

## 2024 Modern Slavery Statement

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

This is the fifth Modern Slavery Statement for the Australasian Performing Right Association Limited (ABN 42 000 016 099) (**APRA**) made under the *Modern Slavery Act 2018* (Cth) (**Act**). This statement covers the reporting period 1 July 2023 to 30 June 2024 (**Reporting Period**).

#### About APRA AMCOS

APRA AMCOS is the trading name of Australasian Performing Right Association Limited and Australasian Mechanical Copyright Owners Society Limited. APRA has an administrative partnership with Australasian Mechanical Copyright Owners Society Limited (ABN 87 001 678 851) (**AMCOS**) but does not own or control this entity or any other entities.

APRA also issues joint licences under agreements with the Phonographic Performance Company of Australia Ltd (ABN 43 000 680 704) (**PPCA**), 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 head office is located in Ultimo, New South Wales. APRA has five other offices across Australia and an office in Auckland, New Zealand.

APRA is run by an executive management team of 11 in liaison with a non-executive board of 12 directors. Individual writer members and representatives of publisher members are elected to the board by their respective memberships for renewable three-year terms.

During the Reporting Period, APRA employed approximately 437 employees with 401 employees located in Australia and 36 located in New Zealand. The employment status of these employees is shown below:

Permanent employees	376
Fixed term employees	49
Casual employees	12
TOTAL employees across Australia & New Zealand	437

APRA also engaged approximately 55 daily rate contractors through recruitment agencies in Australia. APRA also continues to source technology expertise and resources via two Australian third-party providers. One sources talent from the Republic of the Philippines and Vietnam, the other from Pakistan. At the time of reporting, 23 individuals were working on APRA AMCOS projects through these third-party service providers.

#### APRA's position on modern slavery

APRA AMCOS is opposed to any form of modern slavery. We are committed to ethical and responsible conduct in all our operations and supply chains and respect for the rights of all individuals. We aim to work with service providers who share these commitments and, where possible, to partner with them to identify best practice and support improvement. We prioritise having effective systems and controls in place to safeguard against any form of modern slavery taking place within our operations or supply chains.

#### What we do

APRA, in alliance with AMCOS, is a music rights management organisation representing over 124,000 members comprising songwriters, composers and music publishers. 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.

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.

### **Our workplace**

APRA believes our people and culture are what set us apart as a workplace. We are committed to fostering a safe, respectful, and inclusive environment for everyone. We expect everyone involved with APRA to respect others and to act lawfully, safely and responsibly. We believe everyone should be treated fairly and in accordance with the APRA's core values of collaboration, respect, skill, imagination and accountability.

We believe there is no place for any form of discrimination, harassment, bullying, vilification, sexual harassment or violence in our workplace, our industry and our society. We respect cultural, ethnic, religious, disability, age, gender and sexual orientation differences. Our expectation is we all act with integrity, transparency and honesty, staying professional and courteous and always creating and maintaining a safe environment for others.

We comply with relevant state, territory and federal laws, community expectations and ethical standards related to human rights and modern slavery, in respect of our employees, our members, customers and our business operations. We ensure our employment conditions exceed Modern Awards and the National Employment Standards. We also ensure appropriate hours of work and leave, and take significant measures to sustain the health, safety and wellbeing of our employees, contractors and visitors.

### **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. Over the Reporting Period, due to the nature of APRA's business, APRA has assessed the risk of modern slavery practices within APRA's operations and supply chains as low.

### **General actions taken by APRA to address modern slavery risks**

#### **1. *Cross-functional modern slavery committee***

We have established a cross-functional Modern Slavery Committee (**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. For the next reporting period, all members of the Committee have committed to complete comprehensive mandatory training on modern slavery risk assessment and prevention.

#### **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. All policies are published and available to all employees via our Intranet and relevant policies are provided to contractors. Training on these policies is a requirement for employees when joining APRA and repeated on a periodic basis by all employees to maintain their risk and compliance obligations.

In addition to the core suite of policies covering anti-discrimination, harassment and bullying, staff conduct, conflicts of interest, domestic and family violence, privacy, remuneration and work health and safety, we have the following policies and procedures which strengthen our modern slavery prevention:

- Procurement Policy;
- Whistleblower Policy;
- Service Provider Code of Conduct,

as well as policies and principles upholding values consistent with anti-modern slavery practices:

- Statement of Expectations; and
- Community Engagement Principles.

APRA's **Procurement Policy** specifies processes for selecting suppliers. The processes are based on the threshold value of the supply and contain mechanisms to give preference to procurements that provide a social benefit and are locally based suppliers, where practicable. Our procurement policy and procedures were independently audited over the Reporting Period and management is currently considering further improvements, including centralising procurement information within a single database to enable better oversight of procurement and compliance with our policies.

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 in respect of modern slavery practices. 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. Training in relation to this is under active consideration for relevant employees in the next reporting period. The independent hotline contained in the Whistleblower Policy remains an appropriate portal to receive reports regarding modern slavery practices within APRA's operations and supply chains.

Since May 2019, suppliers who provide substantial or ongoing goods or services to APRA are issued a copy of APRA's **Service Provider Code of Conduct (Code)** and are required to sign the Code as part of their onboarding as approved suppliers. 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. Compliance with this requirement is audited by APRA's finance and IT representatives on the Modern Slavery Committee.

Introduced in 2022, **APRA's Statement of Expectations (Statement)** 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 is supplementary to the Code.

In 2023, following an extended consultation with representatives from underrepresented communities, APRA introduced a set of five **Community Engagement Principles (Principles)** that we now apply to our practices to build cultural safety, equity and representation. The five principles are Relationships, Representation, Consent, Co-Design and Collaboration and Accessibility. We are progressing on our development of strategies and tools to embed these principles into our business-as-usual practices.

### **3. *Annual review of 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.

### **4. *Auditing***

Additionally, APRA is regularly audited to ensure compliance with relevant industrial legislation in both Australia and New Zealand.

### **Our supply chain and operational exposure to modern slavery risks**

APRA has a diverse supply chain of more than 3035 suppliers, of which 66% are based in Australia and 23% are based in New Zealand. Fewer than 11% of APR's suppliers are located in other international territories. APRA's operations are conducted substantially in Australia and New Zealand, which have been identified as countries at low risk of modern slavery operations. Supply chain areas that have been assessed as high risk for modern slavery include:

- IT hardware and software – used for operations, including laptops and mobile phones.
- Office supplies – stationery, printing services, other office products such as lanyards.
- Promotional product suppliers – branded merchandise for marketing purposes.
- Facilities management services – cleaning, utility and security services.
- Outsourcing to third party suppliers – for events and functions and for software development.
- Labour hire – contractors, subcontractors, consultants and professional services.

### **Risk mitigation measures: suppliers of IT hardware and software, office supplies and promotional products**

An audit of IT hardware and software suppliers conducted over the Reporting Period established that all of these suppliers have an Australian base. Of these suppliers, 60% are required to submit Modern Slavery Statements and have been compliant with this requirement. This 60% provide the majority of IT hardware and software services to APRA.

APRA mitigates risk across all these suppliers by:

- Having procurement, contracting and onboarding processes with suppliers that set out clear expectations in relation to modern slavery. Procurement is overseen by APRA's Finance and Administration Division.
- Ensuring that the 40% of suppliers who do not need to submit Modern Slavery Statements indicate their commitment to our values and principles by understanding and accepting our Code.

### **Risk mitigation measures: facilities management**

- The procurement, contracting and onboarding of facilities management services is managed by the Finance and Administration team.
- All facilities management services have complied with APRA's requirement to sign the Code.
- APRA acknowledges there is a greater risk of labour exploitation and modern slavery in the supply of these services to APRA because of the low skilled nature of the work with its accompanying low wages.
- These service providers are all located in Australia and are fundamental to supplying services to APRA. APRA continues to monitor these risks through regular audit of the performance of these suppliers against their contractual obligations, including price measurement and comparison against the market and peer service providers in the supply of materials and services.

### **Risk mitigation measures: outsourcing to third party suppliers for events and functions**

- Procurement, contracting and onboarding for outsourcing partners for events and functions is managed by APRA's Events team, in compliance with our Procurement Policy. All contracts are subject to review by the APRA Legal team.
- In the events and functions space, our procurement process contains mechanisms that allow us to give preference to locally based services providers who offer a social benefit, for example, with express values and operations that seek to benefit vulnerable people, like refugees (Parliament on King) and First Nations' people (Supply Nation). Because of their mission statement and their commitment to our Code, APRA considers the modern slavery risks to be very low.
- Event and function outsource partners indicate their commitment to abiding by our values and

practices by signing our Code to secure the engagement. Where they work in close contact with APRA staff, members or other stakeholders, they are also issued with our Statement.

- Modern slavery risks also exist in the engagement of artists, performers, music industry workers as gig workers for events and initiatives hosted by APRA. The services provided by these workers is highly valued by APRA and APRA has taken specific measures to ensure that the engagement of all artists and performers is in line with our Principles and all engagements are remunerated fairly. Artists and performers are also issued with APRA's Statement and, where relevant, the Code. 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.

#### **Risk mitigation measures: outsourcing to third party suppliers for software development**

During the Reporting Period, APRA continued to utilise technology expertise and resources via two Australian third-party providers that source individuals from the Philippines, Vietnam and Pakistan – 23 workers located in these countries provided services to APRA. These individuals work in close virtual contact with the APRA technology team.

Both providers are Australian entities that manage HR, payroll, office space and legal matters associated with resourcing from a number of countries in the Asian subcontinent and 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, as the reliance on the outsourced entity adds complexity to the operational process and can reduce visibility of the physical workplace and operations.

APRA mitigates these risks in the following ways:

- Procurement, contracting and onboarding for outsourcing partners for software development is managed by the IT division, in partnership with our Finance, Legal and People & Culture divisions.
- Procurement of these services is subject to our policy and to strict approval processes. The cost of these services often means that they are subject to approval by the CEO and CFO and the terms of the agreements are reviewed by our Legal team.
- Contractual arrangements between the parties must ensure that no bonded, forced or involuntary labour, child labour, human trafficking or other forms of slavery are employed in the delivery of their services to APRA.
- The APRA People & Culture and IT leadership teams work closely with the providers to ensure the individuals recruited to work on APRA projects in the South-East Asian region are offered salaries commensurate with minimum standards set by Award rates in Australia.
- The professionals recruited via these providers are included as part of APRA's team and have access to health, safety and wellbeing messages posted to our Microsoft Teams channels and to compliance learning and development content, which includes information and resources about modern slavery prevention. They are also able to attend or view recordings of APRA staff briefings which features reports on our work in these spaces.

Annual risk assessments are completed on the outsourced providers and operations to ensure services are maintained within APRA's risk appetite and supplier obligations are met, including in respect of modern slavery risks.

#### **Risk mitigation measures: labour hire**

During the Reporting Period, APRA engaged approximately 55 contractors on a daily rate and 14 consultants. The majority of these contractors provide high value skills in the area of information technology or music rights. The specialised nature of their skills lowers their risk to be victims of modern slavery.

Our annual review of these arrangements confirmed that most daily rate contractors provide services through a recruitment agency and all the consultants are self-employed. All daily rate contractors and most of the consultants are based in Australia. We have two consultants located in the US and one in the United Kingdom.

Where contracted directly by APRA, contract terms are negotiated in good faith and with consideration of equivalent employee entitlements in mind.

Where contracted through a third-party provider, the third party must comply with APRA's Code. 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.

### **Assessment of effectiveness**

To date, 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 (**Committee**) as part of its Equity Action Plan. The 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 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.

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

### **Actions identified for 2025**

- The Committee has identified the need for mandatory training on modern slavery to be required of all staff – this has been set as an objective for 2025.
- In addition, the Committee will audit suppliers of office products over the 2025 reporting period to assess modern slavery risks in these supply chains and consider mitigation measures.
- For the next 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.
- For the next reporting period, APRA is developing a bespoke agreement covering artists and performers that will provide further protections.

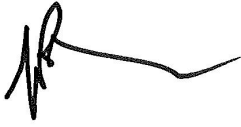
The APRA Executive Leadership team is committed to ensuring that there are adequate resources available to assess and address the risks of modern slavery practices within APRA's operations and supply chains. Consequently, during the Reporting Period, APRA committed additional resources from within its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

### **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 2024. 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 20 November 2024.



Jenny Morris  
**Chair, APRA Board of Directors**