



Modern Slavery Statement 2022

This statement is made pursuant to the requirements of the *Modern Slavery Act 2018* (Cth) (**Act**) on behalf of Netflix Australia Pty Ltd (ABN 81 601 296 771) (**Netflix Australia**) for the fiscal year ending on 31 December 2022 (**Reporting Period**).

1. Our commitment

Netflix, Inc. and its subsidiaries around the world (**Netflix**) do not tolerate or condone slavery, the use of forced or compulsory labour, human trafficking, the deprivation of liberty or other similar forms of exploitation of individuals. We are committed to minimising the risks of modern slavery arising within our operations and supply chains and appropriately addressing any exploitation upon becoming aware of it. At Netflix, we strive to create an employee culture where acting ethically and with integrity is part of our fundamental corporate values.

2. Our structure, operations and supply chains

Netflix Australia is an Australian private company with its registered address located at Level 19, 181 William Street, Melbourne VIC 3000, Australia. Netflix Australia is a wholly-owned subsidiary of Netflix International B.V., a Dutch entity whose ultimate parent is Netflix, Inc., a US company incorporated in the State of Delaware and headquartered in Los Gatos, California. Netflix Australia does not own or control any other entities. During the Reporting Period, Netflix Australia had approximately 50 full-time employees located in Australia.

Netflix is one of the world's leading streaming entertainment services with over 231 million paid memberships in over 190 countries, enjoying TV series, films and games across a wide variety of genres and languages. Members can play, pause and resume watching as much as they want, anytime, anywhere, and can change their plans at any time.

Netflix Australia is the non-exclusive limited risk distributor of access to the Netflix service for subscribers in Australia. In addition, it provides content support and contract research and development support services to Netflix, Inc.

Netflix Australia engages with various vendors, commercial partners and third parties based across Australia to conduct its business. During the Reporting Period, Netflix Australia also engaged suppliers based in the United States, the United Kingdom, Singapore, India, and New Zealand. These suppliers range from large blue-chip companies to smaller vendors (such



as creative and events agencies). Contractual arrangements across these suppliers with Netflix Australia varied.

Netflix Australia's principal types of suppliers include:

- agencies that provide professional services in connection with marketing, advertising, and events;
- payment processors, telecommunication and internet service providers that facilitate the logistics of accepting different payment methods and receipt of fees from subscribers; and
- suppliers of goods and services for routine business operations. This includes providers of IT and hardware goods and services (many of whom are globally established suppliers of "off the shelf" equipment and integrated services who have had long term relationships with Netflix), office supplies and equipment, professional services (such as employee benefits, tax and legal services), and facilities-related services (such as cleaning, security, maintenance and catering services).

3. Risks of modern slavery in our operations and supply chains

Following a high-level review of modern slavery risks across our business, Netflix Australia considers the risk of modern slavery practices in connection with its business activities to be low due to the nature and location of its operations and supply chains.

Netflix Australia's permanent workforce consists primarily of highly skilled employees in professional and administrative roles who typically work in Netflix Australia's Sydney office. Netflix has global employment policies and procedures that are designed to ensure our employees are paid and treated fairly in accordance with local labour laws.

We always endeavour to work with reputable suppliers that are committed to conducting their business operations in a responsible, safe, honest, ethical, and respectful manner. However, we recognise that modern slavery risks exist in all supply chains.

In preparation for this statement, we undertook a high-level review of the business to identify areas of modern slavery risk across our operations and supply chains. This included an assessment of our operations and supply chains during the Reporting Period, focusing on (1) areas of our business that presented higher modern slavery risks due to the nature of their operations, and (2) suppliers that are large entities and/or on which we expended a high percentage of our supplier spend, meaning that they are suppliers over which Netflix Australia

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has greater leverage and influence. As part of this assessment, we developed an internal questionnaire to help provide a framework for assessing modern slavery risks across the business and consulted with relevant internal business teams to evaluate the modern slavery risks associated with Netflix Australia's operations and global and domestic supply chains. We also educated key internal stakeholders about modern slavery, potential areas of risk and assessed whether any additional risk mitigation measures should be implemented (for example, through additional meetings with relevant stakeholders, training sessions, refining our policies and procedures and modification of contractual provisions with our suppliers).

Our risk assessment for the Reporting Period did not identify any suppliers or specific operations that caused, contributed, or are directly linked to modern slavery.

Our assessment identified some areas of Netflix Australia's operations and supply chains that are potentially more susceptible to modern slavery risks such as the following categories of goods and services: office supplies, cleaning, catering, pantry supplies, delivery services, maintenance services and IT hardware. This increased level of risk arises due to a number of factors including:

- inherent sector and industry specific risks related to electronics manufacturing, cleaning and catering, which are globally recognised as higher risk sectors for modern slavery;
- the increased risk of forced labour and other exploitative labour practices of vulnerable, low skilled or low wage workers, such as migrant workers who commonly work in these industries; and
- transparency risks related to operations involving raw materials (for example, trees for paper, flour for bread, metal for tools or hardware) which tend to have long, complex supply chains of which Netflix Australia has no oversight or leverage.

This assessment will continue to be reviewed and updated on an annual basis.

4. Actions taken to assess and address modern slavery risks

Policies and practices: Netflix's global policies and practices apply to Netflix Australia. During the Reporting Period, we continued to make clear that Netflix is committed to ensuring that all personnel are treated with dignity and respect. Exploitation relating to the use of forced, indentured or compulsory labour, deprivation of liberty, including any form of human trafficking, or other forms of physical, mental or economic exploitation of individuals is not

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tolerated or condoned. Netflix codifies this position in its global policies and practices, which includes our internal Human Rights Policy and Code of Ethics.

Our Human Rights Policy explicitly states that Netflix will not tolerate or condone modern forms of slavery, either in our own business or in our supply chains. In addition, our Code of Ethics sets out expectations applicable to Netflix directors, officers and employees designed to deter wrongdoing (for example, through a requirement to comply with all applicable laws, rules and regulations) and promote honest and ethical conduct. Any known misconduct that violates our Code of Ethics must be reported and may result in disciplinary action such as termination of employment.

Netflix's Human Rights Policy and Code of Ethics form part of our practices and policies that employees receive and acknowledge during their onboarding. Our policies and practices are also available to all Netflix Australia employees on our intranet, and they receive annual reminders about Netflix's practices and policies from our Chief Legal Officer.

Additionally, Netflix has developed, and following the end of the Reporting Period has implemented, a Supplier Code of Conduct (**Supplier Code**) that establishes expectations for our suppliers to conduct their business operations ethically and in compliance with all applicable labour laws. The Supplier Code expressly states that Netflix will not tolerate or condone the use of forced, indentured or compulsory labour, or deprivation of liberty, including any form of human trafficking or other forms of physical, mental or economic exploitation of individuals by our Suppliers. If Netflix becomes aware of any instances of modern slavery, we will work with the relevant supplier to remedy the issue. However, if the issue is not appropriately ameliorated by the supplier, Netflix may terminate its relationship with the supplier due to non-compliance with the Supplier Code.

Internal reporting: During the Reporting Period, Netflix's internal confidential reporting policy offered a number of channels for employees to report concerns, including a confidential and anonymous ethics hotline. Under this framework, Netflix Australia employees may submit reports, including concerns relating to modern slavery risks, to this hotline. Netflix prohibits retaliation against reports made in good faith.

Screening and due diligence: During the Reporting Period, Netflix Australia used third party due diligence tools to identify relevant information about third parties that Netflix Australia considered contracting with (including suppliers). Available data from this process typically includes red flags such as reports of associated modern slavery risks, sanctions, criminal cases, regulatory inquiries and penalties, litigation, bankruptcy, liens and judgments, potential conflicts of interest, political exposure, and adverse media. Information on other operational



and reputational risk factors can also be obtained as required based on the risk associated with the scope of the proposed arrangement and locations involved. We continuously monitor for new alerts relating to any key third parties engaged.

Ongoing education: During the Reporting Period and in preparing for this statement, we educated key stakeholders in relevant parts of our business about modern slavery issues and risks. This education process occurs as part of our annual assessment of modern slavery risks where we conduct interviews and training with relevant executives as part of a review of their operations and supplier policies and practices. In conjunction with preparing this statement, the Netflix Legal team also hosted a brown bag session with senior executives and employees across our business to help them understand and identify modern slavery and educate them on what steps should be taken if any exploitation is uncovered.

Remediation: If Netflix Australia becomes aware of any of its suppliers being involved in prohibited activities relating to modern slavery, we will take appropriate remedial action. Such action would likely include seeking to understand the cause of the issue and working with the supplier to mitigate any harm and avoid similar issues in the future. Similarly, if we identify any issues within our own business, we will work quickly to identify and remedy the cause. No such remedial action was required to be taken during the Reporting Period.

Annual assessment: We conduct an annual review of our business to assess and address areas of modern slavery risk across our operations and supply chains. A review was conducted for the Reporting Period as further set out in section 3 above.

5. Assessment of effectiveness

Netflix Australia will assess the effectiveness of its actions to identify and address modern slavery risks in future reporting periods primarily by conducting an annual modern slavery assessment, which will be conducted by the Netflix Legal team. The findings of these annual assessments will be reviewed by the Netflix Australia Leadership team. It is expected that this high-level assessment will include:

- tracking the progress of commitments made by Netflix Australia in response to our assessment of modern slavery risks across our operations and supply chain (including in this statement);
- reviewing reports from our confidential hotline to identify and address any reports concerning modern slavery issues or risks;

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- reviewing the need for targeted modern slavery training of senior staff, relevant members of the Netflix Legal team and business functions that frequently engage with suppliers;
- reviewing the need for input from external experts or advisors to assist with assessing and addressing modern slavery risks in our operations and supply chains; and
- reviewing whether our screening and due diligence procedures continue to meet our expectations for identifying potential modern slavery risks in our existing and prospective supply chains.

We are committed to reviewing our approach to minimising the risk of modern slavery occurring in our operations and supply chains, and expect to build upon our practices as appropriate over time and to mitigate any risks identified.

6. Approval and signatures

This statement has been approved by the board of Netflix Australia Pty Ltd, being the principal governing body of Netflix Australia Pty Ltd on 27 June 2023.

Dated: 27 June 2023



Reg Thompson
Director, Netflix Australia Pty Ltd