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SCA
MODERN SLAVERY
STATEMENT 2024



MODERN SLAVERY STATEMENT 2024

This statement sets out actions taken by Southern Cross Media Group Limited ACN 116 024 536 and its related bodies corporate (together, **SCA**) to address modern slavery and human trafficking risks in our business and supply chain for the year ended 30 June 2024 (**Reporting Period**). It has been prepared in accordance with the *Modern Slavery Act 2018* (Cth).

SCA requires group entities to comply with SCA's corporate policies, including the assessment and mitigation of modern slavery risks. SCA has consulted with subsidiaries and business units within the SCA Group to gather the required information to prepare this statement.

OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Organisational structure and business

Southern Cross Media Group Limited is an Australian public company listed on ASX. SCA is one of Australia's leading media companies and the home of LiSTNR, the Hit and Triple M radio networks, and regional television stations, reaching more than 95 percent of the Australian population.

The LiSTNR digital audio app hosts a library of free and compelling digital audio content available anytime, anywhere. It houses SCA's radio stations, including AFL, NRL and international cricket coverage, music streams, and podcasts from leading Australian and global creators, plus local news and information. The LiSTNR digital audio sales network reaches an estimated 8 million people each month.

SCA owns 99 radio stations across FM, AM, and DAB+ under the Triple M and Hit network brands and provides national sales representation for 56 regional radio stations, with 6.131 million weekly listeners across the Hit and Triple M networks.

SCA's regional television network reaches 3.6 million people a week. SCA broadcasts Network 10 programs in regional QLD, southern NSW, and regional Victoria, and provides national advertising sales representation for

Network 10 programming in all Australian states and territories. SCA also broadcasts and provides sales representation for Seven Network programming in Tasmania, Darwin, and Remote Central and Eastern Australia and for Seven and Nine Network programming in Spencer Gulf and Broken Hill. SCA also features Sky News Regional in regional Queensland, southern NSW, and Victoria and sales representation in northern NSW, Griffith, and Mount Gambier.

Our supply chain

SCA's business operates entirely within Australia and most of our suppliers are also based in Australia. We prioritise relationships with established and trustworthy suppliers and in many instances, have used the same suppliers for many years.

Some of our suppliers have operations in other jurisdictions including the United Kingdom, the United States of America, Singapore, Hong Kong, Japan, The Philippines, and Indonesia. These international suppliers predominately specialise in IT hardware, platforms, communications infrastructure, banking, often through their Australian subsidiaries.

POTENTIAL RISKS IN SCA'S OPERATIONS AND SUPPLY CHAIN

Risks in our operations

Following guidance material and resources (including the Global Slavery Index) available through the Australian Attorney- General's Department and the Australian Human Rights Commission, SCA has assessed risks in its operations and supply chain and has concluded the risk of modern slavery practices in SCA's operations is low.

However, SCA recognises its operations and supply chain are not immune to modern slavery risks. We consider the following areas are vulnerable to modern slavery:

- procurement of event and hospitality services
- labour hire

- cleaning services.

SCA understands these industries are prone to worker exploitation due to casual working arrangements, potentially lower skilled or migrant workers, and their use of subcontracting arrangements which may obscure direct accountability and responsibility from the contracting entity. Inconsistent regulatory enforcement increases the vulnerability of workers in these areas.

Risks in our supply chain

SCA considers the highest risks of modern slavery in SCA's supply chain lie in our procurement of the following goods and services:

- IT/technology equipment
- communications infrastructure
- promotional merchandise.

According to the Global Slavery Index's assessment of countries prone to modern slavery, SCA recognises that products and services in these categories are commonly sourced from jurisdictions where systemic low wages, intense cost-cutting pressures, and insufficient independent oversight or regulation are present. This lack of regulation coupled with new and rapid industrialisation leads to increased risks of human trafficking and labour exploitation.

ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

Supply chain due diligence

The United Nations Guiding Principles on Business and Human Rights identify due diligence as a key means by which businesses can identify, prevent and address human rights harms within their operations or supply chains.

SCA conducts due diligence on our suppliers through a digital Supplier Questionnaire (**Questionnaire**) to identify and assess actual or potential modern slavery risks in our supply chain. We monitor responses to our Questionnaires to identify trends and emerging

risks that warrant further investigation or action. We also routinely check the progress of the Questionnaires to assess the efficacy of this process. Where necessary, this system helps us to further engage with suppliers and stakeholders about how SCA is seeking to address modern slavery risk.

During the Reporting Period, we sent the Questionnaire to suppliers:

- from which we purchased goods or services with a value of \$5,000 or more; or
- which, regardless of the contract value, operate in a high-risk country or whose goods or services fall into a high-risk sector.

Once they have completed the Questionnaire, suppliers are given a risk rating out of 1,000. If a supplier receives a score of less than 600, SCA will review the supplier's responses and any supplementary modern slavery or other materials available or provided to SCA. If SCA remains unsatisfied with these responses, we may request additional information about the supplier's awareness and management of modern slavery risks to warrant ongoing dealings with the supplier. Requests for additional information may also be triggered by a supplier's responses to individual questions.

During the Reporting Period, 62 percent of responding suppliers achieved a score of 800 or more and 36 percent of responding suppliers scored from 600 to 800. As in the previous reporting period, one supplier returned a score below 600. Following review of supplementary materials provided by that supplier and consideration of other mitigating factors, we are satisfied this supplier does not pose modern slavery risks.

Policy and procedures

SCA's policies and operational procedures establish expectations for our people and the responsible conduct of our business. Relevant policy documents are available on our employee Intranet and are communicated to suppliers during the onboarding process.

Our Supplier Code of Conduct (**Code**) sets out SCA's expectations and the minimum standards

of behaviour required of our suppliers in the areas of ethical business practices, conflicts of interest, environmental impacts, and health and safety. It also specifically addresses labour rights, human rights, and modern slavery standards. The Code is publicly available on SCA's corporate website and staff are instructed to provide this to suppliers during the contract procurement and negotiation process. It is a requirement that all suppliers state that they have read and understand the Code as part of the Questionnaire.

In summary, the Code states our expectation that suppliers will:

- engage and manage people ethically and comply with all laws, regulations, and standards in respect of modern slavery, including human trafficking, exploitation, forced labour and child labour
- monitor compliance with modern slavery and human rights laws and notify SCA if they become aware of an actual or potential breach
- take reasonable steps to address, remedy and prevent the recurrence of any breach of the Code.

Additionally, we incorporate standard clauses requiring compliance with relevant modern slavery laws and standards in our contracts with major or high-risk suppliers.

To minimise the risk of modern slavery within our supply chain, SCA enforces responsible purchasing and procurement practices. These practices involve timely payment to suppliers, careful order planning to prevent sudden workload changes, and fostering strong, collaborative supplier relationships. For instance, SCA aims to pay 90 percent of small businesses within 20 days. This goal has been consistently met through rigorous monitoring and six-monthly reporting under the payment times reporting legislation.

Training

We require all new SCA employees to review and confirm their understanding of our Modern Slavery Fact Sheet during their onboarding

process. This document outlines SCA's responsibilities under modern slavery laws and the actions we've taken to evaluate and mitigate modern slavery risks. The Modern Slavery Fact Sheet is available on our employee Intranet and is updated annually.

In addition, our annual compliance training requires employees to review these materials to stay informed about modern slavery and our procedures for detecting and addressing such risks.

Grievance mechanisms

We offer various internal channels for employees to report any concerns, or raise grievances in relation to workplace conduct; including modern slavery, fraud, unethical activity, or other misconduct. We encourage our people to promptly alert their manager, a member of the senior leadership team or the Head of Legal and Corporate Affairs of any concerns. Designated corporate officers are also trained to investigate and implement corrective measures when needed. If an employee does not feel comfortable speaking with any of these people or wishes to report anonymously, they may raise their concern via our internal Speak Up Program or our Whistleblower Policy and whistleblower hotline. These channels are accessible 24/7 by our employees, contractors, and other third parties, via our employee Intranet or via our external whistleblower hotline, 'Your Call'. During induction, we inform employees and contractors about how to access and use these channels.

Remedial action

Where required, SCA will aim to assist any suppliers with modern slavery risks or any actual incidents of modern slavery. If such situation arises, we would first contact the supplier to raise our concerns and conduct further investigations to determine the appropriate course of action. This may involve contributing to an action plan to remedy any issues with these suppliers and to educate them on addressing modern slavery risks. If these actions are not feasible, SCA would look to terminate its contract with the offending supplier or, if required, alerting legal or regulatory authorities,

particularly if any breach were severe or repeated.

CONSULTATION

During the Reporting Period, SCA consulted with entities we own or control within the SCA group, including our two Canberra radio stations operated as a joint venture with ARN Media. This consultation included exchange of updated data surrounding modern slavery risks faced by these entities, mechanisms to address these risks as well as review of ARN's Modern Slavery Statement.

MEASURING THE EFFECTIVENESS OF OUR ACTIONS

During the Reporting Period, SCA received no reports of actual or suspected modern slavery incidents via the above grievance mechanisms or otherwise.

The increased number of suppliers who have completed our Questionnaire (as compared with the completion rate before digitisation of our Questionnaire) has provided us with greater insight into potential risks present in our supply chain and improved oversight in our compliance generally. As part of our ongoing evaluation of our approach to reducing modern slavery risks, we will continue to monitor participation rates of suppliers with our Questionnaire, including providing further explanatory information to suppliers to encourage them to complete the Questionnaire.

This statement has been approved by the Board of Southern Cross Media Group Limited.



JOHN KELLY
Chief Executive Officer and Managing Director
20 August 2024