

Modern Slavery Statement 2020

Covering the reporting period 1 July 2019 – 30 June 2020

1. Introduction

1.1. This document is a Modern Slavery Statement (**Statement**) issued in compliance with s14 of the *Modern Slavery Act 2018 (Cth)* (**the Act**) by Grant Broadcasters Pty Ltd ACN 000 667 470 (**Grant Broadcasters**) and its related bodies corporate (**GB Group**) for the financial year ending 30 June 2020. This is the first annual Statement issued by Grant Broadcasters on behalf of the GB Group. Any capitalised terms not defined in this Statement are defined in the Act.

2. Structure of the GB Group

2.1. Grant Broadcasters is a privately held, Australian owned, company. Grant Broadcasters is the ultimate holding company for 46 subsidiaries, which together form the GB Group. More detailed information on the structure of the GB Group is set out in the audited financial statements of Grant Broadcasters for the financial year ending 30 June 2020, lodged on 27 October 2020 with the Australian Security and Investments Commission, in compliance with sections 292 and 296 of the *Corporations Act 2001 (Cth)*, and which are available as a matter of public record.

3. Operations

3.1. The GB Group is primarily a media organisation, with operations in commercial radio broadcasting, digital content creation, print media, telecommunications infrastructure, and hotel operations. The GB Group employs approximately 700 people in more than 40 locations in Australia, primarily in regional (non-metro) areas. The GB Group operates as a network. Grant Broadcasters dictates policies and processes, which apply to the whole GB Group.

4. Supply chains

- 4.1. The GB Group's supply chains include the following main categories:
- (a) Professional services and consultancy firms who provide professional services and advice to the company including software, legal and financial advice.
 - (b) Communications services acquired on standard commercial terms.
 - (c) Licensing agencies and other media companies, which license rights to content such as music, photographs and audiovisual content to the GB Group.

- (d) Equipment suppliers ranging from specialist broadcast technical equipment and bulk paper supplies for printing to standard office equipment and cars to clothing.
 - (e) Acquisition of advertising (where members of the GB Group are advertising their products and services on platforms outside the GB Group) and production of advertising content.
 - (f) Travel providers, who are typically commercial airlines and accommodation providers.
 - (g) Service suppliers, including printing and contract cleaning suppliers.
 - (h) Food and drink for the hotel operations, sourced within Australia.
- 4.2. Grant Broadcasters has reviewed the allocation of expenditure for the financial year ending 30 June 2020 to each category listed above and established that the bulk of the supplies received by the GB Group are professional services from Australian suppliers.

5. Risks of Modern Slavery practices in the operations of the GB Group

- 5.1. Grant Broadcasters considers that, due to the nature and location of its operations, the risks of Modern Slavery practices in the operations of the GB Group are very low. GB Group's employees and contractors are primarily people with a secure right to live and work in Australia, who speak a high level of English, who are skilled and well educated professionals, and who are therefore not from vulnerable groups where Modern Slavery is a risk. Grant Broadcasters has appropriate work place management policies and practices, along with skilled managers who undergo regular training programs, to ensure appropriate recruitment and management of employees, including compliance with minimum remuneration requirements, in all its operations.

6. Risks of Modern Slavery practices in the supply chains of the GB Group

- 6.1. Grant Broadcasters considers that, due to the nature and location of its operations, the risks of Modern Slavery practices in relation to its supply chains of the GB Group are also low. Our primary suppliers across all categories of goods and services are either reputable suppliers located primarily in Australia or are Australian distributors of global products. The majority of these goods and services are not typically the type that are present a high risk for Modern Slavery practices.
- 6.2. The services we have identified that carry a possible risk of Modern Slavery practices in our supply chains are:
- (a) Contract cleaning services. Grant Broadcasters has no reason to believe that any cleaning supplier to the GB Group is exploiting its workers or failing to provide them with safe workplaces and minimum Australian employment rights and remuneration. However, in view of the fact that hospitality and domestic work are high risk sectors, as part of

discharging its obligations under the Act Grant Broadcasters intends to review the GB Group's cleaning service contracts.

- (b) Food supply, where the supply chain may include exploitation of agricultural workers within Australia, or farmers, fishermen, agricultural workers, or manufacturing workers outside of Australia. Again, Grant Broadcasters has no reason to believe that any Australian food supplier to the GB Group's hotel operations is not complying with Australian laws. In relation to food sourced from outside Australia, Grant Broadcasters has limited transparency into the supply chains and must rely to a large degree on assurances from its Australian suppliers. However, to the extent it can, Grant Broadcasters intends to seek a review of food supply contracts from the service provider overseeing its hotel operations.

6.3. The goods we have identified that carry elevated risks of Modern Slavery practices in our supply chains are computer equipment and technical equipment that are purchased from overseas via Australian distributors. As part of this year's analysis, Grant Broadcasters has identified that further work needs to be undertaken with the Australian distributors of computer and technical equipment to assess the risk of Modern Slavery practices in the supply chains.

7. Actions taken by Grant Broadcasters on behalf of the GB Group to assess Modern Slavery risks

7.1. The actions taken by Grant Broadcasters this year to assess Modern Slavery risks are:

- (a) Taking the time to understand the types of Modern Slavery such as forced labour, involuntary servitude, debt bondage, human trafficking, forced marriage, exploitation of children, wage exploitation, other slavery like exploitation, abuse and removal of personal freedoms, including by reference to the December 2017 report of the Joint Standing Committee on Foreign Affairs, Defence *Hidden in Plain Sight: An inquiry into establishing a Modern Slavery Act in Australia* (**the Hidden in Plain Sight Report**).
- (b) Ascertaining from the Hidden in Plain Sight Report that within Australia the industries at highest risk for Modern Slavery are hospitality, agriculture industries, construction industries, domestic work, and sex work, and evaluating those risk areas against our own operations and supply chains.
- (c) Ascertaining from Walk Free, the Global Modern Slavery Index <https://www.globalModernSlaveryindex.org/2018/findings/country-studies/australia/> that the products imported into Australia that are at highest risk of having Modern Slavery practices in their supply chains are:
 - (i) Laptops, computers, and mobile phones from China, Malaysia;
 - (ii) Apparel and clothing accessories from Argentina, Brazil, China, India, Malaysia, Thailand, Vietnam;

- (iii) Fish from China, Ghana, Indonesia, Japan, Russia, South Korea, Taiwan, Thailand;
- (iv) Rice from India; and
- (v) Cocoa from Côte d'Ivoire, Ghana,

and evaluating those risk areas against our own operations and supply chains. We are aware that the Global Modern Slavery Index list is a top 5, not an exhaustive list, and we have also considered that goods such as technical equipment are likely to carry risks of Modern Slavery practices in their supply chains, especially in the obtaining of raw materials and manufacturing.

7.2. Grant Broadcasters has not yet had the opportunity to fully investigate all the activities of the GB Group's suppliers. In future years Grant Broadcasters intends to seek further information and assurances from suppliers about their efforts to eliminate Modern Slavery practices in their supply chains.

8. Actions taken by Grant Broadcasters on behalf of the GB Group to address Modern Slavery risks

8.1. Grant Broadcasters has not yet taken any targeted actions to address Modern Slavery risks in the GB Group operations and supply chains. Reasons for this are, that:

- (a) the identified potential risks so far are low;
- (b) the identified potential risks so far are remote in the sense that any Modern Slavery practices are likely to be several degrees removed from the GB Group along the supply chain; and
- (c) the GB Group is likely to have only a limited ability to influence the way in which suppliers manage their own supply chains. In some cases, for example with specialist technical equipment, there may be no alternative suppliers.

8.2. In future Grant Broadcasters will continue to assess Modern Slavery risks in its operations and supply chains, and intends to act on any opportunities to address those risks if such opportunities arise.

8.3. In addition, Grant Broadcasters has a number of existing policies, processes and practices in place across the GB Group that minimise the risk of the GB Group contributing to Modern Slavery practices:

- (a) The GB Group is closely engaged in the local Australian communities in which it is based. As a result, the GB Group obtains a significant percentage of its goods and services locally, from regional businesses, where often many or all of the staff are known to the GB Group.
- (b) Where goods and services are not obtained directly in regional areas, the GB Group primarily obtains goods and services from suppliers who are reputable, substantial,

commercial entities, several of whom have reporting obligations of their own under the Act.

- (c) The GB Group has often dealt with those suppliers over many years, which provides Grant Broadcasters with confidence in the quality of their operations.
- (d) Depending on the value and significance, material contracts require approval and signatories from either, senior management of the GB Group, or the Principal Governing Body of Grant Broadcasters. This approval process includes consideration of risks relating to a contract, which could include risks relating to the identity or operations of the counterparty.

8.4. In its own operations, the GB Group engages external professionals to address the GB Group's responsibilities in relation to human resources, work place safety and health, and other areas of employer and business operator compliance.

9. Our effectiveness in addressing Modern Slavery

9.1. The GB Group does not currently assess its effectiveness in addressing Modern Slavery practices, given the low risks of Modern Slavery practices that have been identified to date. The processes described in paragraph 8.3 above provide a method of managing the risks at this stage. Further steps to assess effectiveness have not been considered necessary to date, but may be considered in the future. Grant Broadcasters will review the need for an assessment of our effectiveness with each annual Statement.

10. Consultation process with group entities

10.1. All entities in the GB Group report directly to Grant Broadcasters. Grant Broadcasters has accountability procedures in place that provide oversight and transparency into the activities of all subsidiaries in the GB Group.

11. Further Steps

11.1. Grant Broadcasters will continue to review the GB Group's operations and supply chains, including the procurement of goods and services, to identify whether there are risks relating to Modern Slavery that Grant Broadcasters can mitigate.

11.2. Grant Broadcasters will also consider:

- (a) adopting a supplier code of conduct;
- (b) incorporating terms into supply agreements that provide assurance that suppliers are aware of the risks of Modern Slavery and have taken steps to assess, address, and if applicable remediate, those risks; and

- (c) reviewing any reporting by major suppliers of goods and services, including under the Act where applicable, to assess whether they are appropriately mitigating Modern Slavery risks.

12. Approval

This statement was approved by the Board of Directors, being the Principal Governing Body of Grant Broadcasters, as the parent company of the GB Group, on 2 March 2020.

Signed by the Responsible Member:



Alison Cameron
Chief Executive Officer, Director and Secretary
Grant Broadcasters Pty Ltd ACN 000 667 470
2 March 2021