



2025 Modern Slavery Statement

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

This is the sixth 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 2024 to 30 June 2025 (**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 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 12 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 450 employees with 412 employees located in Australia and 38 located in New Zealand. The employment status of these employees is shown below:

Permanent employees	415
Fixed term employees	22
Casual employees	13
TOTAL employees across Australia & New Zealand	450

APRA also engaged approximately 45 daily rate contractors through recruitment agencies in Australia. APRA also continues to source technology expertise and resources via one Australian third-party provider that sources talent from the Republic of the Philippines and Vietnam. A second provider is in Pakistan. At the time of reporting, 11 individuals were working on APRA AMCOS projects through these third-party service providers. APRA also engaged 16 independent, expert consultants to deliver on defined scopes of service over the reporting period.

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 128,800 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

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. 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.

Actions taken by APRA in 2025 to address modern slavery risks

In APRA's 2024 Modern Slavery Statement, we committed to the following four actions:

- *Mandatory training on modern slavery to be required of all staff* – this has been completed. As at 30 June 2025, the completion rate across the workforce was 92%.
- *Audit suppliers of office products over the 2025 reporting period to assess modern slavery risks in these supply chains and consider mitigation measures.* This was considered as part of a broad review of APRA's Finance and Administration team, and acknowledging the work involved, a decision has been made to create a new centralised and dedicated Procurement function that will take responsibility for procurement, contract management, supplier audits and modern slavery risk mitigation measures. The new role of Procurement Manager has been budgeted for and will be actioned in the 2026 financial year.

- *Consider 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 was considered as part of the broad review of the Finance & Administration function and APRA has decided to include this responsibility as part of the remit of the new Procurement Manager role which will take effect from January 2026.*
- *Developing a bespoke agreement covering artists and performers that will provide further protections: this agreement template has been developed, and the Events team now carries responsibility for its application. In addition, a decision has been made to conduct Work Health and Safety risk assessments for each key event in APRA's event suite.*

Other Actions taken by APRA to address modern slavery risks

1. Cross-functional modern slavery committee

APRA's cross-functional Modern Slavery Committee (**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). All members of the Committee have completed comprehensive mandatory training on modern slavery risk assessment and prevention.

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. In line with this commitment, a report was presented to the APRA Board at the November 2024 APRA Board Meeting.

Over the reporting period, members of the Modern Slavery Committee assessed the policies and protocols we have in place for procurement and our supply chain for risks. The Committee endorsed a decision to rollout **mandatory training on modern slavery risk assessment and prevention for all staff. This was implemented and, as at 30 January 2025, the completion rate was 92% across the entire workforce**, including employees and contractors. Refresher training will be implemented every 18 months, and data on the completion rate for refresher training will be presented in the 2026 Report.

Finance and Administration Department representatives on the committee also undertook to review procurement practices as part of the review of the Finance function which was slated for the first half of FY26. This has been completed, and an important outcome of that review is that a **centralised Procurement function will be established within the Finance Division in FY26**. That function will have responsibility for contract management, Modern Slavery Reporting, ensuring compliance with APRA's Service Provider Code of Conduct and for reporting on procurement practices and outcomes.

2. Policies and procedures

During the reporting period, **APRA transitioned all of its policies and procedures to a new consolidated Sharepoint site called the APRA AMCOS Home Hub**. As part of that transition, a thorough review was undertaken of all APRA policies. The Home Hub provides easy access to carefully curated and up-to-date information on APRA policies, and, in many cases, provides clear links to supporting resources. The Modern Slavery Statement submitted by APRA, for example, is provided on the Home Hub with clear links to the Staff Code of Conduct, the Procurement Policy, the Whistleblower Policy and the Service Provider Code of Conduct.

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. 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. Over the reporting period, there have been no disclosures in relation to Modern Slavery via APRA's whistleblower service.

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, led by 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. Over the reporting period, APRA developed its first Indigenous Employment Strategy founded on these principles. The strategy was developed in partnership with Stonecrab, an Indigenous owned and led consulting firm that is listed with Supply Nation. A key outcome from that

strategy was that APRA is now working with Indigenous owned and led recruitment specialist, Dreamjobz, to promote work opportunities with APRA and to encourage applications from candidates who identify as Aboriginal and/or Torres Strait Islander.

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 1905 suppliers, of which 68% are based in Australia and 24% are based in New Zealand. Fewer than 8% of APRA's suppliers are 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, 67% are required to submit Modern Slavery Statements and have been compliant with this requirement. This 67% 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 33% 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.
- An independent Work Health and Safety (WHS) risk assessment is conducted for each of APRA's key events to ensure that safety risks are carefully considered and appropriate measures are taken to mitigate these risks.

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

During the Reporting Period, APRA continued to utilise technology expertise and resources via one Australian third-party provider that sources individuals from the Philippines and Vietnam – 11 workers located in these countries were providing services to APRA at the end of the reporting period. These individuals work in close virtual contact with the APRA technology team.

The said provider is an Australian entity that manages HR, payroll, office space and legal matters associated with resourcing from a few 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 45 contractors on a daily rate and 16 consultants. Most of these contractors provide high value skills in 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. The table below shows the location of consultants working with APRA during the reporting period.

Count of Consultants (As of 30 Jun)	Current Work Location
9	Australia
1	New Zealand
1	United Kingdom
2	United States
1	China
1	Canada
1	Hong Kong

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.

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

Actions identified for 2026

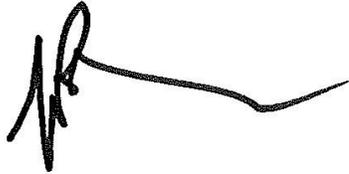
- Ensure refresher training on modern slavery is implemented every 18 months.
- Establish centralised Procurement function, led by a Procurement Manager and establish framework for contract management, supplier declaration form completion and audit of compliance with Supplier Code of Conduct.

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 2025. 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 25 November 2025.

A handwritten signature in black ink, consisting of a stylized 'JM' followed by a long horizontal line that tapers to the right.

Jenny Morris
Chair, APRA Board of Directors