

BELGRAVIA GROUP

2022 MODERN SLAVERY STATEMENT



The Belgravia Group

Belgravia Group (incorporated in the state of Victoria) is a private group of companies owned by the Geoffrey Lord Family Trust since 1980. The Belgravia Group has grown significantly and owns 20 businesses and employs up to 7,000 people across Australasia. Activities range across several industries such as health and fitness, leisure, tourism, clothing and wellbeing related equipment.

Belgravia Group condemns slavery of any form. This Modern Slavery Statement is prepared with reference to the Australian Modern Slavery Act 2018. The Statement is applicable to and describes the steps undertaken by Belgravia Group during the Financial year ending 2022 with the aim of minimising the risk of modern slavery the Group's businesses or related supply chains.

This Statement is lodged as a joint statement on behalf of the following businesses within the Group:

Belgravia Health and Leisure Group



Belgravia Clothing Group



NovoGroup



Belgravia Kids



Belgravia Group's Structure, Operations and Supply Chains



Belgravia Health and Leisure Group

Belgravia Health and Leisure Group Ptd Ltd "BHLG" (ABN 18 118 940 063) consists of two main operating entities Belgravia Leisure "Leisure" and Belgravia Health "Health".

Depending on season BHLG employs more than 5,500 people.

Leisure is the leisure management organisation of 210 government and private facilities across Australia and New Zealand including Tourism and Holiday Parks, Health and Wellness centres, Aquatic Sports and Leisure facilities, and Hospitality and Events venues.

Health is the fitness industry franchiser of Genesis Fitness, Coaching Zone, and Ninja Prc across 75 venues in Australia including wholly-owned, joint venture, and franchise clubs.



Belgravia Kids

Belgravia Kids is a collective of four key operating entities, Belgravia Kids (ABN 97 614 398 668), BK's Gym & Swim (ABN 80 632 108 724), BK's Swim (ABN 22 653 186 700) and BK's Gymnastics (ABN 58 653 191 327). The business has three key brands: BK's Gymnastics, BK's Learn to Swim and Jump Swim Schools of which there are 63 facilities.

BK's Gymnastics and Learn to Swim operations are wholly owned operations whilst Jump Swim Schools is primarily a franchised operation with a few wholly owned facilities. The facilities primary purpose is to deliver either private swimming or gymnastic lessons to customers but there is still some key supplier relationships required. Supply chains are made up of a mixture of corporate controlled contracts for common items across the wider Belgravia Group as well as local area suppliers that sites have the freedom to engage outside of the corporate controlled contracts.





NovoGroup

NovoGroup is a collective of NovoFit (ABN 55 610 480 483), NovoFit WA (ABN 79 917 515 244) and NovoActive (ABN 85 084 981 751).

While Belgravia Group has operational control of these entities there are external partners in the ownership structures.

NovoFit is a trust with a corporate trustee with 45 employees. NovoActive is a private company with 8 employees. NovoFit WA is a private company with 5 employees.

NovoFit and NovoFit WA have no manufacturing component. These entities import and distribute locally only. With a combined total of 3 warehouses located in Melbourne VIC, Sydney NSW and Malaga WA. Supply partners are located globally, predominantly in the USA and China. These supply partnerships are stable, long term, exclusive arrangements. Supply and distribution for these two entities is made up of commercial gymnasium equipment such as cardio and strength machines. Local NovoFit team members then distribute, install and service the equipment nationally.

NovoActive manufactures in its only warehouse, located in Dandenong South, Vic, Australia. Supply partners are located globally, predominantly in China. These supply partnerships are stable, long term, exclusive arrangements. NovoActive use its imported supply to manufacture sport stadium and gymnastics flooring and equipment components. NovoActive local teams then distribute and install the equipment nationally.



Belgravia Apparel Group

Belgravia Apparel Group (ACN 615566142) is a collective of 4 registered business entities – Bizwear (ABN 75104080140), Profile (NZ – IRD 053479138), Option Systems (ABN 613172893) and Belgravia Sports Apparel (ABN - 14635241913). All businesses are 100% owned by Belgravia Group.

Bizwear and Profile design uniforms, manufacturer uniforms via offshore factory partners and manage corporate uniform programs for a variety of organisations, spread across several industry sectors.

Customer relationships are bound under contracts and we are contractually obliged to ensure ethical sourcing and adherence to modern slavery guidelines. Bizwear and Profile's manufacturing is outsourced to long term and trusted offshore factories. Historically, most of our uniforms are made in China. All factory partners engaged by Bizwear hold social and ethical compliance certification under global auditing standards e.g. BSCI, SEDEX etc.

Belgravia Sports Apparel (BSA) designs, manufacturer's and manages both school and sports apparel to several schools and sporting leagues/clubs/sports bodies in Australia. BSA have an internal factory located in Adelaide and place offshore production for its New Balance licensing agreement with a New Balance, globally approved factory in China. This approved New Balance factory holds social and ethical compliance certification under the global auditing standards e.g. BSCI, SEDEX etc

Option Systems is an Information technology company specialising in offering an enterprise software for the apparel industry. Option Systems have a collection of customers in Australia, New Zealand and overseas. All management and employees are based in Melbourne, Australia. All programming is completed in Melbourne Australia.

Risks of Modern Slavery practices in Belgravia Group entities' operations and supply chains

Supply Category	How Modern Slavery may present itself
Belgravia Health and Leisure Group Pty Ltd	
ICT Devices	Manufacture and transportation in low-wage countries with limited labour market protections
Retail and Kiosk	Manufacture and transportation in low-wage countries with limited labour market protections
Staff Uniform	Manufacture and transportation in low-wage countries with limited labour market protections
Fitness Equipment	Manufacture and transportation in low-wage countries with limited labour market protections
Contract Cleaning	Wage Theft
Belgravia Kids	
Contract Cleaning	Wage Theft
Franchisee Operations	Wage Theft
ICT Devices	Manufacture and transportation in low wage countries with limited labour market protections
Retail	Manufacture and transportation in low wage countries with limited labour market protections
Belgravia Clothing Group	
Fabric and Garment Manufacturing	Child labour, Wage theft, Production passed to Non-factory Outworkers, Poor workplace conditions, Unsafe workplace (OHS), Working excessive hours, No or low overtime rates
Transport & Logistics	Under payment to and/or exploitation of local subcontractors
NovoGroup	
Equipment manufacturers	Manufacture and transportation in low-wage countries with limited labour market protections
Transport & Logistics	Manufacture in low wage countries, Forced labour, Human rights violations, Wage theft



Actions taken by Belgravia Group to address Modern Slavery risks

To underpin its efforts combating Modern Slavery, Belgravia Group created the Modern Slavery Working Group ("MSWG") with senior executive representation from the business units as well as the Belgravia Group Board.

The MSWG continues to educate and promote the importance of the Modern Slavery Policy and the Modern Slavery Supply Agreement Clause with particular attention to:

The education of staff and executives involved in procurement of goods and services

The ongoing review of supply agreements and supply chains.

This review includes business units requesting suppliers to recommit in writing to Belgravia's Modern Slavery requirements.

During the reporting period covered by this statement Belgravia Group has not become aware of any Modern Slavery situations.



Assessing the Effectiveness of Belgravia Group's Modern Slavery actions

Modern Slavery forms part of Belgravia Group's Code of Conduct, which is provided to employees as part of their onboarding process.

The Modern Slavery efforts are part of Belgravia Group's published Social Responsibility approach, which can be found here: www.belgraviagroup.com.au/social-responsibility/

The Belgravia Group Board and the executives of all business units are regularly briefed on the activities of the Modern Slavery Working Group.

Consultation across Belgravia Group entities

The first action by the Belgravia Group Board in relation to Modern Slavery obligations was to establish a working group with senior management level representation by all relevant business units exposed to risks of Modern Slavery in their operations and/or supply chains. This working group has jointly prepared this statement.

STATUS LEGENDS AND LOGOS

"Completed"



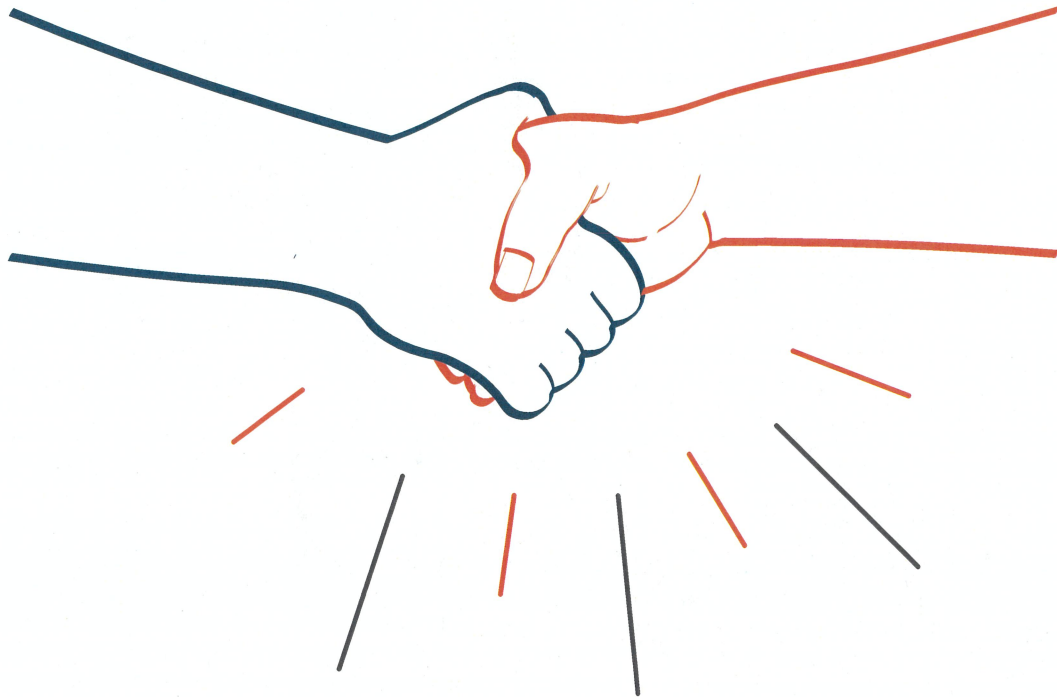
"Commenced"



"Future Focus"



Belgravia Group Standards			BHLG	Belgravia Apparel	Belgravia Kids	Novo Group
Internal Parties	Stakeholder Commitment and Accountability	Business unit acknowledges and is committed to its obligations and has appointed an accountable person	✓	✓	✓	✓
	Organisational Training and Compliance	Business unit ensures that employees in roles involved in and/or accountable for procurement approvals receive ongoing and sufficient training in policies and processes.	✓	✓	✓	✓
	Complaints and Concerns	Business unit has a clear and published process for anonymous and confidential reporting of complaints or concerns about modern slavery in supply chains – from parties within as well as from outside the organisation	✓	✓	✓	✓
	Organisational Review	Business unit performs regular and no less than annual reviews of its risk management status and effectiveness	✓	✓	✓	✓
External Parties	Supply Chain Risk Mapping	Business unit has assessed the risks of modern slavery across its supply chains	✓	✓	✓	✓
	Supplier Contracting	Business unit has incorporated Belgravia Group's "Modern Slavery Supply Agreement Clause" in supply agreements	—	✓	—	✓
	Supply Chain Auditing	Business unit continues to assess its suppliers' supply chains for modern slavery risk to ensure compliance with modern slavery policies	—	✓	—	✓



This statement was approved by the board of
Belgravia Group on 31st January 2023

Geoff Lord
Chairman and CEO
31st January 2023

A handwritten signature in blue ink, appearing to read 'Geoff Lord', written over a horizontal line.

