



NOVA
ENTERTAINMENT

Lvl 5, 33 Saunders St
Pymont NSW 2009

P +61 2 9564 9999
F +61 2 9564 9880

www.novaentertainment.com.au
ABN 75 093 553 989

NOVA ENTERTAINMENT MODERN SLAVERY STATEMENT 2021

This statement is provided by NOVA Entertainment Pty Limited ACN 093 553 989 (**NOVA**) reporting under the *Modern Slavery Act 2018* (Cth) (**Act**) for the period 1 January 2021 to 31 December 2021, which is its 2021 financial year.

NOVA is committed to complying with its obligations under the Act, and to taking appropriate steps to assess and address modern slavery risks.

NOVA welcomes the responsibility and opportunity to address the threat of modern slavery practices to individuals and communities.

Peter Charlton
Chief Executive Officer and Sole Director
NOVA Entertainment

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1 STRUCTURE AND OPERATIONS

NOVA Entertainment is an independent, diversified entertainment business comprising:

Four analogue broadcast and digitally delivered radio brands:



A podcast network:



An intimate live music brand:



A national digital radio station, created by NOVA Entertainment as part of a unique music partnership with Coles:



A partnership between NOVA and Habitat, dedicated to the art of live experience:



NOVA has a workforce of approximately 500 employees, with operations in all major metropolitan cities, Sydney, Melbourne, Brisbane, Adelaide, and Perth, as well as a regional presence in Gosford.

2 SUPPLY CHAINS

NOVA uses supply chains to assist in the production and delivery of its broadcasting, digital audio, and experiential services. The main supply chains are:

- the supply of technology for broadcasting in the form of infrastructure, equipment, and software as well as associated labour from third party providers to operate and maintain that technology;
- the licensing of music, news and entertainment content for broadcasting or podcasting;
- the acquisition of advertising from agencies and directly from companies;
- marketing and promotional services, including the purchasing of merchandising and vehicles used for promotions;
- the convening of live music events, including engagement of associated labour from third party providers; and
- the use of third party suppliers for equipment and labour, including office supplies, cleaning services, document management and security services, IT services and catering services at its office locations.

NOVA also engages the services of external professional service firms in order to obtain legal, accounting, and financial advice.

3 RISKS OF MODERN SLAVERY PRACTICES IN NOVA'S OPERATIONS AND SUPPLY CHAINS

Although the use of supply chains to deliver services means there is a risk of modern slavery practices in its operations, NOVA considers that risk to be low.

In preparing this Statement, NOVA has conducted a due diligence exercise whereby it has collated a list of its service providers across all of its locations in Australia, and in all areas of its business, in order to determine the risk of modern slavery practices in its operations and supply chains. NOVA considers this due diligence exercise to be a reasonable and proportionate step in its management of modern slavery risks.



NOVA has determined that the products and services obtained through its supply chains are predominately secured from within Australia, from Australian businesses. NOVA has either been provided with, or obtained, modern slavery statements in respect of some of its service providers. To the extent the businesses identified in the supply chains are not located in Australia, NOVA has taken steps to confirm that most are based in jurisdictions that are a low risk of modern slavery.

An exception to the above are businesses that supply technological equipment and software for broadcasting. Further detail is provided on this below.

The risk of modern slavery in NOVA's employment practices is also low given it employs individuals and engages independent contractors in accordance with applicable Australian laws. NOVA ensures its employees are made aware of their employment rights through a comprehensive regime of training and workplace policies, with the latter including, without limitation, NOVA's Whistleblower Policy (which incorporates an independent, anonymous reporting phonenumber), the NOVA Code of Conduct, and an Equal Employment Opportunity Policy. NOVA employees are remunerated at or above the minimum lawful entitlement.

As NOVA has limited visibility in respect of the practices of all of the organisations in its supply chains, it acknowledges that there is some risk of a link to modern slavery practices. Some key areas of concern are as follows:

- There are sector and industry risks involved with the use of third party suppliers to provide cleaning services. Such services have been identified as high risk for modern slavery practices. NOVA's due diligence exercise has confirmed the company it uses for cleaning services has a modern slavery statement, modern slavery risk management procedures and modern slavery minimum standards for its suppliers.
- There are product and services risks associated with the supply of technological services such as equipment and software used in broadcasting. That is due to the location they are manufactured in (often countries with higher rates of labour exploitation) and the materials used to manufacture them (the sourcing of which can also involve a risk of labour exploitation).

NOVA has taken steps to inform itself of who its software, equipment and telecommunications suppliers for its broadcasting technology are, and the products and services that they supply. It notes that some are based in Australia, or in jurisdictions that are a low risk of modern slavery practices. However, it has limited oversight as to where the manufacturing of the products being supplied, such as equipment and software, occurs. NOVA considers the steps it has taken are a proportionate and reasonable response to its assessment of modern slavery risks.

4 ACTIONS TAKEN TO ASSESS AND ADDRESS THOSE RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

NOVA has a robust governance and policy framework which sets out its commitment to equality and social justice, and reduces the risk of modern slavery practices arising within its supply chains and operations, including:

- Policies and training modules relating to employee conduct and inclusion, including but not limited to an employee Code of Conduct, Whistleblower Policy, Diversity & Inclusion Statement, and an Equal Employment Opportunity Policy. These documents collectively provide employees with a clear understanding of their legal rights and entitlements;
- A partnership with Talent Beyond Boundaries, a skilled refugee program designed to support and integrate female Afghani refugees within NOVA and the broader community;
- Membership of the Diversity Council of Australia; and
- A Group wide commitment to corporate governance, rigorous compliance practices, and high standards of ethical behaviour, including risk assessments of third parties with whom NOVA contracts.

NOVA also has a Modern Slavery Policy which confirms its commitment to robust corporate governance and ethical behaviour. This Policy can be found on its website.

In preparing this Statement, NOVA has conducted a scoping exercise to ascertain where the products and services obtained through its supply chains are secured from, and which parts of its business are at the greatest risk from



modern slavery. This information was used by NOVA to assess and address the risk of modern slavery practices during this reporting period, and will be used in the future to mitigate modern slavery risks.

NOVA has also reviewed and updated various supplier contracts to reflect its expectations, and the obligations of its suppliers, with respect to modern slavery.

5 ASSESSING THE EFFECTIVENESS OF SUCH ACTIONS

Given the low risk of modern slavery practices in its operations NOVA considers that assessing the effectiveness of its actions will best be achieved by having an annual review, and identifying areas for improvement in its efforts to address the risk of modern slavery in its supply chains. NOVA will also conduct ongoing reviews of supplier contracts, and invite feedback from workers on the effectiveness of measures to raise awareness about modern slavery practices.

6 CONSULTATION PROCESS

In preparing this Statement the operations and supply chains of each subsidiary or related body corporate of NOVA were reviewed, with relevant employees or representatives consulted. That consultation will remain ongoing as part of NOVA's overall commitment to assessing and addressing the risk of modern slavery practices.

7 OTHER RELEVANT INFORMATION

NOVA takes its obligations to assess and address modern slavery risks very seriously; however, it does acknowledge that this is the first modern slavery statement it has prepared and submitted.

That is why, in preparing this Statement, NOVA was proactive in collating a list of its service providers, and taking steps to satisfy itself of the risk of modern slavery across its operations and supply chains.

NOVA has also updated various supplier contracts, published a Modern Slavery Policy and Whistleblower Policy, and implemented Speak Up!, a new whistleblower program for employees to anonymously report conduct and behaviour that falls short of expected standards.

Moving forward, NOVA is committed to continue working with its new and existing suppliers, both nationally and abroad, to improve awareness of modern slavery practices and assess and address modern slavery risks. NOVA is also committed to improving its employees' ongoing awareness of modern slavery practices and risks, and encouraging them to come forward and report any incidents or concerns.

8 APPROVAL

This Statement was approved and signed by Peter Charlton as the Chief Executive Officer, Sole Director and principal governing body (as defined by the Act) of NOVA Entertainment Pty Ltd (ACN 093 553 989) on 7 October 2022.

Peter Charlton
Chief Executive Officer and Sole Director
NOVA Entertainment