

Modern slavery statement **2022**



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We acknowledge the traditional owners of the land where we operate and work. We recognise their continuing connection to land, waters, and culture. We pay our respects to their elders past, present and emerging.

Disclosure Note

This statement has been made on behalf of Club Assist Corporation Pty Ltd. This statement covers all entities owned or controlled by Club Assist Corporation Pty Ltd. Each one is covered by Club Assist's policies, procedures and systems, including those relating to contracting, purchasing and human resources.

ACN 054 184 842



A statement from our Chairman

Club Assist Pty Ltd (CAPL) provides automotive batteries and roadside assistance. We source, store, distribute, and install automotive batteries. Club Assist also offers roadside emergency patrol services serving customers and clients throughout Australia. While our standing in the world market has been cemented over a 30 year history, our governance needs constant review and enhancement to ensure we maintain that position.

Club Assist's board of directors and executive teams are committed to improving our risk and governance across our operations every year, including deeper knowledge of the suppliers within our end-to-end supply chain. As part of this commitment, we have a dedicated program to enable us to understand, meet, and demonstrate our compliance with modern slavery legislation in the markets in which we operate. We are committed to supporting our supply base to understand their requirements and how they can meet them. This is evidenced in the previous two years' statements and the cumulative summary of progress in years 1 to 3 in this statement.

The financial year ending 30th June 2022 was a second consecutive intensely challenging operational year internationally and locally due to the direct and indirect impacts of the global pandemic, global conflicts, and broader supply chain disruptions. However, we are happy to report that we completed our three year road map with the actions outlined within this document. We have then outlined the further actions for year 4 and beyond because as with all risk and compliance oversight, our work is never completed in managing modern slavery risks across the automotive aftermarket services sector.

This statement was approved by the board of directors of Club Assist Corporation Pty Ltd at the board meeting on 28 October 2022.

Phil Turnbull
Chairman, Club Assist

About us

Club Assist Corporation Pty Ltd is the Australian parent entity of AA Battery Service Ltd (investment in New Zealand), Club Assist North America (wholly owned by the Australian entity) and Club Assist Pty Ltd (wholly owned by the Australian entity).

Club Assist Pty Ltd (CAPL) provides lead-acid batteries across several industries in Australia, including the automotive, marine and recreational sectors. We source, store, distribute, and install lead-acid batteries, and provide roadside services such as jump starting, alternator and starter motor replacement. Our head office is in Melbourne, Victoria. Nationally we employ more than 300 staff and manage a strong workforce of contractors. We are owned and backed by the Australian motoring clubs.

Club Assist has been specialising in battery technology for over 30 years, supported by an in-house quality assurance laboratory, a robust national supply chain network and strong global procurement capability.

Company values

Our values underpin our culture and influence the way we interact with each other, our partners, clients, and stakeholders. They represent what is important to us and guide our business success. Everyone across the business is responsible for living and displaying our values:



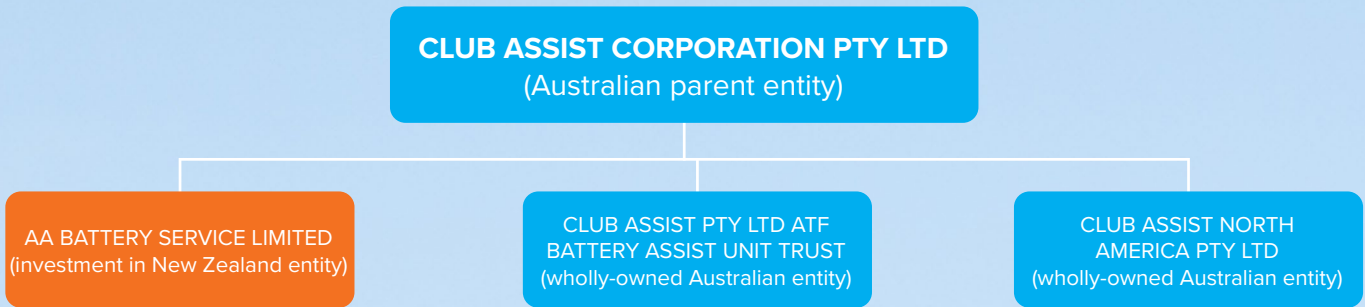
OUR PEOPLE. OUR VALUES.

Club Assist structure and governance

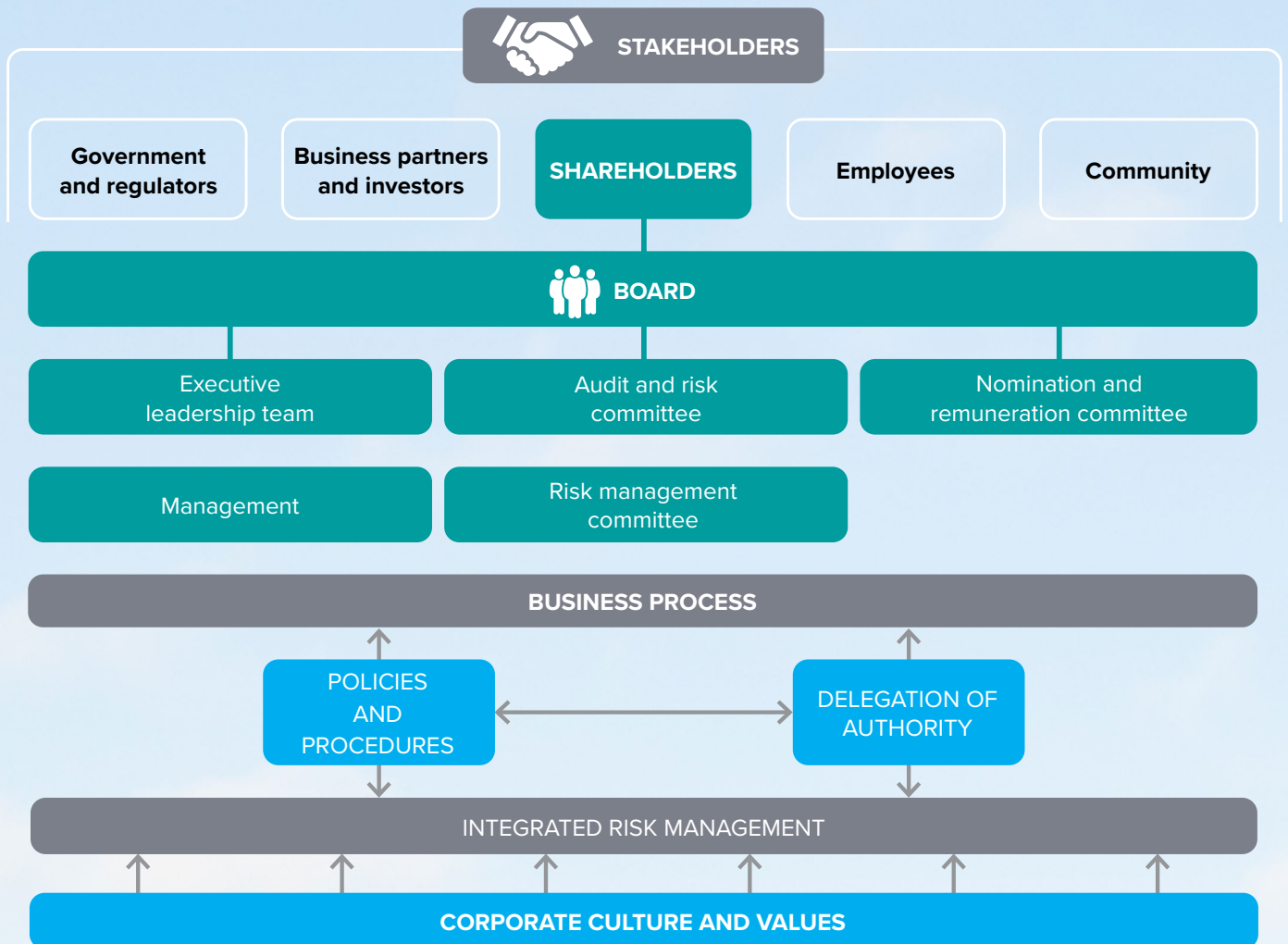
Our organisational structure

Club Assist's shareholding is held by the motoring clubs in Australia and has operations in Australia, the USA, Canada and New Zealand.

CORPORATE STRUCTURE



OUR GOVERNANCE FRAMEWORK



Club Assist's exposure level to modern slavery risks facing global operations and supply chains

Operational risks

For 30 years we have been safely and sustainably providing roadside automotive parts and repair services. We comply with all labour, employment, immigration and whistle-blower laws of Australia and its states and territories, including the Fair Work Act and are committed to:

- working safely and looking out for the safety of our colleagues;
- providing a workplace free from harassment, discrimination and bullying;
- acting ethically and lawfully in all business conduct;
- engaging with our stakeholders respectfully and honestly; and
- building sustainable communities through providing local jobs, developing local skills and providing local business opportunities.

CAPL has programmes in place to address the above matters. CAPL has policies in place that ensure the pursuit of such objectives. Our learning systems also educate the employees on their rights and privileges. While we consider the potential for us to cause or contribute to incidents of modern slavery to be low, areas of vulnerability in our operations include outsourced services such as use of cleaning, security and facilities management and possibly the use of labour hire contractors.

Supply chain risks
















We have identified our highest risk suppliers according to the following indicators:

- Industry sector – specific industry sectors deemed as high risk in international and national guidance documentation.
- Commodity/product – specific products and commodities deemed as high risk by the US Department of Labor's 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials.
- Geographic location – based on estimated prevalence of modern slavery and the government responses as outlined in the 2018 GSI. We are not buying goods that are from high risk (Fig 1), including their country of origin. However, we recognise that our goods and services may come from countries other than those of suppliers' headquarters.
- Workforce profile – in undertaking our supplier analysis we considered the type of labour involved in the production of our goods and services, particularly where low skilled, vulnerable or migrant labour is used, or where the work is deemed as '3D' work (dirty, dull or dangerous).

Recent studies show that the commodity and country that we import from are relatively low risk. While the risk of modern slavery in Australia is lower than many other jurisdictions (according to GSI data), we recognise that our Australian suppliers, who make up 10% of our spend provide us with goods and services across all high-risk categories and thus will require further engagement and assessment. This is part of the operational assessment action in Year 3 of our road map. High-risk goods and services are also procured directly from our international suppliers predominantly South Korea. We have compared our supplier profile with that of the study provided by GSI. From this, we do not see any glaring risk compared to our current supplier profile.

Figure 1:

List of products with identified risk of forced labour by source countries¹⁰

	Cotton: Kazakhstan, Tajikistan, Turkmenistan, Uzbekistan
	Bricks: India, Myanmar, Nepal, Pakistan
	Garments – clothing accessories: Argentina, Brazil, China, India, Malaysia, Thailand, Vietnam
	Cattle: Bolivia, Brazil, Niger, Paraguay
	Sugarcane: Brazil, Dominican Republic
	Gold: Democratic Republic of the Congo, North Korea, Peru
	Carpets: India, Pakistan
	Coal: North Korea, Pakistan
	Fish: Ghana, Indonesia, Thailand, Taiwan, South Korea, China, Japan, Russia ¹⁰
	Rice: India, Myanmar
	Timber: Brazil, North Korea, Peru
	Brazil nuts/chestnuts: Bolivia
	Cocoa: Côte d'Ivoire, Ghana
	Diamonds: Angola
	Electronics – laptops, computers and mobile phones: China, Malaysia

2021 Modern Slavery Statement lodged

Our second Modern Slavery Statement was lodged with the Australian Border Force in early 2021 and was published on the online register portal on 23 April 2021. The Statement can be accessed [here](#).

This year's modern slavery risk management initiatives in summary

A. Ongoing supplier due diligence through on-site audits

We engaged third party auditors, Verisio, to conduct annual audits of our three main suppliers – Atlas Hankook, Global Sebang and Clarios. Verisio conducted the audits undertaken in FY20, providing a consistency in approach. Each audit was undertaken over two days and utilised document and evidence review processes, facility walk throughs and employee interviews. Auditors also assessed the implementation of agreed to corrective action plans from the previous year's audits.

B. Supplier engagement and closure of corrective action plans

Utilising the recommendations made by Verisio, we developed corrective action plans to address and close off the non-compliances (NCs) and partially compliant (PCs) findings. The action plans were completed before 30 June 2022.

C. Tier 2 supplier training

Using information provided by our three priority tier 1 suppliers in our FY20 SAQ process, we successfully engaged several of our tier 2 suppliers (i.e., suppliers to our battery suppliers) in a modern slavery awareness raising webinar. The webinar was translated for our international suppliers.

D. Dedicated training on modern slavery for Club Assist staff

Our Organisational Development Department launched a modern slavery training program for all staff. The training program aims to enhance awareness about modern slavery across all sections of our business and ensure that we continue to effectively assess and address modern slavery risks in our operations and supply chain. The modules were rolled out during the year with 3 – 4 months between each module to ensure effective learning outcomes. The modules cover the following topics:

1. What is modern slavery?
2. Modern slavery in the workplace
3. Business relevance

E. Whistleblower policy

Our Human Resources team reviewed our whistleblower policy to ensure it is suitable for internal and external stakeholders to raise concerns and grievances easily and confidentially. The policy is accessible from the company website.

F. Global steering committee

During Year 1, CAPL formed a steering committee to initiate the modern slavery risk management program across our organisation. The committee included representatives from our North America operations. In 2021, we reviewed the membership of the team and relaunched the committee to maximise engagement with our overseas subsidiaries in regard to ongoing modern slavery risk management plans, in collaboration with our external advisors SD Strategies Pty Ltd.

G. COVID risk management

The global pandemic continued to add pressure and risk to our operations globally and locally. We worked hard to ensure the safety of our team members especially our roadside service crews. Our COVID-19 response remains dynamic and flexible. It is reviewed and updated continuously by our operations and safety divisions to ensure the risks related to the transmission of COVID-19 are managed and minimised. Toolbox Talks and our monthly digital "Safety Pulse" newsletter ensured ongoing communication of our COVID Management Plan. Workers continue to be issued with relevant PPE to minimise infection risk.

H. Operations

Feedback from and discussions generated by our modern slavery training modules has resulted in a more thorough understanding of our potential exposure to operational modern slavery risks. As a result, we plan to undertake a deeper dive assessment of the following operational areas:

- Contractors (Service Delivery Contractor Declaration)
- Security suppliers
- Cleaning suppliers



On-site auditing

On-site auditing formed a major part of our Year 3 modern slavery risk management initiatives. On-site audits have become part of CAPL's ongoing supplier due diligence and an important part of our annual modern slavery risk management program. Three supplier audits were undertaken at the outskirts of Seoul in South Korea. The size of the factories audited ranged from 85,000 square meters to 100,000 square meters, with an average of 500 workers at each site. These factories specialise in manufacturing automotive batteries. The general production processes included injection moulding, pasting, cell assembly, formation, charging and packing.

This year we again appointed Verisio to undertake social impact audits of our South Korean suppliers. Verisio is a global quality and compliance solutions provider offering factory audits, inspector management and quality consulting to retailers and their suppliers, manufacturing in Europe and Asia, with its head office in Cambridge, UK. With expertise in auditing against the Ethical Trade Initiative (ETI) Base Code and customer-specific social compliance programs, Verisio's APSCA certified local auditors also hold relevant professional qualifications as Lead Auditors in social compliance auditing (SA8000) and quality auditing (ISO 9001).

Our three main battery suppliers were audited on 12-13 October, 14-15 October, and 18-19 October 2021. The auditors spent two full days with each supplier to review documentation, interview management and employees and undertake site inspections.

General audit procedures and Verisio's integrity policy were explained and agreed to by factory representatives. Factory management were very supportive and cooperative during the audit and transparently shared their challenges and opportunities.

Factory audit outcomes 2021

		Compliant	Partially Compliant (2021)	Last Year's PC (2020)	Non-Compliant (2021)	Last Year's NC (2020)	Total # of questions
2.0	Governance & Due Diligence	14	0	0	1	1	15
3.0	Risk Management	15	5	4	4	13	24
4.1	Employee Freedom	17	0	0	0	0	17
4.2	Freedom of Association & Collective Bargaining	24	0	0	0	0	24
4.3	Working Condition (Safety and Hygienic)	42	0	1	6	3	48
4.4	Child Labour	26	0	0	0	0	26
4.5	Living Wages	54	0	0	0	0	54
4.6	Working Hours	21	0	1	0	0	21
4.7	Discrimination	9	0	0	0	0	9
4.8	Regular Employment	9	0	0	0	0	9
4.9	Harsh or Inhumane Treatment	11	0	0	0	0	11
4.10	Dormitory Accommodation	0	0	0	0	0	0
5.0	Training	14	0	4	1	1	15
78%	Total	256	5	10	12	18	273

Key points raise during the audits included:

- High risk suppliers and source location of raw commodities including lead and sulfuric acid were not identified.
- There was no evidence that modern slavery/people exploitation was part of the agenda of the Board of Directors meeting.
- Physical site issues that could compromise people's safety (eg. chemicals stored without secondary containers; fire extinguishers not regularly checked)

While based on the SMETA audit protocol, the audit questionnaire and approach were customised to provide a stronger focus on modern slavery and labour rights issues. The company's standard audit protocol was reviewed internally, in consultation with Verisio and our Australian advisors, SD Strategies.

The audit assessed the factories against 13 broad areas, including the three main pillars of our modern slavery risk management approach - Governance/Due Diligence, Risk Management and Training/Reporting.

Corresponding action plans to address the non-compliance (NCs) and partial compliance (PCs) were documented.

General working conditions and labour management systems were found to be satisfactory in all factories. Each factory had its own documented code of ethics which included human rights and modern slavery considerations. The factories had strong human resources (HR) systems and processes and a system to control and oversee working hours. Working hours were monitored by HR daily and overtime did not exceed legal limits. The suppliers had updated certifications from ISO 9001, ISO 14001 and ISO 45001.

The main area of concern was risk management particularly in relation to supply chain risk. Documented mapping of suppliers and supplier risk was non-satisfactory. Based on the audit recommendations, the factories need to undertake improved supplier identification and mapping and introduce effective systems to evaluate the modern slavery risks posed.

In addition, the key points raised during the audits were associated with working conditions in the factory, particularly in relation to safety and hygiene.

The number of non-compliant outcomes reduced from the 2020-2021 audits.
All three suppliers completed 100% of the required corrective actions by 30 June 2022.

Corrective action plans

There was a 40% drop in findings (NC & PC) compared to last year. A post-audit workshop was conducted with each supplier, supported by SD Strategies and relevant Club Assist representatives. The objective of the workshops was to prioritise findings and agree on corrective actions and timeframes for implementation.

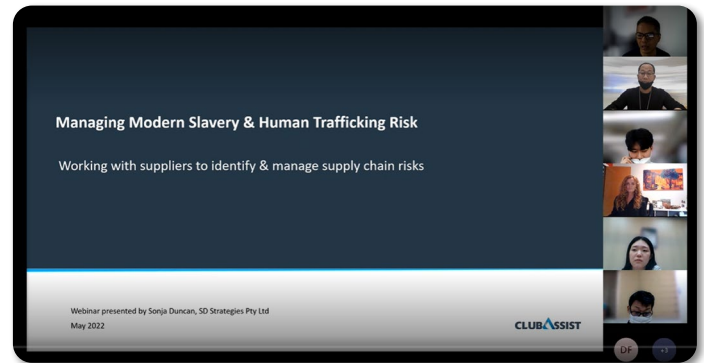
Site audits captured non-compliances relating more specifically to worker health and safety. Our focus in the latter half of this reporting period was on closing off the non-compliances and documenting areas for improvement.

All three suppliers completed 100% of the required corrective actions by 30 June 2022.

Tier 2 supplier engagement and training

Our Supply Chain team facilitated a modern slavery workshop with 10 tier 2 suppliers (i.e., suppliers to our battery suppliers). Several of our tier 1 suppliers also participated and helped with translations from English into Korean. Suppliers from across the globe participated in the webinar which focused on modern slavery risks specific to our industry sector and our collective countries of operation. The feedback from the webinar was positive with both tier 1 and tier 2 suppliers reporting to have learned more about the risks of modern slavery and other human rights abuses in our industry sector.

The webinar provided information on our ongoing supplier due diligence program, which will include desktop assessments of our identified tier 2 suppliers (see Case Study 2 on page 15).



Dedicated training on modern slavery for Club Assist staff

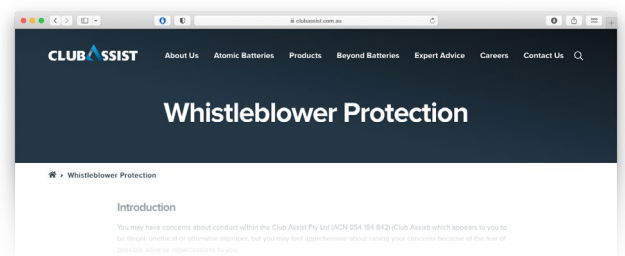
A key action for the current reporting period was to ensure all our leaders and their teams received modern slavery risk management training to better understand what modern slavery is and where the risks may lie in our operations and supply chain. Our Learning & Development (L&D) Department, in collaboration with the Supply Chain team, launched three modern slavery modules within our Learning Management System (LMS). Each module takes approximately 10 minutes to complete and includes a short quiz at the end. The three modules launched during this reporting period were:

- Modern slavery module 1: What is modern slavery?
- Modern slavery module 2: Modern slavery in the workplace
- Modern slavery module 3: Business relevance

There was a 97% uptake on the three modules offered, with 296 out of 304 employees completing the training in FY21.

Whistleblower policy

Our Human Resources team reviewed our whistleblower policy to ensure it is suitable for internal and external stakeholders to raise concerns and grievances (including those related to human rights and modern slavery) easily and confidentially. The Whistleblower Policy was uploaded to the Club Assist website to ensure accessibility for all external stakeholders and provide opportunity to report suspected labour rights, modern slavery and other human rights abuses confidentially and without fear of retaliation. This would ensure that individuals that deal with Club Assist would have an opportunity to communicate potential issues that could affect the company's reputation in dealing with exploitation and abuse.



Global steering committee

During the first two reporting years, our Modern Slavery Committee met monthly to support the development and implementation of our modern slavery risk management program. Members of the Committee were instrumental in ensuring information flow between various sections of the business and engaging staff and managers across the organisation on our modern slavery risk management efforts.

This a key element to ensure modern slavery is embedded into our core operating processes and procedures. During this reporting period, we relaunched the group to maximise ongoing oversight of and commitment to our modern slavery risk management program.

The global steering committee includes senior personnel from our Australian, New Zealand and North American operations.

COVID Risk Management

Responding to the continuing COVID-19 global pandemic

The global pandemic has and will place additional pressure and risk on our supply chain operations globally and locally, particularly as this reporting period represents the second full year of impacts. This extended period brings with it a growing risk of sustained impacts rather than just immediate effects.

We continued to be highly sensitive to the impacts the pandemic has on our supply chain, particularly the less visible indirect impacts. Utilising our Product Supply Business Continuity Plan and our State based COVID-Safe plans, we have actively identified, assessed, and mitigated the risks presented to people (including our own staff, our suppliers, and our customers) and the ongoing availability of our products.

Identifying and mitigating increased supply chain risks

- Supplier communication and collaboration is key

The Club Assist supply chain teams in both Asia Pacific and North America continued to respond quickly to the pandemic challenges by ensuring our regular supplier meetings became more detailed, more open, and more risk focused. This included agreeing swift notification of any manufacturing impacts (for example raw material supply, workforce shortages, and local restrictions) and pro-active communication of any local changes to employee requirements (for example personal protective equipment, shift patterns, working time requirements, accommodation changes). The intention was for Club Assist to maintain confidence and due diligence over any impacts to the workforce that would have been implemented as part of the supplier's pandemic risk response.

- Sharing learning and best practice risk management

The impacts of the pandemic differ across the globe, and different government restrictions and social expectations of service providers can lead to confusion and inconsistency in response. To combat this, Club Assist teams across the USA, Canada, Australia, and New Zealand regularly shared their experiences and learning to anticipate and plan for previously unseen risks.

Safeguarding our teams in Australia

Across our teams in every State and Territory in Australia we implemented the following:

State/Territory specific COVID Safe Plans

Club Assist developed, communicated, and implemented COVID Safe Plans to meet all the requirements set out by the local government as a minimum, while also providing a consistent risk prevention profile for our people. These plans were developed to record:

- Our actions to help prevent the introduction of coronavirus (COVID-19) in our workplaces;
- The level of face-covering or other personal protective equipment (PPE) or practices required for our workforce; and
- How we will prepare for, and respond to, cases of coronavirus (COVID-19) in our workplace.

Risk profiling and safety measures by role

Aligned to the COVID Safe Plans, Club Assist assessed the increased risks from the pandemic to our operations within three classification of roles – Direct Service & Delivery, Warehousing, and Office. Personal protective equipment and other specific risk mitigation measures were then defined and communicated by role type.



Operations

Contractors

Contractors are required by Club Assist to sign a Contractor Compliance Declaration. The declaration includes remuneration, employment entitlements, superannuation, taxation, health and safety, payroll tax, workers compensation, insurance, visa conditions and such other responsibilities imposed by law on the company in respect of the company's engagement of workers, whether as employees or contractors. These declarations are collected, documented by each state, and sent to the Legal department for review.

Security contractors and cleaners

Security and cleaning contractors have been identified and mapped across all our Australian operations. We will engage an independent consultant to undertake surveys of these contractors in FY23 to determine risk levels and develop corrective actions plans as required.

Our plans beyond 2022

A. Gap analysis and 3-year roadmap

Our initial modern slavery gap analysis and action planning process undertaken in 2019 enabled us to document our level of maturity for managing modern slavery risks. It also helped us develop a 3 year road map to better address operational and supply chain risks. We have successfully implemented most actions we committed to over the initial three-year reporting period. In FY22, our steering committee reviewed the gap analysis and participated in an action planning process to set our modern slavery risk management goals and targets for 2023 and beyond.

B. Effectiveness review

We will continue to review the effectiveness of actions taken to identify, assess and address modern slavery risks and incorporate outcomes-focused performance indicators into our management review processes.

C. Desktop assessment of tier 2 suppliers

We will continue to review and improve our supplier due diligence, risk management, training and supplier engagement processes and ensure modern slavery risk management is mainstreamed into business operations. Having identified and engaged our highest risk tier 2 suppliers (being suppliers to our battery suppliers) we will undertake desktop modern slavery risk assessments of these suppliers in late 2022. Suppliers will receive a risk-based report with improvement recommendations and will be further engaged to develop and implement a corrective action plan to ensure risks are addressed.

D. Assessing modern slavery risks of our security and cleaning contractors

In FY23 we will undertake a review and modern slavery risk survey of our security and cleaning providers. We will work closely with these providers to identify potential risks and collaboratively develop corrective action plans.

E. On-site audits:

Following the desktop risk assessment of our tier 2 suppliers, we will ground truth the results with onsite audits undertaken by qualified in-country auditors. The results of the onsite assessments will feed into the supplier corrective action plans.

F. Continuous learning and awareness campaign

We will continue to deliver modern slavery risk management training to staff, contractors and suppliers. We will continue to promote awareness across the organisation of modern slavery fundamentals.

G. Recycling and international freight

While we continue to review our tier 2 suppliers, we will do similar due diligence, risk management, training and engagement processes with our scrap buyers and international freight suppliers. This is to validate compliance with modern slavery legislation across their operations.

This will entail checking their supply chain from their suppliers to their customers. We will undertake desk top modern slavery risk assessments and generate risk-based report with improvement recommendations.



Effectiveness of actions taken

– Reflecting on the past three years

As a company we have learned a great deal about modern slavery risks and impacts within the automobile and battery manufacturing sectors. While developing and implementing our modern slavery risk management program has not always been easy, we have had the support of our leadership team and staff throughout. We have come a long way from our first workshop on modern slavery, with all employees and our highest priority suppliers having now undertaken modern slavery training.

We acknowledge the importance of assessing the effectiveness of our actions to manage and mitigate risk of modern slavery in our operations and supply chain and continue to work on the best approach to measure the effectiveness of our actions.

At Club Assist, we consider an effective response to modern slavery risk management to include:

- Strong modern slavery governance
- Effective supplier partnerships
- Ongoing training and education

The following table provides an overview of our effectiveness assessment against these key pillars.

Pillar	Activity	Qualitative indicators	Quantitative indicators
Governance	<ul style="list-style-type: none"> • Updated policies to reflect modern slavery requirements and enhanced governance processes • Updated Whistleblower Policy and communicated to stakeholders • Reviewed Risk Register to include modern slavery risks • Steering committee meetings 	<ul style="list-style-type: none"> • Integration of modern slavery risk management into BAU • Increased discussion of modern slavery risks and considerations in company decision making • Whistleblower policy understood and distributed • Alignment of grievance mechanisms to UNGPs • Modern Slavery Statement submitted on time 	<ul style="list-style-type: none"> • Percent policies reviewed, updated, and integrated into business processes • Number of modern slavery risks entered into risk register • Number of risk mitigation actions implemented • Number of modern slavery steering committee meetings held annually
Supplier partnerships	<ul style="list-style-type: none"> • Enhanced supplier communications • Supplier desk top assessments and onsite audits • Corrective action plan development & implementation • Supplier training, engagement & collaboration • Contractor engagement 	<ul style="list-style-type: none"> • Number of high-risk suppliers invited to complete assessments and audits • Supplier feedback on due diligence process and benefits • Number of supplier review meetings held 	<ul style="list-style-type: none"> • Percent high-risk suppliers engaged and trained • Number of corrective action requests issued and completed • Number of tier 2 suppliers effectively engaged
Training & awareness	<ul style="list-style-type: none"> • Awareness raising • Modern slavery eLearning modules • Competence assessment 	<ul style="list-style-type: none"> • Staff participate and provide feedback on training • Increased organisational awareness of modern slavery risks • Increased board and executive interest in and support of modern slavery risk program 	<ul style="list-style-type: none"> • Percent relevant staff trained • Percent staff completing eLearning modules and quiz questions • Number of board engagements/ presentations on modern slavery in 12 months



Annexure

MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

Principal Governing Body Approval

This modern slavery statement was approved by the *principal governing body* of

Club Assist Corporation Pty Ltd

as defined by the *Modern Slavery Act 2018 (Cth)*¹ ("the Act") on 10/28/2022

Signature of Responsible Member

This modern slavery statement is signed by a *responsible member* of

Board of Directors of Club Assist Corporation Pty Ltd

as defined by the Act²:



Phil Turnbull, Chairman

Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number/s
a) Identify the reporting entity.	4
b) Describe the reporting entity's structure, operations and supply chains.	5
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.	6
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.	7-12
e) Describe how the reporting entity assesses the effectiveness of these actions.	13
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).*	10
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	14-15

* 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.

Case studies

1. Modern slavery eLearning modules

We rolled out three modern slavery eLearning modules to 308 staff across 8 locations in 2021. The first module provides a broad overview of modern slavery, including the different forms of slavery and its relevance to business in Australia and globally.

The second module explores the potential risk of modern slavery in different industries and workplaces. It discusses the continuum of worker exploitation, factors that lead to vulnerability and the types of high-risk jobs and workplaces.

The third module on Business Relevance provides an overview of the intersection between business, human rights, and modern slavery. It discusses the importance of identifying, managing, and mitigating modern slavery and other human rights impacts to ensure corporate accountability, the protection of workers and a viable bottom line.

Additional eLearning modules on grievance and remedy and board accountability are proposed. All modules will be made available to a wider range of staff across the Club Assist network, supplemented with additional training or education resources where required.

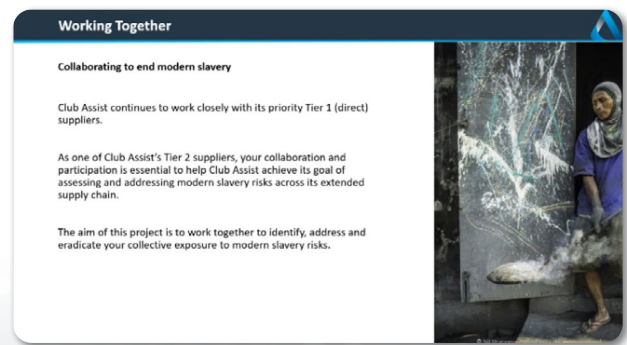


2. Tier 2 supplier engagement

Having spent significant time engaging, educating, and assessing our priority tier 1 suppliers (who together accounted for 90% of our high risk spend) in Years 1 and 2, we were able to work closely with these tier 1 suppliers to identify and engage our priority tier 2 suppliers.

Together with our external modern slavery advisors, SD Strategies, we ran a modern slavery webinar for 10 of our tier 2 suppliers, located largely in South Korea. Two of our tier 1 suppliers attended the webinar and acted as translators during the presentation. The webinar was engaging and informative and provided our tier 2 suppliers with information on modern slavery broadly, the Australian legislative reporting requirement and our expectations of them as an important part of our supply chain. We discussed our desk-top assessment process and invited the suppliers to participate in a self-assessment process in the latter half of 2022.

The feedback was positive with all suppliers reporting they had learned a lot about modern slavery and were looking forward to participating in ongoing awareness raising and risk assessment processes.





Company Directory

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