b>Geographic risks</b></p>	<p>Some countries may have higher risks of modern slavery, including due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors like poverty.</p> <p>The Global Slavery Index 2023 is another useful tool to identify the prevalence of modern slavery and human trafficking in a particular country, and to assess the adequacy of a</p>	<p>The Club does not directly engage with any suppliers in the countries identified in the Global Slavery Index 2023 as having the highest prevalence or the least action in respect of modern slavery.</p>

	<p>government's response to modern slavery and human trafficking risk. The GSI has documented the top 10 countries in having the highest prevalence of modern slavery as:</p> <ol style="list-style-type: none"> <li>1. North Korea</li> <li>2. Eritrea</li> <li>3. Mauritania</li> <li>4. Saudi Arabia</li> <li>5. Turkiye</li> <li>6. Tajikistan</li> <li>7. United Arab Emirates</li> <li>8. Russia</li> <li>9. Afghanistan</li> <li>10. Kuwait</li> </ol>	
<b>Entity risks</b>	<p>Some businesses or other entities may have a higher risk because of poor governance structures, a record of treating workers poorly or a track record of human rights violations.</p>	<p>At this stage, we need to undertake further risks assessment to determine entity risks within our supply chains.</p>

### Our priorities

- Based on our risk assessment, we intend on continue to take a prioritised risk-based approach as recommended by the Commonwealth Guidance.
- In the next few reporting periods we will be focusing our efforts on the following key areas which we have identified as having higher risks and where we have the most leverage:
  - (a) **Uniform and merchandise suppliers; and**
  - (b) **Facilities, cleaning and maintenance services.**

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## 4. Criterion 4 Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes

### Actions taken in the reporting period

- Set out below in this section is an overview of the steps we have taken during this reporting period to assess and address the risks in our operations and supply chains, and the existing policies and processes we have in place which help us assess and address modern slavery risks.
- As this is our inaugural Statement, we acknowledge that we are at the start of our anti-modern slavery journey and there is more work to do.
- Informed by the Commonwealth Guidance we are in the process of formulating a clear roadmap of actions we intend to take to assess and address modern slavery risks in our operations and supply chains.

- Please see section 6 for our looking ahead – future indicative roadmap.

Action	Description and who it applies to	How the action is relevant to preventing and addressing modern slavery	Assessing or addressing modern slavery risks
<b>Foundational and existing actions</b>			
<p><b>Staff onboarding training</b></p> <p><i>Internal</i></p>	<p>All employees, contractors and volunteers* must complete workplace conduct training when onboarded at the Club or any of its subsidiaries and throughout their time at the Club.</p> <p>This training covers key topics such as:</p> <ul style="list-style-type: none"> <li>• sexual harassment;</li> <li>• workplace bullying;</li> <li>• safeguarding children and young people;</li> <li>• anti-discrimination and equal opportunity;</li> <li>• work, health and safety ;</li> <li>• Aboriginal and Torres Strait Islander Inclusion and Cultural Safety; and</li> <li>• whistleblower rights and obligations.</li> </ul> <p>*Contractors and volunteers receive a</p>	<p>This training assists our staff to recognise potential indicators or signs of modern slavery (such as discriminatory behaviour, unsafe working conditions, harassment etc).</p> <p>However, we recognise that targeted modern slavery training is needed and the Club will developing modern-slavery specific training to be implemented in the FY25 Reporting Period.</p>	<p>Assess risks</p>

	streamlined version of the training.		
<b>RFC risk management processes and risk registers</b>  <i>Internal</i>	<p>The Club maintains a risk framework policy (at Board level) and holds annual risk assessment workshops and issues a report for each of the Club's key business focuses. The reports identify assess, and manage key strategic and operational risks. These reports are reported to the Club's Risk, Compliance and Integrity Committee. The Club is intending to develop a complete risk register.</p> <p>In the FY23 Reporting Period, the Club included modern slavery risk in its risk assessments.</p> <p>Aligned Leisure has a separate risk register) to identify assess, and manage key strategic and operational risks</p>	<p>This Risk Register allows for identified modern slavery risks to be prioritised and dealt with by the appropriate stakeholders within the Club.</p> <p>This process mitigates the likelihood of risks not being properly dealt with and allows identified risks to be treated with appropriate diligence and care.</p>	Assess and address risks
<b>Whistleblower policy</b>  <i>Internal and external</i>	<p>The Club's Whistleblower Policy establishes and outlines the procedure for the Club's personnel to report improper conduct, which includes modern slavery risks.</p> <p>Whilst the policy does capture all subsidiary entities, due to the size of Aligned Leisure's operations, it has an identical (but separate) Whistleblower Policy)</p>	<p>The Whistleblower Policy encourages our personnel to "speak up" and to anonymously report improper conduct such as unethical behaviour, unsafe work practices and dishonest or corrupt activities (which can all be potential modern slavery indicators). Having grievance mechanisms is a key process to having more visibility over potential modern slavery risks in the Club.</p>	Address risks



<b>Supplier due diligence</b>	The relevant Club staff member conducts some due diligence on our suppliers at the pre-contractual stage and where possible we negotiate to include clauses in the contracts with suppliers to manage modern slavery risks .	Our existing supplier due diligence allows us to mitigate the risk of engaging a high-risk suppliers.	Assess risks
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**5. Criterion 5 Describe how the reporting entity assesses the effectiveness of these actions**

- The Club will use a range of measures to monitor and assess the effectiveness of its approach to mitigating modern slavery risks based on the following key performance indicators.
- Over the coming years, we will use the results of our key performance indicators to inform our continuous improvement approach to assessing and addressing modern slavery risks in our operations and supply chains.

No.	Key issue and objective	KPI
1	<b>Staff training and awareness</b>	The percentage of our staff who have received and attended our onboarding and anti-modern slavery training over the next few reporting periods.
2	<b>Development of our modern slavery supplier questionnaire</b>	Whether our modern slavery questionnaire has been completed in FY24
3	<b>Policies and procedures implemented</b>	The number of modern-slavery targeted policies and procedures developed and implemented.
4	<b>Reporting and remediation of issues raised through Whistleblower Policy</b>	The number of modern slavery risks or instances raised through our reporting channels and addressed by the Club.

**6. Criterion 6 Describe the process of consultation with any entities the reporting entity own or controls (a joint statement must also describe consultation with the entity giving the statement)**

The Club is making a 'single statement' for the purpose of the Modern Slavery Act and is required to consult with the entities it owns and controls.

During the FY23 Reporting Period that this statement covers, we engaged and consulted with all entities we own or control in the development of this statement, that being: Aligned Leisure the Bachar Houli Foundation and the Islamic College of Sport.

We discussed details of the Modern Slavery Act 2018's reporting requirements; information regarding the actions we intend to take to address these requirements and provided them with relevant materials and updates.

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## 7. Criterion 7 Provide any other relevant information

### Looking Ahead – Our Indicative Future Roadmap

The Club acknowledges the importance of taking a continuous improvement approach and that there is more work to do from its first FY23 Reporting Period.

Over the next reporting periods, we will *consider* taking the following strategic actions to improve the way we assess and address modern slavery risks.

The below roadmap is currently indicative and will be discussed and finalised with our key stakeholders.

#### FY24 (1 November 2023 to 31 October 2024)

- **Commence developing the Club's modern slavery questionnaire for our key suppliers:** this will bolster our modern slavery due diligence process to assist us in identifying modern slavery risks in our supply chains.
- **Commence updating the Club's supplier due diligence and procurement process** to ensure that our suppliers meet the Club's expectations with respect to managing their own modern slavery risks.

#### FY25 (1 November 2024 to 31 October 2025)

- **Sending** out modern slavery questionnaires to our key suppliers.
- **Evaluating responses from** key supplier to commence further risk mapping of operations and supply chains to identify higher risk suppliers within our priority areas.
- **Commence amending the Club's and subsidiaries' Procurement Policy to include our anti-modern slavery position:** this will clearly set out the Club's expectations regarding modern slavery risks and reporting modern slavery incidents to our staff.
- **Modern Slavery workshop and training for key staff:** this will assist key staff who are most likely to deal with modern slavery risks (such as procurement and HR) to better identify and understand modern slavery risks and incidents and build awareness.
- **Supplier pre-screening questions for modern slavery:** this will supplement our current supplier due diligence to better manage modern slavery risks.
- **Supplier Code of Conduct:** to communicate the Club's expectations on anti-modern slavery compliance to our suppliers.

We are aware that the Modern Slavery Act is currently under review and Australian Government has published its statutory review of the Modern Slavery Act. We will continue to monitor the progress of the review and any of any recommendations that may be implemented into the Modern Slavery Act. Depending on what recommendations are implemented, we will review and adjust our modern slavery compliance roadmap accordingly.

## **MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE**

The table below helps illustrate where you can find the criteria for the Modern Slavery Act addressed in this Statement.

<b>Mandatory criteria</b>	<b>Page number/s</b>
a) Identify the reporting entity.	4
b) Describe the reporting entity’s structure, operations and supply chains.	4
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	9
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	12
e) Describe how the reporting entity assesses the effectiveness of these actions.	15
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	15
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	16

If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement ‘Do not own or control any other entities’ instead of a page number.

\*\* You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

1. Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.
2. Section 4 of the Act defines a responsible member as: (a) an individual member of the entity’s principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the *Corporations Act 2001*—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.