

Belgravia Group

2024

MODERN SLAVERY

STATEMENT



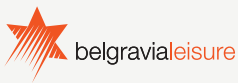
BELGRAVIA GROUP

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 more than 30 businesses and seasonally employs up to 10,000 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



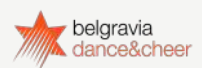
BELGRAVIA FOUNDATION



BELGRAVIA CLOTHING GROUP



BELGRAVIA ACTIVITIES



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 and Fitness "Health".

Depending on season BHLG employs more than 6,000 people.

Leisure is the leisure management organisation of 250 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, franchisor, joint venture, and franchise clubs.



BELGRAVIA APPAREL GROUP

Belgravia Apparel Group (ACN 615566142) is a collective of 4 registered business entities – Belgravia Apparel (ABN 75104080140), Belgravia Apparel NZ Limited (NZBN - 9429039204707), 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. Our factory partners engaged by Belgravia Apparel hold social and ethical audits and compliance under global 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.



NOVOGROUP

NovoGroup is a collective of NovoFit (ABN 55 610 480 483) 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 52 employees. NovoActive is a private company with 9 employees.

NovoFit has 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 ACTIVITIES

Belgravia Activities is a collective of nine key operating entities, BK's Gym & Swim Services Pty Ltd (ABN 55 653 449 720), BK's Gym & Swim Pty Ltd (ABN 80 632 108 724), BK's Swim Pty Ltd (ABN 22 653 186 700), BK's Gymnastics Pty Ltd (ABN 58 653 191 327), Belgravia Kids Pty Ltd (ABN 97 614 398 668), Recreational Gymnastics Australia (ABN 67 660 253 752), Belgravia Outdoor Education Pty Ltd (76 660 626 406), Belgravia Sports Community (ABN 53 664 350 970), Belgravia Cheer Pty Ltd (ABN 22 675 420 390) and Belgravia Dance Pty Ltd (ABN 66 670 234 125). The business has 6 key brands. BK's Gymnastics, Jump Swim Schools, Belgravia Outdoor Education, Belgravia Sports Community, Belgravia Academy and Belgravia Dance & Cheer.

The brands have a combined total of 80+ venues delivering dance & cheer, gymnastics, and swimming. In addition to the venues the business provides business to business services. In school camps, training and RTO services and sports consulting. The ownership structure is predominantly corporate owned sites and businesses and franchising. Furthermore, there are several joint venture operations within the portfolio.

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.



BELGRAVIA FOUNDATION

Belgravia Foundation helps organisations and individuals to welcome, support and include people of any characteristic or circumstance into every aspect of community leisure, aquatics, recreation, sports, fitness and health, so that no one misses out. This is our mission, and our passion!

We value partnership, and we work with others to build capacity, nurturing a legacy that enables organisations and communities to help themselves, and in turn be better able to help others, and sustain that activity.

We apply best practice to guide our endeavours. Along with partnership, and capacity building, we use evidence to guide our actions, engage with community groups and people to listen and learn about local preferences, priorities, needs and gaps, and then collaborate and co-act to enable delivery and evaluation of initiatives that are designed to lead to improved health and happiness for all.

Belgravia Foundation is a registered charity with Public Benevolent Institution certification.

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 Activities	
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, forced or bonded labour, no freedom of association, bribery and discrimination.
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.

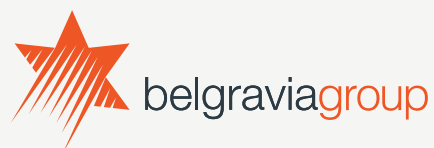
STATUS LEGENDS AND LOGOS

"COMPLETED" 

"COMMENCED" 

"FUTURE FOCUS" 

BELGRAVIA GROUP STANDARDS			BHLG	BELGRAVIA APPAREL	BELGRAVIA ACTIVITIES	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
13th January 2025

GEOFF LORD

Chairman and CEO
13th January 2025

A handwritten signature in black ink, appearing to read 'Geoff Lord', is positioned below the printed name and title.