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Seven West Media

MODERN SLAVERY STATEMENT 2024

Seven West Media Modern Slavery Statement: 1 July 2023– 30 June 2024 (FY24)

1. Reporting entities

This statement is made by Seven West Media Limited on behalf of itself and the other reporting entities within the Seven West Media group of companies named below. It is made pursuant to the *Modern Slavery Act 2018 (Cth)* and sets out the actions the reporting entities have taken in FY24 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 (ACN 053 480 845) is an Australian-incorporated ASX-listed company with its registered office in Perth, Western Australia (**SWM**).

Seven West Media Limited and the following wholly owned subsidiaries/group entities are 'reporting entities' with consolidated revenue of greater than \$100 million and are jointly submitting this Modern Slavery Statement:

- Seven West Media Limited (ACN 053 480 845): Listed holding company
- Seven Network (Operations) Limited (ACN 052 845 262): Main operating entity for Seven's television business
- SWM Finance Pty Limited (ACN 122 715 468): Group Finance company – party to debt facilities with the group's external lenders
- West Australian Newspapers Limited (ACN 008 667 632): Publisher of The West Australian, The Sunday Times, The Nightly and Perth Now
- Channel Seven Sydney Pty Limited (ACN 000 145 246): Television broadcast licence holder and broadcaster
- Channel Seven Melbourne Pty Limited (ACN 004 342 303): Television broadcast licence holder and broadcaster
- Channel Seven Brisbane Pty Limited (ACN 009 684 020): Television broadcast licence holder and broadcaster
- Prime Television (Northern) Pty Limited (ACN 003 344 876): Television broadcast licence holder and broadcaster
- Prime Television (Southern) Pty Limited (ACN 003 368 938): Television broadcast licence holder and broadcaster

- SMG H1 Pty Limited (ACN 122 708 007): Dormant holding company
- SMG H2 Pty Limited (ACN 47 122 710 089): Dormant holding company
- SMG H4 Pty Limited (ACN 122 717 015): Dormant holding company
- SMG H5 Pty Limited (ACN 12 122 717 686): Dormant holding company
- Western Mail Operations Pty Limited (ACN 009 209 787): Dormant holding company
- West Central Seven Pty Limited (ACN 052 827 675): Dormant holding company
- Prime Television Holdings Pty Limited (ACN 003 368 974): Dormant holding company

(collectively the **SWM Jointly Reporting Entities**)

As can be seen in the list above, several entities are dormant holding companies.

The three 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 (**SNOL**);
- West Australian Newspapers Limited, the operating company for the digital and print publishing arm of Seven West Media (**WAN**); and
- Prime Television (Southern) Pty Ltd the operating company for the television arm of the Prime Group (which is comprised of Prime Television (Northern) Pty Limited, Prime Television (Southern) Pty Limited and Prime Television Holdings Pty Limited which contracts with and hires staff for the Prime Group.

Other than Seven West Media Limited, which has its registered offices in Perth, the SWM Jointly Reporting Entities have their registered offices in Eveleigh, NSW.

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

SNOL provides administrative support to Prime so any reference in this Statement to SNOL will also include the Prime Group.

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 Jointly 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, 7Bravo;
- broadcast video on demand platform 7plus;
- 7NEWS.com.au; and
- The West Australian and The Sunday Times, both in print and digital, and The Nightly digital edition.

Across the SWM Jointly Reporting Entities and their related bodies corporate, there are approximately 2350 permanent employees, 2000 casuals and fewer than 500 contractors.

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;
- production services from external production companies and pre-produced content (and rights) from studios;
- goods and services needed to transmit and promote audio visual content, including equipment, digital technology, 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.

SNOL outsources some of its operations relating to commercial inventory scheduling, accounts payable, digital advertising operations, and sales and finance administration to an Australian third party entity with its own Modern Slavery Statement who supply these services from their office in the Philippines.

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 continue to review 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 involves engagement with representatives from Procurement, People and Culture, Legal, Finance and Senior Leadership.

In reviewing our supply chains, we consider active suppliers against the risk factors set out below:

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

In FY24 WAN conducted key high risk vendor audits and included vendors within the IT categories. SNOL completed its key high risk area vendor audits in the previous financial year.

From 1 July 2023, SNOL and WAN both commenced auditing their remaining existing vendor supply chains. This will continue until all active vendors have completed the Modern Slavery Questionnaire and both entities have 100% visibility within their respective supply chains.

4. Actions taken to assess and address the above risks, including due diligence and remediation processes

In FY24, we have made various improvements to assess and address risks of modern slavery practices in our supply chains, in relation to risk, process and awareness as are detailed below.

Assessing the risk.

The SWM Jointly Reporting Entities continue to assess risks of modern slavery practices in our operations supply chains by audits of suppliers (as set out in section 3 above), and as part of our onboarding process for suppliers as set out below.

Addressing the risk.

To address the risk of modern slavery in our supply chains, the SWM Jointly Reporting Entities have now implemented the policies and procedures which were adopted in past financial years and continue to apply in FY24 including with respect to human resources, recruitment, employee conduct and procurement. More specifics are set out below.

Procurement

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

We communicate our expectations to all active suppliers, including via:

- our terms of trade, which include a right to terminate where the supplier is in breach;
- SWM's Request for Proposal documents and processes, which require potential vendors supply their modern slavery statements and information about their supply chain; and
- new supplier contracts.

In FY24:

- SNOL is well underway with auditing its current vendors to actively ensure that they have completed our modern slavery questionnaires to ensure that it has visibility over its supply chain. This will continue until all vendors have been audited.
- SNOL has continued to implement its vendor onboarding tool, which has the Modern Slavery Questionnaire built into the onboarding process. It is mandatory for all new SNOL Vendors to complete the questionnaire as part of onboarding and prior to any payments being made, hence the reason SNOL is now working through active vendors who were not onboarded via this tool.
- Both SNOL and WAN have educated suppliers to understand the purpose of the Supplier Questionnaire and their obligations. SNOL and WAN provide a FAQ and Glossary document as part of the questionnaire to explain the various modern slavery related concepts. Where suppliers had little knowledge of Modern Slavery legislation, key SNOL and WAN staff made themselves available to assist in the completion of questionnaires.
- As part of the WAN supplier onboarding process, new vendors are required to accept terms of trade that agree to compliance with modern slavery obligations.
- WAN has also commenced auditing its existing vendors and has proceeded with identifying vendors who have not completed the Modern Slavery Questionnaire. Questionnaires are being sent to identified vendors on a sample basis and appropriateness of responses are being reviewed. This will be an ongoing process and no issues have been identified in testing performed to date.
- WAN completed its IT and laptop supplier audit.
- SNOL and WAN continue to include Modern Slavery clauses in the SWM Standard Terms of Trade and other agreements issued to SWM Suppliers.

Recruitment processes

In FY24, we continued to:

- supply a list of questions to be put to potential new recruitment agencies;
- apply the newly formulated vetting processes for staff coming through recruitment agencies to assess whether they are victims or potential victims of modern slavery; and
- apply our recruitment guidelines and preferred recruitment supplier guidelines to incorporate modern slavery requirements and procedures to be followed in this area.

SNOL and WAN have a list of Preferred Suppliers for recruitment agencies who place employees in our business and/or engage contractors in a temporary capacity. SWM also has an independent contractor process to ensure any company it engages is legitimate. In both cases, all proper documentation is obtained, including compliance to modern slavery legislation.

Employee Conduct Guidelines

Our Employee Conduct Guidelines require staff to 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 completed training for the majority of existing SNOL employees and as part of induction, we train all new starters to:

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

The majority of existing WAN staff have now been trained and training is rolled out to all new starters as they come onboard.

Recruitment Agency Service Agreement Templates

Modern Slavery clauses have and continue to be incorporated into these templates to mitigate any risk in this area across the SWM Joint Reporting Entities.

Reporting and remediation

Each of the SWM Joint Reporting Entities have adopted Seven West Media Limited's Whistleblower Policy. Our Issue Escalation Guidelines are in place with a mechanism to allow people to safely and anonymously report modern slavery issues in SWM Joint Reporting Entities' operations and supply chains.

With both the Whistleblower Policy and Issue Escalation Policy, 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.

Also, in place is our 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 (i.e.: by calling 000 if someone is at risk of immediate harm);
- addressing any harm caused by a member of the SWM Jointly Reporting Entities itself by providing for, or co-operating in the remediation of that harm;
- if a member of the SWM Jointly Reporting Entities 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.

That said, there were no reports of modern slavery in FY24.

5. How the SWM Jointly Reporting Entities assess the effectiveness of such actions

We approach modern slavery compliance with a continuous improvement mindset.

Our Modern Slavery steering group (including representatives from Procurement, People and Culture, Finance and Legal) meets monthly to review and discuss the actions we have taken in our efforts to prevent, mitigate and where appropriate remedy modern slavery, and to identify areas for improvements and plan accordingly.

We will complete audits and continue to require our existing suppliers complete the SWM Modern Slavery Questionnaire satisfactorily and to make sure our new vendors do the same to ensure that SWM has visibility over the modern slavery risk in its supply chain.

We continue to enhance our central repository with relevant documentation.

We monitor the uptake of modern slavery training as it is rolled out to new starters across SWM Jointly Reporting Entities as well as the completion rate of training by any remaining existing staff.

6. The process of consultation with any entities that the reporting entity owns or controls

This 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**").

All the entities controlled by the SWM Jointly Reporting Entities follow the policies and procedures required by SWM, SNOL and/or WAN.

This Sub Consultation has been carried out with Executives of the relevant entities including representatives from Finance, People and Culture, Legal and Procurement and they have had the opportunity to participate in the preparation of this Modern Slavery Statement.

Approval by Board of Directors

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



Name: **Jeff Howard**

Title: Managing Director and Chief Executive Officer

Date: **13 November 2024**