

## 1 PURPOSE

- 1.1 The purpose of this policy is to ensure that Belgravia Group actively and consistently contributes to the ending of modern slavery as set out in the Modern Slavery Act 2018 (the Act).

## 2 SCOPE

- 2.1 This policy applies to all business units, directors, officers, employees, contractors, suppliers and partners to the Belgravia Group including business units and activities outside Australia and technically not covered by the Act – unless the Act contravenes local modern slavery legislation.

## 3 GLOSSARY

- 3.1 Terms not defined in this document may be in the Organisation's glossary.

### Terms and definitions

**Belgravia Group:** Belgravia Group business units such as but not limited to Belgravia Leisure, Belgravia Health and Fitness, Belgravia Clothing, NovoFit, NovoActive, Belgravia Foundation, Belgravia Technologies and associated entities.

**The Act:** Modern Slavery Act 2018

## 4 POLICY STATEMENT

- 4.1 The Act defines Modern Slavery as serious exploitation and can include:
- **Human Trafficking:** the recruitment, harbouring and people movement for the purposes of exploitation such as but not limited to prostitution, Forced Labour or services, slavery or practices similar to Slavery or Servitude.
  - **Slavery:** actions that equate to taking ownership of a person.
  - **Servitude:** actions that equate to a person's freedom is restricted and they are not free to stop working or leave their place of work at their free will.
  - **Forced Labour:** actions that equate to a person not being free to stop working or leave their place of work at their free will.
  - **Debt Bondage:** actions that equate to a person's services being used as security for a debt or the debt is excessive or services don't reduce the debt or the length and/or type of the services are not limited.
  - **Forced Marriage:** actions that equate to a making a person marry or where the person is incapable of understanding the nature and effect of the marriage ceremony.
  - **The worst forms of child labour:** actions that equate to a child being exploited, including for sexual exploitation; or engaged in hazardous work which may harm their health and safety, or the drug trade.

## 5 PROCEDURE

- 5.1 Belgravia Group will work proactively with its contractors, suppliers and partners to limit the risk of modern slavery in all relevant supply chains.
- 5.2 Belgravia Group expects that all contractors, suppliers and partners operate in compliance with all legislation in all jurisdictions where their goods are sourced, procured or services performed. Contractors, suppliers and partners must use their best endeavours to prevent and eliminated modern slavery in their supply chains and operations. In the event of identification of occurrence or significant risk of modern slavery in their supply chains or operations contractors, suppliers and partners must immediate effective steps to address the situation. Contractors, suppliers and partners must as soon as practicable notify in writing Belgravia Group and relevant authorities of any occurrence or perceived risk of modern slavery.

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- 5.3 Belgravia Group will include in its supplier contracts requirements that suppliers and their sub-contractors comply with relevant modern slavery regulations and reserve Belgravia Group's right to terminate an agreement if the supplier is knowingly and continually in breach of any relevant modern slavery act. See PR SF 3.02 Modern Slavery Supply Agreement Clause document for the information required to be included in supplier contracts.
- 5.4 Belgravia Group requires of its relevant executives, officers and employees that reasonable steps are taken to regularly monitor and assess its suppliers' compliance with modern slavery legislation - proportionate to risk factors for the industry, product, countries involved.
- 5.5 Belgravia Group will proactively audit supply chains with a range of steps including supplier assurances, reviewing supplier modern slavery statements to onsite visits, where deemed required.

## 6 RESPONSIBILITIES

### Compliance, monitoring, review and training

- 6.1 When existing Belgravia Group policies undergo policy review or new policies are developed, policy developers are required to identify modern slavery commitments that can be enhanced, or where modern slavery protections can be incorporated.
- 6.2 The Belgravia Group makes clear its commitment to the elimination of modern slavery and to this policy in its code of ethical conduct. It is a requirement of all Belgravia Group directors, officers, employees to follow the code of ethical conduct in work related dealings.
- 6.3 Belgravia Group directors, officers and employees involved in significant scale procurement responsibilities or who initiate and/or periodically review relationships with third parties will be provided with training to apply due diligence tools and processes.

### Reporting by and within Belgravia Group

- 6.4 Under the definitions of the Act in regards to annual consolidated revenue, Belgravia Group is required to lodge an annual Modern Slavery Statement as the reporting entity.
- 6.5 By 31st December each year Belgravia Group will publish a Modern Slavery Statement outlining the actions undertaken during the relevant financial year to identify where supply chains and operations may be at risk of contributing to modern slavery practices and the actions taken to minimise or eliminate these risk
- 6.6 Belgravia Group supports standards and initiative for anybody to feel safe to speak up when there are reasonable grounds to suspect that Belgravia Group and/or its contractors, suppliers or partners are not acting in accordance with laws and obligations.
- 6.7 Any concerns about compliance or ethical issues or illegal or unethical activities are to be reported to the:
- Chairman,
  - Chief Executive Officer,
  - GM Corporate Services,
  - Group Manager People and Culture or
  - the Company Speak-Up hotline (Speak-Up is an independent third-party service for reporting concerns). Individual can contact Speak-Up on:

Telephone: 1300 933 977 or

Online report at: <https://belgravia.grapevineonline.com.au> or

Mail: PO Box 119 Carlton South, VIC 3053

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- 6.8 Belgravia Group procedure for dealing with any reported modern slavery concerns is for an accountable senior executive in the relevant business area to take carriage of the investigation recognising the potentially sensitive nature of the situation including the paramount need for keep safe at all times the reporting person(s) and affected person(s).
- 6.9 Belgravia Group requires of the accountable senior executive that they investigate any reported concerns in a timely, thorough, transparent and unbiased fashion. Updates and outcomes of any investigation must be reported to the Belgravia Group Board.

## Records management

- 6.10 Belgravia directors, officers and employees involved in activities exposed to modern slavery risk must maintain all records relevant to administering this policy in a recognised recordkeeping system.

## 7 RELATED LEGISLATION AND DOCUMENTS

Modern Slavery Act (Cth) 2018. <https://www.legislation.gov.au/Details/C2018A00153>

Guidance for reporting entities (2018): <https://www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reporting-entities.pdf>

PR SF 3.01 Modern Slavery Statement

PR SF 3.02 Modern Slavery Supply Agreement Clause

## 8 FEEDBACK

- 8.1 Belgravia Group staff may provide feedback about this document by emailing [msmith@belgravialeisure.com.au](mailto:msmith@belgravialeisure.com.au).

## 9 APPROVAL AND REVIEW DETAILS

- 9.1 Approval and review details are available in the Policy Portal document properties.