



## **Modern Slavery Statement 2023 - Netflix Australia Pty Ltd**

This is a Modern Slavery Statement (**Statement**) made pursuant to the requirements of the *Modern Slavery Act 2018* (Cth) (**Act**) on behalf of Netflix Australia Pty Ltd (ABN 81 601 296 771) (**Netflix Australia**) for the period commencing 1 January 2023 and ending on 31 December 2023 (**Reporting Period**).

### **1. Our commitment**

Netflix, Inc. and its subsidiaries around the world (**Netflix**) do not tolerate or condone slavery, the use of forced or compulsory labour, human trafficking, the deprivation of liberty or any other similar forms of exploitation of individuals. We are committed to minimising the risks of modern slavery arising within our operations and supply chains and appropriately addressing any exploitation upon becoming aware of it. At Netflix, we strive to create an employee culture where acting ethically and with integrity is part of our fundamental corporate values.

### **2. Our structure, operations and supply chains**

Netflix Australia is an Australian private company with its registered address located at Level 19, 181 William Street, Melbourne VIC 3000, Australia. Netflix Australia is a wholly-owned subsidiary of Netflix International B.V., a Dutch entity whose ultimate parent is Netflix, Inc., a US company incorporated in the State of Delaware and headquartered in Los Gatos, California. Netflix Australia does not own or control any other entities. During the Reporting Period, Netflix Australia had approximately 40 full-time employees located in Australia.

Netflix is one of the world's leading streaming entertainment services with 270 million paid memberships in over 190 countries, enjoying TV series, films and games across a wide variety of genres and languages. Members can play, pause and resume watching as much as they want, anytime, anywhere, and can change their plans at any time.

Netflix Australia is the non-exclusive limited risk distributor of access to the Netflix service for subscribers in Australia. In addition, it provides content support and contract research and development support services to Netflix, Inc.

Netflix Australia engages with various vendors, commercial partners and third parties based across Australia to conduct its business. During the Reporting Period, Netflix Australia also engaged suppliers based in the United States, the United Kingdom, Singapore, India, Denmark, Thailand, the United Arab Emirates and New Zealand. These suppliers range from large blue-chip companies to smaller vendors (such as creative and events agencies).

Netflix Australia's principal types of suppliers include:

- agencies that provide professional services in connection with marketing, advertising, and events;
- payment processors, telecommunication and internet service providers that facilitate the logistics of accepting different payment methods and receipt of fees from subscribers; and
- suppliers of goods and services for routine business operations. This includes providers of IT and hardware goods and services (many of whom are globally established suppliers of "off the shelf" equipment and integrated services who have had long term relationships with Netflix), office supplies and equipment, professional services (such as employee benefits, tax and legal services), and facilities-related services (such as cleaning, security, maintenance and catering services).

Contractual arrangements with these suppliers are varied given the different size of the relevant suppliers and nature of services involved.

### **3. Risks of modern slavery in our operations and supply chains**

In preparation for this Statement, we undertook a global, enterprise-wide, high-level review of Netflix's business to identify areas of modern slavery risk across Netflix's operations and supply chains.

This included an assessment of Netflix Australia's operations and supply chains during the Reporting Period, focusing on (1) areas of business that presented higher modern slavery risks due to the nature of their operations, and (2) suppliers that are large entities and/or on which we expended a high percentage of our supplier spend, meaning that they are suppliers over which the Netflix Australia has greater leverage and influence.

As part of this assessment, we gathered relevant information using an internal questionnaire designed to help provide a framework for assessing modern slavery risks across the business and consulted with relevant internal business teams to evaluate the modern slavery risks associated with the operations and global and domestic supply chains of Netflix, including Netflix Australia. Netflix also reviewed and assessed the supplier list of Netflix Australia.

We also educated key internal stakeholders about modern slavery, potential areas of risk and assessed whether any additional risk mitigation measures should be implemented (for example, through additional meetings with relevant stakeholders, training sessions, refining our policies and procedures and/or modification of contractual provisions with our suppliers).

Our risk assessment for the Reporting Period did not identify any suppliers or specific operations of Netflix Australia that caused, contributed to, or are directly linked to modern slavery. Further, we consider the risk of modern slavery practices in connection with the operations and supply chains of Netflix Australia to be low due to the following considerations:

- the nature and location of their operations and supply chains, which consist of highly skilled vendors (the majority of which are based in Australia (a country with robust labour laws));
- Netflix Australia's permanent workforce consists primarily of highly skilled employees in professional and administrative roles who typically work in Netflix Australia's Sydney office;
- we endeavour to always work with reputable suppliers that are committed to conducting their business operations in a responsible, safe, honest, ethical, and respectful manner – acknowledging that there may be modern slavery risks in *all* supply chains; and
- Netflix has global employment policies and procedures that are designed to ensure our employees are paid and treated fairly in accordance with local labour laws.

Our assessment identified some areas of Netflix Australia's operations and supply chains that may be more susceptible to modern slavery risks, such as the following categories of goods and services: office supplies, cleaning, catering, pantry supplies, delivery services, maintenance services and IT hardware. This increased level of risk arises due to a number of factors including:

- inherent sector and industry specific risks related to electronics manufacturing, cleaning and catering, which are globally recognised as higher risk sectors for modern slavery;
- the increased risk of forced labour and other labour practices that exploit vulnerable, low skilled or low wage workers, such as migrant workers who commonly work in these industries; and
- transparency risks related to operations involving raw materials (for example, trees for paper, flour for bread, metal for tools or hardware) which tend to have long, complex supply chains of which Netflix Australia has no oversight or leverage.

This assessment will continue to be reviewed and updated on an annual basis.

#### 4. Actions taken to assess and address modern slavery risks

**Policies and practices:** Netflix's global policies and practices apply to Netflix Australia. During the Reporting Period, Netflix continued to make clear that it is committed to ensuring that all personnel are treated with dignity and respect. Exploitation relating to the use of forced, indentured or compulsory labour, deprivation of liberty, including any form of human trafficking, or other forms of physical, mental or economic exploitation of individuals is not tolerated or condoned. Netflix codifies this position in its global policies and practices, which include our Human Rights Policy and Code of Ethics.

Netflix's Human Rights Policy explicitly states that Netflix will not tolerate or condone modern forms of slavery, either in our own business or in our supply chains. In addition, our Code of Ethics sets out expectations applicable to Netflix directors, officers and employees designed to deter wrongdoing (for example, through a requirement to comply with all applicable laws, rules and regulations) and promote honest and ethical conduct. Any known misconduct that violates our Code of Ethics must be reported and may result in disciplinary action such as termination of employment.

Netflix's Human Rights Policy and Code of Ethics form part of our practices and policies that employees receive and acknowledge during their onboarding. Our policies and practices are also available to all Netflix Australia employees on the Netflix intranet, and they receive annual reminders about Netflix's practices and policies from our Chief Legal Officer.

Additionally, Netflix's Supplier Code of Conduct (**Supplier Code**), which was published in June 2023 (i.e. during the Reporting Period), establishes expectations for our suppliers to conduct their business operations ethically and in compliance with all applicable labour laws. The Supplier Code expressly states that Netflix will not tolerate or condone the use of forced, indentured or compulsory labour, or deprivation of liberty, including any form of human trafficking or other forms of physical, mental or economic exploitation of individuals by our Suppliers. If Netflix Australia becomes aware of any instances of modern slavery, we will work with the relevant supplier to remedy the issue. However, if the issue is not appropriately ameliorated by the supplier, Netflix Australia may terminate its relationship with the supplier due to non-compliance with the Supplier Code.

**Internal reporting:** During the Reporting Period, Netflix's internal confidential reporting policy offered a number of channels for employees to report concerns, including a confidential and anonymous ethics hotline. Under this framework, Netflix Australia employees may submit reports, including concerns relating to modern slavery risks, to this hotline. Netflix prohibits retaliation against reports made in good faith.

**Screening and due diligence:** During the Reporting Period, Netflix Australia used due diligence tools to identify relevant information about third parties that Netflix Australia considered contracting with (including suppliers). Available data from this process typically includes red flags such as reports of associated modern slavery risks, sanctions, criminal cases, regulatory inquiries and penalties, litigation, bankruptcy, liens and judgments, potential conflicts of interest, political exposure, and adverse media. Information on other operational and reputational risk factors can also be obtained as required based on the risk associated with the scope of the proposed arrangement and locations involved. We continuously monitor for new alerts relating to any key third parties engaged.

**Ongoing education:** During the Reporting Period and in preparing for this statement, we educated key stakeholders in relevant parts of our business about modern slavery issues and risks. This education process occurs as part of our annual assessment of modern slavery risks where we conduct interviews and training with relevant executives as part of a review of their operations and supplier policies and practices.

**Remediation:** If Netflix Australia becomes aware of any of its suppliers being involved in prohibited activities relating to modern slavery, we will consider taking appropriate remedial action. Such action could likely include seeking to understand the cause of the issue and working with the supplier to mitigate any harm and avoid similar issues in the future. Similarly, if we identify any issues within our own business, we will work quickly to identify and remedy the cause. No such remedial action was required to be taken during the Reporting Period.

**Human Rights Statement:** Netflix has developed, and following the end of the Reporting Period adopted, a Human Rights Statement applicable to all Netflix entities that sets out our commitment to respect internationally recognised human rights (as defined by the International Bill of Human Rights). This Human Rights Statement explicitly states that Netflix respects labour, health, and safety rights throughout our supply chains (including production, consumer products, and indirect suppliers).

**Annual assessment:** We conduct an annual review of our business to assess and address areas of modern slavery risk across our operations and supply chains. A review was conducted for the Reporting Period (as further set out in section 3 above). The purpose of this review is to gain a better understanding of the modern slavery risks in the operations and supply chains of Netflix, including Netflix Australia. Following the conclusion of this annual assessment, we take steps to assess the effectiveness of the actions being taken by Netflix (including Netflix Australia) to assess and address the risks of modern slavery practices in its operations and supply chains (as further detailed in section 5 below).

## **5. Assessment of effectiveness**

Netflix assesses the effectiveness of its actions taken to identify and address modern slavery risks in the business operations and supply chains of Netflix Australia, primarily by conducting an annual modern slavery assessment, which is conducted by the Netflix Legal team. This assessment was last completed in the quarter following the end of the Reporting Period. Following this assessment, we prepare a report on our findings which is shared with and reviewed by the Netflix Australia Leadership team.

This assessment includes the following:

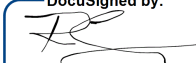
- tracking the progress of commitments made by Netflix Australia in response to our assessment of modern slavery risks across our operations and supply chain (including in this Statement);
- reviewing reports from our confidential hotline to identify and address any reports concerning modern slavery issues or risks;
- reviewing the need for targeted modern slavery training of senior staff, relevant members of the Netflix Legal team and business functions that frequently engage with suppliers;
- reviewing our contract templates to identify which agreements include specific modern slavery clauses and those that do not;
- reviewing the need for input from external experts or advisors to assist with assessing and addressing modern slavery risks in our operations and supply chains; and
- reviewing whether our screening and due diligence procedures continue to meet our expectations for identifying potential modern slavery risks in our existing and prospective supply chains.

We acknowledge that assessment of the effectiveness of the identification and management of modern slavery risks associated with our business is an ongoing process which requires the continual review, adjustment and strengthening of our actions. Netflix Australia is committed to reviewing our approach to minimising the risk of modern slavery occurring in our operations and supply chains, and expects to build upon our practices as appropriate over time to mitigate modern slavery risks.

## **6. Approval and signatures**

This Statement has been approved by the board of Netflix Australia Pty Ltd, being the principal governing body of Netflix Australia Pty Ltd on June 13, 2024.

Dated: June 21, 2024

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Reg Thompson  
Director, Netflix Australia Pty Ltd