

**ABC MODERN SLAVERY  
STATEMENT FY2023**



## CONTENTS

<b>1. Introducing the ABC</b>	<b>4</b>
<b>2. ABC's structure, operations and supply chains</b>	<b>4</b>
2.1 Structure	4
2.2 Operations	4
2.3 The ABC's Supply Chain	6
2.4 Modern Slavery Risks in ABC operations	8
2.5 Modern Slavery Risks in ABC Supply Chains	8
<b>3. Other entities</b>	<b>9</b>
<b>4. Risk identification process</b>	<b>9</b>
<b>5. The ABC'S actions</b>	<b>10</b>
5.1 Modern Slavery Roadmap	10
5.2 Staff Training	11
5.3 Policy Framework	11
5.4 Leveraging Systems	11
5.5 ABC Procurement Process	11
5.6 Supplier Survey	12
5.7 External Collaboration	12
<b>6. Assessing effectiveness</b>	<b>12</b>
<b>7. Next steps</b>	<b>13</b>



**THIS STATEMENT HAS BEEN APPROVED  
BY THE BOARD OF THE AUSTRALIAN  
BROADCASTING CORPORATION**

The Australian Broadcasting Corporation remains dedicated to mitigating the risk of exploitation within our global supply chains. As we enter the fourth year of reporting under the Modern Slavery Act 2018 (Cth), the ABC remains committed to managing and reducing modern slavery risks.

Looking forward, we will uphold our commitment to fostering ethical sourcing practices across our supply chains by collaborating closely with our valued suppliers. This collaboration aims to promote transparency and ethical standards, ensuring that modern slavery has no place in our operations.

A handwritten signature in black ink, appearing to read 'D Anderson', with a long horizontal flourish underneath.

**David Anderson**  
ABC Managing Director



## 1. INTRODUCING THE ABC

With a legacy spanning 90 years, the Australian Broadcasting Corporation (ABC) has become an integral part of the Australian way of life. Guided by the ABC Charter, a foundation established by the Australian Parliament, our purpose is to deliver valued services that reflect and contribute to Australian society, culture and identity.

We extend our responsibilities to incorporate the way we conduct our operations and leverage our purchasing influence to achieve social and sustainable procurement objectives. This involves initiatives aimed at improving supplier diversity and proactively managing the complexities of supply chain risk.

Our commitment to supplier diversity is addressed in our Elevate **Reconciliation Action Plan**, and our dedication to mitigating the risks associated with modern slavery is addressed within our fourth Modern Slavery Statement (Statement).

Collaborating closely with both suppliers and staff, the ABC is focusing on cultivating awareness surrounding the potential risks of modern slavery within our supply chains, reinforcing our commitment to ethical sourcing practices.

## 2. ABC'S STRUCTURE, OPERATIONS AND SUPPLY CHAINS

### 2.1 STRUCTURE

The ABC (ABN 52 429 278 345) is a Corporate Commonwealth Entity (CCE) operating in accordance with the ABC Charter, as prescribed in the Australian Broadcasting Corporation Act 1983. As a CCE, the ABC is a separate legal entity and can act in its own right to create contracts.

The ABC Board is the principal governing body of the ABC, and their duties include ensuring that the functions of the ABC are performed efficiently and with maximum benefit to the people of Australia, while maintaining the independence and integrity of the organisation.

The ABC has a national footprint, with operations in ten major metropolitan areas and fifty regional offices nationally. In addition to its broad national footprint, the ABC also operates multiple foreign newsgathering bureaux and conducts international training projects in several other countries. The ABC is recognised as the pre-eminent Australian media organisation in the Indo-Pacific region.

### 2.2 OPERATIONS

ABC operations include the production, acquisition, distribution, and transmission of content to audiences across Television, Radio, Online and Digital platforms.

In the financial year ending on June 30, 2023, the ABC achieved a significant national audience reach across various platforms, underscoring the broad extent of its multifaceted operations as illustrated in Figure 1.



FIGURE 1: ABC OPERATIONS

## **ON THE RADIO**

### **ABC NEWS on radio**

A national, 24-hour radio news network

### **National Radio Networks**

RN, ABC Classic, triple j

### **Capital City Local Radio**

Available from all eight capital cities

### **Regional Local Radio**

Available in regional locations around Australia

### **Digital Radio**

Double J, ABC Classic 2, ABC Jazz, ABC Country, ABC Sport, triple j unearthed, and ABC KIDS Listen

### **ABC Radio Australia**

An information and entertainment service for the Pacific region

## **ON YOUR SCREENS**

### **ABC**

The ABC's primary television channel

### **ABC Kids / ABC TV PLUS**

Television for pre-schoolers until 7.30pm; then a broad range of documentaries, entertainment and arts programs for adults

### **ABC ME**

A dedicated children's channel

### **ABC NEWS on television**

Broadcasting national and breaking news 24 hours a day

### **ABC News Digital**

In-depth journalism content, analysis and opinion

### **abc.net.au**

Your gateway to ABC news, information, and entertainment

### **ABC iview**

The ABC's online television catch-up and streaming service – available in Kids and international versions

### **Streaming radio**

On ABC listen, ABC KIDS listen and via ABC websites

### **Apps**

For smartphones and tablets

## **COMMERCIAL**

### **Content sales and distribution**

ABC TV content and format licensing, and library sales, ABC NEWS syndication

### **ABC Music and Events**

Record label commercially releasing music and live events

### **Publishing and licensing**

Books and audiobooks, magazines and a range of merchandise

### **ABC Studios and Media Productions**

Provision of production services to the market

## **INTERNATIONAL**

### **ABC Australia and ABC Radio Australia**

Television, radio and online services for audiences across the Indo-Pacific and around the world

### **ABC International Development (ABCID)**

Partnering with media, civil society and government organisations in the Asia-Pacific region, to assist in designing and delivering communication initiatives.

## 2.3 THE ABC'S SUPPLY CHAIN

As a national broadcaster, the ABC has a very diverse supply chain which is influenced by the regional and global production and distribution of our content, through to the types of goods and services necessary to support this operational footprint.

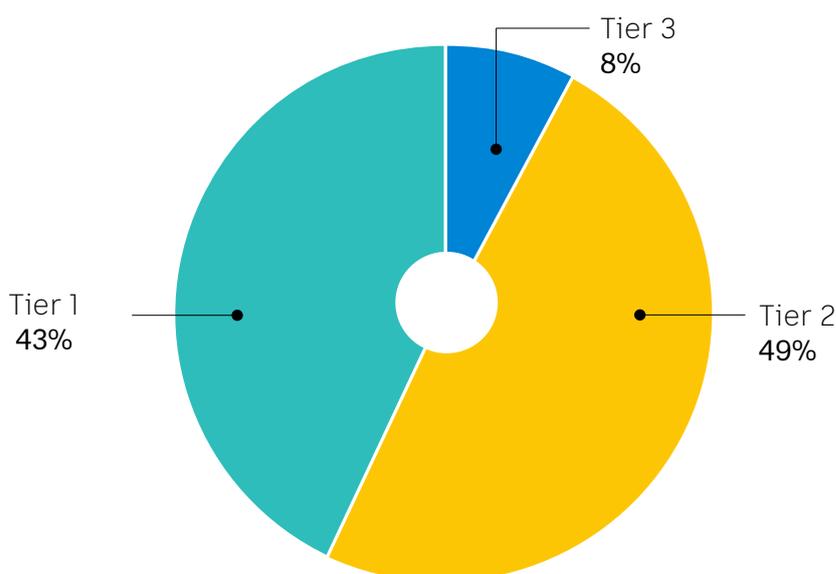
The ABC relies on a combination of internal and external data sources to map and understand its supply chain and continues to work collaboratively with its suppliers to better understand how and where they source the goods and services they supply to the ABC.

We have identified specific spend categories encompassing a wide range of goods and services, each associated with varying degrees of potential modern slavery risk. These variations are influenced by the inherent nature of the goods or services involved and the geographic locations in which they are manufactured.

ABC takes a risk-based approach when engaging with suppliers in these categories to ensure a supplier's supply chain is traceable. As part of the modern slavery risk screening, we employ an Annual Supplier Survey and modern slavery questions within our market engagement documents.

Considering our most recent Annual Supplier Survey, we have observed noteworthy changes in supply chain tier distribution when compared to the previous year. The chart below shows the current supplier profile (Figure 2) "Tier" refers to the different levels or stages within our supply chain, indicating the number of intermediaries between the manufacturer (tier 1) and the end product. In the prior year, we had more tier two and tier three suppliers, whereas the current data highlights a significant shift towards the one or two-tier structure.

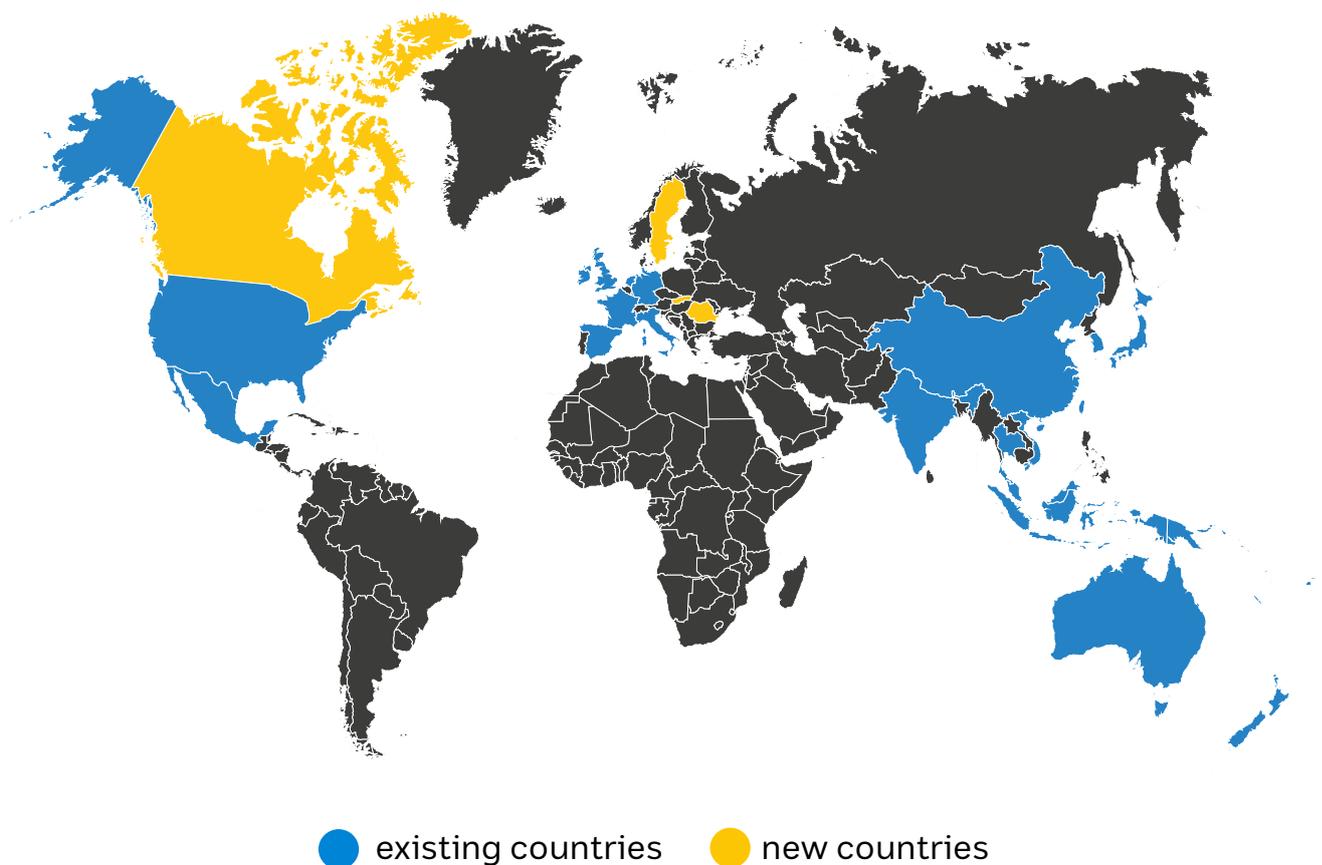
FIGURE 2: TIER PROFILE



While a significant portion of ABC’s supplier base is locally situated in Australia, this proximity doesn’t automatically eradicate the risk of modern slavery. The ABC, through its standard contract conditions, mandates that even local suppliers need to be able to provide information about their supply chains upon request. This requirement, along with the need for country-of-origin data in all ABC market engagement documents, underlines the organisation’s commitment to due diligence in modern slavery prevention.

In the context of our latest Annual Supplier Survey for high-risk category suppliers in 2023, the ABC observed an evolving landscape of global manufacturing. This year’s findings, as illustrated in Figure 3, reveal the involvement of suppliers from 21 manufacturing countries. This represents a reduction when compared to the 26 countries identified in 2022 and the 39 in 2021. The continued decrease can be attributed to a range of factors, primarily stemming from market shifts and consolidation triggered by the global turbulence brought about by the COVID-19 pandemic.

FIGURE 3: COUNTRIES MANUFACTURING GOODS FOR THE ABC



- |           |         |         |           |             |             |          |
|-----------|---------|---------|-----------|-------------|-------------|----------|
| Australia | Canada  | France  | Indonesia | Netherlands | Singapore   | Thailand |
| Austria   | China   | Germany | Japan     | New Zealand | South Korea | UK       |
| Brazil    | Finland | India   | Malaysia  | Philippines | Spain       | USA      |



## 2.4 MODERN SLAVERY RISKS IN ABC OPERATIONS

At ABC, we place a strong emphasis on ethics and social responsibility. Our commitment to addressing modern slavery risks in our operations is unwavering. We have employment structures in place, such as the ABC Enterprise Agreement 2022-2025, which covers the majority of our workforce. This agreement reflects our dedication to fair and ethical labour practices. Additionally, our proactive approach to ethical sourcing and continuous engagement with our suppliers further ensures the maintenance of this low-risk status.

## 2.5 MODERN SLAVERY RISKS IN ABC SUPPLY CHAINS

We understand that we may be directly linked to modern slavery if the projects and services we use are linked to harm carried by another company, like a supplier. For example, if the labour was underpaid by the supplier to produce a product or service specifically for use by the ABC.

Based on a comprehensive assessment of our supply chain, we have identified the following modern slavery risks for each our spend categories in our supply chain: Identifying and assessing risk:

<b>Production &amp; Broadcasting</b>	Exploitation in media production, particularly in underpaid labour in entertainment and content creation.
<b>Information Technology Equipment &amp; Services</b>	Hardware and software components can be produced by vulnerable, low skilled and low wage labour in high-risk countries.
<b>Infrastructure:</b>	Exploitation of low skilled migrant workers for construction and maintenance projects.
<b>Marketing and Communications</b>	Marketing and promotional items can be manufactured in high-risk countries or developing economies by low wage or child labour.
<b>Office Supplies</b>	Consumables can be manufactured in high-risk countries or developing economies by low wage or child labour.
<b>Consultants &amp; Contractors</b>	Risks may involve exploitation of workers in consulting and contracting services, especially in global supply chains.
<b>Program Rights &amp; Royalties</b>	Concerns may arise in the content creation industry regarding royalties, particularly in lower-wage regions.
<b>Property Services</b>	Exploitation of low skilled migrant workers.
<b>Renewable Energy</b>	Solar panels or batteries produced by vulnerable workers in high-risk countries.
<b>Travel &amp; Fleet</b>	Potential issues can include exploitation in transportation services or fleet maintenance.

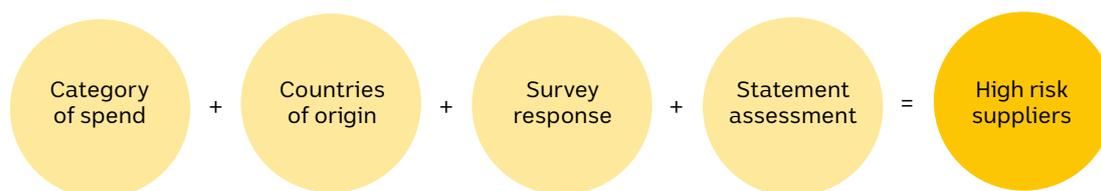
### 3. OTHER ENTITIES

In the financial year ending 30 June 2023, the ABC had one dormant entity under its control. The ABC consulted with this entity in the development of this Statement, and it was confirmed that the entity was dormant throughout the year and did not engage in any trade. The risk of modern slavery involving ABC’s controlled entity is negligible, however the controlled entity was given the opportunity to discuss and provide input into the development of this Statement.

### 4. RISK IDENTIFICATION PROCESS

We uphold a holistic and integrated approach to identify the modern slavery risks in our supply chains. When considering human rights risks, we focus on harm faced by people before we consider risks faced by the business (such as legal, financial, and reputational damage). We use a combination of factors to categorise the suppliers as high risk (Figure 4).

FIGURE 4: RISK IDENTIFICATION PROCESS



We understand that some categories of spend and countries have much higher risk of modern slavery than others, therefore we use these factors to identify the high-risk suppliers. The category of spend is based on the nature of the industry and type of goods and services procured.

If any red flags are identified during a risk assessment, the ABC Contract Manager is advised and seeks clarification from the supplier. Our approach is to raise awareness and build capability. Any concerns about modern slavery practices will be referred to the Australian Border Force. To date, the ABC has not made any referrals.



## 5. THE ABC'S ACTIONS

### 5.1. MODERN SLAVERY ROADMAP

The ABC published its first Statement in 2020 based on the insights derived from the inaugural Annual Supplier Survey. This played a pivotal role as it established the baseline for measuring performance in the subsequent years. Throughout 2023, the ABC remained committed to the execution of initiatives outlined in its initial Modern Slavery Roadmap. This collaborative effort to reinforce and expand our due diligence practices has enhanced modern slavery awareness not only among our suppliers, but also among ABC staff and contractors.

In 2023, the ABC focused on the following key areas:

- Expanding the scope of the Annual Supplier Survey to include more supply chain risks, and social and sustainable procurement issues, with focus on the areas that drive improvement;
- Identifying additional business critical and high-risk suppliers to participate in the Annual Supplier Survey;
- Assessment of the Modern Slavery Statements of our suppliers to ensure their efforts are in line with ABC values, policies, and guidelines; and
- Actively networking with other organisations to share information and insights in relation to management of modern slavery risk.

The ABC has implemented various control measures to mitigate the risks of modern slavery in our operations and supply chains.





## 5.2 STAFF TRAINING

As part of our plan to operationalise our modern slavery due diligence, we took a series of steps to promote greater awareness of modern slavery within the ABC. Our initiatives included online training modules.

- More than 807 staff and contractors involved in procurement of goods and services for the ABC have completed a “Before You Buy” training course which covers modern slavery risks when purchasing.
- We have also implemented a “Evaluation Panel Awareness” training. This training is aimed at equipping staff with tools to appropriately score and evaluate the proposals and responses from the suppliers, including responses to modern slavery requirements.
- Staff are also encouraged to complete the e-Learning modules on modern slavery in the **Resources section** of the Australian Modern Slavery Register.

## 5.3 POLICY FRAMEWORK

We have a range of regularly reviewed policies, standards and procedures that outline our commitment to respect human rights, including freedom from modern slavery. These policies guide ABC employees, contractors, and consultants to consider human rights and modern slavery in their day-to-day work and ensure compliance within their capacity.

- ABC Procurement Policy
- Procurement Governance Guideline
- Supplier Code of Conduct
- Social and Sustainable Procurement Strategy
- Social and Sustainable Procurement Evaluation Guide

## 5.4 LEVERAGING SYSTEMS

- The ABC’s modern slavery requirements and obligations are built into the ABC’s sourcing and contract management system Procure Hub.
- Our modern slavery requirements are incorporated into all our market engagement documents, which ensures that suppliers are aware of our commitment and to simplify the compliance process.

## 5.5 ABC PROCUREMENT PROCESS

The ABC’s procurement process is guided by the Commonwealth Procurement Rules (CPRs) which ensure value for money for ABC. The CPRs cover comprehensive contract clauses for modern slavery.



## 5.6 SUPPLIER SURVEY

The ABC conducts an Annual Supplier Survey to evaluate the risk exposure from engaged suppliers. The survey, continually enhanced, targets high-risk suppliers selected through a risk-based approach, including:

- Business-critical suppliers;
- Top suppliers by spend per category; and
- Suppliers of goods and services in a category with a higher risk of modern slavery in their supply chain.

Most of the survey questions cover modern slavery and the management of their supply chain. The survey also reminds these suppliers of their obligations under the **ABC Supplier Code of Conduct** and the ABC's goal to collaborate with its suppliers to foster capable, ethical and resilient supply chains.

In addition to the supplier survey analysis, the ABC continues to rely on its suppliers' published Statements to verify and test individual supplier's risk mitigation approaches and strategies.

## 5.7 EXTERNAL COLLABORATION

Since the commencement of the Modern Slavery Act 2018 (the Act), the ABC has proactively engaged with peer organisations, networks, and industry bodies to combat modern slavery. These collaborations are aimed at continually enhancing our approach as a buyer to boost corporate awareness and tackle modern slavery risks. Through these alliances, we have engaged in a platform for sharing insights, best practices, and experiences with like-minded buyers, enabling us to refine our strategies and responsibilities as a buyer of goods and services.

## 6. ASSESSING EFFECTIVENESS

While the ABC continues to create and implement mechanisms to mitigate the occurrence of modern slavery in its supply chains, it also recognises the importance of measuring the effectiveness of ongoing efforts. We are fully committed to enhancing our approach to addressing modern slavery risks and acknowledge that the intention of the Act aims not only for regulatory compliance but also for promoting awareness and education among all stakeholders in the supply chain.

The following table (Figure 5) highlights the key indicators that the ABC currently utilises to assess the effectiveness of its initiatives targeting modern slavery.

FIGURE 5: MODERN SLAVERY ACTIONS MEASUREMENT

ACTIVITY	ACTIONS	MEASURE	SOURCE
ABC AWARENESS	<ul style="list-style-type: none"> <li>• Use of data and tools</li> <li>• Completion of training</li> <li>• Management of supplier performance</li> <li>• External collaboration</li> <li>• Remediate identified cases.</li> </ul>	<ul style="list-style-type: none"> <li>• Number of staff taking recommended training</li> <li>• Number of external engagements</li> <li>• Products sourced from high-risk categories and countries</li> </ul>	<ul style="list-style-type: none"> <li>• Procurement reporting</li> <li>• Training data</li> <li>• Spend data</li> <li>• Risk registers</li> </ul>
SUPPLIER AWARENESS	<ul style="list-style-type: none"> <li>• Quality of market engagement responses</li> <li>• Adherence to contract requirements</li> <li>• Adherence to the ABC Supplier Code of Conduct</li> <li>• Participation in the Annual Supplier Survey</li> </ul>	<ul style="list-style-type: none"> <li>• All respondents meet the modern slavery requirements.</li> <li>• Survey response rate percentage</li> <li>• No contract or Code non-compliances identified.</li> <li>• Number of identified cases.</li> <li>• Respondents meeting requirements</li> </ul>	<ul style="list-style-type: none"> <li>• Procurement reporting</li> <li>• Survey results</li> <li>• Complaints database</li> <li>• Contract reviews</li> <li>• Whistleblower reports</li> <li>• Supplier third party audits</li> </ul>

## 7. NEXT STEPS

The ABC takes its social and legislative obligation to reduce the local and global risk of modern slavery very seriously. We have chartered a course for 2024 and beyond to advance our organisational understanding of supply chain risks and engage high-risk suppliers in bolstering traceability and accountability.

### These steps entail:

- Enhancing internal guidelines to facilitate our management of modern slavery
- Raising further awareness of modern slavery risks with ABC staff and contractors; and
- Continued collaboration with our suppliers.