

The logo for SCA, consisting of the letters 'SCA' in a bold, white, sans-serif font. The letters are slightly overlapping, with the 'S' and 'C' sharing a vertical stroke. The logo is centered on a blue background with concentric circles.

**MODERN SLAVERY  
STATEMENT 2021**

## MODERN SLAVERY STATEMENT 2021

This statement sets out actions taken by the 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 financial year ended 30 June 2021. It has been prepared in accordance with the *Modern Slavery Act 2018* (Cth).

SCA requires group entities to follow corporate policies, including in relation to assessment and mitigation of modern slavery risks. Where appropriate, SCA has also consulted with entities in which it has non-controlling interests to assess their approach to management of modern slavery risks.

### OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

#### Organisational structure

Southern Cross Media Group Limited is an Australian public company listed on the Australian Securities Exchange.

#### Our business

SCA is one of Australia's leading media companies reaching more than 95% of the Australian population through its radio, television and digital assets. Under the Triple M and Hit network brands, SCA owns 98 stations across FM, AM and DAB+ radio. SCA provides national sales representation for 23 other regional radio stations. SCA broadcasts 92 free to air TV signals across regional Australia, reaching 4.4 million people a week, with Network Ten television programming and advertising representation across Australia's East Coast, Seven Network programming in Tasmania and Darwin, and Seven, Nine and Ten programming in Spencer Gulf. In 2021, SCA launched LiSTNR, a new audio entertainment platform. SCA's premium brands are supported by social media, live events, video, online and mobile assets that deliver national and local entertainment and news content.

SCA's total workforce on 30 June 2021 was approximately 1600, all based in Australia.

More information about our business operations and strategy is available on our website: <https://www.southerncrossaustereo.com.au/>.

#### Our supply chain

SCA has a relatively simple supply chain for acquisition of products and services needed for day-to-day operations including office supplies, broadcasting equipment, music and other content licensing, IT infrastructure and support services, banking services, marketing services, merchandise, and audit, tax, legal and other professional services. SCA seeks to obtain products and services from suppliers who are reputable, substantial commercial entities. In many instances, SCA has dealt with these suppliers over several years.

While most of our direct supply chain expenditure is located in Australia, SCA sources some goods and services from global suppliers who have operations in places such as the United Kingdom, the United States of America, Singapore, Hong Kong, Japan and Indonesia.

In these instances, we most often deal with Australian-based subsidiaries of our global suppliers. However, we acknowledge their supply chains may involve other jurisdictions.

### POTENTIAL RISKS IN OUR OPERATIONS AND SUPPLY CHAIN

SCA has assessed risks that may possibly cause, contribute or be directly linked to modern slavery practices, in accordance with guidance published by the Australian Government's Department of Home Affairs.

On the basis of this assessment, we believe the risk of modern slavery practices in our operations and supply chains is relatively low.

Areas of higher risk include:

- sector and industry risks, including electronics, cleaning and textiles;
- product and services risks, including food and catering, cleaning and merchandise; and
- geographic risks, including overseas jurisdictions where our suppliers may operate.

Suppliers exposed to these risks may be relatively more likely to participate in modern slavery practices or to be exposed to modern slavery practices in their downstream supply chains. For example, SCA could purchase from an Australian supplier equipment manufactured by an overseas entity with a record of modern slavery practices.

We have also considered common indicators of modern slavery, and how these identifiers could potentially manifest in the case of an end-recipient of goods or services.

## ADDRESSING MODERN SLAVERY RISKS

SCA's policies and procedures set expectations for our staff and the responsible conduct of our business. To address the risk of modern slavery in our supply chains, SCA has continued to refine policies and procedures, including with respect to employee conduct, staff training and due diligence for major suppliers.

### Supplier Code of Conduct

Our Supplier Code of Conduct (**Code**) sets out SCA's expectations and the minimum standards of behaviour required of our suppliers in the areas of ethical business practices, conflicts of interest, environmental impacts and health and safety. It also specifically addresses labour, human rights and modern slavery standards.

The Code is publicly available on SCA's corporate website and is made available to our major suppliers.

In accordance with the Code, we expect suppliers to engage and manage people ethically and to comply with all laws, regulations and standards in respect of modern slavery, including human trafficking, exploitation, forced labour and child labour.

The Code sets out our expectation that suppliers will monitor their compliance and notify SCA as soon as practicable if they become aware of a reasonable risk of a breach. We also expect suppliers to take reasonable steps to address, remedy and prevent the recurrence of any breach of the Code.

SCA may also periodically review or audit a supplier's compliance with this Code. If we discover a case or a significantly increased risk of modern slavery within our supply chain (or indirectly through a supplier's own supply chain) we will first seek to work with the supplier to implement corrective action. Material non-compliance or continued non-compliance with the Code may lead SCA to disqualify a potential supplier or terminate our business relationship with a current supplier.

### Supplier Questionnaire

SCA is not practically able to observe the entirety of suppliers' operations. As part of our supply chain due diligence, we have developed a Supplier Questionnaire (**Questionnaire**) to gather information about suppliers' operations, supply chains and modern slavery standards. SCA may take additional steps based on a supplier's response to our Questionnaire or an assessment of the products and services provided by a supplier.

We have obtained satisfactory responses to this Questionnaire from major suppliers and other suppliers we consider operate in high risk sectors.

We will ask suppliers to refresh their responses to our Questionnaire at appropriate intervals and will continue to give the Questionnaire to new major suppliers (and others we consider operate in high risk areas). We monitor

responses to our Questionnaires to identify trends and emerging risks that may warrant further investigation or action.

## **Contract Terms**

SCA has developed standard contractual clauses for major suppliers (and others we consider operate in high risk areas) requiring them to comply with relevant modern slavery laws and standards. When implementing these terms, SCA adopts a collaborative approach with suppliers to promote mutual understanding of modern slavery risks by communicating the importance of these standard clauses in our contracts to the supplier. We aim to incorporate these clauses in our contracts with all applicable suppliers.

## **Training**

To help build awareness of modern slavery and assist in identifying potential modern slavery risks, we provide employees with information about SCA's obligations under modern slavery legislation and our processes to assess and address modern slavery risks.

During the last 12 months, we distributed a Modern Slavery Fact Sheet to all employees. The Fact Sheet explained what modern slavery is, the modern slavery risks exist within SCA's operations, how our people can identify and mitigate modern slavery risks, and how they can report any indicators or suspected instances of modern slavery within SCA's supply chain.

## **Grievances**

We offer various channels for seeking guidance, reporting concerns and raising grievances. Our people are encouraged to raise concerns as soon as possible with their manager, a member of the senior leadership team of the Head of Legal and Corporate Affairs. If an employee does not feel comfortable speaking with any of these people, they are encouraged to raise their concern via our internal Speak Up Program and our Whistleblowing Policy and whistleblowing hotline. These channels are available to our

employees and third parties to report any wrongdoing, including fraud, unethical activity or irresponsible acts. Reports can be made anonymously. Corporate officers nominated in our policies are trained to conduct necessary investigations and, when required, to design and implement corrective actions.

## **MEASURING EFFECTIVENESS**

We have reviewed responses received to our Supplier Questionnaire. We have also reviewed the modern slavery policies and statements of several major suppliers. Following these reviews, we have not identified any material risk of modern slavery practices in our supply chains.

During the year, we refined our Supplier Questionnaire to improve the relevance and clarity of responses. We will continue to measure our effectiveness in mitigating modern slavery risks to our business by tracking the number of suppliers that respond to our Supplier Questionnaire (or otherwise provide relevant information about their modern slavery standards).

We plan to measure and compare metrics on the use and interaction with modern slavery training materials and policy documents, with the aim of achieving year on year improvement. We also plan to conduct an annual refresher training on modern slavery, particularly for our people who are directly involved in procurement.

We will continue to regularly review our Supplier Code of Conduct, Supplier Questionnaire and risk assessment processes to ensure they remain up to date and effective in assessing modern slavery risks.

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



Chief Executive Officer  
17 August 2021