

Plan of Management 100 South Creek Road Cromer NSW 2099

Updated 15.12.2022

1. Purpose

The purpose of this Plan of Management is to outline the various operating mechanisms we have in place to support the appropriate management of an indoor recreational sporting venue. Throughout this plan the following stakeholders have been taken into consideration:

- Local council
- Neighbouring properties and businesses
- Staff members
- Customers

2. About Aquatic Achievers

Aquatic Achievers is one of Australia's premier Learn to Swim providers. It has been in operation for over 25 years, each year teaching over 600,000 lessons each year across its locations in Queensland, Victoria, NSW and ACT.

Aquatic Achievers teaches children aged from 3 months to 12 years of age using our proprietary *Solo-1 program*.

There are four common themes why Aquatic Achievers' Solo-1 program differentiates our program from others, these being:

- Structure
- Ability based
- Progress
- Achievement

We have a team of over 400 teachers, progress advisors and customer service team members, currently operating across 11 locations across Australia.

Our lesson duration ranges from 30-minute lessons through to 60-minute lessons.

Number of students per class averages from 3 to 4 students over 5 to 12 classes per time slot, typically averaging 40 to 50 classes per operating shift depending on the day.

We also offer adult swimming lessons and other aquatic services such as Aqua Aerobics, lap swimming, etc...

Aquatic Achievers is ISO 9001:2015 (AS/NZS ISO 9001:2016) certified. This certification (most recently re-certified on 2nd March 2021) reinforces our approach to managing our business with the appropriate structure (processes, procedures, policies). We have maintained this certification for 20+ years.

For further information regarding our Solo-1 program please visit aquaticachievers.com.au/program/

3. Hours of Operation

The opening hours for our Aquatic Achievers' sites vary from location to location.

The opening hours for our Aquatic Achievers' Halloran St site are as follows:

Monday to Sunday: 6.30am to 9pm

Our operating hours are split into 2 shifts, thus leaving a period of down time in the Centre between 12.30pm to 2.30pm where typically no lessons are delivered. This time gets often used to provide alternative aquatic services such as Aqua Aerobics, lap swimming, etc...

4. Classes/Students

Lessons times vary from level to level, Infants, toddlers and pre-school children lessons are 30 min with a maximum of 3 to 4 kids per class, school aged children lessons are 30 min and 45 min to an hour with 5 to 12 children per class. Removal of the 2nd pool will reduce the number of classes by 1.

Total number of classes and children at a time varies from shift to shift, this could typically range from 4 to 8 classes at one given time depending on the day. Removal of 2nd pool will reduce the number of classes at one given time by approximately 1 class.

Aquatic Achievers uses a CRM system called UDIO. All students are assessed, booked and enrolled through a meticulous vetting system where Aquatic Achievers maintains a high level of lessons quality and customer service. This is done to ensure we maintain an optimum number of visitors in our Centres at any time meaning we can deliver a superior and quality service that is expected from a premium learn to swim provider.

Our pricing reflects a premium service and with this our business model requires us to provide a service that reflect this, as such ensuring we manage our student numbers per lesson appropriately.

With our main focus on teaching children to swim and provide alternative aquatic services the only additional commercial offering provided within Aquatic Achiever centres is access to swimming merchandise, such as caps & goggles and flippers. We do not operate cafes in our Centres.

Our offering provides many self-service options including self-check into lessons, self-service bookings, self-service payment. 99% of our customers pay via direct debit each month. We hold less than \$100 in cash on our premises at any point in time.

Aquatic Achiever Centres typically employ up to 50 staff per centre in a Full time, part time and casual capacity as per below:

1 x Manager
 1 x Assistant Manager
 Full time during business hours
 Full time during business hours

3-5 x Customer Service - Each working up to 20 hours per week
 5-10 x Progress Advisors - Each working up to 20 hours per week
 30-40 x Teachers - Each working up to 20 hours per week

Centers are normally staffed with 7 to 12 staff at the time per shift.

Each of our Centres have the appropriate people holding the following certifications:

- Working with Children
- Plant Room
- Lifeguard
- First Aid & CPR
- Austswim teaching qualifications
- Other required Certifications to provide a specific service such as Aqua Aerobics, etc...

Aquatic Achievers uses a human resource system called Employment Hero. Employment Hero ensures that each team member has completed the necessary acknowledgement of company policies. It is also used to automatically track compliance for retention of relevant certifications. Employment Hero is also used to manage the employee lifecycle including recruitment, onboarding, induction, performance management and offboarding.

Aquatic Achievers requires its team to complete necessary training on a regular basis. This training includes refresher training on our Emergency Action Plan (EAP).

6. Traffic

Aquatic Achievers' operates in different locations with different considerations relating to traffic management. As part of our business model, it is a current requirement for each of our Centres to have on-site parking. As part of our Lease agreement with the landlord at 100 South Creek Road, Cromer, Aquatic Achievers has 35 dedicated carparking spaces, in addition to these, there is general visitor carparking spaces available.

Whilst on-site parking is made available, a portion of our clients either walk, cycle and carpool to lessons.

There are levels within our program that allow children to be dropped off to lessons and recollected.

7. Waste Management

As an operator primarily focused on teaching children to swim, our waste impact is minimal. Our waste for our existing centres is currently managed using the kerbside local council collection, for both refuse and recycling.

The only additional waste management requirement for our centres is for sanitary waste. This collection is managed through dedicated service providers with fixed service agreements.

Our waste and recycling management plan will comply with all relevant provisions and requirements of the relevant local council authority.

8. Cleaning

Our Centres are cleaned daily and this is done either through cleaners directly employed by Aquatic Achievers or via a third-party cleaning company.

Each centre has a strict cleaning schedule and checklist / sign off process. The centres are cleaned each night (minimum 3 hours) by the rostered cleaner. During the day it is the responsibility of the Manager / Assistant Manager to complete the daily cleaning checklist relevant for tasks during operational hours.

Aquatic Achievers has supply agreements in place with cleaning supplies company, thus using commercial grade cleaning products in maintaining our Centres.

9. Security

Our Centres are securely monitored by a third party (outside of operating hours). Our premises hold less than \$100 on site at any point in time, and the nature of our business means we have very limited assets, of which are also low value, hence making it less attractive for criminal intent.

With respect to security threats during hours of operation, we have Emergency Action Plans (EAP) in place with clearly defined procedures to support the team for various situations. Our Managers, Assistant Managers and Responsible Persons are regularly updated and refreshed on our EAP.

10. Safety

Safety is a key component of what we do – we teach children how to swim and stay safe around water.

There are several safety related aspects in place supporting the safe operations of our Centres. These are summarized below:

Royal Life Guidelines:

- It is a requirement of our licence to operate we apply and adhere to the guidelines outlined in the Royal Life Safe Pool Operations. We review these guidelines on an annual basis, as well as implementing any updates or amendments as communicated by Royal Life.
- The following guidelines are taken into consideration with how we operate:
 - Swimming, Water Safety
 - o Incident Management
 - Facility Design
 - Aquatic Supervision
 - Swimming Pool Design
 - Aquatic Signage

Certifications

- It is a requirement of our licence to operate we apply and adhere to the compliance requirements regarding certifications. For our business this includes:
 - Austswim teaching certifications (Austswim is a nationwide industry body)
 - Working with Children certifications
 - Lifeguard, First Aid and CPR certifications
 - Plant Room certifications

Workplace Health & Safety

- It is a requirement of our licence to operate we apply and adhere to the required government WorkSafe legislation.
- Aquatic Achievers has a formal Incident Management process in place. Each incident
 is recorded via our Employment Hero application and automatic notifications are
 provided to our senior leadership team. These are reviewed and addressed on a
 regular basis to help assess actions & plans to mitigate and minimise future
 incidents.
- In addition to the legislative WH&S considerations, there are also various state generated guidelines relating to Pool & Spa water quality. Included in these are guidelines with respect to the treatment of water quality, including testing & recording regimes. Aquatic Achievers complies with these.
- Aquatic Achievers has never been subject to a MAJOR incident where a Workplace Inspector would have been required to address. We take pride in our safety respect in this respect.
- Each month the Aquatic Achievers Board receives a WHS report indicating any LTIFR (lost time).

Safety Programs

 Each year Aquatic Achievers runs a number of "Safety Week" programs. These are branded events that draw additional attention to important aspects regarding safety, including helping children become even more aware of the key aspects of water safety. It also creates opportunities for us to use these events to test aspects of our Emergency Action Plans.

11. Insurances

Aquatic Achievers holds the following insurances:

- Public Liability for each Centre \$20m
- Professional Indemnity \$5m

In addition to these policies we hold Business Insurance to help protect our individual centres for inclusions such as business interruption, material damage.

12. Noise Mitigation

In the construction of our Centres we use the following to help mitigate noise:

- Ceiling product Rockfon/Medicare standard acoustic system
- Insulation product
- Centre design pool area is contained behind viewing areas, separating the pool from the exterior of the building with minimal glazing on external walls
- All mechanical, pump and filter equipment meet the required noise legislation

In addition to the design and construction of the Centre, the following also help mitigate and minimize any excessive noise impacts:

- There are no loudspeakers used, and our centres are not equipped with any public announcement systems. We do not play music and whilst we have digital panels in our Centres, they do no play sound (visual advertising only).
- The nature of our service means our Customers attend their lesson, and then depart quickly. We do not have any additional services (like food and beverage café services) that could keep people on the premises longer. This helps us to mitigate and manage any excessive noise impact.
- Lessons times are structured and student numbers in each lesson are also capped.
 This is done to ensure we have the optimum number of visitors in our Centres at any time meaning we can deliver a superior and quality service that is expected from a

premium learn to swim provider. This also helps us mitigate and manage any excessive noise impact.

In accordance with the updated Acoustic Assessment prepared by Acoustic Dynamics, specifically Section 5.2.1 relating to 'General Management Measures' the Swim School will also incorporate the following recommended measures:

- 1. The erection of clear signage at all entries and exits advising students and patrons that they must not generate excessive noise when entering and leaving the premises;
- 2. Staff monitoring the behaviour of students and patrons within the premises, and as students/ guardians egress to ensure that the noise emission arising from users of the premises is kept to a minimum when entering and leaving the premises;
- 3. Whilst no loudspeakers are to be used as part of the operation of the premises (see Bullet Point 1, above), any use of low frequency speakers (sub-woofers) is to be restricted, with any full range speakers to be isolated from the building structure. Furthermore, if any full range speakers are to be installed and used, it would be ensured that the internal noise level from music does not exceed LAeq(15min) 75dB. Note is made that the maximum internal reverberant sound pressure level can be set to ensure the adjacent receivers are not adversely affected by the operation of the swim school, following the fit-out of the premises and the installation of the speaker system.

13. Complaint Recording

The recording and management of complaints (and compliments) is a set defined procedure within Aquatic Achievers.

Each complaint is documented and logged and then addressed as per our process. Part of managing this process is our Centre Quality Audits that take place each month. Through these audits, our complaints register is reviewed, and assessments completed in terms of them having been addressed appropriately.

We respect the communities within which we operate. We are active participants in our communities providing sponsorship and support to community programs. We know working collaboratively with our community stakeholders is key to us being successful. Our approach to any complaint is to acknowledge it and work openly and collaboratively in resolving it.

14. Plan of Management Review

This plan will be included in operational documents that form part of our annual ISO review and certification process. This plan will receive a QA number and will be registered in our QA schedule of documents with the appropriate review schedule assigned. We will use the annual ISO review process to ensure this Plan of Management document is reviewed and updated as appropriate.