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SCA
MODERN SLAVERY
STATEMENT 2025

MODERN SLAVERY STATEMENT 2025

This statement sets out actions taken by Southern Cross Media Group Limited ACN 116 024 536 and its related bodies corporate (together, **SCA**) to address modern slavery and human trafficking risks in our business and supply chain for the year ended 30 June 2025 (**Reporting Period**). It has been prepared in accordance with the *Modern Slavery Act 2018* (Cth).

SCA requires group entities to comply with SCA's corporate policies, including the assessment and mitigation of modern slavery risks. SCA has consulted with subsidiaries and business units within the SCA Group to gather the required information to prepare this statement.

OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Organisational structure and business

Southern Cross Media Group Limited is an Australian public company listed on the ASX. SCA is one of Australia's leading media companies and the home of LiSTNR as well as the Hit and Triple M networks.

The LiSTNR digital audio app offers free and compelling digital audio content including SCA's FM, AM, and DAB+ radio stations, live AFL, NRL and international cricket coverage, over 50 music playlists, local news and over 800 podcast titles from leading Australian and global creators. With more than 2.2 million signed-in users, the LiSTNR digital audio sales network reaches an estimated eight million people each month.

SCA owns 104 radio stations across FM, AM, and DAB+ radio under the Triple M and Hit network brands and provides national sales representation for 56 regional radio stations, with more than nine million listeners across the Hit and Triple M networks nationally.

Our supply chain

SCA's business operates entirely within Australia and most of our suppliers are also based in Australia (which has a low prevalence of modern slavery according to the Global Slavery Index

released by Walk Free on 24 May 2023 (**Global Slavery Index**)). We prioritise relationships with established and trustworthy suppliers and in many instances have used the same suppliers for many years.

Some of our suppliers have operations in other jurisdictions including the United States of America, the United Kingdom, New Zealand, Singapore, Germany, Fiji, France, Indonesia, Hong Kong, Japan, the Philippines, and Sweden. These international suppliers predominately specialise in IT hardware, platforms, communications infrastructure and banking, often through their Australian subsidiaries.

Our employees

All our employees are currently employed within Australia and are covered by Australian employment law protections, contracts and awards.

POTENTIAL RISKS IN SCA'S OPERATIONS AND SUPPLY CHAIN

Having regard to guidance material and resources available through the Australian Attorney-General's Department and the Australian Human Rights Commission (including the Global Slavery Index), SCA has assessed risks in its operations and supply chain and has concluded the risk of modern slavery practices in SCA's operations is low.

However, SCA recognises that no organisation is immune to modern slavery risks.

Risks in third party services

We consider the following areas of SCA's third party service requirements may be vulnerable to modern slavery practices:

- procurement of event and hospitality services; and
- labour hire.

These sectors are known to carry elevated risks due to factors such as casual or temporary

employment structures, potential reliance on migrant or lower-skilled workers, and the prevalence of subcontracting, which can obscure lines of direct accountability from the contracting entity.

Risks in supply chain

SCA considers the highest risks of modern slavery in SCA's goods supply chain lie in our procurement of the following goods:

- electronic and communication equipment; and
- promotional merchandise.

According to the Global Slavery Index's assessment of countries prone to modern slavery, SCA recognises that products and services in these categories are commonly sourced from jurisdictions where systemic low wages, intense cost-cutting pressures and insufficient independent oversight or regulation are present. This lack of regulation, coupled with new and rapid industrialization, leads to increased risks of human trafficking and labour exploitation.

ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

Supply chain due diligence

The United Nations Guiding Principles on Business and Human Rights identify due diligence as a key means by which businesses can identify, prevent and address human rights harms within their operations or supply chains.

SCA conducts supplier due diligence through a multi-tiered approach, including desktop risk assessments, a review of publicly available information and direct engagement with certain suppliers.

For those suppliers to SCA during the Reporting Period, SCA conducted a desktop modern slavery supplier risk assessment, by reference to the Global Slavery Index, to review our top 50 suppliers by spend, to understand the risks of modern slavery within our supply chain.

Of those suppliers, SCA sent SCA's Supplier Code of Conduct (**Code**), which establishes SCA's expectations in relation to the minimum standards of behaviour required of all our suppliers in their business operations, as well as a supplier questionnaire (**Questionnaire**) designed to identify actual or potential modern slavery risks in our supply chain, to suppliers which operate in a high-risk country or whose goods or services fall into a high-risk sector.

We monitor and assess responses to our Questionnaires to identify trends and emerging risk indicators which may warrant further investigation or action. Where necessary, this system helps us to further engage with suppliers and stakeholders about how SCA is seeking to address modern slavery risk. This enables us to engage meaningfully with suppliers and take targeted action where necessary.

In addition to the Questionnaire, SCA conducted a review of publicly available records and a search of the Australian Border Force website of uploaded modern slavery statements.

The results of our risk assessment determined that, consistent with last year, the majority of the suppliers presented a low risk of modern slavery. No actual modern slavery concerns were identified in the supplier risk assessment.

SCA will continue to engage with suppliers to understand their approach to managing modern slavery risks.

Policy and procedures

SCA maintains a suite of policies and operational procedures that set clear expectations for our people and the responsible conduct of our business. Relevant policy documents are available on our employee intranet and are communicated to suppliers during the onboarding process.

As noted above, our Code sets out SCA's expectations, and the minimum standards of behaviour required of our suppliers. It covers matters relating to ethical business practices, conflicts of interest, environmental impacts and health and safety. It also specifically addresses

labour rights, human rights and modern slavery standards. SCA's Code is publicly available, and additionally, SCA provides this Code to suppliers following the desktop review process outlined above.

In summary, the Code states our expectation that suppliers will:

- ethically engage and manage workers in compliance with all applicable laws, regulations and standards relating to modern slavery, including human trafficking, exploitation, forced labour and child labour;
- monitor compliance with modern slavery and human rights laws and report any actual or suspected breaches of modern slavery laws; and
- take reasonable steps to address, remedy and prevent the recurrence of any breach of the Code.

To minimise the risk of modern slavery within our supply chain, SCA internally enforces responsible purchasing and procurement practices. These practices involve timely payment to suppliers, careful order planning to prevent sudden workload changes and fostering strong, collaborative supplier relationships. For example, SCA endeavours to pay 95 percent of small businesses within 30 days.

Modern slavery contract provisions

During the reporting period, SCA prepared modern slavery-specific contractual provisions for inclusion in supplier agreements. These provisions will progressively be embedded into new and renewed supplier contracts where appropriate to reinforce SCA's commitment to responsible sourcing and ethical business conduct. Where negotiations are required, SCA will consider supplier feedback to balance commercial and compliance objectives, and use these learnings to further enhance its contractual framework.

Training

To ensure the awareness and understanding of SCA's approach to modern slavery, all new SCA employees are required to review and confirm their understanding of our Modern Slavery Fact Sheet during their onboarding process. This document outlines SCA's responsibilities under modern slavery laws and the steps we take to identify and mitigate modern slavery risks. The Modern Slavery Fact Sheet is available on our employee intranet and is updated annually.

In addition, our annual compliance training reinforces awareness of modern slavery risks and our internal procedures for identifying and addressing such risks.

Grievance mechanisms

We offer various internal channels for employees to report any concerns or raise grievances in relation to workplace conduct, including modern slavery, fraud, unethical activity or other misconduct. We encourage our people to promptly alert their manager, a member of the senior leadership team or the Chief Legal Officer and Company Secretary of any concerns.

Designated corporate officers are also trained to investigate and implement corrective measures when needed. If an employee does not feel comfortable speaking with any of these people or wishes to report anonymously, they may raise their concern via our internal Speak Up Program or our Whistleblower Policy and whistleblower hotline. These channels are accessible 24/7 by our employees, contractors, and other third parties, via our employee intranet or via our external whistleblower hotline, 'Your Call'. During induction, we inform employees and contractors about how to access and use these channels.

Remedial action

Where required, SCA will aim to assist any suppliers with modern slavery risks or any actual incidents of modern slavery. If such situation arises, we would first contact the supplier to raise our concerns and conduct further investigations to determine the appropriate course of action. This may involve contributing to an action plan to

remedy any issues with these suppliers and to educate them on addressing modern slavery risks. If these actions are not feasible, SCA would look to terminate its contract with the offending supplier or, if required, alerting legal or regulatory authorities, particularly if any breach were severe or repeated.

CONSULTATION

During the Reporting Period, SCA consulted with entities we own or control within the SCA group, including our two Canberra radio stations operated as a joint venture with ARN Media. This consultation included exchange of updated data surrounding modern slavery risks faced by these entities, mechanisms to address these risks as well as review of ARN's Modern Slavery Statement.

MEASURING THE EFFECTIVENESS OF OUR ACTIONS

During the Reporting Period, SCA received no reports of actual or suspected modern slavery incidents via the above grievance mechanisms or otherwise.

As part of our ongoing evaluation of our approach to reducing modern slavery risks, SCA will undertake a thorough review of its existing framework during the next reporting period. This review will focus on evaluating the effectiveness of current training programs, risk assessment methodologies, and internal processes designed to identify and mitigate modern slavery risks. Through this process, we seek to ensure continuous improvement in our efforts to prevent modern slavery across our operations and supply chains.

This statement has been approved by the Board of Southern Cross Media Group Limited.



JOHN KELLY

Chief Executive Officer and Managing Director
9 December 2025