

Modern Slavery Statement

2023/24

Acknowledgement of Country

SBS acknowledges the enduring connection of First Nations peoples to Country and extends respect to Elders past and present and all First Nations people across Australia.

The vibrant, dynamic and resilient cultures of First Nations peoples are central to our experience of Country and our shared identity as a nation.

Aboriginal and Torres Strait Islander peoples are the first storytellers of this place and their knowledge continues to enrich and shape our national story.

SBS is committed to working with First Nations peoples to ensure their voices are heard and their stories are told, and in doing so, creating a more inclusive and equitable society for all Australians.



Managing Director Foreword

On behalf of SBS and the SBS Board of Directors, I am pleased to submit SBS's Modern Slavery Statement for the 2023/24 reporting period.

As we enter SBS's 50th year, SBS is better placed than ever before to deliver on SBS's purpose to inspire Australia's growing and evolving population to explore, respect and celebrate our diverse world, and in doing so, contribute to a cohesive society.

An informed and cohesive society is critical to our national wellbeing and prosperity, and SBS has a unique role in delivering this for Australia.

SBS is committed to playing its part in reducing the risk of modern slavery in our operations and supply chains. We are focussed on conducting SBS's business in a legal, ethical and socially responsible way.

This Statement outlines the measures SBS has implemented during the 2023/24 reporting period to address the objectives of the *Modern Slavery Act 2018* (Cth) (**the Act**) and to assess potential modern slavery risks related to SBS's business, operations and supply chains.

This Statement is made in compliance with the Act and has been approved by the SBS Board of Directors in their capacity as principal governing body of SBS at their meeting on 27 November 2024.

A blue ink signature of James Taylor, written in a cursive style.

James Taylor
Managing Director
Date: 27 November 2024

Who We Are

The Special Broadcasting Service Corporation (**SBS**) is Australia's most distinctive and multicultural broadcaster, occupying a unique place in the Australian media market.

The SBS Charter sets out SBS's principal function: to provide multilingual and multicultural broadcasting and digital media services that inform, educate and entertain all Australians, and reflect our multicultural society.

While it began in 1975 as radio programs in a handful of languages, today SBS is a modern, multiplatform media organisation with a free-to-air TV portfolio spanning six distinctive channels; SBS, NITV, SBS Viceland, SBS Food, SBS World Movies and SBS WorldWatch. In addition, SBS Audio provides content in more than 60 languages, including First Nations languages, and SBS On Demand provides a catalogue of over 15,000 hours of curated content from Australia and across the globe.

National Indigenous Television (**NITV**) joined SBS in 2012, marking a major milestone in Australian broadcasting history and in SBS's reconciliation journey. As well as bringing the channel to a national free-to-air audience for the first time, it enabled SBS to amplify Indigenous-led content across all channels and platforms, and support NITV's increasing investment in content, in partnership with Australia's First Nations production sector.

SBS Values

Underpinning our success, SBS's five values inform our behaviours and actions, and influence our decisions and how we work, including our approach to combatting modern slavery:

We are audience obsessed

We exist for them. We are passionate about understanding our audiences' needs and what inspires them. We make decisions with our audiences in mind. We build partnerships with the community.

We are bold and brave

We are thought provoking. We respectfully challenge each other. We don't accept the status quo. We aim for extraordinary. We recognise that when we fail a new learning opportunity is created.

We embrace difference

We bring our whole self to work. We passionately pursue our purpose, and we advocate for diversity. We don't tolerate inequality. We connect with people and ensure everyone is heard.

We engage and participate fully

We don't sit on the sidelines. We hold each other to account whilst accepting personal responsibility. We don't accept passengers along for the ride. We keep evolving through continuous improvement.

We look out for one another

We foster a sense of belonging. We care for each other personally and professionally. We make it easy for people to do their job. We act as one team and support each other. We celebrate our success.

SBS's Structure

SBS was established as an independent authority on 1 January 1978 under the *Broadcasting Act 1942* (Cth). In 1991 the *Special Broadcasting Service Act* (Cth) (**SBS Act**) came into effect and SBS became a corporation. Today, SBS is a Corporate Commonwealth Entity for the purposes of the *Public Governance, Performance Accountability Act 2013* (Cth) and is governed by the SBS Act.

SBS has a Board of Directors appointed by the Federal Government, which consists of the Managing Director and non-executive Directors. The SBS Board of Directors is responsible for deciding the objectives, strategies, and policies to be followed by SBS in performing its functions. They ensure that SBS performs in a proper, efficient, and economical manner, and with the maximum benefit to the people of Australia.

Responsibility for SBS lies within the portfolio of the Minister for Communications, the Honourable Michelle Rowland MP.

SBS does not own or control any other entities.

All of SBS's platforms, free-to-air channels, streaming service and SBS Audio services are covered by this Modern Slavery Statement.



Organisational Structure

Minister for Communications

The Hon Michelle Rowland MP

SBS Board

Chair

George Savvides AM

Directors

Christine Zeitz

James Taylor
(Managing Director)

Vic Alhadeff OAM

Aaron Fa'Aoso

Peeyush Gupta AM

Dr Andrew Lu AM

Katrina Rathie

Cassandra Wilkinson OAM

Audit and Risk Committee

Chair

Peeyush Gupta AM

Codes Review Committee

Chair

Katrina Rathie

Remuneration Committee

Chair

Christine Zeitz

Community Advisory Committee

Chair

Vic Alhadeff
OAM

SBS Executive Committee

Managing Director

James Taylor

**Director,
People &
Culture**
Stig Bell

**Director,
Indigenous
Content**
Tanya
Denning-
Orman

**General
Counsel**
Theo
Dorizac

**Chief
Technology
Officer**
Darren
Farnham

**Director,
Television**
Kathryn
Fink

**Director,
Audio &
Language
Content**
David Hua

**Chief
Financial
Officer**
Nitsa
Niarchos

**Director,
Corporate
Affairs**
Clare
O'Neil

**Chief
Marketing &
Commercial
Officer**
Jane
Palfreyman

**Director,
SBS Media**
Adam
Sadler

**Director,
News &
Current
Affairs**
Mandi
Wicks

**Director,
Corporate
Strategy**
Sarah
Yassien

SBS Ombudsman

Amy Stockwell

SBS's Operations

As Australia's multicultural and First Nations broadcaster, SBS provides unique services that support migrant communities and First Nations peoples and promotes the benefits of diversity to all Australians.

While SBS's focus is delivering services to Australian audiences and SBS core activities take place in Australia, some limited core activities for News and Current Affairs (NACA), SBS Audio and TV and Online Content continue to take place overseas.

SBS's operations can be categorised into the following four key activities, all of which

contribute to SBS delivering on its Charter and achieving its purpose, for the benefit of all Australians:

1. Content creation, acquisition and curation;
2. Content broadcast and distribution;
3. Content commercialisation; and
4. Content support activities

SBS takes a platform-agnostic approach to content, distributing our broad and diverse offerings across linear television, radio, on demand and digital channels.

As at 30 June 2024, SBS had a total headcount of 1,819 employees, including all permanent, part-time and casual employees. The majority of SBS staff are based in SBS's head office in Sydney. SBS

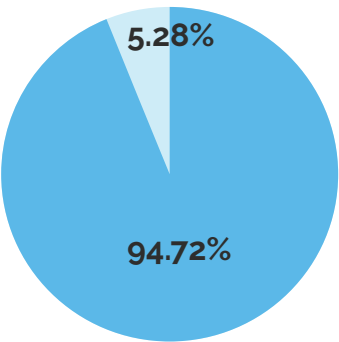
also has operations in Adelaide, Brisbane, Canberra, Darwin, Hobart, London, Melbourne and Perth

SBS operates across eleven main departments, with many more sub-teams and key functions. These eleven divisions are:

- Audio and Language Content (ALC);
- Corporate Affairs;
- Corporate Strategy;
- Finance;
- Legal;
- Marketing;
- News and Current Affairs;
- People and Culture;
- SBS Media;
- Technology; and
- TV and Online Content, including NITV.

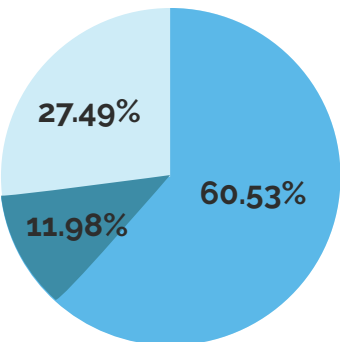
Further details about the composition of SBS's employment workforce as at 30 June 2024 are as follows:

Employee Workforce Legal Framework



■ SBS Enterprise Agreement
 ■ Other Legal Framework

Employee Workforce Employee Type



■ Full Time
 ■ Part Time
 ■ Casual

Figure 1: Composition of SBS employee workforce FY2023/24

SBS's Workforce

A diverse team across 1,250 permanent employees.

SBS has a responsibility to its audiences, communities, and employees to ensure that its workplace reflects the rich diversity of communities it serves, and that its culture exemplifies its purpose of contributing to an inclusive and cohesive society.

SBS employees are invited to confidentially share diversity-related information when they start working at SBS and through an annual Diversity and Inclusion Survey. SBS's workforce overview during the reporting period is set out below.

Identifies as having a culturally diverse background

63.1%

of SBS employees¹

88.9%

of SBS Board²

56.5%

of senior leaders³

59%

of people leaders⁴

Identifies as a person of colour

25.8%

of SBS employees¹

44.4%

of SBS Board²

22.1%

of senior leaders³

19.9%

of people leaders⁴

Aboriginal and/or Torres Strait Islander people*

5.69%

of SBS employees¹

11.11%

of SBS Board²

13.95%

of senior leaders³

5.62%

of people leaders⁴

Place of birth – Australia**

56.16%

of SBS employees¹

66.67%

of SBS Board²

65.96%

of senior leaders³

56.98%

of people leaders⁴

Place of birth – overseas**

43.84%

of SBS employees¹

33.33%

of SBS Board²

34.04%

of senior leaders³

43.02%

of people leaders⁴

*SBS payroll data. All other data is based on voluntary information provided by employees, and how employees self-identify, via SBS's anonymous annual diversity and inclusion survey.

**Represents total percentage of respondents who answered this question.

1. Represents full-time and part-time employees who voluntarily disclosed information.

2. Board data as at 15 August 2024. Managing Director included in both SBS Board and Senior Leader columns.

3. Senior leaders are identified as the SBS Executive Team and their direct reports.

4. People leaders are those employees who have at least one direct report.

Mainly non-English speaking

31.2%

of SBS employees¹

22.2%

of SBS Board²

16.5%

of senior leaders³

24.1%

of people leaders⁴

Combined English and non-English speaking

15.4%

of SBS employees¹

44.4%

of SBS Board²

15.5%

of senior leaders³

14.18%

of people leaders⁴

Lives with a disability or chronic condition requiring workplace adjustments

14.3%

of SBS employees¹

20.7%

of senior leaders³

13.8%

of people leaders⁴

Female

53.2%

of SBS employees¹

33.33%

of SBS Board²

59.62%

of senior leaders³

52.41%

of people leaders⁴

Male

45.29%

of SBS employees¹

66.67%

of SBS Board²

39.42%

of senior leaders³

45.82%

of people leaders⁴

Non-binary*

1.51%

of SBS employees¹

0.96%

of senior leaders³

1.77%

of people leaders⁴

Has a diverse sexuality

16.1%

of SBS employees¹

15.3%

of senior leaders³

12.8%

of people leaders⁴

*SBS payroll data. All other data is based on voluntary information provided by employees, and how employees self-identify, via SBS's anonymous annual diversity and inclusion survey.

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2. Board data as at 15 August 2024. Managing Director included in both SBS Board and Senior Leader columns.

3. Senior leaders are identified as the SBS Executive Team and their direct reports.

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SBS's Supply Chain

As outlined in SBS's previous statements, SBS procures a diverse range of goods and services from a range of suppliers. These suppliers support SBS's operations and services as a multicultural and First Nations broadcasting and digital media service.

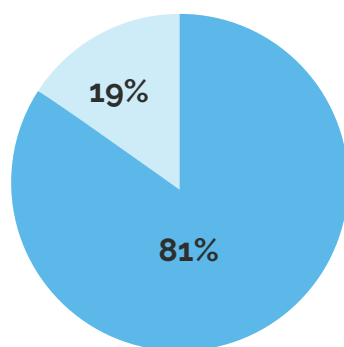
Based on spend, SBS's top three procurement categories in the 2023/24 reporting period were:

- Broadcast equipment and service;
- Program and merchandise acquisition; and
- Distributors.

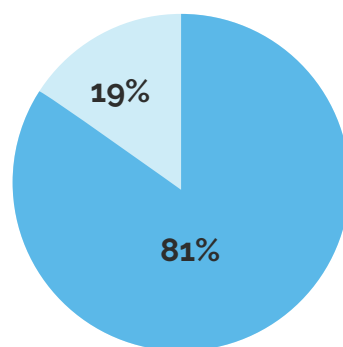
During the 2023/24 reporting period, SBS procured goods and services from 3,051 direct suppliers⁵. The majority of SBS's suppliers (81%) continue to be based in Australia. However, 589 (19%) of SBS's direct suppliers were based overseas⁶.

The graphs below at Figure 2 show the composition of SBS's direct suppliers, and the graph at Figure 3 sets out SBS's top ten countries by number of suppliers engaged in those countries during the reporting period.

SBS Suppliers by Number



SBS Suppliers by Spend



■ Local Suppliers
■ Overseas Suppliers

Figure 2: Composition of SBS direct suppliers during the 2023/24 reporting period.

⁵ This analysis is based on suppliers recorded in SBS's invoice management system for the reporting period.

⁶ Based on location where invoices are issued from/payment sent to for the 2023/24 reporting period.

Top 10 overseas countries based on number of suppliers engaged

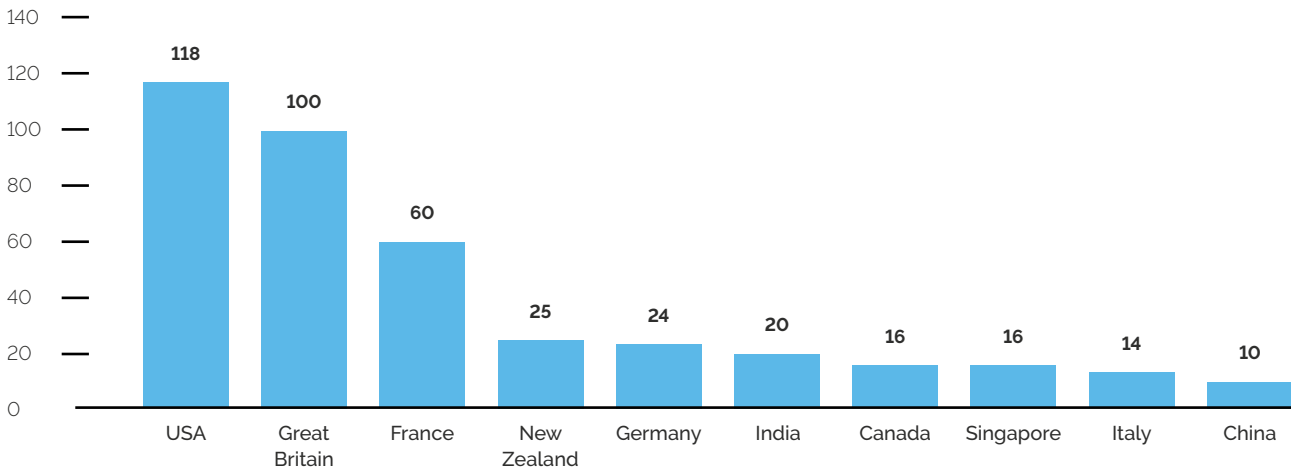


Figure 3: Top 10 overseas countries, based on number of suppliers engaged and location where invoices are issued from/payment sent to, for 2023/24.

For many years, SBS has demonstrated a commitment to ethical sourcing and has provided opportunities to promote Aboriginal and Torres Strait Islander cultures, communities and businesses through the procurement of goods and services owned by First Nations people.

SBS continues to contribute to positive societal outcomes, including its commitment to supporting the ongoing journey of reconciliation for all Australians, and in pursuit of a more sustainable future.

At the conclusion of the 2023/24 reporting period, SBS reached the half-way point of its four-year Elevate Reconciliation Action Plan (**RAP**), which outlines SBS's commitment to cultural awareness, recognition, reconciliation and Indigenous employment. One of SBS's key commitments under SBS's Elevate RAP is to accelerate growth and investment in the Indigenous production sector, media sector

and enterprises. In the reporting period, SBS met its target for increased procurement with Indigenous owned businesses.

SBS also took a strong leadership position within the media and corporate industry on sustainability. During the reporting period, SBS announced the most ambitious target of any Australian media organisation, to reach net zero across all emissions by 2045. As part of this work, SBS partnered with key suppliers across content, technology and marketing to understand their progress in measuring and reducing their carbon footprint as SBS's suppliers contribute to SBS's scope 3 emissions.

SBS is committed to increasing procurement with First Nations businesses, and to lead the industry on sustainability. Noting SBS's ongoing commitment, SBS has identified these two areas of procurement as a focus of SBS's future plans to raise awareness and

to further understand risks within our supply chain, as detailed in the 'SBS Future Actions' section below.

SBS continues to contribute to positive societal outcomes, including its commitment to supporting the ongoing journey of reconciliation for all Australians, and in pursuit of a more sustainable future.

Modern Slavery Risks in SBS's Operations and Supply Chain

During the 2023/24 reporting period, SBS continued to apply a risk-based methodology to review, assess, and prioritise potential modern slavery risks arising in its operations and supply chains.

SBS's risk-based approach to modern slavery takes into account risks associated with geographic locations of suppliers, industries and types of products and services. SBS's approach continues to be informed by the Global Slavery Index (GSI⁷), a reputable tool that provides global data on the estimated prevalence of modern slavery, an analysis of a country's vulnerability to modern slavery, and the relevant government's response to modern slavery. SBS also reviews modern slavery statements published by the industry and suppliers, and monitors emerging risks identified by industry experts, media reporting, and NGO reports.

SBS continues to assess the risk of modern slavery in its operations to be low. SBS's head office and over 99% of SBS's employees are located in Australia, a country which has been assessed by GSI as having a low prevalence of, and vulnerability to, modern slavery. Australia has also been recognised by GSI as having the strongest government response to modern

slavery in the Asia Pacific region, and the equal second strongest response globally. SBS operates within Australia's employment law framework and complies with all applicable legislation. SBS has robust workplace policies in place (as detailed in SBS's previous statement) that cover SBS's expectations regarding workplace behaviours and procedures for engaging suppliers. SBS also has accessible grievance mechanisms for SBS employees, including anonymously through SBS's whistleblowing scheme, YourCall. There were no reports of modern slavery being made to YourCall in the 2023/24 reporting period.

In relation to SBS's supply chain, the majority of SBS's direct suppliers (81%) are also located in Australia and are subject to the same robust labour practices as SBS.

Despite the majority of SBS suppliers being based locally, SBS understands that modern slavery risks are not simply eliminated because a supplier is based in Australia, and that SBS's supply chain extends beyond its direct suppliers. However, many of SBS's larger suppliers operating within Australia are also required to report annually on the steps they have taken to assess and address modern slavery risks in their operations and supply chains. As such, SBS reviews select supplier statements each year to gain greater insight into the supplier and their supply chain, and any

risks or mitigation measures they have in place. This assists with SBS's risk assessment and helps to inform SBS's approach to addressing any modern slavery risks within its supply chain.

SBS acknowledges that in the reporting period it engaged suppliers in certain industries, or product/services categories or from geographical locations that have been identified by GSI as having potentially higher exposure to modern slavery risks. SBS continued its scoping and mapping exercise in the 2023/24 reporting period to examine any direct links it may have to modern slavery risks.

The following procurement categories have been identified by SBS as having higher inherent risk of potential modern slavery practices:

- **Hospitality and catering services:** as the workforce often includes migrant workers or short-term employees who may be more vulnerable to modern slavery.
- **Facilities management, particularly cleaning services:** due to a focus on low-cost service delivery and as the workforce often includes migrant workers on

⁷ Global Slavery Index 2023 - <https://www.walkfree.org/global-slavery-index/map/>

temporary visas who may not be fully aware of their legal rights and entitlements.

- **Information, broadcast and communications technology equipment and services:** as raw materials are often extracted in higher risk countries, and components of software and hardware are often produced by low skilled workers in high-risk countries.
- **Renewable energy:** because renewable energy products are often produced in high-risk countries by vulnerable workers under conditions of modern slavery.

As a result of SBS's due diligence activities in the 2023/24 reporting period and previous periods, SBS considers that any potential modern slavery risks identified among its group of direct suppliers are in most cases being appropriately addressed and mitigated by those suppliers. SBS's larger suppliers have continued to improve their reporting and have mostly submitted robust modern slavery statements during the previous reporting period, which identified risk areas and comprehensively addressed their modern slavery mitigation practices. SBS considers that these larger suppliers covered by the Act pose a low actual modern slavery risk to SBS.

However, SBS acknowledges that it is an ongoing challenge to gain visibility over its indirect suppliers (tier two suppliers and those further down the supply chain). This is particularly challenging with SBS's smaller suppliers that often lack the resources to effectively identify, address or mitigate risk within their supply chain, and who are not subject to the Act. This

continues to limit SBS's oversight and ability to address modern slavery risks more adequately. SBS will continue to issue SBS's supplier questionnaire to suppliers for additional information, particularly for details about SBS's indirect suppliers, and to engage in organic discussions with suppliers.

Overall, SBS continues to assess its likelihood of causing, contributing or being directly linked to modern slavery risks or practices through its operations or supply chains as low. However, SBS acknowledges that greater knowledge of indirect suppliers and awareness of modern slavery risks further down the supply chain is important. SBS has identified areas of risk that SBS will continue to monitor and assess, as well as areas of improvement, as set out in the 'SBS's future action' section.

Summary of Actions to Assess and Address Modern Slavery Risks in the 2023/24 Reporting Period

SBS's key activities during the 2023/24 reporting period are summarised in the table below

SBS's due diligence activities in the 2023/24 reporting period

- SBS reviewed its list of suppliers (as recorded its Finance operating systems) against GSI's current data to map and assess risk.
- SBS's procurement process continued to require consideration of modern slavery risks.
- SBS conducted due diligence desktop screening checks, including reviewing publicly available information about suppliers identified as high risk and any other information supplied to SBS by the supplier on request by SBS.
- In recognising risks within the renewable energy sector, SBS took steps within the reporting period to assess and mitigate risks during the tender process for SBS's renewable energy contract (as set out in the case study below).

Raising awareness of modern slavery

- SBS commenced drafting a modern slavery informational video for SBS staff. The video will raise awareness, and further alert staff to the options available to them to report suspected cases of modern slavery in SBS's supply chain.
- Representatives from the Modern Slavery Working Group met with SBS's Head of Sustainability to raise awareness of modern slavery, including risks in the renewable energy sector and to discuss mitigation steps.

Training

- SBS continued to deliver an online bespoke modern slavery training module to SBS employees who engage contractors or who are otherwise involved in procuring goods and services for SBS.
- The purpose of the training is to help staff to identify modern slavery risks in SBS's operations and supply chain and to engage in discussions with suppliers about modern slavery risks.
- 100% of the employees who engage suppliers or contractors that were assigned the training module during the 2023/24 reporting period, successfully completed it.
- Legal representatives from the Modern Slavery Working Group presented a modern slavery knowledge and information sharing session to the broader Legal division.

Content coverage related to modern slavery

- During the reporting period, SBS News was named Australia's most trusted news brand, delivering dependable and impartial news to communities across the country through a unique global perspective and in-depth reporting on major stories at home and abroad.
- SBS recognises the opportunity it has to influence consumer behaviour by highlighting modern slavery issues through its extensive television, radio and digital media services.
- SBS's NACA team broadcast or published 16 television, 11 digital and three audio stories related to modern slavery and related topics such as wage theft and human trafficking in the reporting period.
- SBS Audio, servicing the 5.6 million Australians who speak languages other than English⁸, covered many modern slavery related stories via in-language podcasts, articles and radio broadcasts, including on topics of workplace exploitation and forced marriage.
- NITV, Australia's leading platform for First Nations storytelling and home to the only national Aboriginal and Torres Strait Islander television news service, published stories of wage theft during the reporting period.
- Through its reporting, SBS continued to raise awareness of modern slavery, particularly among Australia's migrant communities who are often more vulnerable to workplace exploitation.

Modern slavery contractual clauses

- SBS updated its template modern slavery clause to reflect the Australian Government's best practice clause.
- SBS continued to incorporate its tailored modern slavery clauses into new contracts with suppliers.
- SBS engaged with a small production company that requested SBS remove the modern slavery requirements from the contract on the basis that the Modern Slavery Act did not apply to them. SBS was able to use this as an opportunity to educate the production company on the objective of the Act to improve the overall transparency and legal compliance of all aspects of a supply chain. SBS provided SBS's Modern Slavery Guidance Note (which is available on SBS's Producer Hub) and SBS's Supplier Questionnaire to assist the producer to assess their supply chain. SBS also provided practical examples of risks that may exist in a production context.

Dedicated modern slavery intranet portal

- SBS updated its dedicated modern slavery online portal for employees to provide key resources and information on modern slavery laws and obligations. Some of the key updates during this reporting period included:
 - updating the featured modern slavery content, such as news articles and audio stories produced by the SBS News and Current Affairs and SBS Audio teams;
 - adding details of all divisional representatives in the SBS Modern Slavery Working Group to ensure staff know who they can contact to discuss modern slavery or to report any allegations of modern slavery in SBS's supply chains; and
 - outlining SBS's upward referral process for modern slavery reports.
 - The intranet page also includes contact details for SBS's whistleblowing service.
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Whistleblowing hotline

- SBS's contracted independent whistleblowing service continues to enable employees to report any allegations of modern slavery in SBS's supply chains safely and securely via an independent whistleblowing platform.
 - No reports of suspected (or actual) cases of modern slavery have been made to SBS's whistleblowing service in the reporting period.
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SBS's modern slavery working group

- SBS continued to facilitate a modern slavery working group comprising representative from Legal, TV and Online Content (including NITV), Finance, Technology (including Workplace and Property Services), Corporate Affairs, ALC, NACA and Marketing, led by Legal.
 - Two new SBS divisions were represented on the working group in this reporting period.
 - SBS Legal representatives reviewed relevant industry published statements from the previous reporting period.
 - The working group continued to examine learnings from the previous reporting periods, and discussed processes, risk assessments and potential improvement opportunities.
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SBS Annual Report

- SBS is required to produce an Annual Report in accordance with the *Public Governance, Performance and Accountability Act 2013 (Cth)* and the *Special Broadcasting Services Act 1991 (Cth)*. The 2023/24 Annual Report outlined SBS's commitment to addressing potential modern slavery risks and the measures taken to mitigate them. SBS's Annual Report is publicly available on the SBS website.
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CASE STUDY

As a purpose-driven public broadcaster, sustainability is at the heart of SBS's strategy. SBS is taking an ambitious but credible approach to reducing its environmental impact and carbon footprint, helping to lead the Australian media industry on sustainability.

In a major step towards decarbonising SBS's direct operations, SBS switched to 100% renewable energy in 2022-23 becoming Australia's first 100% renewable media organisation.

SBS's commitment to sustainability and renewable energy is not just a short-term initiative but a long-term strategy.

During the reporting period, SBS announced it had achieved Net Zero on its direct emissions, and had analysed its supply chain, working with SBS's partners to

map suppliers' decarbonisation plans. This analysis and scenario modelling has enabled SBS to project an ambitious target to reach Net Zero by 2045 across scope 1, 2 and 3 emissions, which include its supply chain.

SBS's commitment to sustainability is further evidenced through the procurement of a 10 year power purchase agreement for renewable energy, which commenced in July 2024.

SBS is aware that renewable energy products, particularly solar panels and batteries, are recognised globally as being at greater risk of being produced under conditions of modern slavery. SBS also recognises that the GSI lists solar panels in the top five most valuable products imported by Australia that are at risk of exposure to modern slavery.

Therefore, in recognition of the modern slavery risks associated with the production of renewable

energy, SBS took steps during the 2023-24 reporting period to mitigate potential risk by:

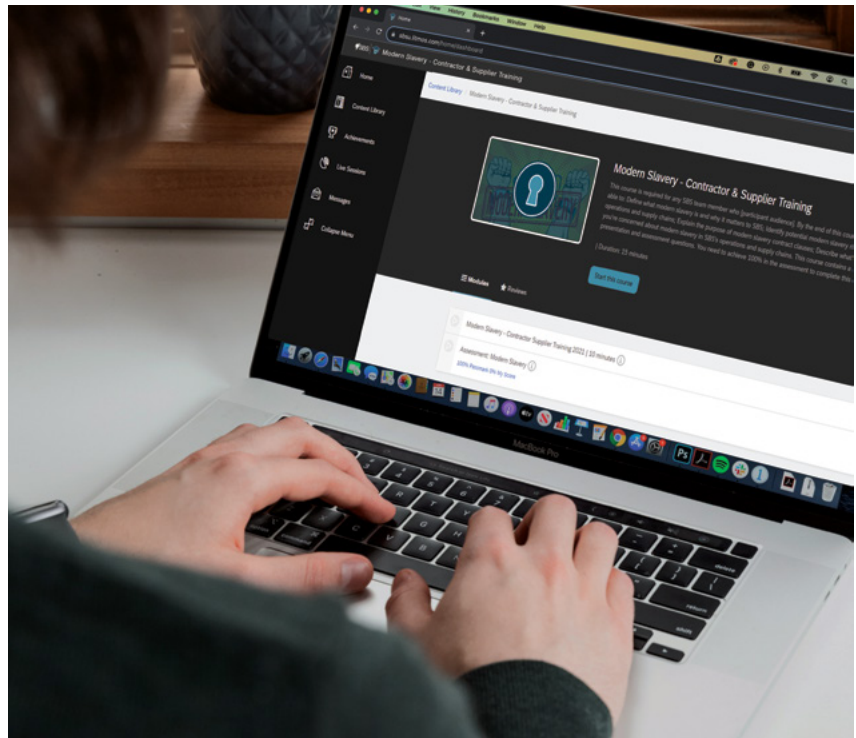
- Including modern slavery as part of the assessment criteria for the renewable energy tender process.
- Conducting due diligence, including by reviewing the modern slavery statements and relevant policies of all tender respondents.
- Requiring staff involved in the tender to complete the SBS modern slavery training course with a 100% completion rate.
- Including in the contract with the successful supplier SBS's modern slavery clause.

SBS will continue to work with its renewable energy supplier to understand any modern slavery risks identified within its supply chain and to take steps to address and mitigate those risks where possible.

Assessing the Effectiveness of SBS's Actions

To evaluate the effectiveness of actions taken by SBS during the 2023/24 reporting period to address modern slavery risks, SBS considers the following information relevant:

- No reports of suspected (or actual) cases of modern slavery were reported through SBS's due diligence processes or to SBS's whistleblowing hotline.
- 100% of staff assigned the online modern slavery training module during the reporting period have completed the course. Almost 300 staff have now successfully completed the training since it was first introduced in 2021. To complete the course, staff require 100% correct answers to the in-built knowledge test.
- SBS continued to include modern slavery clauses in contracts with a broad suite of suppliers. Some suppliers had their own modern slavery clause, or raised concerns or asked questions about SBS's clause, which has opened discussions about modern slavery and enabled SBS greater insight into its current operations and supply chains.
- Through SBS's due diligence activities and direct contact with suppliers, SBS continues to raise awareness of key modern slavery issues.
- Staff from previously unrepresented divisions joined the SBS Modern Slavery Working Group in the reporting period, which will allow greater insight into the operations and supply chain of these areas of the business going forward.



SBS's Modern Slavery Working Group will continue to monitor progress and assess the effectiveness of SBS's actions to assess and address modern slavery risks within its operations and supply chain.

SBS's Future Actions

In accordance with the SBS Value "we engage and participate fully", SBS aims to continually improve its approach to assessing and addressing modern slavery risks in its operations and supply chains, particularly through staff engagement. SBS has identified the following areas for future consideration and action:

- **Monitor the Federal Government's review of the Modern Slavery Act and online resources portal** to stay up to date with government reforms and recommendations and update SBS's policies and processes as required.
- **Develop bespoke resources for SBS's First Nations suppliers** to raise awareness of modern slavery and to assist suppliers to identify risks of modern slavery in their operations and supply chains. SBS is committed to increasing procurement with First Nations suppliers and understands that many of the smaller Indigenous businesses that SBS engages with may be unfamiliar with modern slavery risks within their supply chain or SBS's modern slavery reporting obligations.
- **Continue to develop and share tools to assist production companies and SBS's smaller suppliers** to identify risks and improve their processes to assess and address risks of modern slavery in their operations and supply chains. SBS recognises the greater vulnerability of the small business sector often due to a shortage of resources and lack of awareness of modern slavery.
- **Update SBS's training offering and education to SBS staff** who engage contractors or are involved in procuring goods and services for SBS. This will include reviewing SBS's online modern slavery training module and updating the content where necessary. SBS will continue its business-wide focus on raising awareness of modern slavery and assessing and addressing risks of modern slavery in SBS's operations and supply chains. SBS will continue its work on the internal video currently being drafted (as set out in the table of SBS's actions above) and will circulate to staff once completed.
- **Continue work on SBS's Environmental, Social and Governance (ESG) framework**, which aims to reduce SBS's impact on the environment and incorporate this into SBS's actions and practices. SBS will continue work to integrate modern slavery risk analysis into its existing ESG risk processes. SBS will also work with SBS's suppliers and partners of SBS's decarbonisation journey to identify, and raise awareness of, modern slavery risks and mitigation measures within the sustainability and renewable energy sector.
- **Update relevant finance and procurement documents**, by including references to modern

slavery in SBS's 'purchase orders', 'contract execution checklists', and 'contract execution memos'. This will further ensure modern slavery risks are considered at all stages of procurement and will inform SBS delegates of the modern slavery considerations that have been taken into account during the contracting process.

SBS will continue its business-wide focus on raising awareness of modern slavery and assessing and addressing risks of modern slavery in SBS's operations and supply chains.

