



## Modern Slavery Statement 2020

### 1. Introduction

This statement is for HT&E Limited ('HT&E') (ABN 95 008 637 643) and its related entities (together 'HT&E' or 'the Group') under the *Modern Slavery Act 2018* (Cth) for the year ended 31 December 2020. HT&E is a public company listed on the ASX, and a leading media and entertainment business operating radio, audio and digital businesses in Australia as well as outdoor assets in Hong Kong.

### 2. Business structure and operations

HT&E's portfolio of media assets includes the Australian Radio Network ('ARN'), Emotive, iHeartRadio Australia and Cody Out-of-Home.

ARN is Australia's leading metropolitan broadcaster, home to the national KIIS and Pure Gold networks and youth radio station The Edge. ARN also operates music streaming, digital entertainment and live events brand iHeartRadio in Australia.

ARN operates across Australia with primary operations in Sydney, Melbourne, Brisbane, Perth, and Adelaide, with headquarters located in Sydney. The Group's total work force is approximately 500 employees as at the time of publication of this statement.

HT&E also owns and operates Cody Out-of-Home in Hong Kong, which manages a network of outdoor advertising assets across Hong Kong. Other HT&E investments include a 50% interest in content creation business Emotive and a 25% interest in global provider of mobile messaging technology Soprano Design.<sup>1</sup>

The Group operates under the same company policies and operational protocols having its key activities within the media sector and reporting to an integrated leadership team and the HT&E Board. As such it is appropriate for HT&E to make this statement on behalf of the Group.

To learn more about HT&E's operations and strategy, refer to <http://www.htande.com.au/> and for more information about HT&E's corporate governance, refer to <http://htande.com.au/corporate-governance/>.

### 3. Supply chains

HT&E's business is primarily in the delivery of audio and digital services. The supply chain is generally limited to the procurement of products and services required for general day to day business operations and the delivery of content services to its audiences. These include:

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<sup>1</sup> Soprano Design has a separate modern slavery statement addressing its own operations within the company. <sup>2</sup> <https://www.globallslaveryindex.org/>



- Service suppliers and equipment vendors: including for example office equipment, communication and broadcast services and equipment, IT infrastructure and support services, travel & accommodation providers and vehicle leasing & hire companies, merchandise & event supplies, printing services, and contract cleaning suppliers;
- Content suppliers, licensing agencies and other media companies from whom the Group acquires content rights and advertising services: including licensing content for audio and audio-visual materials such as record labels, collecting societies, newswire services, image libraries and freelance contributors;
- Corporate and Professional services: such as legal, accounting and advisory services.

The direct supply chain is predominantly located in Australia, with only a portion sourced from overseas suppliers. The overseas suppliers are located in developed countries such as the USA, the UK, New Zealand and Ireland. These countries when assessed against the Global Slavery Index are rated low for prevalence of modern slavery.<sup>2</sup>

#### **4. Potential risks of modern slavery**

HT&E has reviewed the risk of modern slavery practices in our supply chain and operations. Given the nature of our supply chains coupled with the majority of suppliers being located in Australia, the risk of modern slavery in any of our suppliers is considered low.

HT&E generally deals with the Australian based subsidiaries of major international suppliers, but acknowledge they may have a wider supply chain originating from overseas over which HT&E does not have oversight. In these instances, HT&E acknowledges suppliers engaged in Australia could purchase equipment manufactured overseas in areas that might be of risk of modern slavery practices. However, this is mitigated by HT&E's major suppliers complying with the relevant modern slavery laws in those jurisdictions and HT&E acquiring goods and services from reputable producers in countries with high standards of protection for the rights of individuals.

HT&E recognises that engagement of employees and contractors may present modern slavery risks but considers this low risk due to its implementation of sound HR practices in compliance with the regulatory framework. HT&E is committed to complying with the high employment standards regulated within Australia.

#### **5. Our policies – Addressing the risks**

The Board of HT&E endorses good corporate governance practices and oversees a holistic commitment to high standards of legislative compliance and ethical behaviour across the Group. HT&E has a number of procedures and policies which minimise the risk of modern slavery practices, including:

- This statement - confirming HT&E's commitment to minimising modern slavery risks.
- Ensuring that the Group acquires goods and services from reputable suppliers who primarily operate in countries with equivalent protections for employees and individuals.

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



- Standard contractual terms to engage major suppliers and for the procurement of goods or services deemed of potential risk, including requiring the supplier to comply with relevant modern slavery laws.
- Code of Conduct - setting out the values, ethical behaviour and commitment to legislative compliance which is expected of the Group and its employees.
- Whistle blower policy - providing an independent avenue for employees, contractors and suppliers to raise concerns regarding actual or suspected contravention of HT&E's ethical and legal standards.
- Internal audit and risk functions to monitor compliance.

Given the low risk of modern slavery among HT&E's operations and supply chain, these policies are considered appropriate and primary audits of the supply chain are not warranted nor feasible.

#### **6. Due diligence and further steps**

HT&E obtains goods and services predominantly from domestic suppliers who are reputable and ethical entities. HT&E also monitors the location of each of its suppliers so that even the small number of international suppliers are identified and any entities that supply from potentially higher risk areas more susceptible to modern slavery practices are managed.

To support and ensure the engagement of reputable entities HT&E has HR, audit and risk, finance and legal functions whose roles include assessing and ensuring such entities comply with both the relevant laws and HT&E policies across the business. This process is accompanied by internal checks and balances, as all material contracts need sign off from senior management, including consideration of risks relating to the supply.

HT&E reviews and tracks contract procurement processes in order to check internal practices are complied with. This compliance is also supported by our key corporate governance policies.

Whilst it is not feasible for HT&E to comprehensively investigate all activities of its suppliers, HT&E will continue to review its operations and its procurement of goods and services to monitor and identify whether there are risks relating to modern slavery which HT&E may then be able to mitigate.

#### **7. Effectiveness in addressing modern slavery**

The processes HT&E currently undertakes provide a framework for managing the risks relating to modern slavery. HT&E will continue to review the risks and effectiveness of actions to mitigate risks relating to modern slavery.

#### **8. Approval**

This statement has been approved by the Board of Directors of HT&E on 31 March 2021.

A handwritten signature in black ink, appearing to read 'Hamish McLennan', followed by a horizontal line.

Hamish McLennan, Chairman, HT&E Limited