



**NOVA**  
ENTERTAINMENT

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## MODERN SLAVERY STATEMENT 2023

This statement is provided by NOVA Entertainment Pty Limited ACN 093 553 989 (**NOVA**) reporting under the *Modern Slavery Act 2018* (Cth) (**Act**) for the period 1 January 2023 to 31 December 2023, which is its 2023 financial year.

NOVA is committed to complying with its obligations under the Act, and to taking appropriate steps to assess and address modern slavery risks.

NOVA welcomes the responsibility and opportunity to address the threat of modern slavery practices to individuals and communities.

**Peter Charlton**  
Chief Executive Officer and Sole Director  
NOVA Entertainment Pty Ltd

**nova**

smoothfm

**FIVEAA**  
Always Adelaide

**STAR104.5**

**NOVAPODCASTS**



## 1 NOVA'S STRUCTURE AND OPERATIONS

1.1 NOVA is an independent, diversified entertainment business comprising:

(a) Four analogue broadcast and digitally delivered radio brands:



(b) A podcast network:



(c) An intimate live music brand:



(d) Two national digital radio stations, created by NOVA as part of a unique music partnership with Coles and Priceline:



(e) A partnership between NOVA and Habitat Media, dedicated to the art of live experience:



1.2 NOVA has a workforce of over 500 employees, with operations in all major metropolitan Australian cities - Sydney, Melbourne, Brisbane, Adelaide, and Perth - as well as a regional presence in Gosford.

## 2 SUPPLY CHAINS

2.1 To facilitate NOVA operations, NOVA procures goods and services (supply chains) from a variety of small, medium and large suppliers to assist in the production and delivery of its broadcasting, digital audio, and experiential services. The main supply chains are:

(a) the supply of broadcasting technology in the form of infrastructure, equipment, and software as well as associated labour from third party providers to operate and maintain that broadcasting technology;



- (b) the licensing of music, news and entertainment content for broadcasting and podcasting;
  - (c) the acquisition of advertising from agencies and directly from companies;
  - (d) marketing and promotional services, including brand activations and the purchasing of merchandising and vehicles used for promotions;
  - (e) the convening of live music events, including engagement of associated labour from third-party providers; and
  - (f) the use of third-party suppliers for equipment and labour, including office supplies, cleaning services, document management and security services, IT services and catering services at its office locations.
- 2.2 NOVA also engages the services of external professional service firms to obtain legal, accounting, and financial advice.
- 2.3 NOVA's direct suppliers are predominately located in Australia.

### **3 RISKS OF MODERN SLAVERY PRACTICES IN NOVA'S OPERATIONS AND SUPPLY CHAINS**

- 3.1 NOVA has thoroughly assessed the degree to which it may contribute to, cause or be linked to modern slavery risks in its operations and supply chains. Based on this assessment, NOVA considers the risks associated with its operations and supply chains to be low.
- 3.2 In preparing this Statement, NOVA has conducted a due diligence investigation whereby it has collated a list of its largest service providers across its locations in Australia, and in all areas of its business, in order to determine the risk of modern slavery practices in its operations and supply chains. NOVA considers this due diligence investigation to be a reasonable and proportionate step in its management of modern slavery risks.
- 3.3 NOVA has determined that the products and services obtained through its supply chains are predominately secured from within Australia, and from Australian businesses. NOVA has either been provided with, or obtained, modern slavery statements in respect of some of its larger service providers. To the extent that a business has identified their supply chains are located outside Australia, NOVA has taken steps to confirm that most of these businesses are based in jurisdictions that carry a low risk of modern slavery, , including conducting due diligence on such suppliers, and inserting modern slavery compliance clauses into contracts.
- 3.4 An exception to the above are businesses that supply technological equipment and software for broadcasting. Further detail is provided on this below.
- 3.5 The risk of modern slavery in NOVA's employment practices is considered low given it employs primarily skilled individuals and engages independent contractors in accordance with applicable Australian laws and modern awards. NOVA ensures its employees are made aware of their employment rights through a comprehensive regime of training and



workplace policies and practices, with the latter including, without limitation, NOVA's Whistleblower Policy (which incorporates an independent, anonymous reporting phonenumber), NOVA's Code of Conduct, and an Equal Employment Opportunity Policy. NOVA employees are also required to undertake a training module in modern slavery, which provides guidance on identifying instances of modern slavery and mechanisms for reporting. NOVA has an employee hotline available on its employee intranet that can be used by employees to anonymously raise concerns relating to labour conditions and/or workplace grievances, which is received by NOVA'S human resources team. NOVA also has an independent external anonymous platform to manage Whistleblower complaints. NOVA employees are remunerated at or above the minimum lawful entitlement. To the extent that NOVA employs non-Australian residents, it confirms their right to work in Australia either through its own enquiries or with the assistance of immigration specialists.

### Key areas of concern

- 3.6 As NOVA has limited visibility over the supply chains of some of its suppliers, it acknowledges that there is some risk of a link to modern slavery practices. Some key areas of concern are as follows:
- (a) Cleaning services
    - (i) There are sector and industry risks involved with the use of third-party suppliers to provide cleaning services. Such services have been identified as high risk for modern slavery practices. NOVA has engaged one company to provide its cleaning services nationally and NOVA's due diligence has confirmed the company has a modern slavery statement, modern slavery risk management procedures and modern slavery minimum standards for its suppliers.
  - (b) Technology services
    - (i) There are product and services risks associated with the supply of technological services such as equipment and software used in broadcasting. That is due to the location they are manufactured in (often countries with higher rates of labour exploitation) and the materials used to manufacture them (the sourcing of which can also involve a risk of labour exploitation).
    - (ii) NOVA has taken steps to inform itself of who its software, equipment and telecommunications suppliers for its broadcasting technology are, and the products and services that they supply. It notes that some are based in Australia, or in jurisdictions that are a low risk of modern slavery practices. However, it has limited oversight as to where the manufacturing of the products being supplied, such as equipment and software, occurs.
- 3.7 NOVA is in the process of preparing a supplier questionnaire that will be issued to its main suppliers to better understand the risks in its supply chain. NOVA considers the steps it



has taken are a proportionate and reasonable response to its assessment of modern slavery risks.

#### **4 ACTIONS TAKEN TO ASSESS AND ADDRESS THOSE RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES**

4.1 During the reporting period, NOVA made updates to its systems and practices to enhance the assessment and management of potential modern slavery risks in its operations and supply chain. The following outlines existing and new key systems and processes implemented by NOVA to identify, prevent, and mitigate potential modern slavery risks in its operations and supply chains.

##### Supplier Code of Conduct

4.2 NOVA has developed and introduced a Code of Conduct for suppliers, which sets out the expectation of ethical conduct NOVA has of its suppliers. All suppliers are required to comply with the Code of Conduct as a part of doing business with NOVA.

4.3 The Code of Conduct sets out the requirements of compliance with all applicable laws and regulations, including anti-bribery, anti-corruption and anti-money laundering laws, refraining from or being complicit in any modern slavery practices, and adhering to all work health and safety law and regulations.

4.4 The Code of Conduct is available on the NOVA website. Invoices issued by NOVA and correspondence with suppliers also contain a statement to the effect that all suppliers must comply with the Code of Conduct, and provides a link to the Code of Conduct.

##### Remediation

4.5 NOVA has a robust governance and policy framework which sets out its commitment to equality and social justice and reduces the risk of modern slavery practices arising within its supply chains and operations including a group wide commitment to corporate governance, rigorous compliance practices, and high standards of ethical behaviour, including risk assessments of third parties with whom NOVA contracts.

4.6 NOVA is committed to preventing acts of modern slavery from occurring in its supply chains or any part of its business. NOVA has enacted a Modern Slavery Policy which reflects its commitment to acting ethically and with integrity in all its business relationships, and to implementing and enforcing effective systems and controls to reduce the risk of slavery taking place in its supply chain.

4.7 NOVA's Modern Slavery Policy exists alongside its Whistleblowing Policy. NOVA encourages its employees to feel confident about raising their concerns by being able to access a reporting and investigative mechanism that is objective and confidential where they know that they are protected from reprisal for doing so. NOVA has in place an external hotline and platform for any employee to use and where they can anonymously raise concerns relating to labour conditions and/or workplace grievances.



### WHS Committee Meetings

- 4.8 NOVA's WHS committee meets monthly to discuss and review all potential hazards with immediate action taken to address physical and psychosocial hazards.
- 4.9 Checks are also undertaken on an ad-hoc basis on employee workspaces to ensure there are no physical or psychosocial hazards present.
- 4.10 NOVA has also considered its approach to psychosocial hazards following from legislative changes to the Commonwealth WHS legislation in April 2023, and remains committed to promoting the physical and psychological wellbeing of all employees.

### Employee Procurement and Training

- 4.11 NOVA engages in stringent employee onboarding procedures including collection of documents showing eligibility to work in Australia.
- 4.12 Additionally, NOVA has various workplace policies and procedures in place to support modern slavery compliance, including:
  - (a) workplace health and safety policies and programmes applicable to all its offices, along with mandatory training for new employees to ensure safe and proper working conditions;
  - (b) a workplace bullying policy which prohibits workplace bullying, harassment and discrimination and which provides support and guidance on a process for reporting concerns;
  - (c) a standalone sexual harassment policy which provides support and guidance on a process for reporting concerns;
  - (d) a free employee assistance provider which provides free and confidential external counselling for employees and their families for any work or personal issues; and
  - (e) performance management and disciplinary framework to hold staff accountable to NOVA policies and procedures.
- 4.13 NOVA has created mandatory training modules for its staff to recognise the risks of modern slavery and human trafficking in its business and supply chain. The training encourages employees to identify and report any potential breaches of NOVA's Modern Slavery Policy. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from its business and supply chains.
- 4.14 In May 2023, NOVA introduced a Modern Slavery training module, which all existing staff and new hires are required to complete.
- 4.15 The training explains what constitutes modern slavery, what are some of the signs of modern slavery, and how to prevent and detect modern slavery incidents in NOVA's business or supply chains. Through the Modern Slavery training course, employees are encouraged to raise concerns about any suspicions of modern slavery that may be in NOVA's business or supply chains at the earliest possible stage to NOVA's Modern Slavery Officer or in accordance with NOVA's Whistleblower Policy.



4.16 Employees are assigned the Modern Slavery training course upon commencing employment at NOVA.

#### Supplier Engagement

4.17 NOVA has reviewed and updated various supplier contracts to reflect its expectations, and the obligations of its suppliers, with respect to modern slavery including introducing modern slavery compliance clauses into its contracts. These clauses require suppliers to comply with all applicable modern slavery laws, maintain their own policies and procedures in relation to modern slavery and carry out due diligence on their supply chain. These clauses also require suppliers to:

4.18 notify NOVA as soon as they become aware of any actual or suspected breach of modern slavery laws; and

#### Modern Slavery Compliance in Agreements

4.19 In instances where NOVA has engaged in agreements that it has assessed as being at a higher risk of modern slavery, NOVA has included modern slavery compliance clauses in agreements that have been assessed as at higher risk for modern slavery.

## **5 ASSESSING THE EFFECTIVENESS OF SUCH ACTIONS**

5.1 NOVA's commitment to minimising the dangers associated with modern slavery to its operations entails ongoing evaluation and enhancement of its policies, codes, standards, and protocols.

5.2 Given the low risk of modern slavery practices in its operations NOVA considers that assessing the effectiveness of its actions will continue to be best achieved by:

- (a) conducting an annual review, and identifying areas for improvement in its efforts to address the risk of modern slavery in its supply chains;
- (b) conduct ongoing reviews of supplier contracts;
- (c) inviting feedback from workers on the effectiveness of measures to raise awareness about modern slavery practices; and
- (d) taking steps towards mapping out its supply chain.

5.3 NOVA has internal audit and risk functions within finance, people experience and legal, whose roles include assessing and ensuring ongoing compliance with relevant laws and NOVA's policies and procedures.

## **6 CONSULTATION PROCESS**

6.1 In preparing this Statement the operations and supply chains of each subsidiary of NOVA were reviewed, with relevant employees or representatives consulted. That consultation will remain ongoing as part of NOVA's overall commitment to assessing and addressing the risk of modern slavery practices.



## 7 FURTHER STEPS

- 7.1 NOVA is committed to continuing to work with its new and existing suppliers, both nationally and abroad, to improve awareness of modern slavery practices and assess and address modern slavery risks. NOVA is also committed to improving its employees' ongoing awareness of modern slavery practices and risks and encouraging them to come forward and report any incidents or concerns.
- 7.2 NOVA has several initiatives which will improve its ability to monitor and manage risks within its supply chain including:
- (a) Developing a supplier questionnaire to be issued to all suppliers above a threshold each year to consider their approaches modern slavery. It is anticipated that NOVA will begin to issue this questionnaire to suppliers in late 2024 to suppliers above this threshold;
  - (b) Whilst NOVA has conducted checks on its largest technological suppliers, this task will expand into the following reporting period;
  - (c) Continue to review supplier contracts and incorporating modern slavery clauses mandating compliance with the Act and the Supplier Code of Conduct.
  - (d) enhancing its procurement and contract management capability;
  - (e) continuing to roll out the supplier code of conduct which will aim to establish NOVA's minimum standards in relation to matters including compliance with relevant laws, human rights, and humane treatment of workers, wages, benefits and working hours and ethical practices; and
  - (f) continuing to implement supplier questionnaire to further enhance its procurement process and assist in its risk assessments.

## 8 APPROVAL

- 8.1 This Statement was approved and signed by Peter Charlton as the Chief Executive Officer, Sole Director and principal governing body (as defined by the Act) of NOVA Entertainment Pty Ltd ACN 093 553 989 on 28 June 2024.

**Peter Charlton**  
Chief Executive Officer and Sole Director  
NOVA Entertainment Pty Ltd