



MODERN SLAVERY STATEMENT FOR YEAR ENDED 30 JUNE 2020

1. INTRODUCTION

Prime Media Group Limited (ABN 97 000 764 867) is publicly listed on the Australian Securities Exchange and is the ultimate parent entity for the Prime group of companies. This Statement is made on behalf of Prime Media Group Limited and its wholly owned subsidiaries.

Prime Media Group Limited and its wholly owned subsidiaries (together, **Prime, we, us** or **our**) are committed to acting ethically and operating responsibly to minimise the risk of modern slavery in our business operations and supply chains.

This is our first modern slavery statement (**Statement**) which has been prepared in accordance with the *Modern Slavery Act 2018* (Cth). This Statement outlines the steps we have taken to identify and address the risks of modern slavery in our business operations and supply chains for the financial year ended 30 June 2020 (the **Reporting Period**).

This Statement has been reviewed and approved by the Board of Directors at Prime.

2. PRIME OVERVIEW

BUSINESS STRUCTURE & OPERATIONS

Prime has established itself as Australia's leading regional free-to-air television network. Reaching a potential audience of over 5.5 million people, Prime holds commercial television licences to broadcast in regional northern and southern New South Wales (NSW), the Australian Capital Territory (ACT), regional Victoria, the Gold Coast area of southern Queensland (QLD) and regional Western Australia (WA). The majority of Prime's television programming is supplied through a program supply agreement with the Seven Network and broadcast in regional areas under the PRIME7 brand on the east coast of Australia and the GWN7 brand in regional WA.

Prime also produces six separate *PRIME7 Local News* bulletins that are broadcast each weeknight in regional NSW, parts of regional Victoria and regional WA. These local news bulletins are the only dedicated half-hour local news bulletins in their markets. GWN7 provides the only local news bulletin on television for viewers in regional WA. Prime also produces and broadcasts a National News bulletin, *PRIME7 at 6.30*, following the local news bulletins in regional NSW.

Seven Affiliate Sales Pty Limited (ABN 49 058 428 158) (SAS) is a wholly owned subsidiary of Prime and services our major national advertisers. SAS also represents Seven Queensland (the regional television licence owned by the Seven Network) and Television New Zealand Limited in Australia. In regional Australia, local clients source television advertising airtime through Prime's local sales team.

OUR PEOPLE AND LOCATIONS

During the Reporting Period, Prime employed more than 340 employees, of which 240 employees were located in regional offices stretching from the Gold Coast, throughout many regional cities and towns in NSW and Victoria, and across regional WA. Prime's head office is located in Sydney and its broadcast operation centre is located in Canberra. 93 employees were involved in the production of regional news services, including as journalists, camera operators and studio personnel.

For more information on Prime's structure, business operations and financial performance please refer to our corporate website, www.primemedia.com.au.

3. PRIME'S SUPPLY CHAIN

Prime's supply chains include:

- television programming acquired under a program supply agreement with the Seven Network;
- outsourced services for communications and television playout services to maintain Prime's television broadcast in regional Australia;
- equipment and consumables needed for our day-to-day operations, including computer hardware, broadcasting and transmission equipment, media production technology, standard office equipment and supplies such as paper and stationery items;
- software acquired under licence for television broadcast and corporate activities; and
- services procured to maintained leased premises and transmission towers, including transmission tower maintenance services; building services, cleaning, security and other maintenance services.

The majority of Prime's suppliers are located in Australia. However, some products and services are sourced from international suppliers based in regions such as Europe, the United States of America, the United Kingdom, Singapore and New Zealand. Many of these international suppliers have supply chains that extend throughout Asia.

4. RISK IDENTIFICATION

Prime has reviewed the risk of modern slavery practices across our business operations and supply chain, with close consideration of the *Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities* document (**Guidance Document**).

In assessing the inherent risk of modern slavery in our supply chain, we also had regard for the most recent Global Slavery Index¹ which rated the countries in the regions that Prime directly deals with (referred to in paragraph 3 above) as low for prevalence of modern slavery practices. Based on this initial assessment, Prime's direct global suppliers are based in countries where there are reasonable standards of protection for individual rights and there is not a significant workforce of vulnerable populations.

The Guidance Document assisted Prime to identify risk areas that could be exposed to modern slavery practices, such as:

- electronic equipment purchased from Australian vendors with supply chains extending to high risk geographies;
- products manufactured off-shore from high risk geographies for items including stationery, Prime branded clothing and promotional products, and consumables;
- services where there may be a high risk of vulnerable employees such as migrant and base-skilled workers such as overseas based call centres. For our Australian based service providers, we recognised risks associated with services that use low skilled migrant workers such as cleaning contractors.

¹ 2018 Global Modern Slavery Index developed by the International Labour Organization (ILO) and the International Organization for Migration (IOM), the Walk Free Foundation.

5. RISK MANAGEMENT

During the Reporting Period, Prime implemented a number of initiatives to strengthen our understanding of the risks and incidences of modern slavery in our business operations and supply chains.

Initial supply chain due diligence

To increase the awareness of modern slavery in our supply chain, we are updating our new vendor engagement and contract management practices, which includes assessing the supplier's reputation and any non-compliance with legal and regulatory standards.

As part of our updated contract management practices, when engaging with a supplier, we require our suppliers to confirm they operate in compliance with the *Modern Slavery Act*. Failure to comply, may lead Prime to terminate a current supplier's business relationship with immediate effect.

Policies and procedures

Prime has a number of policies and procedures that collectively contribute towards the mitigation of the modern slavery risks that Prime may face. These policies can be publicly accessed on our [corporate website](#).

- (i) Modern Slavery Policy (**Policy**) – supports Prime's commitment to tackling modern slavery and minimising the risk of incidence within its business operations and supply chains. The Policy was formally approved by the Board of Directors in July 2020.
- (ii) Whistle Blower Protection Policy – encourages individuals to report any illegal and improper conduct occurring within Prime, and ensures reports can be made in a safe and confidential environment without consequences or fear of detrimental treatment.
- (iii) Anti-bribery and Corruption Policy – supports Prime's zero-tolerance approach to modern slavery, and reinforces the premise that the incidence of bribery and corruption in supply chains are risks that contribute to the spread of modern slavery globally and domestically.

Training

Employees (to the extent applicable to their roles) have been briefed about Prime's obligations under the *Modern Slavery Act*. We have also educated employees more widely through information on our Intranet. Prime plans to include training on our Policy as part of employee inductions in the next Reporting Period.

Prime's Employee Code of Conduct also helps to ensure that all Prime employees not only act in accordance with all relevant laws, but also with openness, honesty, fairness and integrity. The Employee Code of Conduct underpins all of our business operations and promotes ethical business practices that mitigate the risk that any of Prime's business operations contribute to modern slavery.

6. EFFECTIVENESS: LOOKING TO THE FUTURE

This Statement represents Prime's baseline efforts on the initial actions we have taken and highlight the actions we will incorporate into the next Reporting Period.

Prime will continue to review its operations, including the purchase of products and services, to identify whether there are risks relating to modern slavery which can be mitigated. Prime also plans to develop a supplier code of conduct which will reflect the requirements of the *Modern Slavery Act 2018* (Cth).

The Audit & Risk Committee of the Board will be provided with regular reports on progress made to implement our modern slavery risk management strategy.

7. Consultation

Prime and its subsidiaries are treated as one entity from a corporate governance perspective and Prime's subsidiaries adhere to Prime's policies and procedures, including in respect of modern slavery.

This Statement has been approved by the Board of Prime.



IAN AUDSLEY
Chief Executive Officer
26 March 2021