



Seven West Media

MODERN SLAVERY STATEMENT 2022

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Seven West Media Modern Slavery Statement: FY21-22

1. Reporting entities

This statement is made by Seven West Media Limited on behalf of itself and the other reporting entities within the Seven West Media group of companies named below.

It is made pursuant to the Modern Slavery Act 2018 (Cth) and sets out the actions the reporting entities have taken in FY21-22 and continue to take to address modern slavery and human trafficking risks in our business and in our supply chains.

2. Structure, operations and supply chains

Seven West Media Limited (ACN 053 480 845) is an Australian-incorporated publicly listed company with its registered office in Perth WA.

Seven West Media Limited and the following wholly-owned subsidiaries/group entities are 'reporting entities' with consolidated revenue of greater than \$100 million and are jointly submitting this Modern Slavery Statement:

- Seven West Media Limited (ACN 053 480 845): Listed holding company
- SMG H1 Pty Limited (ACN 122 708 007): Dormant holding company
- SMG H2 Pty Limited (ACN 47 122 710 089): Dormant holding company
- SWM Finance Pty Limited (ACN 122 715 468): Group Finance company – party to debt facilities with the group's external lenders
- SMG H4 Pty Limited (ACN 122 717 015): Dormant holding company
- SMG H5 Pty Limited (ACN 12 122 717 686): Dormant holding company
- Western Mail Operations Pty Limited (ACN 009 209 787): Dormant holding company
- West Central Seven Pty Limited (ACN 052 827 675): Dormant holding company
- Seven Network (Operations) Limited (ACN 052 845 262): Main operating entity for Seven's television business
- Channel Seven Sydney Pty Limited (ACN 000 145 246): Television broadcast licence holder and broadcaster
- Channel Seven Melbourne Pty Limited (ACN 004 342 303): Television broadcast licence holder and broadcaster
- Channel Seven Brisbane Pty Limited (ACN 009 684 020): Television broadcast licence holder and broadcaster

- West Australian Newspapers Limited (ACN 008 667 632): Publisher of The West Australian, The Sunday Times and Perth Now
- Prime Television Holdings Pty Limited (ACN 003 368 974): Dormant holding company
- Prime Television (Northern) Pty Limited (ACN 003 344 876): Television broadcast licence holder and broadcaster
- Prime Television (Southern) Pty Limited (ACN 003 368 938): Television broadcast licence holder and broadcaster

(collectively "SWM Jointly Reporting Entities")

As can be seen in the list above, many of these entities are dormant holding companies.

The three key reporting entities with their own operations and supply chains are:

- Seven Network (Operations) Limited, the operating company for the television arm of Seven West Media, and the entity which contracts with suppliers and hires staff for its broadcast licence holders Channel Seven Sydney Pty Limited, Channel Seven Melbourne Pty Limited and Channel Seven Brisbane Pty Limited (**SNOL**);
- West Australian Newspapers Limited, the operating company for the digital and print publishing arm of Seven West Media (**WAN**); and
- Prime Television (Southern) Pty Ltd the operating company for the television arm of the Prime Group which contracts with and hires staff for the Prime Group. (**Prime**).

Other than Seven West Media Limited, which has its registered offices in Perth, WA, the SWM Jointly Reporting Entities have their registered offices in Everleigh, NSW.

As a large corporate group, there are numerous additional entities controlled by the SWM Jointly Reporting Entities, and our approach with respect to those entities is outlined in section 6.

Our operations

The SWM Jointly Reporting Entities are part of one of Australia's largest cross platform media groups, with its core business being that of:

- content production and acquisition, in news, sport and general entertainment;
- broadcast television;
- publishing; and
- digital.

SWM Joint Reporting Entities collectively own and operate some of Australia's most renowned media platforms, including:

- free to air broadcast television channels 7, 7two, 7mate, 7flix;
- broadcast video on demand platform 7plus;
- 7NEWS.com.au;
- The West Australian and The Sunday Times, both in print and digital.
- across the SWM Jointly Reporting Entities and their related bodies corporate, approximately 2000 permanent employees, 2000 casuals and less than 500 contractors are employed.

Our supply chains

The SWM Jointly Reporting Entities' supply chains include the procurement of:

- goods needed for their everyday operations, including office supplies;
- services needed for their everyday operations, including professional services such as legal and tax, and non-professional services such as IT, telecommunications, freight and cleaning;
- production services from external production companies and pre-produced content (and rights) from studios;
- goods and services needed to transmit and promote audio visual content, including equipment, digital technology, transmission services, advertising services, merchandise;
- goods and services needed to produce and deliver newspapers, including paper, ink, printing services, delivery services, equipment; and
- goods and services needed to stage and run sponsored events and campaigns.

SNOL outsources some of its operations relating to commercial inventory scheduling, accounts payable, digital advertising operations, and sales administration to an Australian 3rd party entity with its own Modern Slavery Statement who supply these services from its office in the Philippines.

3. Risks of modern slavery practices in supply chains of SWM Jointly Reporting Entities and any entities under their control

The SWM Jointly Reporting Entities continue to review their operations and supply chains, and those of the entities under their control, to assess the risk of modern slavery practices in those supply chains.

The consultation process involves representatives from Procurement, People and Culture, Legal, Finance and Senior Leadership.

In reviewing our supply chains, we consider active suppliers against the risk factors set out below:

- Sector and industry risks, including electronics, cleaning and textiles;
- Product and services risks, including cleaning and merchandise;
- Geographic risks, including the countries in which our suppliers operate; and
- Entity risks.

Key risk areas identified for audit in FY21/22 were suppliers of commercial cleaning to SWM Jointly Reporting Entities premises, suppliers of physical merchandise to sales and marketing and suppliers of coffee.

The SWM Jointly Reporting Entity's ability to identify some of their risk areas has been limited due to changes to its suppliers caused by COVID-19. Additionally, the SWM Jointly Reporting Entities note that the economic and social impacts of COVID-19 may have increased modern slavery risks in some parts of their operations and supply chains.

4. Actions taken to assess and address the above risks, including due diligence and remediation processes

In FY21-22, we have made various improvements to assess and address risks of modern slavery practices in our supply chains, in relation to risk, process and awareness as are detailed below.

Assessing the risk

The SWM Jointly Reporting Entities continue to assess risks of modern slavery practices in our operations supply chains as set out in section 3 above and by audits of suppliers, and as part of the onboarding process for its suppliers as set out below.

Addressing the risk

To address the risk of modern slavery in our supply chains, the SWM Jointly Reporting Entities are now implementing the policies and procedures which were amended for this purpose in past FYs and continue to review, update and amend them in FY21/22 including with respect to human resources, recruitment, employee conduct and procurement. More specifics are set out below.

• Procurement

Seven West Media's Procurement Policy (which applies to all SWM Jointly Reporting Entities) and procedures now include conducting pre-qualification and due diligence before engagement of new suppliers.

We communicate our expectations to all active suppliers, including via:

- our terms of trade which include a right to terminate where the supplier is in breach;
- SWM's Request for Proposal documents and processes which require potential vendors supply their modern slavery statements and information about their supply chain; and
- new supplier contracts.

In FY21/22, we have:

- implemented the Supplier Questionnaire developed in FY20/21 and rolled it out to high risk suppliers in particular categories in FY21/22;
- assisted suppliers in understanding the purpose of the Supplier Questionnaire and their obligations, and in particular we supply FAQs and a Glossary to explain to them various modern slavery – related concepts, and made our people available to assist where requested by suppliers with little knowledge in this area;
- commenced a project to implement a Vendor onboarding tool which has capability to capture modern slavery information at the commencement of Vendor onboarding. This will mean all new Vendors will be required to complete this when adding their initial company information;
- commenced audits of vendor supply chains for modern slavery risk across the SWM Jointly Reporting Entities in select high-risk areas including cleaning suppliers, merchandise and coffee vendor's. These are ongoing and once complete other high-risk areas will be selected and audited; and
- incorporated Modern Slavery clauses into the SWM Standard Terms of Trade issued to SWM Suppliers.
- Ensured SNOL's 3rd party supplier in the Philippines has in place a Modern Slavery Statement which has been supplied and reviewed to ensure that it is managing and minimising any Modern Slavery risk in its own supply chain.

• **Recruitment processes**

In FY21/22, we continued to:

- supply a list of questions to be put to potential new recruitment agencies;
- apply the newly formulated vetting processes for staff coming through recruitment agencies to assess whether they are victims or potential victims of modern slavery; and
- apply our recruitment guidelines and preferred recruitment supplier guidelines to incorporate modern slavery requirements and procedures to be followed in this area.

• **Employee Conduct Guidelines**

Our Employee Conduct Guidelines require staff to practice ethical business standards and take steps such as conducting due diligence checks with respect to prospective suppliers and report any unlawful practices such as forced labour or slavery/slavery-like practices observed in our supply chains.

• **Training**

We have completed training for all existing SNOL employees and will train any new starters to:

- improve awareness of modern slavery risks; and
- equip management and others involved in contracting, with the processes they need to follow to handle and manage modern slavery issues.

Prime staff have been integrated into SNOL so existing staff have been trained to the same standard as the SNOL staff as will be any new starters.

We have commenced training and will continue rolling out this training to WAN staff and new starters.

• **Recruitment Contract Templates**

We have reviewed our recruitment contract templates and incorporated Modern Slavery clauses to mitigate any risk in this area across the SWM Joint Reporting Entities.

Reporting and remediation

Each of the SWM Joint Reporting Entities have adopted Seven West Media Limited's Whistleblower Policy. Our Issue Escalation Guidelines are in place with a mechanism to allow people to safely report modern slavery issues in SWM Joint Reporting Entities' operations and supply chains.

In this way, staff have a safe and easy way of reporting the issue and in a manner, which will ensure the issue is handled appropriately and without creating additional risk to the potential victim.

Also, in place are our remediation framework for how we intend to handle allegations of modern slavery which are reported via the Issue Escalation Guidelines:

- ensuring our actions are always in the best interests of the suspected victim(s) and ensuring our actions in responding to the report do not put them at greater risk;
- considering if further investigation is required to verify any unsubstantiated allegations;
- considering whether and how to involve the Australian Federal Police (ie: by calling 000 if someone is at risk of immediate harm);
- addressing any harm caused by a member of the SWM group itself by providing for, or co-operating in the remediation of that harm;
- if a member of the SWM group is directly linked to the applicable exploitation by a supplier, playing a role in remediation and take steps to ensure there is no re-occurrence by that supplier by using the leverage that exists via the business relationship itself; and
- carefully considering whether to end the business relationship, or instead to continuing the relationship, provided the supplier addresses the issue and there is prospect of real change in relation to their compliance with modern slavery laws.

That said, there were no reports of modern slavery in FY21-22.

5. How the SWM Jointly Reporting Entities assess the effectiveness of such actions

We recognise that we have a long way to go, and that the work covered by this Modern Slavery Statement is only the beginning. We continue to approach modern slavery compliance with a continuous improvement mindset.

Our Modern Slavery steering group (including representatives from Procurement, People and Culture, Finance and Legal) meets monthly to review and discuss the actions we have taken in our efforts to prevent, mitigate and where appropriate remedy modern slavery, and to identify areas for improvements and plan accordingly.

We continue to identify and will complete existing audits and commence further audits of high risk suppliers during the next FY.

We continue to enhance our central repository with relevant documentation.

We monitor the uptake of modern slavery training as it is rolled out to new starters across SWM and to Prime and WAN existing staff.

6. The process of consultation with any entities that the reporting entity owns or controls

This joint Modern Slavery Statement has been prepared in consultation with each of the SWM Jointly Reporting Entities covered by the Statement (except those which are dormant).

Consultation has also been undertaken with entities owned and controlled by each SWM Jointly Reporting Entity to ensure that they are aware of what actions they need to take and that modern slavery risks relating to those entities have been identified, assessed and addressed ("**Sub Consultation**").

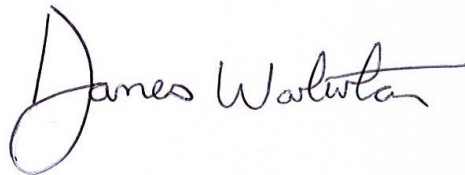
This Sub Consultation has been carried out with Executives of the relevant entities including from Finance, People and Culture, Legal and Acquisitions and they have had the opportunity to participate in the preparation of this Modern Slavery Statement.

Many of these entities exist only for financial reasons, follow policies set by the SWM Jointly Reporting Entities and do not have any actual physical operations or assets.

Others operate in the same sector and are bound by the same policies and procedures as one or more SWM Jointly Reporting Entities but do their own contracting and therefore have their own supply chains.

Approval by Board of Directors

This Modern Slavery Statement has been approved by the Board of Directors of Seven West Media Limited.



James Warburton

Managing Director and Chief Executive Officer

14 December 2022