

PRT Company Limited

ACN:000764867

MODERN SLAVERY STATEMENT FOR YEAR ENDED 30 JUNE 2021

1. INTRODUCTION

This modern slavery statement has been prepared in accordance with the *Modern Slavery Act 2018* (Cth) and sets out the actions taken by PRT Company Limited (formerly Prime Media Group Limited) (ABN 97 000 764 867) and its wholly owned subsidiaries (together, **Prime, PRT, we, us or our**) during the FY20-21 reporting period.

Prime is committed to continuing to act ethically and operating responsibly to minimise the risk of modern slavery and human trafficking in our business operations and supply chains. This is our modern slavery statement (**Statement**) for the financial year ended 30 June 2021 (the **Reporting Period**).

This Statement has been reviewed and approved by the Board of Directors at Prime.

2. PRIME OVERVIEW

BUSINESS STRUCTURE & OPERATIONS

During the Reporting Period Prime operated a leading regional free-to-air television network. Reaching a potential audience of over 5.5 million people, Prime held commercial television licences to broadcast in regional northern and southern New South Wales (NSW), the Australian Capital Territory (ACT), regional Victoria, the Gold Coast area of southern Queensland (QLD) and regional Western Australia (WA). The majority of Prime's television programming was supplied through a program supply agreement with the Seven Network (Operations) Limited and broadcast in regional areas under the PRIME7 brand on the east coast of Australia and the GWN7 brand in regional WA.

Prime also produced six separate *PRIME7 Local News* bulletins that are broadcast each weeknight in regional NSW, parts of regional Victoria and regional WA. These local news bulletins were the only dedicated half-hour local news bulletins in their markets. GWN7 provides the only local news bulletin on television for viewers in regional WA. Prime also produced and broadcast a National News bulletin, *PRIME7 at 6.30*, following the local news bulletins in regional NSW.

Seven Affiliate Sales Pty Limited (ABN 49 058 428 158) (**SAS**) is a wholly owned subsidiary of Prime and serviced Prime's major national advertisers. SAS also represents Seven Queensland (the regional television licence owned by the Seven Network) and Television New Zealand Limited in Australia. In regional Australia, local clients source television advertising airtime through Prime's local sales team.

OUR PEOPLE AND LOCATIONS

During the Reporting Period, Prime employed more than 340 employees, of which approximately 275 employees were located in regional offices stretching from the Gold Coast, throughout many regional cities and towns in NSW and Victoria, and across regional WA. Prime's head office was located in Sydney and its broadcast operation centre is located in Canberra. 98 employees were involved in the production of regional news services, including as journalists, camera operators and studio personnel.

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3. PRIME'S SUPPLY CHAIN

During the Reporting Period, Prime's supply chains included:

- television programming acquired under a program supply agreement with the Seven Network;
- outsourced services for communications and television playout services to maintain Prime's television broadcast in regional Australia;
- equipment and consumables needed for everyday operations, including computer hardware, broadcasting and transmission equipment, media production technology, standard office equipment and consumables such as paper and stationery items;
- software acquired under licence for television broadcast and corporate activities; and
- services procured to maintain leased premises and transmission towers, including transmission tower maintenance services; building services, cleaning, security and other maintenance services.

The majority of Prime's suppliers are located in Australia. However, some products and services are sourced from international suppliers based in regions such as Europe, the United States of America, the United Kingdom, Singapore and New Zealand. Many of these international suppliers have supply chains that extend throughout Asia.

4. RISK IDENTIFICATION

In the Reporting Period, Prime continued to review its operations and supply chains to understand and assess the risk of modern slavery practices in those supply chains. Close consideration was given to the *Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities* document (**Guidance Document**).

In assessing the inherent risk of modern slavery in our supply chain, we once again had regard for the most recent Global Slavery Index¹ which rated the countries in the regions that Prime directly deals with (referred to in item 3 above) as low for prevalence of modern slavery practices. Based on this ongoing assessment, Prime's direct global suppliers are situated in countries where there are reasonable standards of protection for individual rights and there is not a significant workforce of vulnerable populations.

In reviewing our supply chains and adopting the government's framework, Prime considered active suppliers against the risk factors set out below:

- electronic equipment purchased from Australian vendors with supply chains extending to high risk geographies;
- products manufactured off-shore from high risk geographies for items including stationery, Prime branded clothing and promotional products, and consumables;
- services where there may be a high risk of vulnerable employees such as migrant and base-skilled workers such as overseas based call centres. For our Australian based service providers, we recognised risks associated with services that use low skilled migrant workers such as cleaning contractors.

¹ 2018 Global Modern Slavery Index developed by the International Labour Organization (ILO) and the International Organization for Migration (IOM), the Walk Free Foundation.

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5. RISK MANAGEMENT

During the Reporting Period, Prime implemented a number of initiatives to continue to strengthen our understanding of the risks and incidences of modern slavery in our business operations and supply chains.

Initial supply chain due diligence

To increase the awareness of modern slavery in our supply chains, we have updated our new vendor engagement and contract management practices, which includes assessing the supplier's reputation and any non-compliance with legal and regulatory standards.

As part of our updated contract management practices, when engaging with a supplier, we now require our suppliers to confirm they operate in compliance with the *Modern Slavery Act*. Failure to comply, may lead Prime to terminate a current supplier's business relationship with immediate effect.

We have also included a specific Modern Slavery clause within relevant supply and services contracts ensuring that each party commits to respecting and supporting international human rights and undertakes to comply with applicable obligations under the *Modern Slavery Act 2018* (Cth) or similar legislation. This clause allows a party to terminate the agreement if the other party is found to be in breach of their obligations by not complying with such modern slavery legislation.

Policies and procedures

Prime has a number of policies and procedures that collectively contribute towards the mitigation of the modern slavery risks that Prime may face. During the Reporting Period, these policies were publicly accessible on our corporate website and continue to be available to all Prime staff via our employee intranet:

- (i) **Modern Slavery Policy (MS Policy)** – supports Prime's commitment to tackling modern slavery and minimising the risk of incidence within its business operations and supply chains. The MS Policy was formally approved by the Board of Directors in July 2020 and will be reviewed on a regular basis. The MS Policy outlines a clear reporting process for anyone who becomes aware of, or suspects, any modern slavery risks relating to Prime employees or with regard to any Prime business suppliers.
- (ii) **Whistle Blower Protection Policy (Whistle Blower Policy)** – designed to comply with the Australian whistleblowing legislation enacted in 2019 and encourages individuals to report any illegal and improper conduct occurring within Prime, ensuring reports can be made in a safe and confidential environment without consequences or fear of detrimental treatment.
- (iii) **Anti-bribery and Corruption Policy** – supports Prime's zero-tolerance approach to modern slavery, and reinforces the premise that the incidence of bribery and corruption in supply chains are risks that contribute to the spread of modern slavery globally and domestically.

Training

Employees have been briefed about Prime's obligations under the *Modern Slavery Act* (to the extent applicable to their roles). We have also educated employees more widely through information available on our employee Intranet. Prime conducted legal and ethics training for news staff across its

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offices which outlined the policies referred to above and highlighted the risks regarding modern slavery.

Additionally, during the Reporting Period, all new starters were provided with a welcome pack that included the MS Policy and Whistle Blower Policy.

Prime's Employee Code of Conduct further helps to ensure that all Prime employees not only act in accordance with all relevant laws, but also with openness, honesty, fairness and integrity. The Employee Code of Conduct underpins all of our business operations and promotes ethical business practices that mitigate the risk that any of Prime's business operations contribute to modern slavery.

6. EFFECTIVENESS AND LOOKING TO THE FUTURE

This Statement represents Prime's efforts during the Reporting Period and the actions we have taken to identify, assess and mitigate modern slavery risks within our business operations and supply chains.

Prime will continue to review its operations, including the procurement of products and services, to identify whether there are risks relating to modern slavery which can be mitigated.

On 31 December 2021, Prime sold its business and assets to Seven Network (Operations) Limited, a wholly-owned subsidiary of Seven West Media Limited (Seven West). At the date of this submission Prime is a shell company. Seven West will be responsible for future submissions relating to subsidiaries acquired from Prime.

7. CONSULTATION

During the Reporting Period, Prime and its subsidiaries were treated as one entity from a corporate governance perspective and Prime's subsidiaries adhered to Prime's policies and procedures, including in respect of modern slavery.

This Statement has been approved by the Board of PRT Company Limited.



John Palisi
Director & Company Secretary
17 March 2022