



ABC MODERN SLAVERY STATEMENT FY2024



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**THIS STATEMENT HAS BEEN APPROVED
BY THE BOARD OF THE AUSTRALIAN
BROADCASTING CORPORATION**

Each year the Australian Broadcasting Corporation procures goods and services from suppliers to meet our obligations under the ABC Charter. As we enter our fifth year of reporting under the Modern Slavery Act 2018 (Cth), we remain committed to managing and reducing modern slavery risks, and to promote social and sustainable outcomes from our procurement activities that benefit our audience, communities, stakeholders and supply chains.

A handwritten signature in black ink, appearing to read 'D Anderson', with a long horizontal flourish underneath.

David Anderson
ABC Managing Director

1. INTRODUCING THE ABC

With a history of over 90 years, the Australian Broadcasting Corporation (ABC) remains deeply embedded in Australian life. Underpinned by the ABC Charter, and established by the Australian Parliament, our mission is to provide valuable services that enrich and reflect Australia's society, culture, and identity.

In delivering on our responsibilities, it is important that our operations and purchasing decisions contribute to social and sustainable procurement goals. This includes initiatives that enhance supplier diversity and address the complexities of managing supply chain risks. Our focus on supplier diversity is highlighted through our [Diversity, Inclusion and Belonging Plan 2023-2026](#), whilst our ongoing commitment to addressing modern slavery risks is presented in this, our fifth Modern Slavery Statement.

By collaborating closely with suppliers and staff, the ABC continues to raise awareness of potential modern slavery risks within our supply chains, strengthening our commitment to ethical sourcing and responsible procurement practices.

2. ABC'S STRUCTURE, OPERATIONS AND SUPPLY CHAINS

2.1 Structure

The ABC (ABN 52 429 278 345) operates as a Corporate Commonwealth Entity (CCE) in line with the ABC Charter, as outlined in the Australian Broadcasting Corporation Act 1983. As a CCE, the ABC is a separate legal entity and can act in its own right to create contracts.

The ABC Board serves as the organisation's primary governing body, responsible for ensuring that the ABC's functions are conducted efficiently and deliver maximum value to the Australian public, all while preserving the organisation's independence and integrity.

With a national presence, the ABC operates across eleven major metropolitan areas and maintains fifty regional offices throughout Australia. Alongside this extensive domestic network, the ABC also runs foreign newsgathering bureaux and undertakes international training projects in several other countries, cementing its role as Australia's leading media organisation in the Indo-Pacific region.

2.2 Operations

The ABC's operations encompass the production, acquisition, distribution, and transmission of content across Television, Radio, Online, and Digital platforms.

In the financial year ending June 30, 2024, the ABC reached a wide national audience across various platforms, highlighting the vast scope and impact of its diverse operations, as demonstrated in Figure 1.

FIGURE 1: ABC OPERATIONS

ON THE RADIO

ABC NEWS on radio

a national, 24-hour radio news network

National radio networks¹

RN, ABC Classic, triple j

Capital city Local Radio²

available from all eight capital cities

Regional Local Radio³

available in regional locations around Australia

Digital Radio⁴

Double J, ABC Jazz, ABC Country, ABC Sport, triple j Unearthed, and ABC KIDS listen⁵

ABC Radio Australia

a new, information and entertainment service for the Pacific region

On your screens

ABC TV

the ABC's primary television channel

ABC Kids / ABC TV PLUS

television for preschoolers until 7.30pm, then a broad range of documentaries, entertainment and arts programs for adults

ABC ME

a dedicated children's channel

ABC NEWS on television

broadcasting national and breaking news 24 hours a day

ABC NEWS Digital

in-depth journalism content, analysis and opinion

abc.net.au

your gateway to ABC news, information, and entertainment

ABC iview

the ABC's online television catch-up and streaming service – available in Kids and international versions

Streaming radio

on ABC listen, ABC KIDS listen and via ABC websites

Apps

for smartphones and tablets

Commercial

Content sales and distribution

ABC TV content and format licensing, and library sales, ABC NEWS syndication

ABC Music and Events

record label commercially releasing music and live events

Publishing and licensing

books and audiobooks, magazines and a range of merchandise

ABC Studios and Media Productions

provision of production services to the market

International

ABC Australia and ABC Radio Australia

television, radio and online services for audiences across the Indo-Pacific and around the world

ABC International Development (ABCID)

partnering with media, civil society and government organisations in the Asia-Pacific region, to assist in designing and delivering communication initiatives

Source: [Australian Broadcasting Corporation Annual Report 2024](#)

¹ Also available in mainland capital cities as a digital radio service, and nationally via digital satellite services.

² Also available in mainland capital cities as a digital radio service. Some Local radio services are available via digital satellite subscription services.

³ 44 regional local radio services are available on AM or FM radio and via streaming. Some Local Radio services are available via digital satellite subscription services.

⁴ All available as DAB+ stations and streams, except ABC Classic 2 which is only available as a stream.

⁵ ABC Local Radio (metropolitan), RN, ABC Classic, triple j, triple j Unearthed, Double J, ABC Jazz, ABC Kids listen, ABC Country and ABC NewsRadio are also available as free-to-air digital television.

2.3 The ABC's Supply Chain

As a national broadcaster, the ABC's supply chain is diverse, reflecting the regional and global production and distribution of content, as well as the broad range of goods and services required to support our operational footprint.

To better understand and map our supply chain, the ABC collaborates with our suppliers to enable us to gain a clearer understanding of how and where the goods and services provided to the ABC are sourced.

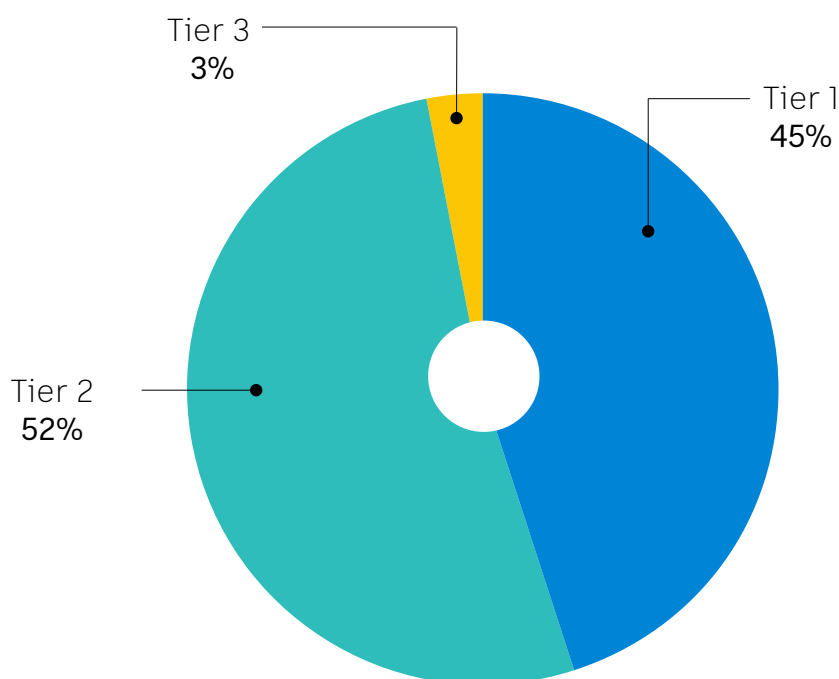
We have also identified key spend categories that cover a variety of goods and services, each presenting unique modern slavery risks. These risks vary depending on the nature of the goods or services and the regions where they are produced.

The ABC takes a risk-based approach when engaging suppliers, ensuring traceability throughout the supply chain. Our modern slavery risk management includes our Annual Supplier Survey and integrating modern slavery-related questions into our market engagement processes.

The ABC continuously monitors shifts in the supply chain landscape, identifying potential risks and opportunities for greater transparency.

Considering our most recent Annual Supplier Survey, we have observed noteworthy changes in supply chain tier distribution when compared to the previous year. The chart below shows the current supplier profile (Figure 2). "Tier" refers to the different levels or stages within our supply chain, indicating the number of intermediaries between the manufacturer (tier 1) and the end product. In the prior year, we had more tier two and tier three suppliers, whereas the current data highlights a significant shift towards the one or two-tier structure.

FIGURE 2: TIER PROFILE



While a significant portion of ABC's supplier base is locally situated in Australia, this proximity doesn't automatically eradicate the risk of modern slavery. The ABC, through its standard contract conditions, mandates that even local suppliers need to be able to provide information about their supply chains upon request. This requirement, along with the need for country-of-origin data in all ABC market engagement documents, underlines the organisation's commitment to due diligence in modern slavery prevention.

2.4 Modern Slavery Risks in ABC operations

At the ABC, ethics and social responsibility are at the core of how we operate. We remain steadfast in our commitment to mitigating modern slavery risks across our operations. Key to this is our employment framework, such as the ABC Enterprise Agreement 2022-2025, which covers the majority of our workforce and underscores our dedication to fair and ethical labour practices.

2.5 Modern Slavery Risks in ABC Supply Chains

We recognise that modern slavery risks may arise if the goods or services we procure are linked to exploitative practices by another company within our supply chain.

We also maintain a proactive stance on ethical sourcing, continuously engaging with our suppliers to ensure responsible practices are upheld throughout the supply chain. This integrated approach helps to reinforce our low-risk status when it comes to modern slavery within our internal operations.

Through a detailed assessment of our supply chain, we have identified the key modern slavery risks associated with each of our major spending categories:

Production & Broadcasting	Exploitation in media production, particularly in underpaid labour in entertainment and content creation.
Information Technology Equipment & Services	Hardware and software components and finished goods can be sourced and produced by vulnerable, low skilled and low wage labour in high-risk countries.
Infrastructure	Exploitation of low skilled migrant workers or those without work rights for construction and refurbishment projects.
Marketing and Communications	Marketing and promotional items can be manufactured in high-risk countries or developing economies by low wage or child labour.
Office Supplies	Consumables components and finished goods can be manufactured in high-risk countries or developing economies by low wage or child labour.

Consultants & Contractors	Risks may involve exploitation of workers in consulting and contracting services, especially in low-cost global supply chains.
Program Rights & Royalties	Concerns may arise in the content creation industry regarding royalties, particularly in lower-wage regions.
Property Services	Exploitation of low skilled migrant workers or those without work rights for maintenance of ABC properties.
Renewable Energy	Solar panels or batteries components and finished goods can be sourced and produced by vulnerable workers in high-risk countries.
Travel & Fleet	Potential issues can include exploitation in transportation services and hospitality, or fleet maintenance and the sourcing of components for electric vehicle batteries.

3. OTHER ENTITIES

In the financial year ending 30 June 2024, the ABC had one dormant entity under its control. The ABC consulted with this entity in the development of this Statement, and it was confirmed that the entity was dormant throughout the year and did not engage in any trade.

4. RISK IDENTIFICATION PROCESS

We adopt a comprehensive and integrated approach to identifying modern slavery risks within our supply chains. Our primary focus is on the potential harm experienced by individuals, prioritising human rights risks before considering business risks such as legal, financial, or reputational impacts.

We acknowledge that certain spending categories and countries present a higher risk of modern slavery than others. As a result, we assess high-risk suppliers based on factors such as the industry, type of goods or services procured, and the geographic region of their operations.

If any concerns or “red flags” are raised during a risk assessment, the ABC Contract Manager will engage with the supplier to seek further clarification. Our approach is centred on raising awareness and building capacity to address potential issues. Should any serious concerns arise, they will be referred to the Australian Border Force. To date, the ABC has not had to make any referrals.

5. THE ABC'S ACTIONS

5.1. Modern Slavery Roadmap

The ABC introduced its first Modern Slavery Statement in 2020, informed by insights from the inaugural Annual Supplier Survey. This set a foundation for assessing our progress in subsequent years. In 2024, the ABC continued to advance initiatives outlined in the original Modern Slavery Roadmap, further strengthening our due diligence efforts and raising awareness of modern slavery risks among suppliers, staff, and contractors.

In 2024, the ABC concentrated on key areas, including:

- Broadening the Annual Supplier Survey to encompass additional supply chain risks and focus on social and sustainable procurement areas that drive improvement;
- Identifying more business-critical and high-risk suppliers to take part in the Annual Supplier Survey;
- Evaluating the Modern Slavery Statements of our suppliers to ensure their actions align with ABC's values, policies, and guidelines; and
- Engaging with other organisations to share information and strategies related to managing modern slavery risks.

The ABC has implemented a range of control measures to mitigate the risk of modern slavery across our operations and supply chains.



5.2 Staff Training

As part of our plan to operationalise our modern slavery due diligence, we took a series of steps to promote greater awareness of modern slavery within the ABC. Our initiatives included online training modules.

- “Before You Buy” training is available for staff who purchase goods or services for the ABC. As well as being an introduction to the ABC's procurement process, it also covers awareness of what modern slavery is and how it applies to the ABC. .
- Completion of “Evaluation Panel Awareness” training is mandatory for staff who are participating in an Evaluation Panel. This is accompanied by a Social and Sustainable Procurement Evaluation Guide to assist in evaluation of responses including the modern slavery requirements of the market engagement.
- Staff are also encouraged to complete the e-Learning modules on modern slavery in the [Resources section](#) of the Australian Modern Slavery Register.

5.3 Policy Framework

The ABC has a number of policies, standards and procedures that outline our commitment to demonstrate ethical behaviour including respecting human rights, which guide ABC employees, contractors, and consultants in their day-to-day work and ensure compliance within their capacity.

- ABC Code of Conduct
- ABC Procurement Policy
- Procurement Governance Guideline
- ABC Supplier Code of Conduct
- Social and Sustainable Procurement Strategy
- Social and Sustainable Procurement Evaluation Guide

5.4 Leveraging Systems

- The ABC's modern slavery requirements and obligations are built into our market engagement templates within our sourcing and contract management system Procure Hub.
- These requirements ensure that suppliers are aware of the ABC's commitment to addressing modern slavery and to simplify the compliance and due diligence process during market engagements.

5.5 ABC Procurement Process

The ABC has a published procurement policy, and comprehensive procurement procedures and guidelines. These guide the ABC on obtaining value for money, whilst supporting sustainable procurement which takes into account the total cost of the relationship – economic, environmental and social – within a wider framework of good governance.

5.6 Supplier Survey

The ABC conducts an Annual Supplier Survey to evaluate the risk exposure from engaged suppliers. The survey, continually enhanced, targets high-risk suppliers selected through a risk-based approach, including:

- Business-critical suppliers;
- Top suppliers by spend per category; and
- Suppliers of goods and services in a category with a higher risk of modern slavery in their supply chain.

Most of the survey questions cover modern slavery and the management of their supply chain. The survey also reminds these suppliers of their obligations under the [ABC Supplier Code of Conduct](#), which is publicly available on the ABC website and was updated during the 2024 reporting period, and the ABC's goal to collaborate with its suppliers to foster capable, ethical and resilient supply chains.

In addition to the supplier survey analysis, the ABC continues to rely on reviewing its suppliers' published Statements to verify and test individual supplier's risk mitigation approaches and strategies.

5.7 External Collaboration

Since the commencement of the Modern Slavery Act 2018 (the Act), the ABC has proactively engaged with peer organisations, networks, and industry bodies to combat modern slavery, including the Chartered Institute of Procurement and Supply. These collaborations are aimed at continually enhancing our approach as a buyer to boost corporate awareness and tackle modern slavery risks. Through these we have channels for sharing insights, best practices and experiences with like-minded buyers, enabling us to refine our strategies and responsibilities to align with leading practice.

6. ASSESSING EFFECTIVENESS

The following table (Figure 3) highlights the key indicators that the ABC currently utilises to assess the effectiveness of its initiatives targeting modern slavery.

FIGURE 3: MODERN SLAVERY ACTIONS MEASUREMENT

ACTIVITY	ACTIONS	MEASURE	SOURCE
ABC AWARENESS	<ul style="list-style-type: none"> • Use of data and tools • Completion of training • Management of supplier performance • External collaboration • Remediate identified cases 	<ul style="list-style-type: none"> • Number of staff taking recommended training • Number of external engagements • Products sourced from high-risk categories and countries 	<ul style="list-style-type: none"> • Procurement reporting • Training data • Spend data • Risk registers
SUPPLIER AWARENESS	<ul style="list-style-type: none"> • Quality of market engagement responses • Adherence to contract requirements • Acknowledgement of the ABC Supplier Code of Conduct • Participation in the Annual Supplier Survey 	<ul style="list-style-type: none"> • All respondents meet the modern slavery requirements • Survey response rate percentage • No contract or Code non-compliances identified • Number of identified cases • Respondents meeting requirements 	<ul style="list-style-type: none"> • Procurement reporting • Survey results • Complaints database • Contract reviews • Whistleblower reports • Supplier third party audits

While the ABC continues to create and implement mechanisms to mitigate the occurrence of modern slavery in its supply chains, it also recognises the importance of measuring the effectiveness of ongoing efforts. We are committed to enhancing our approach to addressing modern slavery risks and acknowledge that the intention of the Act aims not only for regulatory compliance but also for promoting awareness and education among all stakeholders in the supply chain.

7. NEXT STEPS

We have a number of ongoing focus areas to ensure we continue to advance our organisational understanding of supply chain risks and to further develop our traceability and accountability processes.

These include:

- Staying across emerging issues and thought leadership in combating modern slavery;
- Reviewing and enhancing ABC internal guidelines to facilitate our management of modern slavery risk;
- Raising further awareness of modern slavery risks with ABC staff and contractors; and
- Continued collaboration with our suppliers.

