Introduction

This Modern Slavery Statement is made pursuant to the *Modern Slavery Act* 2018 (Cth) and outlines the steps taken by Mount Pritchard & District Community Club Ltd (ACN 000 458 622) and our controlled entities ("Mounties Group") to identify, assess, and address risks of modern slavery in our operations and supply chains during the financial year ending 30 June 2025.

About Mounties Group

Mounties Group is a registered club, hospitality, leisure, health and property organisation providing a range of services to our members and the broader community. As at 30 June 2025, we had close to 280,000 members, an increase of around 9% on the previous year, and we employed over 1,300 full-time equivalent employees and served 4.1 million people across our group.

We are a 'Profit-for-Purpose' organisation, meaning that we reinvest every dollar of profit back into enhancing our services, facilities and the lives of our members and communities.

Our values are Family, Caring, Loyalty, Innovative, Fun, Honesty and Outcome Driven. We believe that these values form a solid foundation upon which to carry out our further responsibilities to reduce the risk of modern slavery in our operations and supply chains.

Our Operations, Structure and Supply Chains

Mount Pritchard & District Community Club Ltd is a not-for-profit company limited by guarantee, incorporated and domiciled in Australia under the *Corporations Act* 2001 (Cth). We are headquartered at 101 Meadows Road, Mount Pritchard NSW 2170. We are a registered club under the *Registered Clubs Act* 1976 (NSW).

Our core operations include eight licenced hospitality, leisure and entertainment venues across South-Western Sydney, Northern Beaches Sydney and Central Coast NSW:

mounties

MOUNTIES

254 HUMPHRIES ROAD MOUNT PRITCHARD

triglav

TRIGLAV

80-84 BRISBANE ROAD ST JOHNS PARK

mekong

MEKONG

LEVEL 1/117 JOHN STREET CABRAMATTA

mounties group

harbord diggers

HARBORD DIGGERS

88 EVANS STREET FRESHWATER

manly bowling club

MANLY BOWLING CLUB

59 RAGLAN STREET MANLY

club wyong

CLUB WYONG

15 MARGARET STREET WYONG NSW

breakers country club

BREAKERS COUNTRY CLUB

64 DOVER ROAD WAMBERAL

halekulani bowling club

HALEKULANI BOWLING CLUB

50 NATUNA AVENUE BUDGEWOI NSW

Our growth operations include:

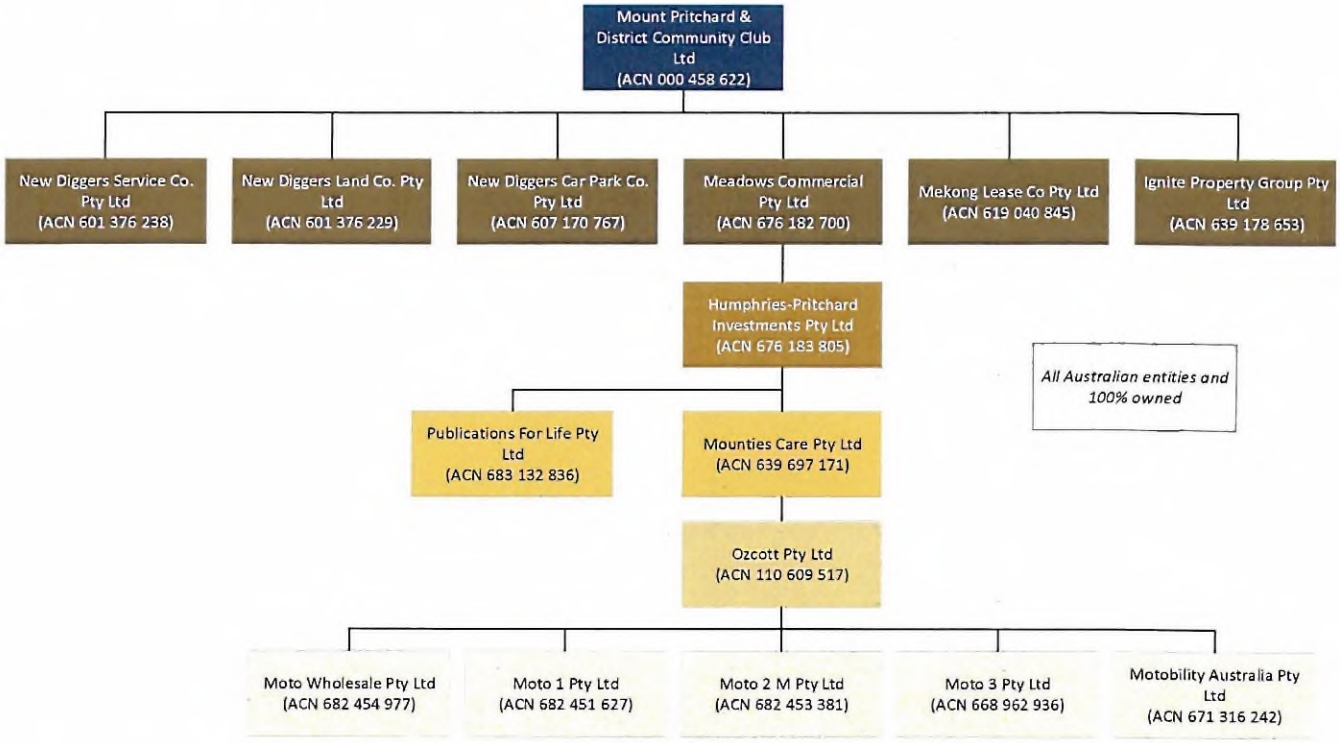
- Mounties Care health clinics at Mount Pritchard, Guildford, Freshwater and Wyoming
- Specialist medical services across NSW, Queensland and ACT
- Home Care services across NSW, Queensland and Victoria
- Mobility aids retail, wholesale and franchising operations across Western Australia, Victoria, Queensland and NSW
- Major Fun children's play centres at Mount Pritchard and Freshwater
- Resort accommodation at Sussex Inlet, NSW
- Retirement living at Freshwater
- Property holdings across key locations to support our operations and future growth plans

In addition, we support a range of community services such as:

- Junior sporting and social clubs via our sub-clubs, supporting more than 3,500 members with over $3m invested annually
- Elite sports via pathways and semi-professional teams, across rugby league, soccer, cricket and netball
- Sponsorships and donations for local and regional communities and specified causes aligned with our values, including $13m committed towards Mounties Care Cottage as Western Sydney's first children's hospice, and $10m committed to Mounties Care CareFlight Rapid Response Helicopter
- Grant funding of over $6.3m for a range of local initiatives via the ClubGRANTS scheme

mounties group

Our group structure consists of Mount Pritchard & District Community Club Ltd (ACN 000 458 622) and the following controlled entities:



Our supply chains include:

- Procurement of goods and services such as food and beverages, cleaning services, uniforms, construction services, facilities/equipment management, entertainment services, security services, sporting facilities, healthcare services, IT equipment and services; and
- Engagement with suppliers and partners located predominantly in Australia with some specialty providers located overseas.

Our Governance

Our Board of Directors is responsible for the strategic leadership and good governance of Mounties Group, ensuring compliance with relevant standards and legislative requirements while reflecting community expectations. The Board holds primary responsibility for setting the strategic objectives of the group, overseeing proper management of the group, and monitoring its overall performance. The Board is also responsible for governing and reviewing policies relevant to the group's relationship with other stakeholders and the broader community. This includes policies and practices concerning modern slavery risks, amongst its broader responsibilities in relation to environmental, employment, occupation, health and safety, social responsibility, sustainability and other matters.

Our group's management is lead by our Chief Executive Officer (CEO), supported by our Executive Team who have delegation to oversee operational and strategic risk management in their respective areas of expertise. We operate via a centralised management team across our business lines and locations, enabling us to enforce coordinated policies and procedures concerning modern slavery risks across our group.

Mounties Group has a number of internal policies and procedures to ensure that the organisation is run in an ethical, responsible and transparent manner. These policies include:

- **Modern Slavery Policy** – Supporting the organisation's commitment to eliminating or limiting the risk of modern slavery. This has been further updated and reviewed during this reporting period.
- **Code of Conduct** – Founded upon Mounties Group's values and sets out the minimum behavioural standards expected by employees as well as suppliers.
- **Whistleblower Policy** – Reaffirms Mounties Group's commitment to modern slavery by way of encouraging employees to report concerns freely and without fear.
- **Procurement Policy** – Applies stringent procurement procedures to be adhered to with regard to the procuring of goods and services on behalf of Mounties Group.
- **Risk Management Framework** – We have introduced a new Risk Management Policy, Risk Management Standards and Risk Management Processes, which together set out Mounties Group's core principles and expectations regarding risk management, and offer practical guidance to support the implementation of effective risk management practices.
- **Other Policies** – Including Discrimination, Bullying and Harassment, Right to Disconnect, Leave Standards and Cultural Diversity, Workplace Health & Safety, Respect and Awareness Policies.
- **Committees:** Our Remuneration Committee and Workplace Health & Safety Committee ensure staff are employed and paid according to the terms and conditions of their employment, are provided with a safe working environment and adhere to legislative requirements. Our Risk & Audit Committee helps to identify, analyse, evaluate, and manage key risks within our organisational risk framework and escalate matters to the Board.
- **Staff onboarding and training** – Mounties Group has a comprehensive mandatory orientation training program for all staff, covering all facets of risk management.
- **Diversity and Inclusion reporting** – WGEA reporting submitted annually.
- **Due diligence and audit** – We internally review and evaluate our supply chain to identify any possible risks, including to ensure compliance with modern slavery requirements. During the reporting period, Mounties Group commenced revising the supplier onboarding questionnaire and risk assessment processes to enable further detailed analysis of key suppliers.

These policies and frameworks demonstrate our commitment to addressing modern slavery risks, whilst ensuring we have responsible and ethical practices in place, in compliance with relevant workplace legislation.

Through our newly-formed Modern Slavery Working Group, we have formulated a commitment statement to more clearly articulate our position on modern slavery:

> *OUR COMMITMENT TO ETHICAL PRACTICES*
>
> *Mounties Group acknowledges its responsibility to take a firm stance against all forms of modern slavery and human trafficking. We are dedicated to upholding ethical business practices that protect individuals from abuse and exploitation, both within our operations and throughout our supply chain.*

Mounties Group is a member of ClubsNSW, the peak representational body for the NSW club industry, whose purpose is to lead a sustainable industry and to support the local community we serve. Mounties Group is committed to working with ClubsNSW to embrace ethical engagement and professional guidance to fight modern slavery within its business.

Risks of Modern Slavery Practices

Throughout the reporting period, we have continued to consider modern slavery risks that our group may cause, contribute to or be directly linked to.

Our own operations

In relation to the risk of using exploited labour in our own operations, Mounties Group prioritises employing people from local communities which we operate in. Being an Australian domiciled organisation with a centrally managed office and a business which is focussed on servicing our local communities, we consider our modern slavery risks in this area to be low.

Our staff are employed on negotiated enterprise agreements, industry awards and individual contracts and we implement proper staff on-boarding and payroll practices in the usual course of our business. This ensures that our employees are paid in line with, or above the minimum industry rates and have access to rights and support services which reduce the risk of exploitation. Mounties Group has a Remuneration Committee which ensures staff are employed and paid according to the terms and conditions of their employment. Additionally, Mounties Group provides its employees with an Employee Assistance Program and provides benefits to its employees via its Mounties Perks program.

Mounties Group also has a Workplace Health & Safety Committee, comprised of representatives from all businesses and business units, that meets quarterly and ensures that staff are provided with a safe working environment and that the group adheres to legislative requirements. Through induction processes, our staff are made aware of their rights and responsibilities and access to whistleblowing and complaints processes. Regular Work Health and Safety risk assessments are conducted to identify potential hazards and evaluate control measures. We aim to implement effective controls to eliminate or minimise risks, ensuring the wellbeing of our employees. In addition, we uphold strict standards to guarantee that no worker is subjected to slavery or slavery-like practices.

Our supply chains and connections

For the reporting period, Mounties Group utilised the services of over 1,200 suppliers for the provision of food and beverage, catering and hospitality, gaming, health care, maintenance, security, sporting facilities as well as corporate, technology and administrative services. Wherever possible, Mounties Group strives to utilise local, Australian-based suppliers. A minimal number of suppliers (mostly software providers and product suppliers to our mobility aids business) are based overseas.

Contractors also supply services to Mounties Group as part of our day-to-day operations, which include security services, cleaning and maintenance, the majority of which are recruited from local areas. Mounties Group acknowledges that such contractors may not share our commitment to modern slavery prevention and as such, our service providers must remain a key focus area.

We nonetheless currently classify the risk of modern slavery in our direct contractor base and key suppliers as low, due to the majority of these entities being located in Australia and subject to the same labour and work health and safety laws. Some larger entities are also subject to Commonwealth modern slavery reporting requirements themselves. We will continue to use preferred Australian-based suppliers and conduct more detailed due diligence, risk assessment and analysis of our largest suppliers and their supply chains to better understand the modern slavery risks arising from our engagements with those entities.

We remain cognisant that modern slavery risk can be inherent in the supply chain from high-risk jurisdictions, geographies and exploitative business models via the practices and operations of our

suppliers. As such, we will also explore ways in which our contractual relationships with our larger suppliers can be strengthened to impose further obligations in relation to requiring them to address modern slavery risks in their supply chains and operations and disclose relevant risks to us.

Actions Taken to Address Modern Slavery Risks

Since our 2024 Modern Slavery Statement, we have sought to identify concrete actions to address modern slavery risks across our operations and supply chains. Our progress and proposed next steps against these actions is as follows:

Action	Progress and Next Steps
Formation of a Modern Slavery Working Group	The Working Group has been formed and is comprised of representatives from the following teams: People & Culture, Finance, Legal, Risk, Compliance & Assurance, Procurement & Supply Chain, Marketing, Experience. This Working Group will be instrumental in driving forward initiatives in this space.
Increased modern slavery training and awareness for staff	New training provider online training materials have been assessed and will be tailored for rollout in FY2026 with a more targeted audience comprising of senior managers, administrative staff, procurement staff, and venue managers. We will continue to explore ways in which modern slavery awareness can be incorporated into general staff induction materials.
Updated procurement policies and template documentation	An updated Modern Slavery Policy has been created and approved by the Board, reflecting our latest commitment and approach to addressing risks in this space. Work continues regarding uplift of our Supplier Code of Conduct, procurement policies and templates. We have introduced a new Risk Management Framework to guide our decision-making, and establish expectations and key processes regarding best practice risk management.
Supplier mapping and risk assessments and enhance engagement with suppliers on modern slavery risks	We have examined previous supplier risk assessments and committed to doing more due diligence on key suppliers who pose a degree of modern slavery risk and with whom we spend significant sums. Through a process of deeper analysis of these suppliers, we aim to identify suppliers who may pose unacceptable risks of modern slavery in their operations and supply chains, and explore ways in which we can further engage with those suppliers to align expectations in this area.

Assessing the Effectiveness of Actions

Mounties Group is committed to continuously improving our approach to addressing modern slavery risks. To assess the effectiveness of our actions, we have implemented the following measures:

- **Monitoring and Reporting:** We will monitor compliance with our policies and procedures and require suppliers to report on their adherence to modern slavery requirements through more detailed

engagement practices. In addition, we will utilise our incident reporting and whistleblowing mechanisms to ensure we obtain timely and accurate reports of any modern slavery concerns.

- **Supplier Assessment:** We will conduct more detailed assessments of high-risk suppliers to ensure compliance with our standards and identify areas for improvement.
- **Stakeholder Feedback:** Using the Modern Slavery Working Group as a key vehicle for communication and engagement, we will seek feedback from employees, suppliers, and other stakeholders to identify gaps and opportunities for improvement in our approach and address any instances of non-compliance with policy identified.
- **Review of Key Actions:** The Modern Slavery Working Group will review key actions related to modern slavery on a regular basis, such as the progress of supplier risk assessments, training sessions delivered, and progress of policy improvement.

During the reporting period, Mounties Group did not report any incidents or concerns with regard to modern slavery directly associated with its own operations. There were no complaints relating to modern slavery received through our Whistleblower Policy. Further, Mounties Group is not aware of any complaints raised by customers, contractors or members of the general public with regard to modern slavery associated with Mounties Group.

Consultation

Mounties Group has engaged with entities within our controlled entity group and with relevant internal stakeholders via our Modern Slavery Working Group, to ensure a collaborative approach to addressing modern slavery risks. We are committed to fostering open communication and working together to uphold human rights across our operations and supply chains.

Approval

This Modern Slavery Statement was approved by the Board of Directors of Mounties Group on 21 December 2025

Signed,

Dale Hunt

Dale Hunt
Chief Executive Officer
Mounties Group
21 December 2025

mounties group