



**APRA
AMCOS**

Modern Slavery Act Statement

The Australasian Performing Right Association Limited (ABN 42 000 016 099)

This is the second Modern Slavery Statement for the Australasian Performing Right Association Limited (**APRA**) (ABN 42 000 016 099) made under section 14 of the *Modern Slavery Act 2018* (Cth). This statement covers the reporting period 1 July 2019 to 30 June 2020.

Structure of APRA

APRA's head office is located in Ultimo, in inner Sydney. APRA also has four other offices across Australia and also an office in Auckland, New Zealand. APRA has formed an administrative partnership with the Australasian Mechanical Copyright Owners Society Limited (**AMCOS**) (ABN 87 001 678 851) but does not own or control this entity or any other entities. APRA AMCOS is the trading name of Australasian Performing Right Association Limited (APRA) and Australasian Mechanical Copyright Owners Society (AMCOS). APRA also issues joint licences under agreements with the Phonographic Performance Company of Australia Ltd (**PPCA**) (ABN 43 000 680 704). However, APRA does not own or control PPCA or any entities related to PPCA.

APRA's Operations

APRA, in alliance with AMCOS, is a music rights management organisation representing over 111,000 members who are songwriters, composers and music publishers. APRA is run by an executive management team in liaison with a non-executive board of directors. Individual writer members and representatives of publisher members are elected to the board by their respective memberships for renewable three-year terms.

APRA conducts its operations in Australia and New Zealand. **APRA licenses organisations to play, perform, copy, record or make available its members' music, and APRA distributes the royalties to its members and to overseas collecting societies. During the reporting period, APRA employed approximately 320 employees in Australia and New Zealand. APRA also engaged approximately 60 daily rate contractors through recruitment agencies in Australia.**

APRA is affiliated with similar collecting societies around the world. When Australian and New Zealand songs and compositions are performed overseas, Australian and New Zealand members receive payment. APRA also helps music customers in Australia and New Zealand access music from the rest of the world. APRA also advocates on behalf of music creators' rights and the Australasian music industry locally, nationally and internationally.

APRA's Commitment against Modern Slavery

Modern slavery is against all of APRA's values of Collaboration, Respect, Skill and Imagination. APRA is committed to having effective systems and controls in place to safeguard against any form of modern slavery taking place within its business and its supply chains.

Policies and Procedures

APRA abides and operates under a number of policies to ensure that we are conducting its business in an ethical and transparent way. These policies include:

- Code of Conduct for Copyright Collecting Societies;
- Whistleblower Policy; and
- Service Provider Code of Conduct (**Code**).

The Code is a document issued to third party service providers to APRA where they provide substantial or ongoing services to APRA. A third party which is identified as a substantial or ongoing service provider is required to sign the Code to continue its arrangements with APRA. The Code requires that the service provider confirms that they will comply with the applicable laws with regard to modern slavery.

Identification of Risks of Modern Slavery

Australia is generally considered to be a low modern slavery violation risk country by international standards. Due to the nature of APRA's business, the previous assessment of APRA's supply chains and exposure to the risk of modern slavery was that its risk was low.

Due Diligence

During the reporting period from 1 July 2019 to 30 June 2020, APRA conducted the following to ensure compliance with the Modern Slavery Act:

1. Conducted a review of APRA's exposure to modern slavery to assess APRA's current risk of modern slavery.

APRA reviewed its risks with regard to modern slavery at the start of the reporting period. The main risks identified by this review are associated with APRA's operations with its main suppliers, and not within APRA's operations itself. This is because the nature of APRA's operations is conducting business substantially in Australia and New Zealand, which have been identified as countries at low risk of modern slavery. Additionally, APRA is regularly audited to ensure compliance with relevant industrial legislation and employment conditions in both Australia and New Zealand.

The review found that third party suppliers to APRA were mainly located in Australia, with some technology services being provided from the United States, such as companies providing software as a service. APRA acknowledges that risks exist from the supply of services to APRA, such as cleaning and maintenance to our office premises in Australia. A review of these suppliers concluded that with these types of services, low skilled work with low wages is required to perform these services, which is at greater risk of labour exploitation and modern slavery, and that these risks exist within Australia and New Zealand. As most of these suppliers are located within Australia, this reduces the risk of modern slavery occurring in the supply chain for these services, but that risk is still present. The review found that suppliers from overseas, such as suppliers of software as a service were at low risk for modern slavery, due to the high value nature of this work.

Conclusion: After undertaking this review of the supply chain, APRA's assessment that the risks to modern slavery continue to be in its supply chain through the supply of services by third party providers. However, these risks are assessed as low.

2. Reviewed third party supplier commitment to compliance with modern slavery legislation

During the reporting period, APRA reviewed its supply chain to establish how to manage risks associated with third party suppliers and modern slavery.

Conclusion: As a result, APRA has determined that compliance to the Code by third party suppliers continues to be the most appropriate way to manage these risks. During the reporting period, APRA identified its main third party suppliers and conducted a compliance audit to check that these suppliers had signed the Code.

Two suppliers to APRA of software services based in the United States of America declined to sign the Code but instead offered compliance with their own corporate codes of conduct. APRA was satisfied with this approach as the services are being supplied from outside Australia, and, therefore, for an overseas based entity, compliance with Australian legislation may be difficult for that entity to ensure.

APRA will continue to require that substantial new suppliers are signatories to the Code.

3. Reviewed risks associated with daily rate contractor engagement

During the reporting period, APRA engaged approximately 60 contractors on a daily rate. The majority of these contractors provide high value skills in the area of information technology. A review of this contractors found that most daily rate contractors provide services from a recruitment agency and all daily rate contractors are based in Australia.

Conclusion: APRA has ensured that each recruitment agency that contracts to APRA is a signatory to the Code in order to minimize risks of modern slavery. It is also noted these contractors provide high value skills which lowers their risks to be victims of modern slavery.

4. APRA reviewed its ability to receive information regarding modern slavery

All APRA staff were provided training provided on APRA's Whistleblower Policy by a legal provider. This training explained how APRA's whistleblower hotline can be utilized to report any issues regarding modern slavery. APRA's whistleblower hotline is operated by an independent third party. APRA's Whistleblower website has been updated to be more user friendly and with greater functionality, such as the ability to add information to whistleblower reports made on the website.

Conclusion: APRA's whistleblower website remains an appropriate portal to receive reports regarding information of modern slavery within APRA or its supply chain.

5. Consultation with other entities

As APRA does not control or own any other entities, APRA was not required to consult with any other entities in its ownership or control regarding risks to modern slavery.

6. Remediation Requirements

In the two years' of complying with the requirements of the Modern Slavery Act, APRA has not yet been required to undertake any remediation processes for compliance.

Approval Process

This statement is made pursuant to the Modern Slavery Act 2018 (Cth) and constitutes APRA's Modern Slavery Statement for the financial year ending 30 June 2021. A copy of this Modern Slavery Statement will be published on the APRA AMCOS external website.

This statement has been approved by the APRA's Board of Directors, who will review and update it annually. APRA's Executive Leadership team takes responsibility for implementing this statement and its objectives. The Executive Leadership team has undertaken to ensure adequate resources are available within APRA to ensure slavery is not taking place within APRA or within its supply chains.

Signed on behalf of the APRA Board of Directors

A handwritten signature in black ink, appearing to be 'Jenny Morris', with a long horizontal line extending to the right.

Jenny Morris
Chair, APRA