

# Modern Slavery Statement

2022/23

# Acknowledgement of Country

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SBS acknowledges the enduring connection of First Nations peoples to Country and extends our respect to Elders past and present and all First Nations people across Australia.

The vibrant, dynamic and resilient cultures of First Nations peoples are central to our experience of Country and our shared identity as a nation. Aboriginal and Torres Strait Islander peoples are the first storytellers of this place and their knowledge continues to enrich and shape our national story.

SBS is committed to working with First Nations peoples to ensure their voices are heard and their stories are told, and in doing so, creating a more inclusive and equitable society for all Australians.



## Managing Director Foreword

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On behalf of SBS and the SBS Board of Directors, I am pleased to present and share SBS's fourth Modern Slavery Statement.

At SBS, our purpose is to inspire all Australians to explore, respect and celebrate our diverse world, and in doing so, contribute to a cohesive society.

Guided by the SBS Charter, SBS's principal function is to provide multilingual and multicultural broadcasting and digital media services that inform, educate and entertain all Australians, and in doing so, reflect Australia's multicultural society.

SBS is aware that modern slavery can occur in every industry and sector, including ours. In fulfilling our purpose and Charter obligations, we're focussed on conducting SBS's operations in a legal, ethical and socially responsible way.

As a reporting entity under the Modern Slavery Act 2018 (Cth) (the Act) and building on SBS's previous three Statements, SBS remains committed to opposing modern slavery in all its forms.

This Statement sets out the corporate action plans and risk management framework during the 2022/23 reporting period, to assess and address potential modern slavery risks related to SBS's business, operations and supply chains.

This Statement has been approved by the SBS Board of Directors in their capacity as principal governing body of SBS at their meeting on 22 November 2023 in accordance with the requirements of the Act.

A handwritten signature in blue ink that reads "James Taylor". The signature is fluid and cursive.

James Taylor  
Managing Director  
Date: 29 November 2023

# Who We Are

The Special Broadcasting Service Corporation (SBS) is Australia's most diverse broadcaster, holding a unique place in the Australian media landscape.

SBS was founded on the belief that every Australian, regardless of geography, age, cultural background or language skills, should be able to access independent, culturally relevant Australian media of a high standard, enabling them to actively participate in public life.

Almost 50 years later, SBS continues to inspire Australians to explore, respect and celebrate our diverse world and in doing so, contribute to an inclusive and cohesive society.

SBS invests in initiatives to deepen connections with communities, sharing their stories and giving a voice to those often unheard, to increase understanding of and respect for the differences that make up society.

While it began in 1975 as radio programs in a handful of languages, today SBS is a modern, multiplatform media organisation with a free-to-air TV portfolio spanning six distinctive channels; SBS, NITV, SBS Viceland, SBS Food, SBS World Movies and SBS WorldWatch. In addition, SBS Audio provides over 64 communities with in-language audio content, and SBS OnDemand provides 15,000 hours of on-charter content available anytime and anywhere.

## Core Values

**Underpinning our success, SBS's five values inform our behaviours and actions, and influence our decisions and how we work:**

### We are audience obsessed

We exist for them. We are passionate about understanding our audiences' needs and what inspires them. We make decisions with our audiences in mind. We build partnerships with the community.

### We embrace difference

We bring our whole self to work. We passionately pursue our purpose and we advocate for diversity. We don't tolerate inequality. We connect with people and ensure everyone is heard.

### We are bold and brave

We are thought provoking. We respectfully challenge each other. We don't accept the status quo. We aim for extraordinary. We recognise that when we fail a new learning opportunity is created.

### We engage and participate fully

We don't sit on the sidelines. We hold each other to account whilst accepting personal responsibility. We don't accept passengers along for the ride. We keep evolving through continuous improvement.

### We look out for one another

We foster a sense of belonging. We care for each other personally and professionally. We make it easy for people to do their job. We act as one team and support each other. We celebrate our success.

## SBS's Structure

SBS was established as an independent authority on 1 January 1978 under the *Broadcasting Act 1942 (Cth)*. In 1991 the *Special Broadcasting Service Act (Cth) (SBS Act)* came into effect and SBS became a corporation. Today, SBS is a Corporate Commonwealth Entity for the purposes of the *Public Governance, Performance and Accountability Act 2013 (Cth)* and is governed by the SBS Act.

SBS has a Board of Directors appointed by the Federal Government, which consists of the Managing Director and non-executive Directors. The SBS Board of Directors is responsible for deciding the objectives, strategies, and policies to be followed by SBS in performing its functions. They ensure that SBS performs in a proper, efficient, and economical manner, and with the maximum benefit to the people of Australia.

Responsibility for SBS lies within the portfolio of the Minister for Communications, the Honourable Michelle Rowland MP.

SBS does not own or control any other entities.

All of SBS's platforms, free-to-air channels, its streaming service and its SBS Audio services are covered by this Modern Slavery Statement.



# Organisational Structure

## Minister for Communications

The Hon Michelle Rowland MP

### SBS Board

#### Chair

George Savvides AM

#### Directors

Christine Zeitz

James Taylor  
(Managing Director)

Vic Alhadeff

Aaron Fa'Aoso<sup>1</sup>

Peeyush Gupta AM

Dr Andrew Lu AM<sup>2</sup>

Katrina Rathie

Cassandra Wilkinson<sup>3</sup>

William Lenehan<sup>4</sup>

Dorothy West OAM<sup>5</sup>

Nyunggai Warren

Mundine AO<sup>6</sup>

#### Audit and Risk Committee

##### Chair

Peeyush Gupta AM

#### Codes Review Committee

##### Chair

Katrina Rathie

#### Remuneration Committee

##### Chair

Christine Zeitz

### Community Advisory Committee

#### Chair

Vic Alhadeff

### SBS Executive Committee

#### Managing Director

James Taylor

#### Director, People & Culture

Stig Bell

#### Director, Indigenous Content

Tanya Denning-Orman

#### General Counsel

Theo Dorizac

#### Chief Technology Officer

Darren Farnham

#### Director, Television

Kathryn Fink

#### Director, Audio & Language Content

David Hua

#### Chief Financial Officer

Nitsa Niarchos

#### Director, Corporate Affairs

Clare O'Neil

#### Director, Marketing

Jane Palfreyman

#### Director, SBS Media

Adam Sadler

#### Director, News & Current Affairs

Mandi Wicks

#### Director, Corporate Strategy

Sarah Yassien

### SBS Ombudsman

Amy Stockwell<sup>7</sup>

1. Aaron Fa'Aoso was appointed to the Board on 16 February 2023

2. Dr Andrew Lu AM was appointed to the Board on 16 February 2023

3. Cassandra Wilkinson was appointed to the Board on 8 June 2023

4. Bill Lenehan's term on the Board expired on 7 November 2022

5. Dot West's term on the Board expired on 7 November 2022

6. Warren Mundine resigned from the Board on 12 September 2022

7. Amy Stockwell was appointed SBS Ombudsman on 29 September 2022 (Sally Begbie was previous SBS Ombudsman, who retired August 2022)

## SBS's Operations

**As the multicultural and diverse fabric of Australia evolves, SBS continues to invest in its operations. Guided by the SBS Charter, SBS deepens connections with communities, and increases respect and understanding within society as a whole.**

SBS offers a distinctive network across broadcast and digital platforms, encouraging diverse views and voices to be represented.

At SBS, we believe there has never been a more important time to inspire a greater understanding of multiculturalism. Through its operations, SBS provides unique services that support migrant communities and First Nations Australians and promotes the benefits of diversity to all Australians.

SBS operates across many platforms to deliver our Charter and achieve our purpose. SBS's operations can be categorised into four key activities:

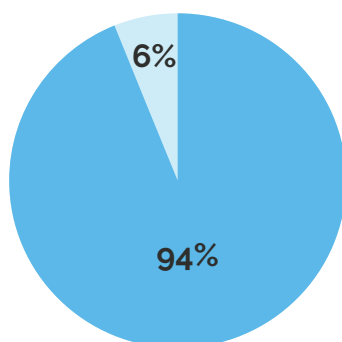
1. Content creation, acquisition and curation;
2. Content broadcast and distribution;
3. Content commercialisation; and
4. Content support activities.

SBS's commitment to diversity goes beyond content and our audiences. The diversity of SBS's employees in supporting our day-to-day operations, is one of SBS's greatest strengths. This is central to SBS's unrivalled connections to communities and the trust audiences have in SBS.

**As at 30 June 2023, SBS employs 1,773 employees in total and has operations in Sydney, Canberra, Melbourne, Brisbane, Hobart, Perth, Darwin, Adelaide and London. Further details about the composition of SBS's employment workforce as at 30 June 2023 are as follows:**

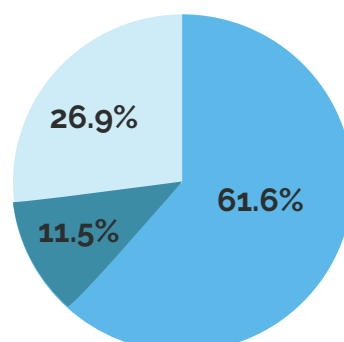
Figure 1: Composition of SBS Employee Workforce FY2022/23

### Employee Workforce Legal Framework



■ SBS Enterprise Agreement  
■ Other Legal Framework

### Employee Workforce Employee Type



■ Full Time  
■ Part Time  
■ Casual

# SBS Voluntary Diversity & Inclusion Survey, May 2023

## Identify as having a culturally diverse background

**58.2%**  
of SBS employees

**56%**  
of senior leaders

**88.9%**  
of SBS Board

**92%**  
of the SBS Audio team

**56.9%**  
of the SBS News and Current Affairs team

## Aboriginal and/or Torres Strait Islander people<sup>†</sup>

**4.8%**  
of SBS employees

**13.8%**  
of senior leaders

**11.1%**  
of SBS Board

## Women<sup>\*</sup>

**52.8%**  
of SBS employees

**51.3%**  
of senior leaders

**33.3%**  
of SBS Board

## Born overseas

**39.7%**  
of SBS employees

**30.1%**  
of senior leaders

**33.3%**  
of SBS Board

## Diverse sexuality

**17.7%**  
of SBS employees

**15%**  
of senior leaders

**12.5%**  
of Board members<sup>†</sup>

## Have a disability or chronic condition requiring workplace adjustments

**13.1%**  
of SBS employees

**13.5%**  
of senior leaders

**11.1%**  
of SBS Board

## Identify as a person of colour

**24.5%**  
of SBS employees

**18.6%**  
of senior leaders

**44.4%**  
of SBS Board

<sup>\*</sup> SBS payroll data. All other data is based on voluntary information provided by employees, and how employees self-identify, via SBS's anonymous annual diversity and inclusion survey conducted May 2023.

<sup>†</sup> Represents total percentage of respondents who answered this question.



## SBS's Supply Chain

**SBS procures a diverse range of goods and services from a range of suppliers. These suppliers support SBS's operations and services as a multilingual and multicultural broadcasting and digital media service.**

While SBS's focus is delivering services to Australian audiences and SBS core activities take place in Australia, some limited core activities for News and Current

Affairs (NACA), SBS Audio and TV and Online Content take place overseas.

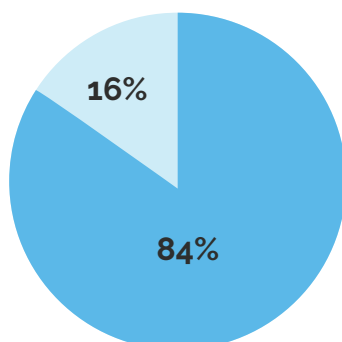
During the 2022/23 reporting period, SBS procured goods and services from 3820 direct suppliers<sup>8</sup>. The majority of SBS's suppliers were based in Australia. However, 596 of SBS's direct suppliers were based overseas. SBS also recognises that many of its local suppliers source components of their goods or services from overseas. For example,

- equipment, software, fittings, furnishings and stationery, ingredients and supplies for hospitality and event planning services, and customer support for telecommunications, electricity, software, internet and insurance services are often sourced from overseas.
- SBS Audio has longstanding arrangements with experienced, reputable freelance journalists all over the world who provide various reporting and production services for SBS Audio content.

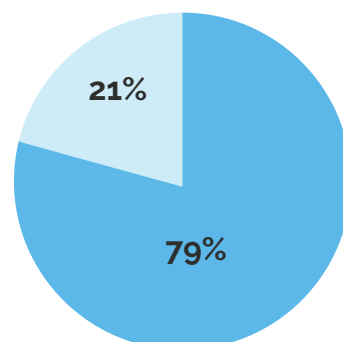
The graphs below at Figure 2 show the composition of SBS's direct suppliers, and the graph at Figure 3 sets out SBS's top ten countries by number of suppliers engaged in those countries.

Figure 2: Composition of SBS direct suppliers during the 2022/23 reporting period<sup>9</sup>.

### SBS Suppliers by Number



### SBS Suppliers by Spend



■ Local Suppliers  
■ Overseas Suppliers

<sup>8</sup> This analysis is based on suppliers recorded in SBS's invoice management system for the reporting period.

<sup>9</sup> Based on location where invoices are issued from/payment sent to for the 2022/23 reporting period.

### Top 10 overseas countries based on number of suppliers engaged

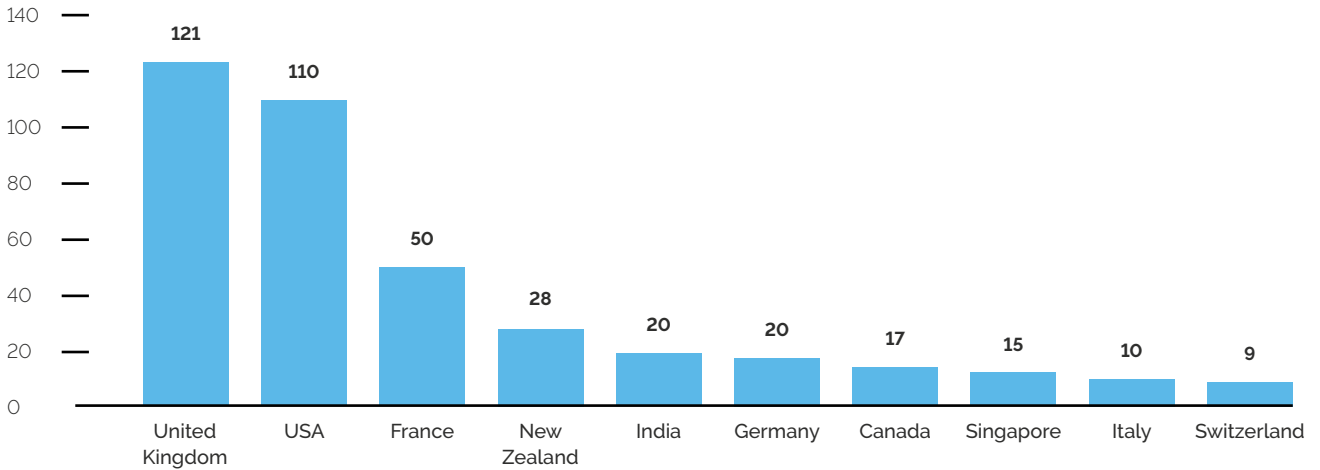
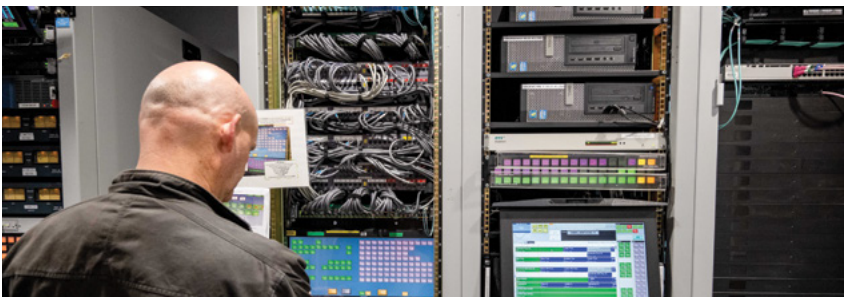


Figure 3: Top 10 overseas countries, based on number of suppliers engaged and location where invoices are issued from/payment sent to, for 2022/23.

#### SBS's main procurement categories include:

- Information, broadcast and communications technology and services (including computer hardware and software, radio and television equipment, broadcast operations and other major technology and engineering equipment and services).
- Office facilities management (including property, equipment and facilities repairs, maintenance and cleaning services, electricity and internet services and leasing).
- Commissioned and acquired content and related services (including production services, distribution, music, research, in-language translation and interpreting services, and international stringer services).
- On-air talent services (including make-up and hair products, textiles).
- Marketing and promotional services (including photography, editing and publicity services).
- Professional services (including insurance, financial management software, consultancy services and external legal counsel).
- Human resources (including external recruitment and training software and services).
- Hospitality and catering services (including food and beverages).
- Business travel (including transport and accommodation).

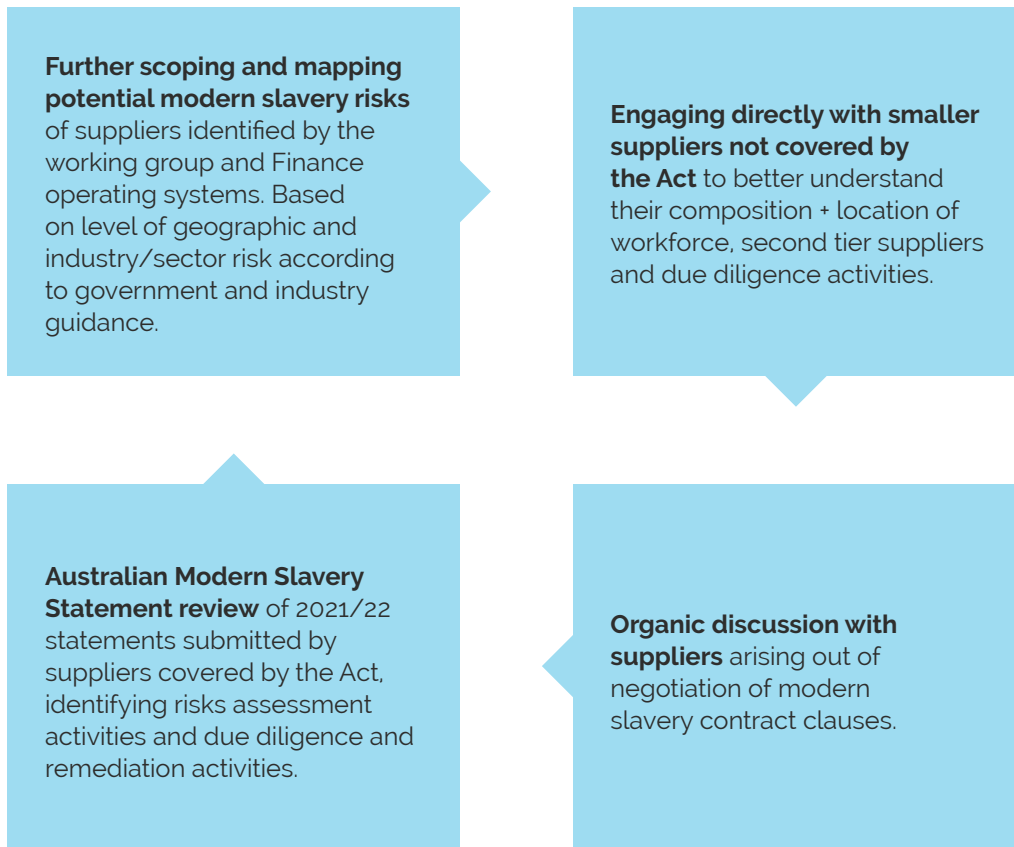


**SBS has long term arrangements with reputable suppliers for telecommunication, electricity and internet services, property, equipment, and facilities repairs.**

# Modern Slavery Risks

During the 2022/23 reporting period, SBS continued to apply a risk-based methodology to review, assess, and prioritise potential modern slavery risks arising in its operations and supply chains. Continuing its previous work, SBS carried out a robust three-step scoping and mapping exercise and due diligence activities to assess its operations and supply chains, focusing on the following activities set out in Figure 4

Figure 4: SBS's due diligence activities during the 2022/23 reporting period.



SBS's assessment of modern slavery risks was carried out in accordance with the SBS value, "we look out for one another", and against the background of SBS's robust labour practices and existing workplace policies. These policies, aimed at ensuring a safe and just working environment, which also guide SBS's approach to mitigating modern slavery risks in its operations and supply chains, include:

- **Code of Conduct** - applies to employees, contractors, and officers of SBS. The SBS Code of Conduct ('Code') sets the standards for the way to work at SBS and outlines responsibilities as an SBS team member. At the heart of the Code is the importance of doing the right thing and upholding the reputation of SBS. The Code was updated and re-launched during this reporting period, and now includes a section on compliance with the Modern Slavery Act.
- **Appropriate Workplace Behaviour Policy** – outlines SBS's commitment to achieving a workplace where everyone is treated fairly and with respect and is free from unlawful discrimination, harassment, sexual harassment, bullying, vilification, and victimisation. The policy applies broadly to all SBS team members (including contractors and sub-contractors), including when interacting with SBS's customers, clients, and suppliers.
- **Working with Children & Child Employment Policy** - SBS acknowledges the vulnerability of children in the workplace and is committed to ensuring the safety and well-being of all children who are employed by SBS or who may be involved in or directly affected by the work of SBS.
- **Workplace Health, Safety and Wellbeing Policy** – outlines SBS's commitment to fostering a positive safety and wellbeing culture and to ensuring the workplace health and safety (WHS) of all its employees, contractors, customers, visitors, and members of the public who may be affected by its work.
- **Finance Manual** – includes sections on 'Third Party Risk Framework' and 'Purchasing Guidelines' which reference modern slavery as a relevant consideration when engaging third parties.
- **Contractor Management Policy** – sets out the responsibilities of all SBS staff responsible for engaging independent contractors to carry out work for, or provide services to SBS.

SBS's risk-based approach to modern slavery takes into account risks associated with geographic locations, industries and types of products and services provided. SBS's approach is informed by the Global Slavery Index (GSI<sup>9</sup>), a reputable tool that provides global data on the estimated prevalence of modern slavery, an analysis of a country's vulnerability to modern slavery, and the relevant Government's response to modern slavery.

***SBS has assessed the risk of modern slavery in its operations to be low. SBS's head office and over 99% of SBS's employees are located in Australia, which has been assessed by GSI as having a low prevalence of, and vulnerability to, modern slavery.***

Australia has also been recognised by GSI as having the second strongest government response to modern slavery globally. SBS operates within Australia's employment law framework, complies with all applicable legislation and has robust workplace policies in place as detailed above.

In relation to SBS's supply chain, as set out previously at Figure 2, the majority of SBS's suppliers are located in Australia and are subject to the same robust labour practices as SBS. However, SBS acknowledges that in the reporting period it engaged suppliers in certain industries, or product/services categories or from geographical locations that have been identified by GSI as having potentially higher exposure to modern slavery risks. SBS continued its scoping and mapping exercise in the 2022/23 reporting period to examine direct links it may have to modern slavery risks. Taking a risk-based approach, two categories SBS focused on in the 2022/23 reporting period included:

- Facilities management, particularly cleaning services.
- Hospitality including catering.

<sup>9</sup> Global Slavery Index 2023 - <https://www.walkfree.org/global-slavery-index/map/>



CASE STUDY

## CLEANING SUPPLIER

In previous statements, SBS noted that it had long term arrangements in place with its cleaning service providers. However, during the 2022/23 reporting period, SBS engaged a new cleaning supplier for one of its offices. The cleaning industry is recognised as a potential high risk area for modern slavery, due to a focus on low-cost service delivery and as the workforce often includes migrant workers on temporary visas who may not be fully aware of their legal rights and entitlements. As such, SBS took steps to mitigate potential risk, including by:

- Conducting due diligence in the RFP phase and issuing a questionnaire to understand the supplier's awareness of modern slavery and to gain greater

insight into their supply chain.

- Providing the supplier with an informational guidance note on modern slavery, the Act, what SBS is doing to combat modern slavery and how to report suspected instances of modern slavery to SBS.
- Including SBS's standard modern slavery clause in the contract.
- Providing training on modern slavery to SBS's Workplace and Property Services team.
- Sharing a link to the 'Modern Slavery in the Cleaning Industry' educational video, developed by the Cleaning Accountability Framework and available in the resources section of the Australian

Modern Slavery Register, internally to SBS's cleaning contract owner and externally to SBS's new cleaning supplier.

***Based on the information available and cooperation of the cleaning supplier in responding to our due diligence activities, SBS is confident that any potential modern slavery risk is being appropriately addressed and mitigated by this supplier.***

## HOSPITALITY/CATERING SUPPLIER

In the reporting period, SBS entered a contract with a new Australian supplier in the hospitality and catering category. The hospitality and catering industry is recognised as carrying a higher potential risk of modern slavery, as the workforce often includes migrant workers or short-term employees who may be more vulnerable to risks of modern slavery practices.

Action taken by SBS to understand and assess modern slavery risks included:

- Issuing a questionnaire to understand the supplier's awareness of modern slavery and to gain greater insight into the supply chain;
- Recognising that the supplier is a smaller business, with no mandatory reporting obligations under the Act, SBS provided the supplier with an

informational guidance note on modern slavery, the Act, what SBS is doing to combat modern slavery and how to report suspected instances of modern slavery to SBS.

- Providing training on modern slavery to SBS's Workplace and Property Services team.

The supplier has acknowledged that it has low visibility over risk in its supply chain, low knowledge of modern slavery risks, and currently has no systems in place to adequately address modern slavery. However, the supplier has:

- Indicated a commitment to educate their business, implement systems to report suspected cases of modern slavery; and
- Contacted their larger suppliers to assess risk and map their supply chain.

*As an Australian small business with a relatively flat supply chain, SBS considers that any potential modern slavery risk identified in relation to this supplier pose a low actual modern slavery risk to SBS.*



## COVID-19 Response

**The COVID-19 pandemic had an impact on all aspects of SBS's operations and supply chains during the 2020/21 and 2021/22 reporting periods.**

As detailed in our previous reports, SBS had to:

- limit events and travel;
- reprioritise its core operations to prioritise the safety and wellbeing of its workers; and
- postpone some productions, non-essential projects and in-person community engagements.

These changes had flow-on impacts for SBS's supply chains.

SBS's modern slavery response was also impacted in the previous reporting periods by Covid-19. This included:

- lack of face-to-face training;
- limited supplier engagement in due diligence as many businesses were focused on keeping their businesses afloat; and
- reduced use of certain suppliers, particularly in hospitality/catering, merchandise, travel, transport and accommodation services.
- re-engage certain suppliers which were for the most part non-operational during the height of the Covid-19 pandemic, including hospitality and catering, travel and accommodation services.

***Overall, the level of engagement with suppliers improved during this reporting period.***

However, as restrictions both in Australia and globally eased, so did the impacts on SBS's operations and supply chains. As a result, during the 2022/23 reporting period, SBS was able to:

- re-deliver face-to-face training as staff returned to the office in 2022 in a hybrid capacity;
- re-engage with suppliers to conduct due-diligence; and

SBS acknowledges the ongoing impacts of Covid-19 on some operations and supply chains globally and the additional risks it presents to vulnerable workers worldwide. SBS will continue to work with suppliers to assess, address and mitigate the risks of modern slavery to vulnerable workers.





## What SBS Found

**SBS has not identified that any of its operations or supply chains cause or contribute to modern slavery risks by being complicit in, facilitating or incentivising modern slavery.**

As a result of SBS's due diligence activities in the 2022/23 reporting period and previous periods, SBS considers that any potential modern slavery risks identified among our group of suppliers are in most cases being appropriately addressed and mitigated by those suppliers. SBS's larger suppliers had mostly submitted robust Modern Slavery Statements during the previous reporting period,

which comprehensively addressed their modern slavery mitigation practices.

However, SBS recognises that in some cases it was the first time certain smaller suppliers were questioned about or had considered modern slavery risks within their operations or supply chains. In these limited cases, it was obvious, through SBS's due diligence activities, that modern slavery risks were not being adequately addressed or mitigated by the supplier. SBS acknowledges that additional resources may need to be offered to its smaller suppliers in future to help them better understand their supply chain and modern slavery risks (as set out in the 'future actions' section below).

Greater supplier knowledge and awareness of modern slavery risks will also assist SBS with its own risk assessment going forward.

*Overall, SBS assesses its likelihood of being directly linked to modern slavery risks or practices through its operations or supply chains as low.*

*SBS has identified areas of improvement, particularly in relation to smaller suppliers, and endeavours to address those in future reports, as set out in the 'future actions' section.*



# Summary of Actions To Assess and Address Modern Slavery Risks in the 2022/23 Reporting Period

SBS's key activities during its fourth reporting period are summarised in the table below.

<b>Further in-depth scoping and assessment of SBS's operations and supply chains and due diligence</b>	<ul style="list-style-type: none"> <li>- SBS reviewed its list of suppliers (as recorded in Finance's operating systems) against GSI's current data to map and assess risk.</li> <li>- SBS's tender procurement process continued to require consideration of modern slavery risks.</li> <li>- SBS sent due diligence questionnaires to some new suppliers in medium and high-risk industries, including cleaning services, hospitality and financial services and assessed their responses.</li> </ul>
<b>Raising awareness of modern slavery</b>	<ul style="list-style-type: none"> <li>- SBS prepared a practical guidance note for smaller suppliers who are not subject to the Act and lack the resources to understand modern slavery risks. This guidance was provided to a supplier in the hospitality industry who had limited knowledge of modern slavery laws and requirements. In response, the supplier advised SBS that they planned to educate themselves further to implement policies and had contacted some of their larger suppliers for further details.</li> <li>- SBS continued to increase internal learning opportunities and raise further awareness of the Act and SBS's commitment to combatting modern slavery. During the reporting period, internal training sessions were provided to SBS's Corporate Affairs and Workplace and Property Services teams.</li> <li>- Information on SBS's modern slavery obligations were included in SBS's Board induction pack. SBS welcomed 3 new board members during the reporting period.</li> <li>- SBS shared the 'Modern Slavery in the Cleaning Industry' educational video, developed by the Cleaning Accountability Framework and available in the resources section of the Australian Modern Slavery Register, internally to SBS's cleaning contract owner and externally to SBS's new cleaning supplier.</li> </ul>
<b>Content coverage related to modern slavery</b>	<ul style="list-style-type: none"> <li>- During the reporting period, SBS's News and Current Affairs team has broadcast or published 23 digital, 16 SBS World News, and 5 audio stories related to modern slavery and related topics such as wage theft and human trafficking</li> </ul>

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**Training**

- SBS continued delivering an online bespoke modern slavery training module to SBS employees who engage contractors or who are otherwise involved in procuring goods and services for SBS.
- The purpose of the training is to help staff to identify modern slavery risks in SBS's operations and supply chain and to engage in discussions with suppliers about modern slavery risks.
- In the previous reporting period, SBS achieved a 100% (200 people) completion rate for required employees assigned the online training module.
- In the 2022/23 reporting period, 95% of the 38 new employees who engage suppliers or contractors successfully completed the training module.

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**Updated Code of Conduct**

- SBS reviewed and updated its Code of Conduct for SBS workers which led to the inclusion of a new section on SBS's compliance with the Act, emphasising the importance to SBS of combatting modern slavery in its operations and supply chains and setting expectations for the role that employees and contractors play in doing so.

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**Modern Slavery contractual clauses**

- SBS's Request for Proposal (RFP) tender template was updated in the reporting period, including the modern slavery section, to reflect the Australian government's best practice clause.
- SBS continued to incorporate its tailored modern slavery clauses into new contracts with suppliers.

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**Dedicated modern slavery intranet portal**

- SBS continued to update its dedicated modern slavery online portal to provide key resources and information to employees on modern slavery laws and obligations.
- The portal also includes details for internal contacts and links to report allegations of modern slavery to SBS's whistleblowing service.

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**Whistleblowing hotline**

- SBS's contracted independent whistleblowing service continues to enable employees to report any allegations of modern slavery in SBS's supply chains safely and securely via an independent whistleblowing platform.
- No reports of suspected (or actual) cases of modern slavery have been made to SBS's whistleblowing service in the reporting period.

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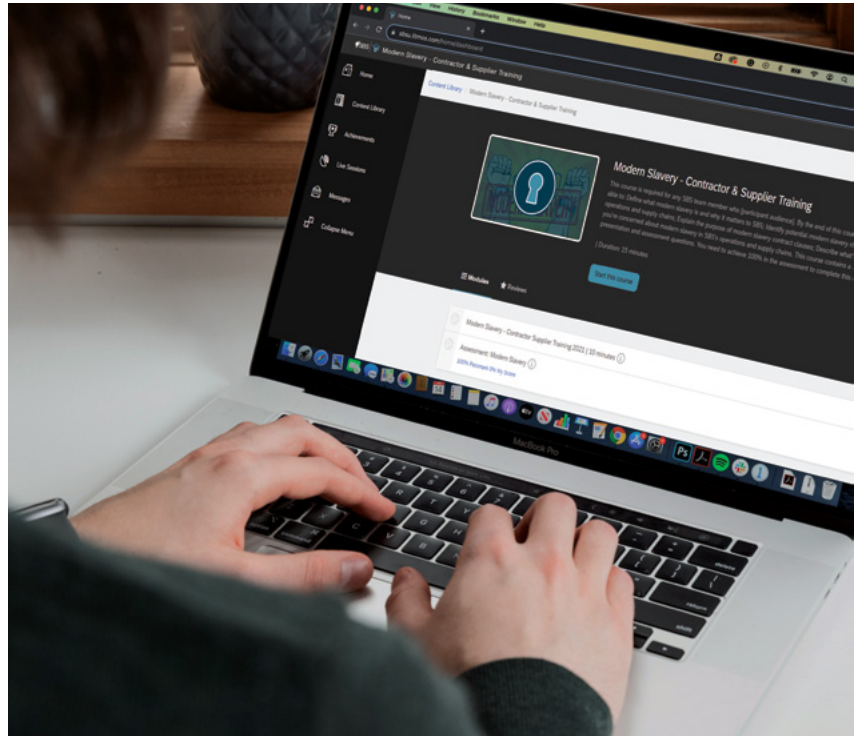
**SBS's modern slavery working group**

- SBS continued to facilitate a modern slavery working group comprising representative from Legal, TV and Online Content, Finance, Technology, Corporate Affairs, ALC, NACA and Workplace and Property Services, led by Legal
  - SBS Legal representatives reviewed relevant industry published statements from the previous reporting period and presented a summary of the review findings and potential next steps to the SBS modern slavery working group.
  - The working group examined learnings from the previous reporting periods, and discussed processes, risk assessment and potential improvement opportunities.
  - SBS Legal representatives attended a workshop dedicated to modern slavery, as part of their Continuing Professional Development (CPD) commitments.
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## Assessing The Effectiveness of SBS's Actions

The effectiveness of actions already taken by SBS to address modern slavery risks is difficult to quantify. However, SBS considers the following information relevant to assessing how effective and impactful its actions have been during the 2022-23 reporting period:

- 95% of staff assigned the online modern slavery training module during the reporting period have completed the course. To complete the course, staff require 100% correct answers to the in-built knowledge test.
- SBS continued to include modern slavery clauses in contracts with a broad suite of suppliers. Some suppliers raised concerns or asked questions about the clause, which has opened discussions about modern slavery and enabled SBS greater insight into its current operations and supply chains.
- Through SBS's due diligence activities and direct contact with suppliers, SBS continues to raise awareness of key modern slavery issues.
- No reports of suspected (or actual) cases of modern slavery were reported through SBS's due diligence processes or to SBS's whistleblowing hotline.



***SBS's modern slavery working group will continue to monitor progress and assess the effectiveness of SBS's actions to assess and address modern slavery risks within its operations and supply chain.***

## SBS's Future Actions

**SBS aims to continually improve its approach to assessing and addressing modern slavery risks in its operations and supply chains. SBS has identified the following areas for future consideration and action:**

- **Develop a Supplier Code of Conduct (Supplier Code)** to reflect SBS's core values and to set out the minimum standards expected of SBS's suppliers in relation to ethical and social responsibility and related topics, including modern slavery.
- **Develop a grievance, escalation and remediation framework** to ensure concerns and risks of modern slavery are appropriately addressed and brought to the attention of SBS's senior leadership. The aim of the framework would be to set out clear internal escalation points and process and address reporting mechanisms, response protocols and remediation steps to respond to reports of modern slavery.
- **Consider partnership opportunities with community organisations** to raise further awareness of modern slavery. SBS aims to be a positive example within the community through a range of Corporate Social Responsibility (CSR) initiatives, supporting organisations in raising awareness of issues aligned to the SBS Charter. Beyond this, SBS employees also engage with and support charities through staff volunteering initiatives, fundraising drives, events and internal staff network groups.
- **Monitor the Federal Government's review of the Modern Slavery Act** to stay up to date with government reforms and recommendations and update SBS's policies and processes as required.
- **Develop and share tools to assist smaller suppliers** to identify risks and improve their processes to assess and address risks of modern slavery in their operations and supply chains. SBS recognises the greater vulnerability of the small business sector often due to a shortage of resources and lack of awareness of modern slavery.
- **Continue to deliver training and education to SBS staff** who engage contractors or are involved in procuring goods and services for SBS. This will include continuing to require all new staff who procure goods and services for SBS to complete the online modern slavery training module. SBS will also follow up the 5% of required staff who did not complete the training module within this reporting period to ensure they complete the course. SBS will continue its business-wide focus on raising the awareness of modern slavery, educating staff and reiterating SBS's commitment under the Act to combat modern slavery.
- **Continue work on SBS's Environmental, Social and Governance (ESG) framework**, which aims to reduce SBS's impact on the environment and incorporate sustainability in SBS's actions and practices. SBS is considering incorporating modern slavery as part of SBS's ESG framework.

*We require all new staff who procure goods and services for SBS to complete the online modern slavery training module.*

