

Modern Slavery Statement

2024/25

Acknowledgement of Country

SBS acknowledges the enduring connection of First Nations peoples to Country and extends 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

On behalf of SBS and the SBS Board of Directors, I am pleased to submit SBS's Modern Slavery Statement for the 2024/25 reporting period.

As we celebrate SBS's 50th year, SBS is focused on delivering on our purpose to inspire all Australians to explore, respect and celebrate our diverse world, and in doing so, contribute to a cohesive society.

SBS is committed to playing its part in reducing the risk of modern slavery in our operations and supply chains. We are focused on conducting SBS's business in a legal, ethical and socially responsible way.

This Statement outlines the measures SBS has implemented during the 2024/25 reporting period to address the objectives of the *Modern Slavery Act 2018* (Cth) (**the Act**) and to assess potential modern slavery risks related to SBS's business, operations and supply chains.

This Statement is made in compliance with the Act and has been approved by the SBS Board of Directors in their capacity as principal governing body of SBS at their meeting on 26 November 2025.

A handwritten signature in black ink that reads "Palfreyman". The signature is written in a cursive, flowing style.

Jane Palfreyman
Managing Director (Acting)
Date: 26 November 2025

Who We Are

The Special Broadcasting Service Corporation (**SBS**) is Australia's most distinctive and multicultural broadcaster, occupying a unique place in the Australian media market.

The SBS Charter sets out SBS's principal function: to provide multilingual and multicultural broadcasting and digital media services that inform, educate and entertain all Australians, and reflect our multicultural 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 content in more than 60 languages, including First Nations languages, and SBS On Demand provides a catalogue of over 15,000 hours of curated content from Australia and across the globe.

National Indigenous Television (**NITV**) joined SBS in 2012, marking a major milestone in Australian broadcasting history and in SBS's reconciliation journey. As well as bringing the channel to a national free-to-air audience for the first time, it enabled SBS to amplify Indigenous-led content across all channels and platforms, and support NITV's increasing investment in content, in partnership with Australia's First Nations production sector.

SBS Values

Underpinning our success, SBS's five values inform our behaviours and actions, and influence our decisions and how we work, including our approach to combatting modern slavery:

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 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 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 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 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.

SBS does not own or control any other entities.

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

SBS's Operations

As Australia's multicultural and First Nations broadcaster, SBS provides unique services that support migrant communities and First Nations peoples and promotes the benefits of diversity to all Australians.

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 continue to take place overseas.

SBS's operations can be categorised into the following four key activities, all of which

contribute to SBS delivering on its Charter and achieving its purpose, for the benefit of all Australians:

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

SBS takes a platform-agnostic approach to content, distributing our broad and diverse offerings across linear television, radio, on demand and digital channels.

As at 30 June 2024, SBS had a total headcount of 1,312 permanent employees. The majority of SBS staff are based in SBS's head office in Sydney.

SBS also has operations in Adelaide, Brisbane, Canberra, Darwin, Hobart, Melbourne and Perth. SBS operates across ten main departments, with many more sub-teams and key functions. These ten divisions are:

- Audio and Language Content (ALC);
- Corporate Affairs;
- Finance;
- Legal;
- Marketing;
- News and Current Affairs;
- People and Culture;
- SBS Media;
- Technology; and
- TV and Online Content, including NITV.

SBS's Supply Chain

As outlined in SBS's previous statements, SBS procures a diverse range of goods and services from a range of suppliers. These suppliers support SBS's operations and services as a multicultural and First Nations broadcasting and digital media service.

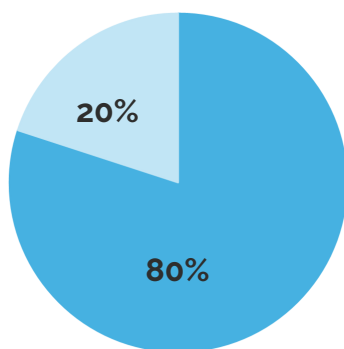
Based on spend, SBS's top three procurement categories in the 2024/25 reporting period were:

- Broadcast equipment and service;
- Program and merchandise acquisition; and
- Distributors.

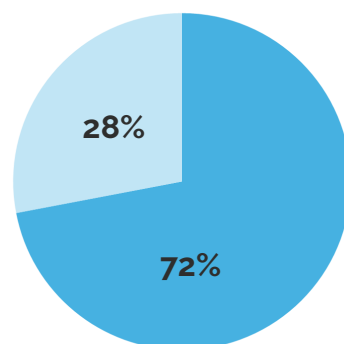
During the 2024/25 reporting period, SBS procured goods and services from 2,963 direct suppliers¹. The majority of SBS's suppliers (80%) continue to be based in Australia. However, 581 (20%) of SBS's direct suppliers were based overseas².

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 during the reporting period.

SBS Suppliers by Number



SBS Suppliers by Spend



■ Local Suppliers
 ■ Overseas Suppliers

Figure 1: Composition of SBS direct suppliers during the 2024/25 reporting period.

¹ This analysis is based on suppliers recorded in SBS's invoice management system for the reporting period.
² Based on location where invoices are issued from/payment sent to for the 2024/25 reporting period.

Top 10 overseas countries based on number of suppliers engaged

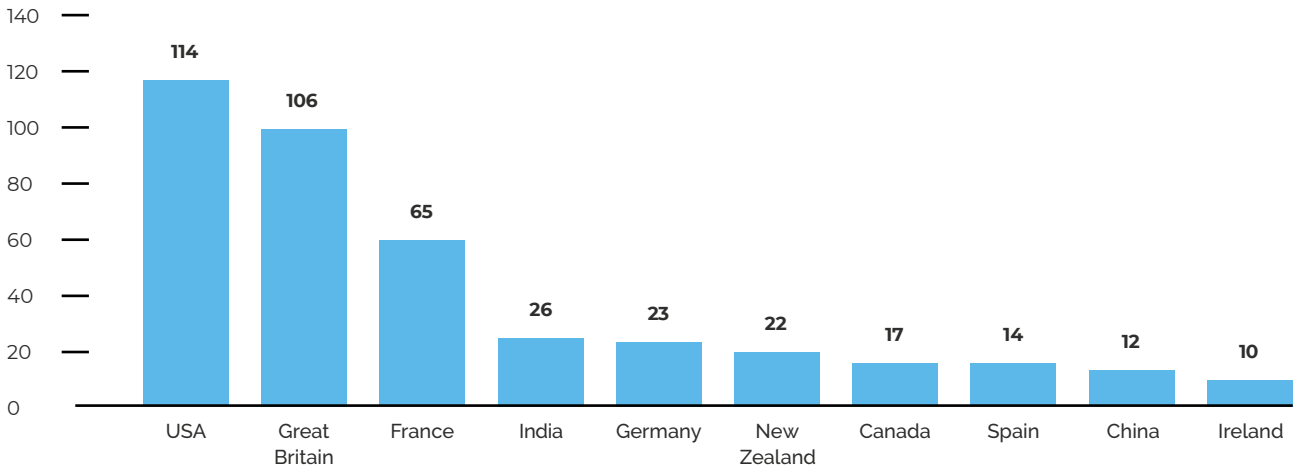


Figure 2: Top 10 overseas countries, based on number of suppliers engaged and location where invoices are issued from/payment sent to, for 2024/25.

For many years, SBS has demonstrated a commitment to ethical sourcing and has provided opportunities to promote Aboriginal and Torres Strait Islander cultures, communities and businesses through the procurement of goods and services owned by First Nations people.

SBS continues to contribute to positive outcomes for all Australians, including its commitment to supporting cohesion, reconciliation and sustainability.

SBS has a four year Elevate Reconciliation Action Plan (RAP), which outlines SBS's commitment to cultural awareness, recognition, reconciliation and Indigenous employment. One of SBS's key commitments under SBS's Elevate RAP is to accelerate growth and investment in the Indigenous production sector, media sector and enterprises.

SBS also has a strong leadership position within the media and corporate industry on sustainability. As part of this work, SBS partnered with key suppliers across content, technology and marketing to understand their progress in measuring and reducing their carbon footprint as SBS's suppliers contribute to SBS's scope 3 emissions.

SBS is committed to increasing procurement with First Nations businesses, and to lead the industry on sustainability. Noting SBS's ongoing commitment, SBS has identified these two areas of procurement as a focus of SBS's future plans to raise awareness and

to further understand risks within our supply chain, as detailed in the 'SBS Future Actions' section below.

SBS continues to contribute to positive outcomes for all Australians, including its commitment to supporting cohesion, reconciliation and sustainability.

Modern Slavery Risks in SBS's Operations and Supply Chain

During the 2024/25 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.

SBS's risk-based approach to modern slavery takes into account risks associated with geographic locations of suppliers, industries and types of products and services. SBS's approach continues to be informed by the Global Slavery Index (GSI)³, 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 also reviews modern slavery statements published by the industry and suppliers, and monitors emerging risks identified by industry experts, media reporting, and NGO reports.

SBS continues to assess 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, a country 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 strongest government response to modern slavery in the Asia Pacific region,

and the equal second strongest response globally. SBS operates within Australia's employment law framework and complies with all applicable legislation. SBS has robust workplace policies in place (as detailed in SBS's 2022/23 statement) that cover SBS's expectations regarding workplace behaviours and procedures for engaging suppliers. SBS also has accessible grievance mechanisms for SBS employees, including anonymously through SBS's whistleblowing scheme, YourCall. There were no reports of modern slavery being made to YourCall in the 2024/25 reporting period.

In relation to SBS's supply chain, the majority of SBS's direct suppliers (80%) are also located in Australia and are subject to the same robust labour practices as SBS.

Despite the majority of SBS suppliers being based locally, SBS understands that modern slavery risks are not simply eliminated because a supplier is based in Australia, and that SBS's supply chain extends beyond its direct suppliers. However, many of SBS's larger suppliers operating within Australia are also required to report annually on the steps they have taken to assess and address modern slavery risks in their operations and supply chains. As such, SBS reviews select supplier statements each year to gain greater insight into the supplier and their supply

chain, and any risks or mitigation measures they have in place. This assists with SBS's risk assessment and helps to inform SBS's approach to addressing any modern slavery risks within its supply chain.

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.

The following procurement categories have been identified by SBS as having higher inherent risk of potential modern slavery practices:

- **Hospitality and catering services:** as the workforce often includes migrant workers or short-term employees who may be more vulnerable to modern slavery.
- **Facilities management, particularly cleaning services:** 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.
- **Renewable energy:** because renewable energy products are often produced in high-risk countries by vulnerable workers under conditions of modern slavery.

³ Global Slavery Index - <https://www.walkfree.org/global-slavery-index/map/>

- **Information, broadcast and communications technology equipment and services:** as raw materials are often extracted in higher risk countries, and components of software and hardware are often produced by low skilled workers in high-risk countries.

As a result of SBS's due diligence activities, SBS considers that any potential modern slavery risks identified among its group of direct suppliers are in most cases being appropriately addressed and mitigated by those suppliers. SBS's larger suppliers have continued to improve their reporting and have mostly submitted robust modern slavery statements during the previous reporting period, which identified risk areas and comprehensively addressed their modern slavery mitigation practices. SBS considers that these larger suppliers covered by the Act pose a low actual modern slavery risk to SBS.

However, SBS acknowledges that it is an ongoing challenge to gain visibility over its indirect suppliers (tier two suppliers and those further down the supply chain). This is particularly challenging with SBS's smaller suppliers that often lack the resources to effectively identify, address or mitigate risk within their supply chain, and who are not subject to the Act. This continues to limit

SBS's oversight and ability to address modern slavery risks more adequately. SBS will continue to issue SBS's supplier questionnaire to suppliers for additional information, particularly for details about SBS's indirect suppliers, and to engage in organic discussions with suppliers.

Overall, SBS continues to assess its likelihood of causing, contributing or being directly linked to modern slavery risks or practices through its operations or supply chains as low. However, SBS acknowledges that greater knowledge of indirect suppliers and awareness of modern slavery risks further down the supply chain is important. SBS has identified areas of risk that SBS will continue to monitor and assess, as well as areas of improvement, as set out in the 'SBS's future action' section.

Summary of Actions to Assess and Address Modern Slavery Risks in the 2024/25 Reporting Period

SBS's key activities during the 2024/25 reporting period are summarised in the table below

Streamlining reporting processes	<ul style="list-style-type: none"> - SBS's primary focus for this period has been on improving the efficiency of our modern slavery reporting processes by focusing on the most critical areas of concern and reducing the operational impacts of reporting.
Modern slavery contractual clauses	<ul style="list-style-type: none"> - SBS has continued to focus on incorporating its best practice modern slavery clauses into new contracts with suppliers and the number of new contracts that use these terms has steadily increased. - SBS continues to engage with our suppliers to improve the overall transparency and legal compliance of all aspects of our supply chain. The SBS Producer Hub provides SBS's Modern Slavery Guidance Note and SBS's Supplier Questionnaire to assist producers to assess their supply chain.
SBS's due diligence activities in the 2024/25 reporting period	<ul style="list-style-type: none"> - SBS continues to review its list of suppliers (as recorded in its Finance operating systems) against GSI's current data to map and assess risk. - SBS conducted due diligence desktop screening checks, including reviewing publicly available information about suppliers identified as high risk and any other information supplied to SBS by the supplier on request by SBS.
Launch of Australian Red Cross and SBS Modern Slavery training program	<ul style="list-style-type: none"> - The SBS Inclusion Program and the Australian Red Cross launched an online Modern Slavery training program - This innovative program is informed and inspired by the experiences and resilience of survivors and draws on the perspective of leading experts and practitioners from across the sector. It offers actionable insights and impactful strategies to help organisations identify, prevent and address modern slavery in all its forms.
Internal Training	<ul style="list-style-type: none"> - SBS continued to deliver 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.

SBS's modern slavery working group

- SBS continued to facilitate a modern slavery working group comprising representative from Legal, TV and Online Content (including NITV), Finance, Technology (including Workplace and Property Services), Corporate Affairs, ALC, NACA and Marketing, led by Legal.
- Relevant industry published statements from the previous reporting period were reviewed to gain insights.

Content coverage related to modern slavery

- SBS recognises the opportunity it has to influence consumer behaviour and regularly provides coverage of issues related to modern slavery such as wage theft and human trafficking through its extensive television, radio and digital media services.

Dedicated modern slavery intranet portal

- SBS provides a dedicated modern slavery online portal for employees to access key resources and information on modern slavery laws and obligations including:
 - details of all divisional representatives in the SBS Modern Slavery Working Group to ensure staff know who they can contact to discuss modern slavery or to report any allegations of modern slavery in SBS's supply chains;
 - details of SBS's upward referral process for modern slavery reports; and
 - contact details for SBS's whistleblowing service.

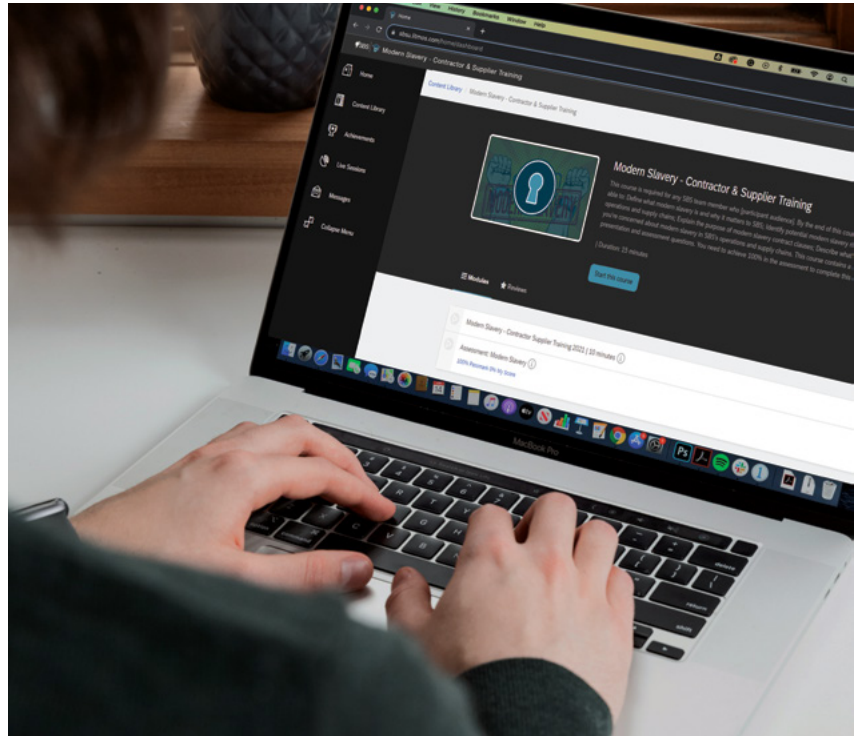
Whistleblowing hotline

- 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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Assessing the Effectiveness of SBS's Actions

To evaluate the effectiveness of actions taken by SBS during the 2024/25 reporting period to address modern slavery risks, SBS considers the following information relevant:

- **Effective monitoring:** No reports of suspected (or actual) cases of modern slavery were reported through SBS's due diligence processes or to SBS's whistleblowing hotline.
- **Increased staff awareness:** 100% 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.
- **More engaged suppliers:** SBS continued to include modern slavery clauses in contracts with a broad suite of suppliers. Some suppliers have their own modern slavery clause, or raise concerns or ask questions about SBS's clause, which can open discussions about modern slavery and provide greater insight into our supply chains.
- **Editorial impact:** SBS continues to provide the Australian public with trusted, accurate and impartial news and current affairs coverage, and other content of global issues, including those relating to modern slavery.



- **Effective cross-divisional internal engagement:** Through the Modern Slavery Working Group, SBS has been able to capture a range of perspectives which supports SBS's due diligence activities and direct contact with suppliers, to raise awareness of key modern slavery issues.

SBS's Modern Slavery Working Group continues to monitor progress and effectiveness of SBS's actions to assess and address modern slavery risks.

SBS's Future Actions

In accordance with the SBS Value "we engage and participate fully", SBS aims to continually improve its approach to assessing and addressing modern slavery risks in its operations and supply chains, particularly through staff engagement. SBS has identified the following areas for future consideration and action:

- **Monitor the Federal Government's review of the Modern Slavery Act and online resources portal** to stay up to date with government reforms and recommendations and update SBS's policies and processes as required.
- **Continue to develop bespoke resources for SBS's First Nations suppliers** to raise awareness of modern slavery and to assist suppliers to identify risks of modern slavery in their operations and supply chains. SBS is committed to increasing procurement with First Nations suppliers and understands that many of the smaller Indigenous businesses that SBS engages with may be unfamiliar with modern slavery risks within their supply chain or SBS's modern slavery reporting obligations.
- **Continue to develop and share tools to assist production companies and SBS's 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.
- **Update SBS's training offering and education to SBS staff** who engage contractors or are involved in procuring goods and services for SBS. This will include reviewing SBS's online modern slavery training module and updating the content where necessary. SBS will continue its business-wide focus on raising awareness of modern slavery and assessing and addressing risks of modern slavery in SBS's operations and supply chains.
- **Continue work on SBS's Environmental, Social and Governance (ESG) framework**, which aims to reduce SBS's impact on the environment and incorporate this into SBS's actions and practices. SBS will continue work to integrate modern slavery risk analysis into its existing ESG risk processes. SBS will also work with SBS's suppliers and partners of SBS's decarbonisation journey to identify, and raise awareness of, modern slavery risks and mitigation measures within the sustainability and renewable energy sector.
- **Continue to update relevant finance and procurement documents**, by including references to modern slavery in SBS's 'purchase orders', 'contract execution checklists', and 'contract execution memos'. This will further ensure modern slavery

risks are considered at all stages of procurement and will inform SBS delegates of the modern slavery considerations that have been taken into account during the contracting process.

SBS is committed to assessing and addressing the risks of modern slavery in SBS's operations and supply chains.

