

# Matchbox Pictures / UPI Australia / NBCUniversal

## Australian Modern Slavery Act Statement

### 1. Identify the reporting entity and describe the reporting entity's structure, operations and supply chains.

Matchbox Pictures Pty Ltd (ABN 81 130 167 912: '**Matchbox Pictures**') and its subsidiaries is a film and television production company with offices in Sydney and Melbourne, Australia. Matchbox Pictures is a wholly owned subsidiary of NBCUniversal, and NBCUniversal is a wholly owned subsidiary of Comcast Corporation.

Universal Pictures International Australasia Pty Limited (ABN 44 122 951 099: '**UPI Australia**') is a theatrical film distribution company with offices in Sydney. UPI Australia is a wholly owned subsidiary of NBCUniversal, and NBCUniversal is a wholly owned subsidiary of Comcast Corporation.

As an enterprise, we are principally focused on connectivity, aggregation and streaming in the United States and Europe. We deliver broadband, video and wireless through our Xfinity, Comcast Business and Sky brands; create, distribute and stream leading entertainment, sports and news through Universal Filmed Entertainment Group, Universal Studio Group, Sky Studios, the NBC and Telemundo broadcast networks, Peacock, NBC News, NBC Sports, Sky News and Sky Sports; and provide memorable experiences at Universal Destinations and Experiences in the United States and Asia. NBCUniversal also licenses its intellectual property to third parties to create games and manufacture toys and apparel related to its content.

Our enterprise-wide Modern Slavery Statements under the equivalent UK legislation are published online, and are available at the following URL: <https://www.cmcsa.com/esg-reporting/statement-on-modern-slavery-and-supply-chain-values>

NBCUniversal also has other businesses operating in Australia which are not subject to this reporting requirement, such as its television channels business (E!, Universal TV and Oxygen). Nonetheless, all NBCUniversal's businesses, including Matchbox Pictures and UPI Australia are subject to our global policy on Modern Slavery and Human Rights, regardless of whether they are subject to these reporting requirements. Accordingly, this disclosure references both NBCUniversal and enterprise-wide initiatives, policies and procedures, as well as those relating to Matchbox Pictures and UPI Australia.

This statement covers the financial year ending 31-DEC-2024. This statement was approved by the Board of Matchbox Pictures on 12-MAR-2025, and by the Board of UPI Australia on 12-MAR-2025

## **2. Describe risk of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.**

Matchbox Pictures and UPI Australia, like NBCUniversal's other Australian-based businesses use a combination of locally sourced and globally sourced third parties to support their businesses, following a risk-based approach to due diligence activities.

In all of our businesses, we seek to work only with third parties who are reputable, qualified to perform the services for which they are engaged, and similarly committed to complying with the laws and regulations relating to human rights, modern slavery and anti-exploitation

**1) Merchandising, Factory Production & Replication.** We recognize that the use of third-party factories to produce NBCUniversal-themed merchandise presents a heightened risk of modern slavery. Accordingly, NBCUniversal's "Global Brand Standards" policy, which is applicable to any merchandising activities in Australia, clearly sets out the standards to which a factory must adhere before they are authorised to produce NBCUniversal-themed merchandise. NBCUniversal's Global Brand Standards group, headquartered in Los Angeles USA, regularly conducts factory audits and spot checks globally prior to approving them for use, and completed **1554** such audits and spot checks globally in 2024. Matchbox Pictures and UPI Australia are subject to these requirements.

**2) Content Production.** Content production, eg the operations of our Matchbox production group can also pose an increased risk of exploited labour being used to support filming, particularly in support services such as security, logistics, catering, cleaning or set construction. This risk increases when Matchbox uses a third-party production company to produce content on location outside of Australia. Our production businesses follow the global policies and procedures rolled out by the NBCUniversal, including training production staff on exploitation risk, our Code of Conduct for Suppliers and Business Partners (the "Supplier Code"), and other relevant policies and standards, on a risk-based approach.

This is not an exhaustive list, and we recognise that the risk of exploitation in all operations and supply chains is always present. NBCUniversal conducts an annual risk assessment focusing on a number of different risk areas, including human rights, modern slavery and labor exploitation risks. The output of this exercise informs the following year's activities.

## **3. Describe the actions taken by the reporting entity to assess and address the risks (including due diligence and remediation processes).**

Comcast and all its subsidiaries, including those NBCUniversal subsidiaries based in Australia, operate in accordance with the Comcast Code of Conduct ("The Code"), which can be accessed from this link:

<https://corporate.comcast.com/values/integrity/code-of-conduct>.

The Code requires all employees to ***“strive to only partner with those who share our values”***, and expects business partners to ***“[obey] laws and regulations relating to labour and employment, including human trafficking and forced labour prevention”***.

Our Code of Conduct is published in 17 languages and dialects and is publicly available on our corporate website. We review our Code annually to ensure that we continuously strive for the highest standards of integrity in our business practices.

Additionally, NBCU maintains a global Modern Slavery and Human Rights policy, which is applicable to all employees, including those based in Australia.

We also publish our Supplier Code, which is translated into 18 languages and dialects. This makes clear our expectations and standards in NBCUniversal’s business units – reinforcing that suppliers and business partners must act ethically and comply with applicable laws and regulations in connection with their provision of products, services, or staffing to or for our company.

Specifically, the Supplier Code requires our suppliers and business partners to prevent and not support or engage in forced labour or human trafficking and to hold their agents and recruiters to the same standards. It also sets additional expectations about treating people fairly and with respect, including ensuring that all workers meet applicable legal minimum age requirements, are provided compensation required by law and/or contract, and have a safe, secure, and healthy working environment.

The Supplier Code is publicly available at the following URL:

<https://corporate.comcast.com/values/integrity/our-suppliers-and-business-partners>.

NBCUniversal’s Legal and Compliance functions conduct training with NBCUniversal staff working in Australia, including targeted training of how to spot the signs of forced labour, how to best deal with suspected exploitation, and how to report concerns to the Corporate Compliance group.

#### **4. Describe how the reporting entity assesses the effectiveness of these actions.**

Our employees, suppliers, and business partners around the world are encouraged to report suspected illegal or unethical conduct, in good faith without fear of retaliation.

Employees may raise any issues, including those which relate to human rights or suspected exploitation, in to HR, legal, any senior leader or via our externally managed [Comcast NBCUniversal Listens platform](#) without fear of retaliation, in accordance with our open door values. NBCUniversal’s suppliers and business partners may also use the [Comcast NBCUniversal Listens platform](#) and details are included in our Supplier Code


At a corporate level, NBCU also partners with several NGOs and charities to ensure it is following best practice.

**5. Describe the process of consultation with any entities the reporting entity owns or controls.**

Although the reporting entity neither owns nor controls the other NBCU businesses referenced in this disclosure, NBCUniversal's legal teams regularly consult with all NBCU businesses operating in Australia to inform them of relevant reporting requirements and how to recognize and deal with human rights, modern slavery and exploitation risks.

This statement was approved by the boards of each of the reporting entities covered by this statement. The board of Matchbox Pictures approved this statement on 12 - MAR - 2025. The board of UPI Australia approved this statement on 12 - MAR - 2025.

This statement is signed by Alastair McKinnon in his role as the Managing Director of Matchbox Pictures

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Alastair McKinnon

Managing Director, Matchbox Pictures

13 - MAR - 2025

AND

This statement is signed by Mike Baard in his role as the Managing Director of UPI Australia

Signed by:  
  
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Mike Baard

Managing Director, UPI Australia

13 - MAR - 2025