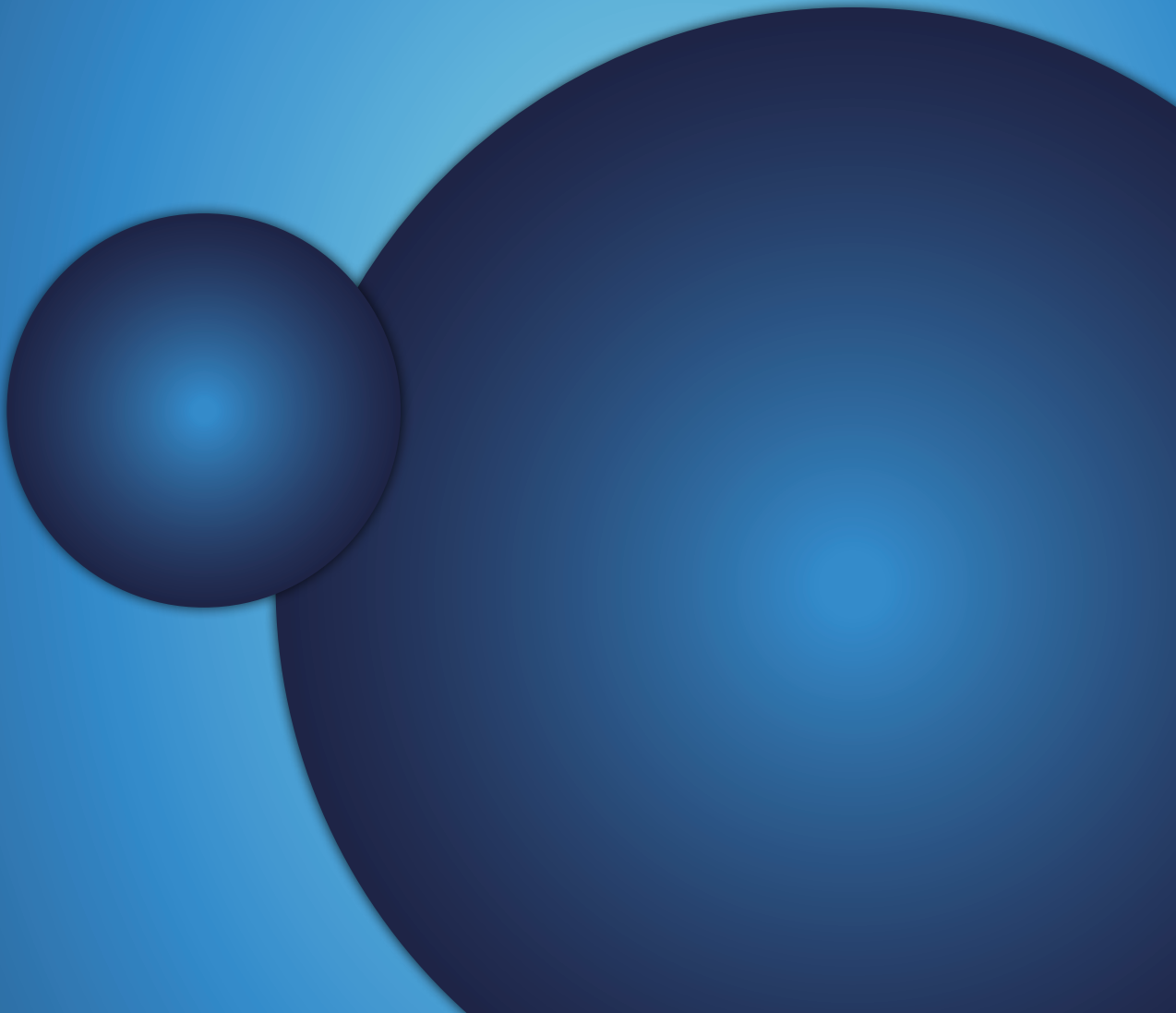




**MODERN SLAVERY
STATEMENT 2022**



Message from the CEO

I AM PLEASED TO PRESENT NINE'S MODERN SLAVERY STATEMENT FOR FY22.

Nine's strategy is to create great content, distribute it broadly and engage audiences and advertisers. As the home of Australia's most trusted and loved brands, we pride ourselves on creating the best content, accessed by consumers when and how they want. In doing this, the team at Nine is committed to reducing the risk of modern slavery in our operations and in our supply chains.

MIKE SNEESBY
CEO



Modern Slavery Statement 2022

1. INTRODUCTION

This is the Modern Slavery Statement (**Statement**) issued by Nine Entertainment Co. Holdings Limited ACN 122 203 892 (**Nine**), under the *Modern Slavery Act 2018* (Cth) (the **Act**) for the year to 30 June 2022. It is issued on behalf of Nine and its related bodies corporate (**Nine Group**), other than Domain Holdings Australia Limited ACN 094 154 364 and its subsidiaries¹.

2. NINE'S STRUCTURE AND OPERATIONS

The Nine Group is Australia's largest, locally owned, media company, with investments spanning television, video on demand, print, digital and radio.

The Nine Group includes the following wholly owned subsidiaries:

- Nine Network Australia Pty Ltd (ACN 008 685 407) which is responsible for its television operations, which operate as part of the 9Network. This comprises its television channels 9, 9HD, 9Go!, 9GEM, 9Life and 9RUSH.
- Nine Digital Pty Ltd (ACN 007 753 461) which operates Nine's Broadcast Video on Demand service 9Now and digital properties such as nine.com.au and owns the digital publishers Drive and PedestrianTV;
- Fairfax Media Publications Pty Ltd (ACN 003 357 720) which, directly or through other subsidiaries, publishes the major mastheads *Australian Financial Review*, *The Sydney Morning Herald* and *The Age*;
- Nine Radio Pty Ltd (ACN 063 906 927) which operates its radio operations including its radio channels 2GB, 3AW, 4BC and 6PR; and
- Stan Entertainment Pty Ltd (ACN 168 856 924) which operates the subscription video platform Stan.

The Nine Group also includes a majority investment in Domain.

For the purposes of this Statement, all of the assets of the Nine Group are treated as those of the group and, for clarity, all the entities which comprise the Nine Group, other than Domain and its subsidiaries, are covered by this Statement.

Key activities of the Nine Group's operations include the production and distribution of content (across multiple platforms and genres of content), the acquisition of content produced by third parties, and the sale of advertising inventory and sponsorships. Nine is a participant in a number of joint ventures which provide operational services to the Nine Group, including playout, transmission and news helicopters for the television business, and content licensing services for the publishing business. It is also a member of a number of industry bodies, including The Premium Content Alliance, FreeTV, Commercial Radio Australia, the Australian Press Council and Freeview.

The Nine Group operates across Australia, with primary operations in Sydney, Melbourne, Brisbane, Perth, Adelaide, Darwin and Newcastle, as well as having a sales office in New Zealand, and news bureaus in a number of locations around the world including the USA, Indonesia, and the United Kingdom. Nine has approximately 5,000 employees.

1. Domain Holdings Australia Limited has prepared a separate Modern Slavery Statement for the operations of that group of companies.



Modern Slavery Statement 2022

Nine is the ultimate holding company of the Nine Group, with its headquarters located in Sydney. It is a public company, incorporated in Australia and listed on the ASX.

The Nine Group's annual revenue for the year to 30 June 2022 was \$2.689 billion.

The Nine Group operates under broadly common policies and processes and its operations are within the same, broad, media sector. As such, it is appropriate to provide a single statement for the Nine Group. As the ultimate holding company of the Nine Group, Nine has the required knowledge of the group's operations to prepare this statement. Staff involved in the preparation of this statement have consulted with necessary business operation areas to gather the necessary information to prepare this statement on behalf of the Nine Group.

3. OUR SUPPLY CHAINS

Our supply chains involving our direct (Tier 1) suppliers can be broadly grouped as content, goods/equipment and services. Nine Group:

Content

- acquires licensed and commissioned content from an array of suppliers including major studios and distributors, production companies and boutique content houses;
- engages freelance writers, performers and contributors who contribute to Nine's audio-visual, digital and published content;
- acquires content rights from Australian and international sporting bodies;
- licenses content such as photographs from various licensing agencies and other media companies;
- acquires advertising (where Nine is advertising its products and services on platforms outside the Nine Group) and production of advertising content;

Goods and equipment

- acquires goods ranging from specialist broadcast technical equipment and bulk paper supplies for printing to standard office equipment and cars to clothing, merchandise used for promotional purposes and props for television programs;

Services

- acquires technology and communications services on standard commercial terms; and other specialised services such as professional or broadcast services and non-core, repeatable services, such as some finance operations; and
- acquires other services such as printing, delivery of newspapers, specialist services such as camera operators at outdoor sporting events, building management, security and contract cleaning; from a range of specialist suppliers and from labour hire businesses as appropriate.

Stan.
Domain



Nine's suppliers are located in over 46 countries around the world, but, by value of expenditure, are predominantly located in Australia, USA, United Kingdom, Ireland and the Netherlands which represents more than 98% of Nine's expenditure. These countries are all rated low for prevalence of modern slavery practices on the last available Global Slavery Index.²

4. NINE'S COMMITMENT TO HUMAN RIGHTS

Nine is committed to respecting and upholding the human rights of our people and any other individuals we are in contact with. We understand that our commitment to human rights will support our future success as a responsible business.

As Australia's largest, locally owned, media company, Nine recognises that it is a part of the communities in which it operates, including the communities where Nine's content is accessed, those where Nine produces the content or the communities where Nine's people, suppliers and partners live and work. Nine's commitment to the communities in which it operates has been demonstrated through its Nine Cares activities, as well as initiating and leading the 2022 telethon for people affected by floods in Queensland and NSW, shown by all three commercial television networks. Nine knows that in order to succeed, Nine must commit to upholding respect for human rights and that includes ensuring modern slavery risks are identified and, where possible, addressed.

Nine's commitment is also reflected in the following policies (which can be found at www.nineforbrands.com.au/corporate-governance-2):

- Code of Conduct
- Diversity Policy
- Whistleblower Policy



2. <https://www.globallslaveryindex.org/>

Modern Slavery Statement 2022

5. NINE'S RISKS OF MODERN SLAVERY PRACTICES

The Nine Group considers that the nature and location of its operations means that the risks of modern slavery practices in its supply chains are low. Similarly, Nine's risk of contributing to modern slavery practices by its suppliers is considered low, based on Nine's review of its major suppliers' assessments of their own modern slavery risks and our knowledge of their operations. Nonetheless, Nine remains committed to taking steps to identify and address potential incidents of modern slavery within the Nine Group or our supply chains.

Our employees are primarily skilled professionals, and so are not from vulnerable groups where slavery is a risk. Nine has appropriate workplace management policies and practices, along with skilled managers and access to external advisers, to ensure appropriate recruitment and management of employees, including compliance with minimum remuneration requirements.

While Nine does not regularly work with children, Nine is committed to the protection of children. Where children may feature in programming which Nine is producing, Nine typically engages children through talent agencies, ensuring that the correct remuneration is paid given the work involved and the child's age. Nine is also fully aware of the regulatory requirements relating to working with children, and is committed to complying with applicable requirements, where it is necessary to engage children for such work.

Our operations are in countries with high standards of protection for employees and the rights of individuals. We acquire content from reputable producers who also primarily operate in countries with commensurate protections for employees and other individuals. Our other primary suppliers across all categories of goods and services are also located in Australia or in other countries which do not pose a high degree of risk of modern slavery practices. 87% of Nine's annual spend with suppliers occurs within Australia. The majority of Nine's spend with Tier 1 suppliers outside of Australia is in low risk industries, such as major studios, shown on the graph below.

While we have some isolated instances of suppliers operating in countries where modern slavery risk is higher, we have put in place measures to monitor the nature of these activities to ensure the risk of slavery is managed.

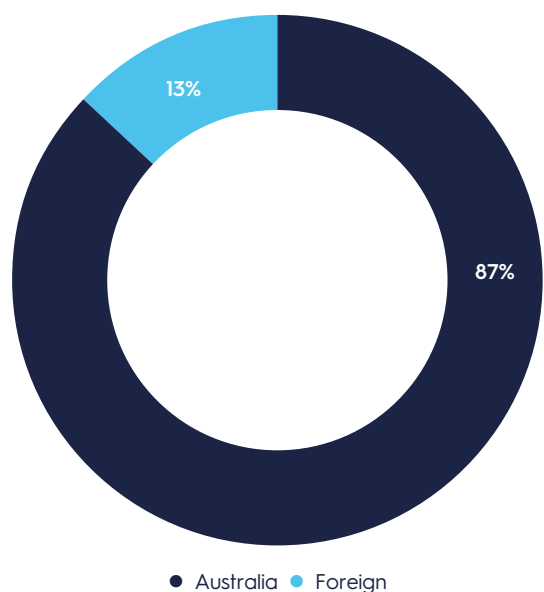
Where Nine has contracted with a third party to produce programming solely for Nine, Nine will have staff closely involved in the production, giving a first hand ability to identify any concerns about the way in which the production is being undertaken. One area for particular focus in this respect is the way in which participants in programming are cared for and managed, both during and after filming of a program occurs. This gives Nine confidence in this part of its supply chain.

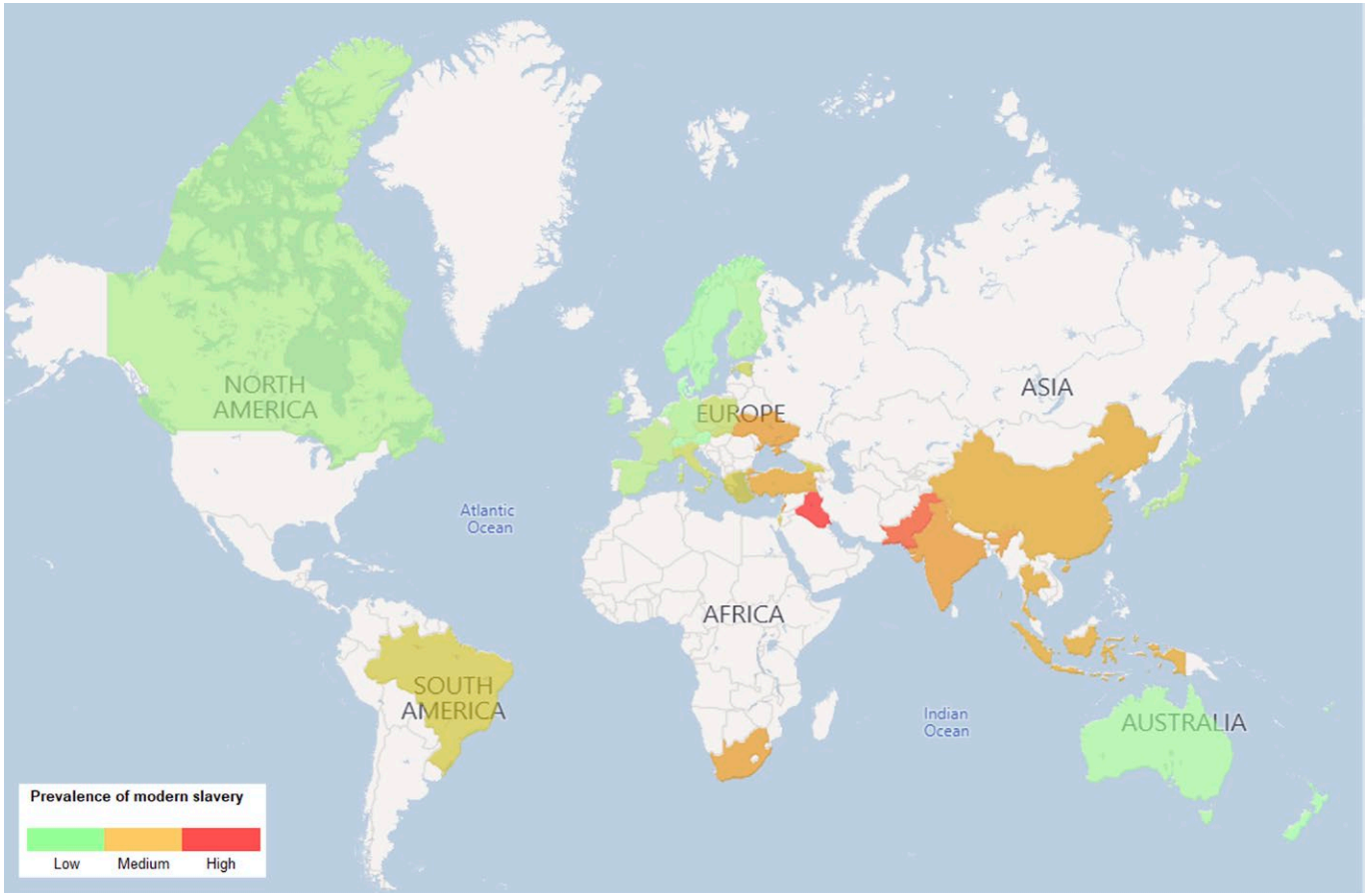
Where Nine acquires services such as cleaning (which is an area that is identified as being at risk of modern slavery practices in areas such as deceptive recruitment or forced labour), that is done through Australian based contractors who are committed to operating their business in an ethical manner, including ensuring workers are properly treated in all respects.

Nine is particularly cognisant of its modern slavery risks relating to its direct suppliers in the key areas shown below which have a heightened risk of modern slavery practices, although these are mostly industry-wide risks which reflect the origin of goods from countries with a higher prevalence of modern slavery.

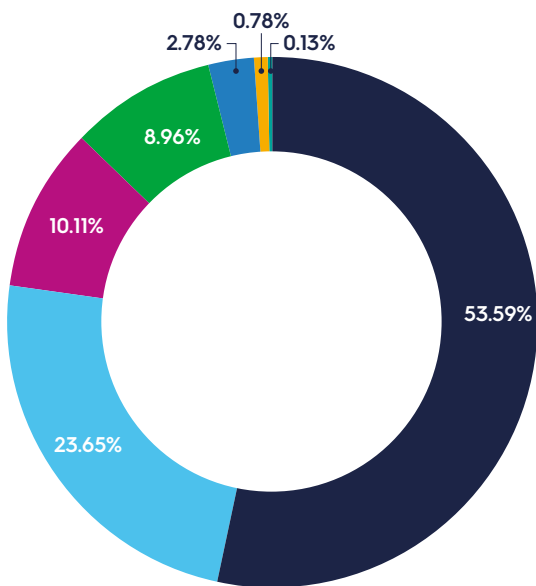
Notwithstanding the above, we are continuing to look deeper into our supply chains, enhancing our capability to identify modern slavery risks and improving our supplier due diligence, onboarding and compliance monitoring processes as noted further in this statement.

TIER 1 SUPPLIER SPENDING



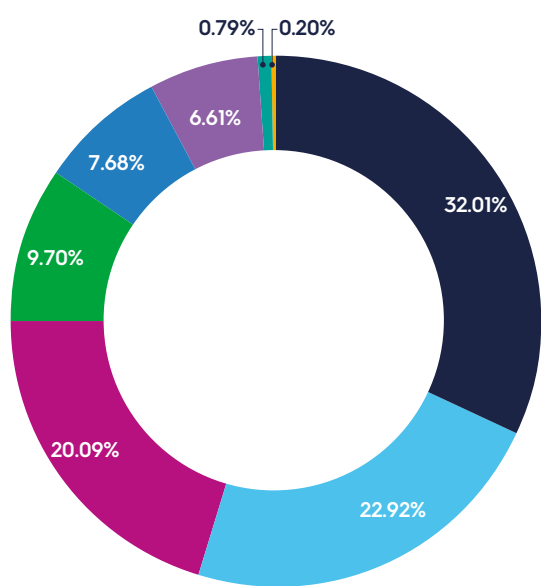


TALENT, RECRUITMENT AND CONTRACTORS



- Talent
- Crew Hire
- Contractors
- Staff Recruitment
- Recruitment
- Model/Talent Agencies
- Temporary Staff

COMPUTER EQUIPMENT AND PRINTING



- Printing Services
- IT
- Capital Expenditure
- Technology
- Telecommunication
- Telephones
- Printers/Equipment
- Printing Consumables

Modern Slavery Statement 2022

6. DUE DILIGENCE PROCESSES FOR MODERN SLAVERY

There are a number of policies, processes and practices across Nine which minimise the risk of Nine contributing to modern slavery practices.

Nine consults with senior management of the key business units in the Nine Group, in particular those set out in item 2 of this Statement to increase the awareness of modern slavery risks and in the design of additional measures to the risk in our operations and supply chains

The Nine Group generally obtains goods and services from suppliers who are reputable, substantial commercial entities. Nine has often dealt with those suppliers over many years, which provides Nine with confidence in the quality of their operations. As a Supplier Code of Conduct is rolled out, Nine intends that suppliers will have a contractual obligation to comply with it.

The Nine Group has HR, risk, finance and legal teams whose roles include ensuring compliance with laws and internal policies and processes across the business. A number of those policies, including Nine's Code of Conduct, Occupational Health and Safety Policy and Workplace Harassment, Discrimination and Bullying Policy, are designed to ensure that Nine's business is conducted in accordance with ethical and responsible business practices which will reduce the risks of slavery practices arising.

The Nine Group has adopted a whistleblower policy, which provides for protection to whistleblowers and for the investigation of any disclosures made under that policy. Nine has appointed an external supplier to receive reports made under Nine's whistleblower policy, to provide an independent avenue for concerns to be raised about Nine's treatment of employees or suppliers. This facility is available to Nine's suppliers, as well as employees. Any disclosures received under that policy are investigated by senior staff at Nine and, where appropriate, with the assistance of external advisers. As part of Nine's group wide learning program, all staff were required to confirm that they had read and understood the whistleblower policy.

Any material contracts need sign off from senior management of Nine. This approval process includes consideration of risks relating to a contract, which could include risks relating to the identity or operations of the counterparty, and confirmation of whether the contract includes a clause relating to notification of modern slavery issues.

While we acknowledge that it may not be possible for Nine to fully investigate all activities of its suppliers, and in turn, their suppliers, we continue to look for ways to support the promotion of human rights within our operations and our sphere of influence. However, if Nine became aware of instances of slavery practices by any of its suppliers, it would promptly seek to address the issue to determine whether it is appropriate for Nine to continue to deal with that supplier.

Case Study: Supplier Engagement

We outsource part of our finance operations to a reputable global service provider. Our analysis identified that the provider's operations occur in a country with a higher prevalence of modern slavery in accordance with the 2018 Global Modern Slavery Index. To provide reasonable assurance that the services being provided to Nine had appropriate measures in place to address the risk of modern slavery in their operation, Nine engaged with the service provider to understand their modern slavery practices. This involved meetings with both senior leaders and operational team members, review of policies and receipt of written confirmations.

7. OUR EFFECTIVENESS IN ADDRESSING SLAVERY

Nine has conducted a review of the modern slavery disclosures of the majority of its largest suppliers (noting that not all of them have prepared modern slavery statements) by dollar value as well as those submitted by some of its smaller suppliers in areas such as cleaning which may be considered higher risk. That review encompassed suppliers from Australia and overseas (primarily the US and Europe), and included sports bodies, content production and licensing, technology services, professional services, printing and building services. Those suppliers did not identify any material risks of modern slavery in their business practices. Given those suppliers are typically large organisations, which operate in Australia or other countries with comparable legal systems to protect the rights of individuals, that outcome aligned with Nine's expectations of its business partners.

Another way in which the Nine Group can assess its effectiveness in addressing slavery practices is through the use of its whistleblower policy, given it is available to current and former suppliers, as well as employees. There have been no complaints raised through that channel which relate to slavery practices.

The due diligence processes described above provide a method of managing the risks however we will continue to enhance our capability to identify any risks indicators within our supply chain and our capability to investigate and address any concerns.

During FY22, Nine has:

- progressed its finance modernisation project which will give Nine greater visibility of its supply chain and deeper insights into supply chain data. This is expected to be completed in early FY23;
- adopted a supplier code of conduct which will be rolled out to suppliers over FY23;
- developed standard clauses addressing modern slavery risks for progressive inclusion in supplier contracts;
- updated our contract approval process, to require explicit acknowledgement of whether the contract includes at least Nine's core provisions relating to management of modern slavery risks;
- undertaken an independent assessment (as part of our Business Assurance program) of the effectiveness of the actions Nine takes to assess and address modern slavery risks; and
- conducted Modern Slavery training by external advisors to senior employees of Nine who have close involvement with procurement in key areas relevant to this Statement. We will continue to roll out relevant training in FY23.

The Nine Group will continue to review our approach and continuously improve our processes to respond to the risks of modern slavery. In FY22, Nine has not received any complaints of any modern slavery issues or notifications from its suppliers of identification of modern slavery practices.

Modern Slavery Statement 2022

8. ADDITIONAL INFORMATION

Mandatory Reporting Criteria

The following table provides reference to where within this statement we have addressed the mandatory criteria of the Act.

Mandatory reporting criteria	Where we do this
Identify the reporting entity	Section 2
Describe the reporting entity's structure, operations and supply chains	Sections 2 and 3
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity it owns or controls	Section 5
Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	Section 6 and 9
Describe how the reporting entity assesses the effectiveness of these actions	Section 7
Describe the process of consultation with any entities that the reporting entity owns or controls	Section 8
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Sections 4, 8 and 9

9. FURTHER STEPS

Nine will continue to review its operations, including the procurement of goods and services, to identify whether there are risks relating to modern slavery in such procurement which Nine can mitigate.

Nine has a number of initiatives, many of which will be completed during FY23, which will improve our ability to monitor and manage risks within our supply chain including:

- Rolling out the supplier code of conduct;
- Enhancement of our procurement and contract management capability;
- Implementation of a "Supplier Portal" to improve the quality of supplier information and our ability to engage with our suppliers to ensure obligations are understood via agreed terms and conditions;
- Incorporating terms into supply agreements which provide assurance that suppliers are aware of and comply with modern slavery obligations;
- Continuing to regularly review any reporting by Nine's major suppliers of goods and services, to assess whether they are appropriately mitigating modern slavery risk; and
- Implementing modern slavery training throughout the business.

10. APPROVAL

This statement was approved by the Board of Directors of Nine Entertainment Co. Holdings Limited, as the parent company of the Nine Group, on 24 August 2022. This statement is signed by Peter Costello, as Chairman of Nine Entertainment Co. Holdings Limited and Mike Sneesby as the Chief Executive Officer of the Nine Entertainment Holdings Co. Holdings Limited on the date shown below.

PETER COSTELLO

Chairman

Nine Entertainment Co. Holdings Limited

24 August 2022

MIKE SNEESBY

Chief Executive Officer

Nine Entertainment Co. Holdings Limited

