



Seven West Media
Modern Slavery Statement 2020



Seven West Media **FY20** Modern Slavery Statement

1. Reporting Entities

This statement is made pursuant to the Modern Slavery Act 2018 (Cth) and sets out the actions the reporting entities of the Seven West Media group (collectively “SWM Jointly Reporting Entities”) have taken and continue to take to address modern slavery and human trafficking risks in our business and in our supply chains.

2. Structure, Operations and Supply Chains

Seven West Media Limited is an Australian publicly listed company, with the following entities having consolidated revenue of greater than \$100 million and jointly submitting this Modern Slavery Statement:

- Seven West Media Limited: Listed holding company
- SMG H1 Pty Limited: Dormant holding company
- SMG H2 Pty Limited: Dormant holding company
- SWM Finance Pty Limited: Group finance company
- SMG H4 Pty Limited: Dormant holding company
- SMG H5 Pty Limited: Dormant holding company
- Western Mail Operations Pty Limited: Dormant holding company
- West Central Seven Pty Limited: Dormant holding company
- Seven Network (Operations) Limited: Main operating entity for Seven’s television business.
- Channel Seven Sydney Pty Limited: Television broadcast licence holder and broadcaster
- Channel Seven Melbourne Pty Limited: Television broadcast licence holder and broadcaster
- Channel Seven Brisbane Pty Limited: Television broadcast licence holder and broadcaster
- West Australian Newspapers Limited: Publisher of The West Australian, The Sunday Times and Perth Now

As can be seen in the list above, many of these entities are dormant holding companies.

The two key reporting entities with their own operations and supply chains are:

- Seven Network (Operations) Limited, the operating company for the television arm of Seven West Media, and the entity which contracts with suppliers and hires staff for its broadcast licence holders Channel Seven Sydney Pty Limited, Channel Seven Melbourne Pty Limited and Channel Seven Brisbane Pty Limited;

- West Australian Newspapers Limited, the operating company for the newspaper publishing arm of Seven West Media.

As a large corporate group, there are numerous additional entities controlled by the reporting entities, and our approach with respect to those entities is outlined in section 6.

Our Operations

The SWM Jointly Reporting Entities are part of one of Australia's largest cross platform media groups, with its core business being that of:

- content production and acquisition, in news, sport and general entertainment;
- broadcast television;
- publishing; and
- digital.

SWM Joint Reporting Entities collectively own and operate some of Australia's most renowned media platforms, including:

- free to air broadcast television channels 7, 7two, 7mate, 7flix;
- broadcast video on demand platform 7plus;
- 7NEWS.com.au;
- The West Australian and The Sunday Times, both in print and online.

Across the SWM Jointly Reporting Entities and their related bodies corporate, approximately 2000 permanent employees, 2000 casuals and less than 500 contractors are employed.

Our Supply Chains

The SWM Jointly Reporting Entities' supply chains include the procurement of:

- goods needed for their everyday operations, including office supplies;
- services needed for their everyday operations, including professional services such as legal and tax, and non-professional services such as IT, telecommunications, freight and cleaning;
- goods and services needed to produce, transmit and promote audio visual content, including equipment, digital technology, content rights, transmission services, advertising services, merchandise;
- goods and services needed to produce and deliver newspapers, including paper, ink, printing services, delivery services, equipment; and
- goods and services needed to stage and run sponsored events and campaigns.

3. Risks of Modern Slavery Practices in Supply Chains of SWM Jointly Reporting Entities and Any Entities Under Their Control

The SWM Jointly Reporting Entities have undertaken a review of their operations and supply chains, and those of the entities under their control, to assess the risk of modern slavery practices in those supply chains.

The consultation process has involved representatives from Procurement, People and Culture, Legal, Finance and Senior Leadership.

In reviewing our supply chains and adopting the government's framework, we have considered active suppliers against the risk factors set out below:

- Sector and industry risks, including electronics, cleaning and textiles;
- Product and services risks, including cleaning and merchandise;
- Geographic risks, including the countries in which our suppliers operate; and
- Entity risks.

Using this framework, we have identified and in turn focused on suppliers we have assigned a High Risk Rating.

4. Actions Taken to Assess and Address the Above Risks, Including Due Diligence and Remediation Processes

Assessing the Risk

The SWM Jointly Reporting Entities have taken various actions to assess risks of modern slavery practices in our operations supply chains as set out in section 3 above.

Addressing the Risk

To address the risk of modern slavery in our supply chains, the SWM Jointly Reporting Entities have reviewed existing policies and procedures, including with respect to human resources, recruitment, employee conduct and procurement. More specifics are set out below.

❖ Procurement

We have amended the Seven West Media Procurement Policy (which applies to all SWM Jointly Reporting Entities) and procedures to include conducting pre-qualification and due diligence before engagement of new suppliers.

We have clearly communicated our expectations to active suppliers, including by:

- revising our terms of trade which form part of every purchase order and which include a right to terminate where the supplier is in breach, and notifying our active suppliers of such revision;
- writing to all suppliers on our High Risk list, requiring them to notify us if they are not able to comply, notifying them of our ability to review or terminate our arrangement with them if they do not meet their modern slavery obligations, and providing them with a way of contacting us with any questions; and
- ensuring modern slavery issues are specifically addressed in SWM's Request for Proposal documents and processes as well as new supplier contracts.

❖ Recruitment Processes

We have:

- created a list of questions to be put to potential new recruitment agencies;
- sent compliance letters to our existing recruitment agencies;

- formulated vetting processes for staff coming through recruitment agencies to assess whether they are victims or potential victims of modern slavery; and
- amended our recruitment guidelines and preferred recruitment supplier guidelines to incorporate modern slavery requirements and procedures to be followed in this area.

❖ Employee Conduct Guidelines

We have amended our Employee Conduct Guidelines to ensure that staff practice ethical business standards and take steps such as conducting due diligence checks with respect to prospective suppliers and report any unlawful practices such as forced labour or slavery/slavery-like practices observed in our supply chains.

❖ Training

We have developed and launched modern slavery training to:

- improve awareness of modern slavery risks; and
- equip management and others involved in contracting, with the processes they need to follow to handle and manage modern slavery issues.

We have also briefed the Board of Directors and Chairman of the Audit and Risk Committee.

Reporting and Remediation

We have amended our Issue Escalation Guidelines to now include a mechanism to allow people to safely report modern slavery issues in SWM Joint Reporting Entities' operations and supply chains.

In this way, staff have a safe and easy way of reporting the issue and in a manner which will ensure the issue is handled appropriately and without creating additional risk to the potential victim.

We have formulated the following remediation framework for how we intend to handle allegations of modern slavery which are reported via the Issue Escalation Guidelines:

- ensuring our actions are always in the best interests of the suspected victim(s) and ensuring our actions in responding to the report do not put them at greater risk;
- considering if further investigation is required to verify any unsubstantiated allegations;
- considering whether and how to involve the Australian Federal Police (ie: by calling 000 if someone is at risk of immediate harm);
- addressing any harm caused by a member of the SWM group itself by providing for, or co-operating in the remediation of that harm;
- if a member of the SWM group is directly linked to the applicable exploitation by a supplier, playing a role in remediation and take steps to ensure there is no re-occurrence by that supplier by using the leverage that exists via the business relationship itself; and
- carefully considering whether to end the business relationship, or instead to continuing the relationship, provided the supplier addresses the issue and there is prospect of real change in relation to their compliance with modern slavery laws.

5. How the SWM Jointly Reporting Entities Assess the Effectiveness of Such Actions

We recognise that we have a long way to go, and that the work covered by this Modern Slavery Statement is only the beginning. We intend to approach modern slavery compliance with a continuous improvement mindset.

We have set up a steering group to provide a forum for regular engagement and feedback between key areas of SWM Jointly Reporting Entities including Procurement, People and Culture, Finance and Legal, and to regularly review the actions we have taken in our efforts to prevent, mitigate and where appropriate remedy to modern slavery.

Having provided high risk suppliers with a centralised email address for modern slavery communications with us, we expect that suppliers will contact us in the event they have concerns about or wish to discuss or learn more about our requirements. We will monitor these communications to assess and improve the effectiveness of our own communications and processes in connection with suppliers.

We have created a central point for the tracking of actions we have taken.

Whilst initial training has been developed and launched, we intend to increase the audience and depth of this training over time to grow staff understanding of the issue and the obligations we have.

6. The Process of Consultation with any Entities that the Reporting Entity Owns or Controls

This joint Modern Slavery Statement has been prepared in consultation with each of the SWM Jointly Reporting Entities covered by the Statement (except those which are dormant).

Consultation has also been undertaken with entities owned and controlled by each SWM Jointly Reporting Entity to ensure that they are aware of what actions they need to take and that modern slavery risks relating to those entities have been identified, assessed and addressed ("**Sub Consultation**").

This Sub Consultation has been carried out primarily with the Company Secretary, Deputy Chief Financial Officer and relevant Legal Counsel/Executives of the relevant entities, and they have had the opportunity to participate in the preparation of this Modern Slavery Statement.

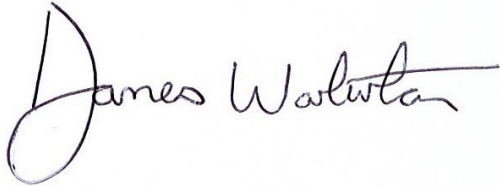
Many of these entities exist only for financial reasons, follow policies set by the SWM Jointly Reporting Entities and do not have any actual physical operations or assets.

Others operate in the same sector and are bound by the same policies and procedures as one or more SWM Jointly Reporting Entities but do their own contracting and therefore have their own supply chains.

Approval by Board of Directors

This Modern Slavery Statement has been approved by the Board of Directors of Seven West Media Limited

Signed

A handwritten signature in black ink that reads "James Warburton". The signature is written in a cursive style with a large initial 'J' and a long horizontal stroke at the end.

James Warburton

Managing Director and Chief Executive Officer

25 March 2021