

## MODERN SLAVERY STATEMENT

This statement is made pursuant to the Modern Slavery Act 2018 (Cth) in relation to the operations and supply chains of Parramatta Leagues' Club LTD ABN 52 000 218 655 and its controlled entities (PLC, PLC Group or Club) to assess and address the risk of modern slavery in our business operations and supply chain for the financial year ending 31 October 2022. The purpose of this statement is to outline our approach to ensuring PLC has robust frameworks and processes in place to identify, mitigate and manage the risk of modern slavery in our business operations and supply chain.

### **Mandatory Criteria 1 & 2 - Covered entities, structure, operations and supply chains**

PLC is a not-for-profit member-based organisation that provides entertainment and dining facilities in Parramatta and Dundas and supports the Parramatta Eels NRL and NRLW rugby league teams.

PLC's strategic ambitions focus on delivering great experiences, value to its members, patrons and support to the broader community. It aims to establish a robust business to future proof long-term success and build on the governance initiatives which culminated in the appointment of its new Board in March 2020. PLC, being at the heart of our community, aims to maximise its impact through its people and support of the community.

Our venues are:

- Parramatta Leagues - 1 Eels Pl Parramatta 2150 NSW
- Vikings Sports Club - 35 Quarry Rd Dundas Valley 2117 NSW
- Parramatta Eels – Cnr Memorial Ave & Stone Mason Dr Kellyville 2155 NSW

The PLC Group consists of the following organisations:

- Parramatta Leagues' Club LTD (ABN 52 000 218 655)
- Parramatta National Rugby League Club Pty Limited (ABN 66 092 536 519)
- Parramatta Power Soccer Club Limited (ABN 93 089 593 117)

There has been no trading in Parramatta Power Soccer Club in the last 12 months to 31 October 2022.

The importance of social and sustainability objectives is represented in two of the Club's five strategic pillars i.e. People & Culture and Community Impact. Being a community-based organisation, the safety and wellbeing of its workers, members, and communities has always been a priority. Beyond this, the Club is fully aware of the sustainability agenda, its objectives and the responsible action expected from businesses as advocated by the Sustainability Development Goals, ESG and local legislation.

### ***Supply Chain***

PLC's supply chains predominately relate to the sourcing of goods and services for the provision of food and beverage, hospitality, gaming, corporate and administration and professional rugby league. Where possible, PLC's focus is on local, Australian-based suppliers.

PLC is committed to ensuring its own supply chain and related practices are well understood, to ensure modern slavery are not present and doing what it can to eradicate such risks where they may exist, by improving company procedures and the application thereof.

The Club has completed an analysis of its group spend for the year ending 31 October 2022. Most of the Club's expenditure is Statutory and Services related, with Product related spend only accounting for ~ 17% of total expenditure. PLC's significant spend categories are:

- Food products
- Beverage products
- Cleaning products and services
- Gaming machines and devices
- Sporting Goods / Apparel / PPE

Key factors being considered when assessing suppliers include geographical location of the supplier's production facilities, where materials/products are sourced from, policies and processes the supplier has in place, supplier employee practices and any known history of modern slavery or related breaches.

### Mandatory Criteria 3 - Risks

Given the large volume of local suppliers, and the focus on the large businesses by the Modern Slavery Act, we see our overall risk as low. We understand that we need to fully investigate every aspect of our operations and supply chain.

### Mandatory Criteria 4 - Actions

In response to the agenda on Modern Slavery and reporting obligations, PLC is proactively implementing several initiatives to build awareness within the business. These include:

- Updates to the Procurement Policy to incorporate the sustainability agenda.
- Policies on Equal Employment Opportunity, Discrimination, Harassment and Bullying, Employee Code of Conduct and Whistleblowing, to promote a safe and positive work environment and reporting.
- Training of staff involved with procurement processes and/or the management of supplier agreements.
- A due diligence assessment to be included in the tender process for risk categories/services.
- Supplier communications to create awareness on PLC's position on modern slavery.

When renewing agreements for goods and services, PLC will be introducing clauses on modern slavery into contracts and its tender documents. The aim being to highlight the importance of this and the intention to partner with suppliers who are committed to collaborating with the Club to prevent, identify and remove any risks on modern slavery in our supply chain.

### *Supply Chain*

The plan for CY23 and beyond is to focus on risk categories and material expenditure (> \$50,000) associated with the supply of physical products/materials and some services (such as cleaning). This plan is tabulated below.

CY23	<b>Existing Suppliers</b> a. Introduce general Supplier communications regarding the Clubs ESG objectives to all PLC Group suppliers. The intention is to create awareness regarding the Club's position statement on modern slavery risks and the need for collaborative efforts to prevent and address these risks when identified.
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	b. Validate the list of suppliers that fall in the affected categories c. For affected categories, hold an information session(s) with suppliers to build further understanding, address questions, and explain future reporting requirements which should be supported by the due diligence outcomes.  <b>New Suppliers (affected categories)</b> d. For affected spend categories, modern slavery requirements will be included in the tender documentation and contract process e. Introduce the new supplier onboarding form f. Suppliers will be required to complete a Modern Slavery Information form
CY23+	a. Annually, suppliers in affected categories will be required to complete a modern slavery self-assessment questionnaire

### Mandatory Criteria 5 - Effectiveness

The PLC Group recognises that judging the effectiveness of its actions to address Modern Slavery risks in its operations and supply chains is crucial.

Implementation and effectiveness of actions will be managed as follows:

- Procurement will assess the information shared in the self-assessment questionnaire for affected spend categories. Any material risks will be documented in the Procurement risk register for the attention of the Manager: Governance and Compliance and Chief Financial Officer.
- Procurement will be responsible to follow-up and facilitate resolutions of risks with respective Suppliers, with support from the Manager: Governance, Risk and Compliance.
- The Manager: Governance, Risk and Compliance will monitor, and report progress to the Chief Financial Officer, pertaining to risk mitigation, resolutions and remaining risks.
- The Chief Financial Officer will review, intervene where necessary and report status to the Board Audit and Risk Committees for feedback and action(s) (where necessary).

### Mandatory Criteria 6 – Consultation

During the reporting period, PLC considered and assessed modern slavery risks across the business, with focus on next stages of implementation.

The PLC Group has commenced with implementing the actions noted within its organisation and supply chain to promote due care and ensure compliance with the modern slavery act. Whilst the likelihood of risks is low, the first phase of supplier assessments is important to validate our risk assessment and highlight any areas requiring attention.

### Conclusion

The PLC Group is committed to ensuring the desired objectives on this important matter is granted the appropriate attention and effort.

Chris Dimou

**Parra Leagues Club Ltd C.E.O**