



2023 Modern Slavery Statement

Australasian Performing Right Association Limited (ABN 42 000 016 099)

This is the fourth Modern Slavery Statement for the Australasian Performing Right Association Limited (**APRA**) (ABN 42 000 016 099) made under the *Modern Slavery Act 2018* (Cth) (Act). This statement covers the reporting period 1 July 2022 to 30 June 2023 (Reporting Period).

Structure of APRA

APRA's head office is located in Ultimo, Sydney. APRA has five other offices across Australia and an office in Auckland, New Zealand. APRA has formed an administrative partnership with Australasian Mechanical Copyright Owners Society Limited (**AMCOS**) (ABN 87 001 678 851) but does not own or control this entity or any other entities. APRA AMCOS is the trading name of Australasian Performing Right Association Limited and Australasian Mechanical Copyright Owners Society Limited. APRA also issues joint licences under agreements with the Phonographic Performance Company of Australia Ltd (**PPCA**) (ABN 43 000 680 704), however APRA does not own or control PPCA or any entities related to PPCA.

As APRA does not control or own any other entities, APRA was not required to consult with any other entities regarding risks to modern slavery in preparing this statement.

APRA's operations

APRA, in alliance with AMCOS, is a music rights management organisation representing over 119,000 members comprising songwriters, composers and music publishers. APRA is run by an executive management team in liaison with a non-executive board of directors. Individual writer members and representatives of publisher members are elected to the board by their respective memberships for renewable three-year terms.

APRA conducts its operations in Australia and New Zealand. APRA licenses organisations to play, perform, copy, record and make available its members' music, and APRA distributes the royalties to its members and a number of overseas rights management organisations. During the Reporting Period, APRA employed approximately 419 employees in Australia and New Zealand. APRA also engaged approximately 60 daily rate contractors through recruitment agencies in Australia.

APRA coordinates with similar rights management organisations around the world. When Australian and New Zealand songs and compositions are performed overseas, APRA collects the royalties and distributes them to its members accordingly. APRA also helps music customers in Australia and New Zealand access music from the rest of the world. APRA also advocates on behalf of music creators' rights and the Australian music industry locally, nationally and internationally.

Identification of risks of modern slavery practices in APRA's operations and supply chains

While not immune from modern slavery, Australia is generally considered to be a low modern slavery risk country by international standards. Due to the nature of APRA's business, APRA's Modern Slavery Statement for the period ending 30 June 2022 provided that the risk of modern slavery practices within APRA's operations and supply chains was low. Over the Reporting Period, APRA identified that its risk of modern slavery remains low.

Audit of APRA's operational and supply chain exposure to modern slavery risks.

1. APRA reviewed its risks with regard to modern slavery at the start of the Reporting Period. The nature of APRA's operations is conducting business substantially in Australia and New Zealand, which have been identified as countries at low risk of modern slavery. Additionally, APRA is regularly audited to ensure compliance with relevant industrial legislation and employment conditions in both Australia and New Zealand.
2. During the reporting period, APRA engaged approximately 60 contractors on a daily rate. The majority of these contractors provide high value skills in the area of information technology. As a part of an ongoing review of these arrangements, it was confirmed that most daily rate contractors provide services through a recruitment agency and all daily rate contractors are based in Australia. These contractors provide high value skills which lowers their risks to be victims of modern slavery.
3. Also during the Reporting Period, APRA has continued to sourced technology expertise and resources via an Australian third party provider from The Philippines and Vietnam in the South-East Asian region. APRA recognises that suppliers from countries such as these pose a higher risk of modern slavery practices than in Australia and New Zealand. The due diligence conducted in 2022 in respect of these arrangements assessed the modern slavery risk as potentially low to moderate. APRA continues to take preventative measures to address potential modern slavery risks in this context.
4. APRA acknowledges that risks of modern slavery exist from the supply of services to APRA, such as cleaning and maintenance to our office premises in Australia. A review of these suppliers concluded that low skilled work with low wages is required to perform these services, which is at greater risk of labour exploitation and modern slavery, and that these risks exist within Australia and New Zealand. As most of these suppliers are located within Australia, this reduces the risks of modern slavery occurring in the supply chain for these services, but that risk is still present. APRA continues to monitor these risks with regular consideration of suppliers.
5. APRA also acknowledges that risks exist in the engagement of artists, performers, music industry workers as gig workers for events and initiatives hosted by APRA. The *Raising Their Voices* report (2022) identified that the music industry poses particular challenges for gig workers arising out of the large number and diversity of workplaces, the high prevalence of gig work, the lack of job security, the passion people have for music which may lead them to accept poor practices and behaviour. The services provided by these workers is highly valued by APRA and APRA has taken specific measures to mitigate these risks including its Statement of Expectations, Service Provider Code of Conduct and Community Engagement Principles. While the risk is present in this context, the measures APRA takes reduces the risk of modern slavery occurring in the provision of these services.

Conclusion:

1. After undertaking this review of APRA's operations and supply chains, APRA's assessment is that the risks of modern slavery continue to be in its supply chain through the supply of resources and services by third party providers.
2. These risks are assessed as low where we are partnering with local suppliers or with United States of America and United Kingdom based providers of high value software services.
3. The risk increases to moderate to high when we are sourcing services from providers based in The Philippines and Vietnam in the South-East Asian region.

Actions taken by APRA to address modern slavery risks

1. Establishment of a cross-functional modern slavery committee

Modern slavery is against APRA's core values of Collaboration, Respect, Skill, Imagination and Accountability. To specifically address APRA's commitment to "Accountability" in relation to

modern slavery, we have established a cross-functional modern slavery committee (**Modern Slavery Committee**) that convenes at least twice a year to assess the policies and protocols we have in place for procurement and to assess our supply chain for risks.

APRA is committed to having effective systems and controls in place to safeguard against any form of modern slavery taking place within its operations and supply chains.

2. Policies and Procedures

APRA abides by and operates under several policies to ensure that APRA is conducting its business in an ethical and transparent way. These policies include:

- Procurement Policy;
- Whistleblower Policy;
- Statement of Expectations (**Statement**);
- Community Engagement Principles (**Principles**); and
- Service Provider Code of Conduct (**Code**).

We reviewed and updated our Procurement Policy during the Reporting Period to include a requirement for suppliers to comply with applicable laws, including those pertaining to modern slavery. The Procurement Policy now clearly sets out APRA's commitment to give preference to certain procurements, including those which provide social and environmentally sustainable benefits where practicable. The Procurement Policy is maintained by APRA's Finance and Administration Division. It specifies processes for selecting suppliers. The processes are based on the threshold value of the supply. The Procurement Policy allows for a price preference of up to 10% to be applied to procurements that provide a social benefit and prioritise local suppliers.

APRA's Whistleblower Policy is available on its website and contains a link to an independent hotline for eligible whistleblowers to report a wide range of issues, including modern slavery. Eligible whistleblowers include APRA officers, employees, contractors, members, suppliers, associates (including their relatives, dependants and spouses). Staff are regularly reminded about APRA's processes for raising concerns, including APRA's whistleblower hotline. APRA is considering training in relation to this for relevant employees in the current reporting period. The independent hotline contained in APRA's Whistleblower Policy remains an appropriate portal to receive reports regarding modern slavery practices within APRA's operations and supply chains.

APRA's Statement of Expectations, introduced in the 2022 reporting period, outlines APRA's expectation that everyone involved with APRA must respect others and act lawfully, safely and responsibly. The statement was developed in response to allegations of sexual harm, harassment, and sexual and racial discrimination in the music industry. The statement applies to all our members, staff, advisory groups, award nominees, award winners and others involved in any APRA function, event and program, and to partners and contractors in their dealings with APRA. It outlines the kinds of behaviours that are unacceptable and how to speak up if breaches occur. The Statement of Expectations is supplementary to the APRA Service Provider Code of Conduct.

During the reporting period, APRA consulted with members and representatives from underrepresented communities to develop a set of five Community Engagement Principles that we can apply to our practices to build cultural safety, equity and representation. The five principles are Relationships, Representation, Consent, Co-Design and Collaboration and Accessibility. The next step is to develop strategies and tools to embed these principles into our business as usual practices.

The Code is a document issued to third party providers to APRA where they provide substantial or ongoing goods or services to APRA. A third party provider that is identified as a substantial or ongoing service provider is required to sign the Code to continue its arrangements with APRA. The Code requires providers to confirm that they are minimising modern slavery risks and complying with the applicable laws with regard to modern slavery, and that they are aware of our expectations.

For the current reporting period, APRA is considering requesting suppliers that meet defined thresholds (such as purchase values and/or work that requires significant interaction with APRA staff or members) to complete a supplier declaration form that will specifically request supplier information in relation to modern slavery risks. This proposal is currently under review by the Modern Slavery Committee.

3. *Reviewed third party supplier commitment to compliance with modern slavery legislation*

- During the Reporting Period, APRA continued to require third party suppliers who provide goods or services to sign the Code, including those that interact closely with APRA staff and members.
- APRA has ensured that each local recruitment agency that provides APRA with Australian contractors on a daily rate is a signatory to the Code in order to minimise risks of modern slavery practices.
- Compliance to the Code by third party suppliers continues to be the most appropriate way to manage modern slavery risks. Two suppliers to APRA of software services based in the United States of America, as well as one large accounting consulting firms with head offices in the United States of America declined to sign the Code but instead offered compliance with their own corporate codes of conduct. APRA was satisfied with this approach as the services are being supplied from outside Australia, and, therefore, for an overseas based entity, compliance with Australian legislation may be difficult for that entity to ensure.
- Another large accounting consulting firm that supplies services to APRA that had previously declined to sign the Code has since returned a signed Code. This followed discussions that APRA had with the firm's senior leadership regarding the release of a major independent review into its workplace culture.
- For the current reporting period, APRA is putting in place practices to track signing of the Code by all recipients of APRA grants. APRA's grants program has undergone a significant review this year and a more robust and centralised reporting and governance structure has been established to ensure transparent and timely reporting to the APRA Board and management. This reporting will include data on the return of signed Codes.
- APRA will continue to require that new suppliers that provide substantial or ongoing goods or services to APRA are signatories to the Code.

4. *Ensured suppliers in the South-East Asian region offered salaries commensurate with minimum standards set by Award rates in Australia*

APRA has contracted with an international technology resource provider (**Provider**) to recruit and manage remote technology experts to support the Australian APRA technology team with the delivery of projects. The arrangement is now in its second year of operation. The Provider is an Australian entity that manages HR, payroll, office space and legal matters associated with resourcing from a number of countries in the South-East Asian region and is dedicated to working with the APRA technology team. The APRA People & Culture and IT leadership teams continue to work closely with the Provider to ensure the professionals recruited to work on APRA projects are paid above the minimum rates payable to Australian employees under the *Professional Employees Award 2020*. We also request that this Provider shares annual reports on its modern slavery prevention measures with APRA. The Provider submitted a 2022 Report for that reporting period.

5. *Remediation Requirements*

In the three years of complying with the requirements of the Act, APRA has not been required to undertake any remediation processes for compliance.

Assessment of effectiveness

Over the previous reporting periods, APRA's focus has been primarily on identifying any risks in its operations and supply chains and taking action to address or prevent those risks.

As committed to in APRA's 2022 Modern Slavery Statement and noted above, APRA has now set up the Modern Slavery Committee as part of its Equity Action Plan. The Modern Slavery Committee is made up of representatives from the key areas of the business that are involved in procurement (Events, Finance & Administration, Membership, Technology and People & Culture). The Modern Slavery Committee is responsible for tracking and assessing the progress and efficacy of APRA's modern slavery commitments and ensuring these are reported on to the APRA Board's Audit Risk & Culture Committee at least twice a year and are included in this statement. .

The APRA Executive Leadership team is committed to ensuring that there are adequate resources available to assess and address the risks of modern slavery practices within APRA's operations and supply chains. Consequently, during the Reporting Period, APRA committed additional resources from within its key departments to continue and develop its response to this.

Other information

While APRA appreciates that unsafe working conditions in themselves do not constitute modern slavery, APRA's commitment against modern slavery includes continuing to identify, assess, and address these risks as a potential flag of occurrences of modern slavery or related conduct, or circumstances that may increase the risk of modern slavery occurring.

Advocacy for the Centre for Creative Workplaces

Following the release of the *Raising Their Voices* report (**Report**) on sexual harassment, exclusion, bullying and safety in the Australian music industry, the Australian Government announced the establishment of the Centre for Creative Workplaces chaired by former Sex Discrimination Commissioner, Kate Jenkins AO. This centre promotes industry standards for fair, safe and respectful workplaces for Australian artists and arts workers. The Report identified challenges that are specific to the music industry and that increase modern slavery risk exposure, such as the large number and diversity of workplaces, high proportion of freelancers, 'gig economy' workers, small organisations, lack of job security for many workers, and the passion people have for music, which may lead them to accept poor practices and behaviour.

APRA was a key advocate for this change and was a founding member of the resulting Music Industry Review, conducted by independent consultants Alexandra Shehadie and Sam Turner. This review addressed and recommended reform for sexual harm, sexual harassment and systemic discrimination in the Australian music industry.

APRA also welcomed the establishment of the Creative Workplaces Council, chaired by Kate Jenkins AO, and continues to work with colleagues in the music industry, and with the government to advocate for and enable the implementation of the Report's 17 recommendations. The Creative Workplaces Council will provide broad government leadership and support for positive change towards equity, inclusion and safety in our industry.

Partnership with allied music industry organisations to provide guidelines on workplace psychosocial safety

APRA partnered with Support Act as the music industry's leading charity and independent safe space providing mental health and wellbeing programs and services. We are a founding signatory to Support Act's Minimum Standards for a Mentally Healthy Workplaces and have provided support in kind on the development of Support Act's *Guide to Safer Workplaces in the Music Industry* and *Guide to Sexual Misconduct, Bullying and Discrimination*.

Approval process

This statement is made pursuant to the *Modern Slavery Act 2018* (Cth) and constitutes APRA's Modern Slavery Statement for the financial year ending 30 June 2023. A copy of this Modern

Slavery Statement will be published on the APRA AMCOS external website.

This statement has been approved by the APRA's Board of Directors, who will review and update it annually. APRA's Executive Leadership team takes responsibility for implementing this statement and its objectives.

This statement was signed by responsible member Jenny Morris in her role as Chair of APRA on behalf of the APRA Board of Directors, on 22 November 2023.

A handwritten signature in black ink, appearing to be 'JM', with a long horizontal line extending to the right.

Jenny Morris
Chair, APRA