

The SCA logo is rendered in a bold, white, sans-serif font. The letters 'S', 'C', and 'A' are connected, with the 'C' having a thick, rounded shape. The logo is centered horizontally and vertically within the upper half of the page.

**SCA**

**MODERN SLAVERY  
STATEMENT 2020**

This statement, pursuant to the *Modern Slavery Act 2018* (Cth), sets out the actions taken by the Southern Cross Media Group Limited ACN 116 024 536 and its related bodies corporate (together, **SCA**) to address modern slavery and human trafficking risks in our business and supply chain for the financial year ended 30 June 2020.

## OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

### Organisational structure

Southern Cross Media Group Limited is an Australian public company listed on the Australian Securities Exchange.

### Our business

SCA is one of Australia's leading media companies reaching more than 95% of the Australian population through its radio, television and digital assets. Under the Triple M and Hit network brands, SCA owns 98 stations across FM, AM and DAB+ radio. SCA provides national sales representation for 23 other regional radio stations. SCA broadcasts 92 free to air TV signals across regional Australia, reaching 4.4 million people a week, with Nine Network programming and advertising representation across Australia's East Coast, Seven Network programming in Tasmania and Darwin, and Seven, Nine and Ten programming in Spencer Gulf. SCA operates Australia's leading premium podcasting network - PodcastOne Australia – and provides Australian sales representation for global open audio platform SoundCloud. SCA's premium brands are supported by social media, live events, video, online and mobile assets that deliver national and local entertainment and news content.

SCA's total workforce on 30 June 2020 was approximately 1700, all based in Australia.

For more information about our business operations and strategy, please refer to our

website:

<https://www.southerncrossaustereo.com.au/>.

### Our supply chain

SCA has a relatively simple supply chain that includes the purchase of products and services needed for day-to-day operations including office supplies, broadcasting equipment, music and other content licensing, IT infrastructure and support services, banking services, marketing services, merchandise, and audit, tax, legal and other professional services.

While most of our direct supply chain expenditure is in Australia, SCA sources some goods and services from global suppliers who have operations in places such as the United Kingdom, the United States of America, Singapore, Hong Kong, Japan and Indonesia.

In these instances, we most often deal with Australian-based subsidiaries of our global suppliers. However, we acknowledge that their supply chains may include involvement from other jurisdictions.

## POTENTIAL RISKS IN OUR OPERATIONS AND SUPPLY CHAIN

SCA has reviewed the risk of modern slavery practices across our operations and supply chains.

During the assessment process, SCA considered risks that may possibly cause, contribute or be directly linked to modern slavery practices, in accordance with the Australian Government's Department of Home Affairs draft guidance document.

SCA has identified areas it considers are little to no risk, for example, in operational and recruitment activities directly undertaken by SCA.

SCA has also identified some areas it considers higher risk, and which will be the focus of this statement. These are areas in which SCA

engages with suppliers who might potentially participate in modern slavery practices themselves or whose own supply chains might be at increased risk of modern slavery practices. For example, SCA could purchase equipment through an Australian supplier that has been manufactured by an overseas entity with a record of modern slavery practices.

## ADDRESSING THE RISK OF MODERN SLAVERY PRACTICES

### *Our progress in the year ended 30 June 2020*

#### **Supplier Code of Conduct**

During this reporting period, we launched our Supplier Code of Conduct (**Code**).

The Code establishes SCA's expectations and the minimum standards of behaviour required of our suppliers in the areas of ethical business practices, conflicts of interest, environmental impacts and health and safety. It also specifically addresses labour, human rights and modern slavery standards.

In accordance with the Code, suppliers must not engage or be complicit in any practices of modern slavery and must complete our Supplier Questionnaire in respect of their operational practices.

The Code is publicly available on SCA's corporate website and has been issued directly to many of our major suppliers. We will continue to send the Code to new and existing suppliers.

Suppliers are expected to monitor their compliance with the Code and notify SCA as soon as practicable if they become aware of a reasonable risk of a breach. Suppliers are also expected to take reasonable steps to address, remedy and prevent the recurrence of any breach of the Code.

SCA may also periodically review or audit a supplier's compliance with this Code. If we discover a case of modern slavery within our supply chain (or indirectly through a supplier's own supply chain) we will first seek to work with the supplier to implement corrective action. Material non-compliance or continued non-compliance with the Code may lead SCA to disqualify a potential supplier or terminate a current supplier's business relationship.

#### **Supplier Questionnaire**

SCA does not have full transparency over the entire operations of each of its suppliers and has therefore developed a Supplier Questionnaire to assist our understanding of our suppliers' operations, supply chains and modern slavery standards. The Questionnaire has been sent to our major suppliers and those suppliers we consider operate in high risk sectors.

These questionnaires will be refreshed at appropriate intervals and will also be sent to all new major suppliers (and new suppliers we consider operate in high risk areas). SCA may take additional steps based on a supplier's response to our questionnaire or an assessment of the products and services provided by a supplier.

#### **Contract Terms**

SCA has also developed standard contractual clauses for major suppliers (and new suppliers we consider operate in high risk areas) requiring them to comply with relevant modern slavery laws and standards. We require these clauses to be incorporated in our contracts with applicable suppliers.

#### **Training**

We have briefed relevant members of our organisation about SCA's obligations under modern slavery legislation and SCA's processes described above to assess and address modern slavery risks.

## Grievances

We offer various channels for seeking guidance, reporting concerns and raising grievances including our internal Grievance Policy and Speak Up Program and our Whistleblowing Policy and whistleblowing hotline. These channels are available to our staff and third parties to report any wrongdoing, including fraud, unethical activity or irresponsible acts. Reports can be made anonymously. Corporate officers nominated in our policies are trained to conduct necessary investigations and, when required, to design and implement corrective actions.

## MEASURING EFFECTIVENESS

We have reviewed responses received to our Supplier Questionnaire. We have also reviewed the modern slavery policies and statements of several major suppliers. As a result of these reviews, we have not identified any material risk of modern slavery practices in our supply chains.

SCA intends to regularly review our Supplier Code of Conduct, Supplier Questionnaire and risk assessment processes to ensure they remain up to date and effective in assessing modern slavery risks.

We will also measure how effective we have been in mitigating modern slavery in our supply chain by tracking the number of suppliers that respond to our Supplier Questionnaire (or otherwise provide relevant information about their modern slavery standards).

While relevant members of staff have been briefed about SCA's obligations under modern slavery legislation, SCA also intends to educate staff more widely, for example through information on our internal intranet site, to raise awareness of the risks of modern slavery across our business.

## CONSULTATION

SCA requires all its related bodies corporate to follow corporate policies, including in relation to assessment and mitigation of modern slavery risks. SCA also has non-controlling interests in several entities in the broadcasting industry. Where appropriate, SCA has consulted with those entities to assess their approach to management of modern slavery risks.

*This statement has been endorsed by the Board of Southern Cross Media Group Limited.*



**GRANT BLACKLEY**  
Chief Executive Officer  
19 August 2020