

fetch

Modern Slavery
Statement

Introduction, approval and signing

At Fetch TV our goal is to make extraordinary entertainment simple and in pursuit of that goal, our culture code commits us to caring deeply and personally about our service and the way we deliver it and our interactions as part of that process.

It follows that acting ethically is a key part of the way in which Fetch TV operates in the conduct of our business. A commitment to the elimination of modern slavery¹ is essential to the running of an ethical business.

In this our first Modern Slavery Statement, Fetch TV takes its initial steps to being part of a wider solution to this international problem. This Statement responds to the mandatory reporting criteria of the Modern Slavery Act 2018 (Cth) for the reporting period of 1 July 2019 to 30 June 2020.

We look forward to reporting on the steps we are taking in future years, in accordance with the Modern Slavery Act 2018 (Cth).

In accordance with section 14(1) of the Modern Slavery Act 2018 (Cth), this Statement was approved by the Board of Media Innovations Holdings Pty Ltd (ACN 636 073 884) on 11 October 2021). Media Innovations Holdings Pty Ltd is the ultimate holding company of all the companies within the Fetch TV Group of companies and is in a position to control the other reporting entities covered by this Statement.



Simon Cathcart
Director,
Media Innovations Holdings Pty Ltd

¹ The term "modern slavery" is used in this Statement to describe a range of situations in which coercion, threats or deceptions are used to exploit individuals and undermine their freedom. These situations include trafficking in persons, slavery, servitude, forced labour, forced marriage, debt bondage, deceptive recruiting for labour and the worst forms of child labour. Trafficking in persons occurs when a person recruits and/or arranges or facilitates the travel of another person with a view to the other person being exploited through some form of modern slavery.

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The Table of Contents below illustrates where we address each of the reporting criteria of the Modern Slavery Act within our Modern Slavery Statement.

Section of our Modern Slavery Statement	Requirement under Modern Slavery Act
Page 2 – Approval and signing of this Modern Slavery Statement	Approval and signing of a Joint Modern Slavery Statement (section 14(1))
Section 1 – Who we are	Identify the reporting entities (section 16(1)(a))
Section 2 – Our structure, operations and supply chains	Describe the structure, operations and supply chains of the reporting entities (section 16(1)(b))
Section 3 – Risks we have identified	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entities, and any entities that the reporting entities own or control (section 16(1)(c))
Section 4 – Our present and future actions to address risks	Describe the actions taken by the reporting entities and any entities that the reporting entities own or control, to assess and address those risks, including due diligence and remediation processes (section 16(1)(d))
Section 5 – Measuring our effectiveness	Describe how the reporting entities assess the effectiveness of such actions (section 16(1)(e))
Section 6 – Consultation criteria	Describe the process of consultation with any entities that the reporting entities own or control; and, in the case of a reporting entity covered by a statement under section 14, the entity giving the statement (section 16(1)(f))

Section 1 - Who we are

Organisation's structure

Fetch TV Pty Ltd (ACN 130 669 500) is the main operating company of the Fetch TV Group of companies. The ultimate holding company is Media Innovations Holding Pty Ltd (ACN 636 073 884) incorporated in Australia and its shareholding in Fetch TV Pty Ltd is held via Convergent Media Investments Pty Ltd (ACN 112 246 027).

Fetch TV Pty Ltd wholly owns four operating companies within the Fetch TV Group of companies. These subsidiaries are Fetch TV Content Pty Ltd (ACN 139 732 684), Fetch TV Management Pty Ltd (ACN 141 367 740), Fetch TV Retail Pty Ltd (ACN 168 151 5220) (each of which is incorporated in Australia) and Media Innovations Sdn Bhd (incorporated in Malaysia). Each of those companies performs a separate operational role:

Fetch TV Content Pty Ltd: is the entity responsible for entering into contracts for the supply of content to the business.

Fetch TV Management Pty Ltd: is the employing entity and the entity through which operational agreements are entered.

Fetch TV Retail Pty Ltd: is the entity through which the DTC (direct to consumer) retail business of Fetch TV is operated.

Media Innovations Sdn Bhd: is the entity, operating in Kuala Lumpur, Malaysia, which provides operational services to the Australian businesses, primarily in the area of encoding film and television content and managing metadata.

Media Innovations Holding Pty Ltd wholly owns some other non-operating companies in the Fetch TV Group.

The reporting entities for purposes of this Statement are Media Innovations Holding Pty Ltd, Convergent Media Investments Pty Ltd and Fetch TV Pty Ltd.

In this Statement "Fetch TV" is used to refer to all the companies in the Fetch TV Group of companies.

Section 2 - Our structure, operations and supply chains

The business of Fetch TV is to partner with leading internet service providers and retailers to provide subscribers with an entertainment service delivered to the TV over a broadband connection to a set top box. In addition to a 1 terabyte personal video recorder for recording TV,

the content line-up includes an in-home movie store with over 9,500 titles including the latest releases; a TV store with popular TV shows to purchase; leading SVOD services Netflix, Stan, Amazon Prime Video, Britbox, hayu and others; Free to Air and subscription Catch-Up TV services; Pay per View access to UFC; and apps including YouTube, as well as the option to add subscription entertainment channel packs from major content providers, enabling Fetch subscribers to access the things they love to watch all in one place with one simple menu and one remote.

Fetch TV operates almost entirely in Australia but from time to time, has provided consultancy services in the area of software development to other set top box based media providers in the Asia/Pacific region.

Fetch TV has 95 employees based in Australia. Employees perform work across a range of functional areas, with approximately 75% of all employees engaged directly or indirectly in the operational areas related to information technology, such as software design, testing and management, including the management, design and deployment of networks and systems to assist the establishment and distribution of the IPTV platform.

Media Innovations Sdn Bhd, wholly owned by Fetch TV Pty Ltd, has 26 employees in Kuala Lumpur, Malaysia. All of these employees are engaged in activities that provide operational support to the IPTV platform in Australia, including the performance of roles such as video editors, metadata administrators, content quality control, design and customer service.

Our supply chains

Fetch TV has reviewed the risk of modern slavery practices across our operations and supply chains. We did this by establishing and using a checklist based upon a list of all suppliers to the operation and posing a series of questions to the key managers of the distinct areas of operation.

The key operational categories into which our suppliers fall are as follows:

Area of Operations	Nature of Suppliers
Content Delivery	Content Suppliers are overwhelmingly Australian based entities which are often local operations of large global content suppliers such as Disney, Discovery, Paramount and the BBC which provide on the basis of a licence, linear channel content and Video On Demand content (delivered as TV and movies on a transactional basis). Suppliers also include all local free to air networks as well as, increasingly, streaming apps both local and international, such as Netflix, Stan, Amazon etc.
Network	Suppliers to the Network operations of Fetch TV include a multiplicity of suppliers which are primarily service providers, such as data centres and monitoring service providers (for example, Telstra Broadcast Centres) internet and telecommunications services providers (Vocus/Aussie Broadband), satellite delivery services and

	suppliers of network hardware equipment, such servers and encoders as well as suppliers of other IT equipment such as laptops and monitors.
Set Top Box	Fetch TV has only one Original Equipment Manufacturer (OEM), the manufacturer of Fetch TV's proprietary set top box. Fetch TV has some other limited direct contractual relationships for the supply of accessories and materials for the manufacturer of the Set Top Box.
Marketing	Suppliers to marketing and related services are service providers, operating almost wholly within Australia, providing the services of advertising and promotional time, media buyers, advertising and marketing production both online and physical, and associated providers and consultants.
Operations: Other	This category of suppliers covers other suppliers to the general operations of Fetch TV, including software licences for use in firmware associated with the Fetch TV Platform and set top box, service providers and consultants to the business (including accountants, bankers and external lawyers) and service providers associated with the provision of office accommodation in Sydney and Kuala Lumpur.

Section 3 – Risks we have identified

We considered risks that may possibly cause, contribute or be directly linked to modern slavery practices, having regard to the Commonwealth Guidance for Reporting Entities and resources such as Walk Free's Global Slavery Index (including the 10 countries with the highest prevalence of modern slavery). The majority of Fetch TV's suppliers are either Australian incorporated or registered businesses.

We have identified areas that are considered to be of little to no risk and these areas form the bulk of the operations and activities undertaken by Fetch TV. By way of example, the primary supply to the business consists of licence agreements for the supply of content for films and television content, streaming services and Apps. These are almost invariably entered with large, global suppliers and distributors of content based in geographic locations with a low prevalence of slavery, low risk products involving the use of highly paid "knowledge" workers and involving entities with a high degree of compliance and awareness of the risks of modern slavery in their supply chains.

We have also identified areas which are considered to be of a higher risk, which chiefly relate to the manufacturing of the Fetch TV set top boxes and risk is assessed based upon geographic

location and the fact that the suppliers of products to the Fetch TV's OEM potentially may engage or whose own supply chains might put them at risk of engaging in modern slavery practices.

Section 4: Our approach – present and future actions

Our policies on slavery

We are committed to minimising the risk that there is modern slavery in our supply chains or in any part of our business.

We will take appropriate steps to investigate any allegations of modern slavery in our operations and supply chains and we will do all we reasonably can to ensure that any confirmed incidences of modern slavery are remediated. This will include doing all we reasonably can to ensure that victims are compensated and provided with ongoing protections. This will also include working with our suppliers to ensure the harm does not recur.

Over the past 12 months:

- We have mapped our supply chains and undertaken a risk analysis.
- We have ensured that our Code of Conduct reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to minimise the risk that slavery is taking place in our supply chains.
- We have developed contractual terms to include in all supplier contracts where we have the ability to so, which provide clear contractual obligations in relation to modern slavery and appropriate redress in the event of non-compliance.
- We have developed a Supplier Questionnaire/Code of Conduct with the intention of commencing external distribution in the near future.

During the next 12 months:

- We will finalise the Supplier Questionnaire and distribute, with the expectation that it will focus initially upon medium to high risk suppliers covering most categories of spend.
- We will develop and implement a process that will provide victims of modern slavery, no matter where they are in our supply chains, with an avenue to raise their grievances.
- We will conduct training on modern slavery for all direct reports to the Chief Executive and COO and all other employees with key procurement responsibilities.
- We will continue to assess and monitor our supply chains, with particular focus upon identified risk areas. For the OEM and suppliers, we will resume in person audits, travel permitting.
- We will ensure regular Board reporting on progress.
- We will review our Whistle-blower Policy with a particular view to ensuring it is fit for purpose of compliance with our modern slavery obligations and commitments.

Section 5 – Measuring our effectiveness in combating slavery

The items referred to in our record of implementation over the past 12 months are our first steps in an ongoing plan to survey and identify on a continuing basis the risk of modern slavery in our supply chains. We consider that the building of awareness internally, and externally with our suppliers, particularly those we assess to be a higher risk, are of critical importance in the effectiveness of our steps.

We intend to ensure that training, policy and risk assessment are reviewed regularly to determine their effectiveness. We will regularly assess guidance provided by the Commonwealth, key NGOs and seek to draw upon the advice and experience of external consultants as and when appropriate.

Section 6 – Consultation

This Statement was prepared by the legal and finance departments within Fetch TV, following internal consultation with the managers responsible for the key operational aspects of the businesses of all entities with the Fetch TV Group of companies, including the local manager of the office in Kuala Lumpur, noting that all companies within the Group utilise the same policies, codes, procedures and template documentation.

This consultation also involved Media Innovations Holdings Pty Ltd consulting with the Boards of each of the other reporting entities covered by this Statement about the terms of this Statement.